

# EXHIBIT F

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF THE DISTRICT OF COLUMBIA**

CITIZENS FOR CONSTITUTIONAL  
INTEGRITY,

Plaintiff,

v.

THE CENSUS BUREAU, *et al.*,

Defendants.

No. 1:21-cv-3045

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**SARAH BANKS DECLARATION**

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1. My name is Sarah Banks, and I reside in Lancaster, Pennsylvania. I am a member of Citizens for Constitutional Integrity. Although I had lived in Pennsylvania for almost three months before the November 2020 election, Pennsylvania would not permit me to register to vote. I felt devastated when I could not vote in that election, and I felt frustrated that Pennsylvania law disenfranchised me. I understand that because the Census Bureau did not complete the analysis the Fourteenth Amendment requires, Pennsylvania lost a seat in the U.S. House of Representatives. The Census Bureau harmed me by diluting my vote.

2. As a United States citizen, I enjoy the freedom to move between states, and my husband, and I had spent so little time outside of Montana that I wanted to live somewhere else with new opportunities. I did not expect that would come with the price of losing my ability to vote in an election.

3. When my husband and I moved to Pennsylvania, on or about August 3, we first lived with a friend for about a week. Starting on August 9, I rented a place on Airbnb in the town of Bird in Hand, Pennsylvania. I started working at an animal hospital. In early September, my husband and I moved in with friends in York, Pennsylvania. In the meantime, we searched eagerly for a

house to buy. We ultimately put a contract on a house in Lancaster with a target closing date on October 13. We continued staying with our friends in York while waiting for the closing date.

4. After closing, I knew the election was almost upon me, and I was running out of time to register. Everyone in my life was discussing it, and I felt compelled to make my voice heard. When I went to the Lancaster County voter registration office to register to vote, the elections officials gave me a form to complete.

5. To my surprise, the directions on the form prohibited me from registering to vote for the November 2020 elections. *See Pennsylvania Voter Registration Application*, Ex. 1. I had not resided in the election district for thirty days before the election. I had just closed on my house on October 13, and I had lived at a different address until then. I moved too close to the November election. Therefore, when I tried to register, I had lived in Pennsylvania for three months, but Pennsylvania would not allow me to vote because I had moved too close to the election. I felt powerless, and I deserved to be able to vote.

6. I could not vote in Montana because I did not live there anymore. I could not vote in my friend's place's district because I did not live there anymore and because it was not in the same district as where I lived now. And I could not vote where I lived now because I had resided there eight days too few.

7. I had no choice. I did not vote in 2020. I believe I deserved to vote as a United States citizen who has lived in this country my whole life, and I felt frustrated that the laws of my new state made it impossible.

8. Since the November 2020 election, I have registered, and I look forward to voting in November 2022 and into the future. My frustrating experience in 2020 only reinforces my deep believe in the importance of voting.

9. Ultimately, the Census Bureau has injured me by failing to implement the Fourteenth Amendment. I understand that other states have denied their citizens' rights to vote by failing to register them to vote, and the Census Bureau and Department of Commerce have not discounted those states' populations when distributing seats in the U.S. House of Representatives. I understand that the Fourteenth Amendment and a federal statute require those discounts.

10. If the Census Bureau and the Secretary of Commerce do not complete the calculations for their reports and statements, they will cause Pennsylvania to lose a representative seat in the U.S. House of Representatives—even as other states deny their citizens' rights to vote. With one fewer representative for Pennsylvania, the Census Bureau's report and the Department of Commerce's statement dilute my vote. I want the Census Bureau to complete the analysis the Fourteenth Amendment requires.

11. Implementing the Fourteenth Amendment will likely make my voter registration easier when I next move election districts in Pennsylvania. I understand that, if the Census Bureau implements the Fourteenth Amendment, Section 2, to discount those states' basis of representation, those states will make registration easier. And if other states make registration easier, Pennsylvania will want to make registration easier, so its basis for representation does not decrease. Then, if I move districts again within thirty days before an election, Pennsylvania may allow me to register in my new election district.

12. I declare under penalty of perjury that the foregoing is true and correct.

Executed on 12/7/21.

  
SARAH BANKS