

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
EASTERN DIVISION**

ELIZABETH JANE SINNER, WHITNEY
OXENDAHL, CAROL SAWICKI, LOIS
ALTENBURG, and NORTH DAKOTA
VOTERS FIRST,

Plaintiffs,

v.

AL JAEGER, in his official capacity as
Secretary of State of North Dakota,

Defendant.

Case No. 3:20-cv-00076

**BRIEF IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY
INJUNCTION**

EXHIBIT 19
Declaration of Lois Ivers Altenburg

DECLARATION OF LOIS IVERS ALTENBURG

1. My name is Lois Ivers Altenburg and I reside at 1146 5th St N, Fargo ND 58102. I was born and raised in Fargo, ND, and, aside from around ten years away when my husband and I studied inter-state, I have lived my whole life in Fargo.
2. I am 82 years old. I am retired and a caretaker for my husband who has a number of medical conditions including mild COPD, polymyalgia, rheumatica, as well as heart and neurological issues. My husband is currently unable to walk and so taking care of him is a full-time occupation for me.
3. Because of our age, and my husband's health conditions, particularly his COPD, it would be dangerous for us to come into contact with people while the COVID-19 pandemic continues. We have not seen our children or grandchildren in person since January, and, aside from quick visits to the grocery store (where I wear a mask), we have stayed out of contact with people entirely since mid-March.
4. I have voted in every election for which I have been eligible since I was 21 years old and first able to vote. I have been an election judge and have both circulated and signed many ballot petitions, including a redistricting reform ballot initiative I worked to get on the ballot in 2010 as part of a League of Women Voters effort. Unfortunately, we were not successful.
5. I have run for office four times, each time as a Republican candidate. I ran for school board, mayor, state legislature and U.S congress, but was not successful in these races. For each of these races I successfully collected the required number of signatures to get my name on the ballot.
6. I have been a member of the League of Women Voters since the 1960s. For many of the years since 1970 I have been the President of the League of Women Voters of North Dakota, though I stepped down in February, 2020.
7. I am heavily involved in the North Dakota Voters First (NDVF) campaign: I am on the sponsoring committee, I am a spokesperson for the campaign, and an honorary chair of the campaign. I was planning to start gathering signatures for NDVF but the COVID-19 pandemic has meant that I do not believe I can safely gather signatures. To do so would put my health, my husband's health, and the community's health at risk.
8. I would like to sign the NDVF petition myself, but in order to do so, I would need to meet with a canvasser, and have them leave a clipboard for me, then move six feet away, then I could sign using my own pen, and then walk away from the clipboard and the canvasser would return and collect the clipboard. This would be a much greater burden on me than the usual way that I sign petitions.
9. I would like to gather my husband's signature on the NDVF petition, but if I did that, I would need to swear an affidavit before a notary that I had witnessed him sign the

petition. I would usually use a notary at our local bank. In order to get a document notarized with the COVID-19 restrictions in place, I would have to set up a special appointment with the bank, and use the drive through service. I would then have to get my affidavit notarized from my car, while remaining six feet from the notary public. I am very committed to redistricting reform and would be prepared to go through these steps, but they would be much more burdensome and dangerous to my health, and my husband's health than would have been the case without COVID-19.

10. Because I am trying to remain six feet from people to protect my health, my husband's health and that of my community, it is simply not realistic for me to canvass at the places I usually would attend to gather signatures: street fairs, county fairs, and the state fair.

I declare under penalty of perjury that the foregoing statements are true and correct. Executed on

May 6, 2020, by

Lois Ivers Altenburg
Lois Ivers Altenburg