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PEOPLE NOT POLITICIANS OREGON,
COMMON CAUSE, LEAGUE OF WOMEN
VOTERS OF OREGON, NAACP OF
EUGENE/SPRINGFIELD, INDEPENDENT
PARTY OF OREGON, and C. NORMAN
TURRILL

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

PEOPLE NOT POLITICIANS OREGON,
COMMON CAUSE, LEAGUE OF WOMEN
VOTERS OF OREGON, NAACP OF
EUGENE/SPRINGFIELD, INDEPENDENT
PARTY OF OREGON, and C. NORMAN
TURRILL,

Plaintiffs,

v.

BEVERLY CLARNO, OREGON
SECRETARY OF STATE,

Defendants.

Case No. 20-01053-MC

**DECLARATION OF CANDALYNN
JOHNSON IN SUPPORT OF
PLAINTIFFS' MOTION FOR A
TEMPORARY RESTRAINING ORDER**

I, CANDALYNN JOHNSON, declare that:

1. I have been a resident of Oregon since 2005. I have been active in Oregon politics and campaigns since 2014.

2. I have been involved in the People Not Politicians (PNP) campaign to qualify Initiative Petition (IP) 57 for the 2020 general election ballot, and its predecessor efforts and activities, since August of 2018.

3. My duties of the PNP campaign since 2019 have included, and do include: Acting as official spokesperson for the campaign at events and speaking engagements; supporting and actively expanding the PNP coalition through outreach; management of logistical daily activities for the petition-processing office; recruitment and on-boarding of campaign volunteers; internal and third-party communications; administrative needs (including serving as the minutes-taker at all meetings of the PNP campaign's Executive Committee; I attended all Executive Committee meetings); community outreach; building and maintaining the campaign calendar for events; database management and communications with the public via email, social media, and speaking engagements.

4. My efforts included holding, from late 2018 into 2020, around the state, a series of forums and presentations on the need for redistricting reform, assisting in the drafting of the initiatives in 2019, and recruiting volunteer circulators for in-person signature collection in early 2020.

5. Among my initial duties as PNP deputy campaign manager starting in January 2020 were to seek out persons and entities who might be, or were, in favor of IP 57, and to

increase the number of coalition partners. In performing those functions, I have sought out, talked with, had meetings with, recruited, or made presentations throughout most of Oregon, to a minimum total of a thousand persons, and at least 30 entities (such as academic, service, civic, and professional groups) from as early as September 2018 to today. I know that other officers for the PNP campaign were similarly engaged on behalf of the campaign, because I was present at all meetings of the campaign's Executive Committee (usually held weekly, if not more frequently), and took notes of the meetings for the campaign. Before the Executive Orders shut down volunteer signature gathering, I had a list that include at least of 77 people who had volunteered to be circulators.

6. I was fully engaged in these activities until early March, when groups with whom I had scheduled meetings began cancelling them, telling me they were doing so because of fears of the COVID-19 virus. Further, in response to the Governor's Executive Orders and the restrictions therein commencing in mid-March, I had to greatly reduce, and finally eliminate, my live, in-person interactions with people on behalf of the PNP campaign. The PNP campaign was preparing to sponsor an appearance in April 2020 by some of the members of California's citizen redistricting commission, on which IP 57's commission was largely based; that event had to be cancelled because of the restrictive Executive Orders. Some groups with whom I had planned to meet in person, and now could not do so because of the Executive Orders, were unable to confer with me via various video platforms, because of lack of capability, access, or both.

7. Despite these tremendous challenges, PNP has engaged in a good faith effort to meet the qualifying signature requirements through the unconventional means of relying exclusively on downloadable and mail petition signature-gathering methods. However, with that

diminished access to voters, I could not produce the campaign results, in solicitation and adding coalition members, that I was able to do before the Executive Orders were issued. In my opinion, these restrictions greatly reduced the overall impact and efficacy of the PNP campaign, and my own ability to recruit, inspire, activate, and gather more supporters for the PNP campaign.

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

Dated: June 30, 2020

s/ Candalynn Johnson

CANDALYNN JOHNSON