

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

NATIONAL ASSOCIATION FOR THE)
ADVANCEMENT OF COLORED)
PEOPLE,)

Plaintiff,)

v.)

Civil Action No. 20-cv-2295 (TSC)

UNITED STATES POSTAL SERVICE,)
et al.,)

Defendants.)

_____)

DECLARATION OF CARMEN WATKINS

I, Carmen Watkins, declare as follows:

1. I am the Interim Vice President of Field Operations for the National Association for the Advancement of Colored People (NAACP). In that Position, I am a member of the Senior Leadership of the Organization and involved in decisions about the NAACP’s strategic priorities.

2. Founded in 1909, the NAACP is the nation’s largest and oldest civil rights grassroots organization. The NAACP works to ensure the political, educational, social, and economic equality of all persons and to eliminate race-based discrimination. The NAACP has fought in the courts for decades to protect the constitutional guarantee of equal protection under law. To advance its mission, the NAACP has brought landmark civil rights cases over its 109-year history and continues to do so. The NAACP also has filed numerous amicus briefs in cases that significantly impact people of color.

3. The NAACP is organized into state and local units, known as conferences, chapters and branches, all of which are part of the NAACP. Every member of a state or local unit is also a

member of the NAACP. The NAACP has conferences, chapters, or branches in 48 states, and it has over 200,000 members nationwide.

4. In my position as Interim Vice President of Field Operations and a member of the Senior Leadership team, I regularly communicate with NAACP members and volunteers throughout the country.

5. The NAACP relies on mail service by the United States Postal Service for a variety of important purposes, including communicating with members. NAACP members also rely on the United States Postal Service, including to receive medications, pay bills, receive NAACP material, send and receive mail-in ballots, and other purposes. Delays in mail delivery are of significant concern to the NAACP and to NAACP members.

6. The NAACP has established a civic engagement program, which is designed to encourage citizens to be fully engaged in the democratic process, and to raise awareness for political, educational, social, and economic equality for communities of color in the electoral and legislative process. Drawing upon the resources of our branches across the country, the program seeks to increase turnout among Black voters in federal, state, and local elections.

7. The widespread delays in USPS service over the last month have required the NAACP, and will continue to require the NAACP, to divert resources that it would have otherwise expended on other aspects of its civic engagement program.

8. For example, because of numerous reports over the past month about the reliability and timeliness of mail delivery, the Florida State Conference of the NAACP and volunteers it recruited as part of the civic engagement program disseminated information and organized transportation for voters to drop off their absentee ballots at local supervisors of elections in advance of Florida's August 18, 2020 primary election, including after church services. The

Florida State Conference is planning to conduct similar activities in preparation for the November 2020 election as a result of continuing concerns about delays in mail services.

9. Due to concerns about delays in mail delivery, the Georgia State Conference of the NAACP also plans to conduct similar activities in preparation for the November 2020 election, including organizing events and transportation for voters to drop off their absentee ballots at drop boxes.

10. Likewise, due to concerns about delays in mail delivery, the Ohio State Conference of the NAACP is planning to disseminate information and organize transportation for voters to drop off their absentee ballots at local supervisors of elections after church services, in connection with the November 2020 election.

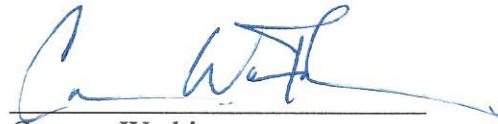
11. Engaging in these activities has diverted resources from the regular activities of the NAACP's civic engagement program. Absent the increasing mail delays this summer, the Florida, Georgia, and Ohio State Conferences would instead devote the resources spent on these activities to the regular activities of the NAACP's civic engagement program, such as registering voters, contacting registered voters to ensure they have accurate voting information and encouraging them to vote, organizing events to get out the vote, and conducting voter protection activities during early voting.

12. Concerning voter protection activities, for example, the Florida State Conference plans to have its members and volunteers recruited as part of the civic engagement program conduct in-person and remote poll monitoring for the 2020 November election. Because of the mail delays, however, they will instead have fewer members and volunteers to conduct poll monitoring because they will need to send those members and volunteers to assist with

disseminating information about dropping off absentee ballots, organizing transportation, and transporting voters to drop off absentee ballots.

Executed this 31st day of August, 2020.

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

A handwritten signature in blue ink, appearing to read 'Carmen Watkins', written over a horizontal line.

Carmen Watkins