

EXHIBIT 16

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

VOTE FORWARD,
611 Pennsylvania Ave. SE #192
Washington, DC 20003;

AARON CARREL,
2 N Roby Rd.
Madison, WI 53726;

VOCES UNIDAS DE LAS MONTAÑAS,
1001 Grand Ave., Suite 107
Glenwood Springs, CO 81601;

COLORADO ORGANIZATION FOR
LATINA OPPORTUNITY AND
REPRODUCTIVE RIGHTS,
P.O. Box 40991
Denver, CO 80204;

and

PADRES & JÓVENES UNIDOS,
4130 Tejon St., Suite C
Denver, CO 80211,

Plaintiffs,

v.

LOUIS DEJOY, in his official
capacity as the Postmaster General,
475 L'Enfant Plaza SW,
Washington, D.C. 20260-0546;

and

UNITED STATES POSTAL SERVICE,
475 L'Enfant Plaza SW
Washington, DC 20260-0546,

Defendants.

Civil Case No. 1:20-cv-02405-EGS

DECLARATION OF AARON CARREL

I, Aaron Carrel, declare as follows:

1. I am a resident of Madison, Wisconsin. The matters set forth herein are true and correct of my own personal knowledge. If called as a witness, I could and would testify competently thereto.

2. I am a registered voter of Wisconsin and have been registered since 1992.

3. I intend to vote by mail in the November 2020 general election to minimize my family's risk of exposure to COVID-19. My wife suffers from systemic lupus and has to take multiple immunosuppressants. I do not want to place her at risk of contracting COVID-19 by going in to vote in person, where I will have to be physically close to people outside of my household. I voted by mail in the August primaries due to these same concerns.

4. I requested my absentee ballot for the general election on July 2, 2020, but I have not yet received it. I do not know when the election officials will be mailing it to me, and I am concerned that I may not receive it at all. For the primaries, one of my family members and I both requested our absentee ballots at the same time. Although I received my ballot, my family member never received his.

5. During the August primaries, I decided to complete and return my absentee ballot by mail early, well before the state's deadline to receive completed ballots. I mailed in my ballot around July 10, 2020, which was several weeks before the deadline.

6. After I mailed my completed ballot, various events occurred in Wisconsin that led to unrest and even riots on topics of social injustices. I watched local debates where candidates for a state senate position addressed these issues. I decided I wanted to change my vote and instead support a different candidate who had impressed me in the way she responded to the events taking place.

7. I reached out to the local city clerk via email to try to rescind my ballot and vote for the other candidate. The city clerk told me the only way for me to change my vote was to go

in person. I did not want to go change my vote in person due to my wife's medical condition. Thus, I was forced to leave my ballot as it was, for a candidate that I did not want to vote for.

8. I want to prevent this scenario from re-occurring in the general election. I have not yet decided who I will vote for in our local congressional race. Instead of making a quick decision and mailing my completed ballot early, as I did for the primaries, I would like time to fully understand the candidates' positions and the ability to consider all information that may come out about the candidates' positions. Given the current situation in Kenosha, it is important for me to understand how local candidates respond to social justice issues. Every day the situation changes and new issues may arise.

9. Therefore I intend to mail my ballot as close to election day as possible, perhaps waiting to vote until the weekend before election day, so that I can be fully informed when deciding which local candidate to vote for.

10. In Wisconsin, a completed ballot must be received by Election Day in order to be counted. Because I intend to mail my ballot close to election day, I fear that the delays caused by USPS will cause my ballot to not arrive on time and therefore not be counted.

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

Executed on September 02, 2020, in Madison, Wisconsin.



Aaron Carrel