

# **EXHIBIT 23**

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 ALEX SANCHEZ ON BEHALF OF  
VOCES UNIDAS DE LAS MONTAÑAS

I, Alex Sánchez, declare as follows:

1. I am the co-founder and executive director of Voces Unidas de las Montañas (“Voces Unidas”), a new non-profit organization that seeks to elevate the voices of Latinos in three rural Colorado counties through civic engagement. 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. Voces Unidas is a new organization created by myself and other individuals from the Roaring Fork Latino Network, a collective of approximately 100 local Latino and Latina leaders in the Roaring Fork Valley of Colorado, dedicated to elevating the voices of Latinos and Latinas in the region. We formed Voces Unidas in order to address the need for civic engagement of Latino communities in the counties of Garfield, Eagle, and Pitkin. To date, no non-profit or private organization has spent significant resources in get-out-the vote efforts specifically aimed at the Latino communities in these three rural counties.

3. At Voces Unidas, we seek to lead efforts such as registering people to vote, providing them with information during elections, and mounting get-out-the-vote campaigns. In the future, Voces Unidas intends to nurture candidates who want to run for office and champion broader social-justice issues such as affordable housing and expanded health care coverage for Latino communities in the region.

4. Latinos represent 30% of the population in Garfield and Eagle counties and 10% of the population in Pitkin county. The rural communities Voces Unidas serves, which are often hundreds of miles in distance from each other and from city centers, rely heavily on USPS for both everyday communication, delivery of essential needs like medications, and for the exercise of their civic rights, including the right to vote.

5. The delays caused by USPS’s policies have threatened to frustrate Voces Unidas’s mission to elevate the voices of Latinos and enhance civic engagement in two specific

ways. First, the delays caused by USPS's policies have undermined Latino and rural communities' trust in USPS. People in communities we serve have already experienced delays in receiving their mail and are worried about the severe consequences this may have. These communities rely on the mail for essential items like medication or official notices from government agencies, so when they are impacted by USPS delays, they distrust the government's ability to respond to their needs and withdraw from civic engagement. If people believe their vote will not count and their voice will not be heard, they will not take the time and effort to cast a ballot.

6. As a result, Voces Unidas will be spending its resources, time, and energy on efforts to rebuild the communities' trust in the electoral process and in USPS so that they may in turn have confidence that their voice will matter when it comes time for the general election. Voces Unidas plans to do this via additional education and outreach efforts, including phone banking and canvassing, pushing out digital ads, and creating additional voter engagement programs. Absent USPS's policies that have caused delays, Voces Unidas would not have to direct so much time, energy, and resources into the effort to rebuild people's trust in USPS.

7. Second, the delays caused by USPS's policies have shortened the timeline that Voces Unidas previously thought it had to complete our get-out-the vote campaigns and have caused us to have to work faster and harder. In Colorado, a completed ballot must be received by Election Day in order to be counted. Because of the USPS delays, Voces Unidas will have to redirect its time, energy, and resources at convincing people to mail their ballot earlier than they normally would have. In order to ensure that their votes will be counted, people will have to mail their ballot earlier than in past elections. Thus, Voces Unidas will have to initiate its outreach and canvassing efforts earlier than we planned, and we will have to expend additional resources to successfully do this.

8. The delays caused by USPS's policies have caused Voces Unidas to have to expend its limited resources in a manner that we did not previously foresee or budget for. Before the USPS policies caused mail delays and eroded the communities' trust in the mail service,

Voces Unidas planned to spend approximately \$30,000 on civic engagement work tied to the general election. But now, given the need for additional education and outreach efforts, Voces Unidas calculates that we will need to spend \$50,000 to \$80,000 in addition to the original budget in order to be effective. Voces Unidas will spend this additional money by paying canvassers to do more phone banking and field canvassing, by adding paid advertising via social media, and by mailing two informational pieces to each Latino voter in the three counties well in advance of election day to help ensure that voters send in their ballot earlier. With these additional efforts, Voces Unidas thinks we will be able to restore people's confidence in USPS and also convince people in our communities that they need to mail their completed ballot out earlier.

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

Executed on September 5, 2020, in Glenwood Springs, Colorado.

  
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Alex Sánchez