

Exhibit 1

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

ELECTRONIC PRIVACY INFORMATION CENTER

Plaintiff,

v.

PRESIDENTIAL ADVISORY COMMISSION ON
ELECTION INTEGRITY, *et al.*,

Defendants.

Civ. Action No. 17-1320 (CKK)

SECOND DECLARATION BY MARC ROTENBERG

I, Marc Rotenberg, declare as follows:

1. I am President and Executive Director for the Plaintiff Electronic Privacy Information Center (“EPIC”).
2. Plaintiff EPIC is a non-profit corporation located in Washington, D.C. EPIC is a public interest research center, which was established in 1994 to focus public attention on emerging civil liberties issues and to protect privacy, the First Amendment, and other constitutional values. EPIC pursues a wide range of activities, including public education, litigation, and advocacy. EPIC has a particular interest in preserving privacy safeguards established by Congress, including the E-Government Act of 2002, Pub. L. 107-347, 116 Stat. 2899 (codified as amended at 44 U.S.C. § 3501 note).
3. The statements contained in this declaration are based on my own personal knowledge.

The Governance of EPIC

4. EPIC is governed by a Board of Directors in accordance with the Articles of Incorporation and the Bylaws of the Electronic Privacy Information Center, as amended February 1, 2015.

5. The EPIC Advisory Board is the primary constituency of the organization.

The Members of the EPIC Advisory Board

6. Since EPIC's incorporation in 2000, the Members of the EPIC Advisory Board have played a central role in the work, leadership, and support of the organization.

7. The Members each year undertake a detailed review of the organization and provide specific guidance for EPIC's program activities.

8. The Members each year participate in an annual meeting.

9. The Members routinely participate in EPIC's substantive work. Members participate in EPIC's advocacy effort and litigation, speak at EPIC conferences, and contribute to EPIC's publications.

10. New members are nominated by current Members and by the Directors of the Board.

11. Nominees are considered by the Board of Directors, and if approved, formally join EPIC as a member of the Advisory Board.

12. A formal public announcement is made each year when members are added to the Advisory Board.

13. The Directors of the Board are elected from among the Members.

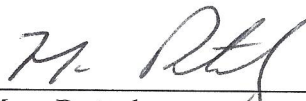
14. All the current Directors on the EPIC Board are Members.

15. Members routinely make financial contributions to support the work of the organization.

16. The vast majority of individual donations to EPIC (in excess of 90%) are received from Members.

17. The vast majority of supporters of the annual EPIC awards dinner are Members.
18. In this matter, EPIC represented the interests of more than 30 Members. These Members signed a statement to the National Association of State Secretaries in opposition to the Commission's demand for personal voter data.
19. Members live in states which have provided, or have stated their intention to provide, voter data to the Commission.

Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.



Marc Rotenberg
EPIC President and Executive Director

Executed this 8 day of September, 2017