

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

LEAGUE OF WOMEN VOTERS	:	
OF OHIO, et al,	:	
	:	
Plaintiffs,	:	CASE NO. 2:20-CV-1638
	:	
v.	:	CASE NO. 2:20-CV-1638
	:	
FRANK LAROSE,	:	
	:	
Defendant.	:	

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**DECLARATION OF FORMER OHIO GOVERNOR BOB TAFT**

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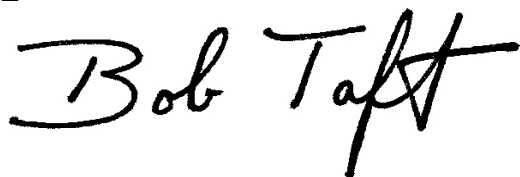
I, Former Ohio Governor Bob Taft, declare as follows:

1. I served as Ohio's Governor from 1999-2007.
2. I served as Ohio's Elected Secretary of State and was its Chief Elections Official from 1991 to 1999. In my capacity as Ohio Secretary of State I was responsible for overseeing all federal and state elections in Ohio and advising Ohio's 88 boards of elections on the proper administration of each election that I oversaw.
3. I have read House Bill 197, the Complaint (ECF Doc. No.1) filed in the above-captioned matter, and Plaintiffs' associated request emergency relief, as set forth in their request for an emergency temporary restraining order (ECF Doc. No. 4).
4. I am also aware of Ohio Department of Health Director Dr. Amy Acton's March 16, 2020 Order closing all Ohio polling locations, which prevented in-person voting at Ohio's March 17, 2020 Primary Election.
5. I have also read Ohio Secretary of State Frank LaRose's Directive Number 2020-06, issued on March 16, 2020 to Ohio's Boards of Election in response to Director Action's Order.
6. I have also read Ohio Secretary of State LaRose's Directive Number 2020-07, issued on March 27, 2020, which provides direction to Ohio's Boards of Election as to how to administer H.B. 197.

7. I submit this declaration on behalf of the State of Ohio and in support of H.B. 197.
8. Based on my experience, now that Ohio's Boards of Elections have been notified via Directive 2020-07 of the final legislative framework through which voting in the 2020 Presidential Primary Ohio's is to be completed, any changes to that framework and dates will cause confusion among election officials and voters and could jeopardize the integrity of the election.
9. For example, Plaintiffs here request that this Court order the Secretary to direct the Boards of Elections to mail separate ballots for each party with candidates on the ballot to every registered elector who has not already cast a ballot. Doc. No. 4, Page ID NO. 34. This could result in an elector receiving at least three ballots.
10. During my term as Ohio's Secretary of State, absentee voters were never sent more than one ballot. In my experience, giving a voter more than one ballot could cause confusion to the voter as to which one to cast.
11. Further, sending a voter more than one ballot increases the risk that a voter will return more than one ballot. If a voter casts more than one ballot, Boards will be unable to determine which ballot the voter intended to cast. This could cause confusion for Boards as to which one to count and could cause voters to be disenfranchised in the event that Boards decide not to count any of the ballots cast.
12. Mailing multiple ballots to one voter also increases the risk of voter fraud should a voter cast multiple ballots, or in the event that a third party attempts to vote uncast ballots that were sent to another voter.
13. Combined with the absentee voting period preceding March 17, 2020 the absentee voting procedure set forth in H.B. 197 is longer than any absentee voting period that existed when I was Secretary of State.
14. Ohio's Elections are run according to deadlines set out in statute. Statutes provide certainty as to when certain events are to occur. In my experience, Boards of Elections rely on election statutes passed by the General Assembly and the Secretary of State's directives interpreting them in administering elections.
15. The time frame and deadlines for requesting and submitting absentee ballots set forth in H.B. 197 provide ample time for voters to cast their ballots in Ohio's 2020 Primary Election. There has been much publicity from the Secretary of State's Office, political and public interest campaigns, and the media about H.B. 197's procedure for obtaining an absentee ballot. Voters' ability to receive an absentee ballot application via a phone call or by printing an application off of the Secretary of State's website and mailing it to the Board, has been widely publicized. So too has H.B. 197's requirement that the Boards send all absentee ballots to voters with prepaid return postage. Given this, most voters will not have to wait to receive the postcard required by H.B. 197 and the postcard serves as just one more form of voter outreach.

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

Executed this 1<sup>st</sup> day of April, 2020.

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A handwritten signature in black ink that reads "Bob Taft". The signature is written in a cursive style with a large, sweeping "B" and a distinct "T".

Bob Taft, Governor of Ohio 1999-2007,  
Secretary of State of Ohio 1991-1999