

EXHIBIT 1

Declaration of Jennifer Flanagan

I, Jennifer Flanagan, hereby declare as follows:

1. I am Executive Director of Colorado Common Cause, and a resident of the state of Colorado. I have personal knowledge of the matters set forth in this declaration, and if called to do so, could and would competently testify thereto.

2. Colorado Common Cause is a non-profit organization fighting for open, honest and accountable government. A central mission of Common Cause is to ensure that every American, including every Common Cause member, has the right to vote and the opportunity to exercise that right. Additionally, Common Cause is committed to strengthening public participation and ensuring that government and the political process serve the public interest. Colorado Common Cause's mission statement stresses that it strives to "promote fair and honest elections;" and protect the civil rights of all Americans."

3. My responsibilities as Executive Director include supervision of many of Common Cause's activities in Colorado, including a number of election-related programs, like the Just Vote Colorado program, a voter protection program. The goal of Just Vote Colorado is to "monitor the 2008 general election, identify the impact that current laws have on Coloradan's right to vote and present findings in a post-election report so that the process can be verified or challenged." I also conduct advocacy throughout the year in conjunction with other organizations related to election administration, and work directly with election officials and elected officials to resolve voting issues and promote sound election administration. Additionally, I oversee Colorado Common Cause's effort to educate and train members on election-related issues.

4. Colorado Common Cause has 4,000 dues-paying members and 8,000 online members within the State of Colorado, many of whom are registered Colorado voters who actively participate in the political process and regularly vote in Colorado elections.

5. Colorado Common Cause has learned from recent news reports and a recent press release from the Secretary of State that large numbers of registered voters have been purged from the voter rolls.

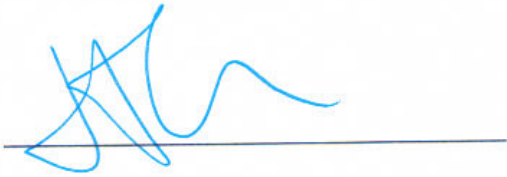
6. These purges injure Colorado Common Cause by unlawfully purging Colorado Common Cause's members from the rolls or subjecting them to imminent risk that they will be purged unlawfully from the rolls and not permitted to vote in the upcoming November 4, 2008 general election or subsequent elections.

7. Colorado Common Cause is conducting voter protection and education activities around Colorado in advance of the upcoming general election. Colorado Common Cause has limited resources and, to the extent Colorado Common Cause is required to spend staff time and resources on investigating and taking measures to counteract the State's unlawful purging practices, it will need to divert resources from its planned voter protection and education efforts.

8. Colorado Common Cause will further be harmed after the November 4, 2008 general election if these purging practices are not discontinued because our members may be unlawfully purged in the future.

I declare under penalty of perjury under the laws of the state of Colorado that the foregoing is true and correct to the best of my knowledge.

DATED this 24th day of October 2008 in Denver, Colorado.

A handwritten signature in blue ink is written over a horizontal black line. The signature is stylized and appears to be 'Jennifer Flanagan'.

Jennifer Flanagan