

FILED

**IN THE MONTANA FIRST JUDICIAL DISTRICT COURT
LEWIS AND CLARK COUNTY**

JAN 3 2022

**FORWARD MONTANA; LEO
GALLAGHER; MONTANA
ASSOCIATION OF CRIMINAL DEFENSE
LAWYERS; GARY ZADICK,**

Plaintiffs;

vs.

**THE STATE OF MONTANA, by and
through GREG GIANFORTE, Governor,**

Defendant.

ANGIE SPARKS, Clerk of District Court
By *Maureen Goetz* Deputy Clerk

Cause No. BDV-2021-611

**AFFIDAVIT OF
AMARA REESE-HANSELL**

I, AMARA REESE-HANSELL, state as follows:

1. I am over 18 years old and a resident of Bozeman, Montana. The matters set forth in this Affidavit are based on my personal knowledge.
2. I am currently the Program Director for Forward Montana. I have been in that role since July 2019. I have worked for Forward Montana for at least the last five years in different roles.
3. In my role as Program Director, I oversee all of our statewide programming, including our voter registration program.
4. During my time working for Forward Montana, I have registered hundreds of voters, mostly students.
5. The Strand Union Building located on Montana State University's campus is one of the critical locations where I have engaged in voter registration activities on behalf of Forward Montana. When tabling in the Strand Union Building, we

generally set up in the Union Market in the SUB main level large seating area, which is classified as a retail dining facility.

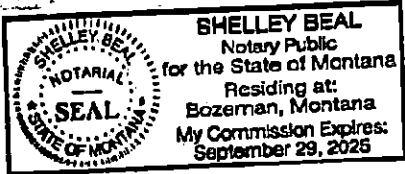
6. Prior to conducting voter registration on any campus, I familiarize myself with the rules and regulations applicable to that campus. When registering voters, I abide by all applicable university rules and regulations.
7. I also ensure that any Forward Montana staff and volunteers who engage in voter registration activities are familiar with applicable rules and regulations and follow them as a matter of course.
8. In a state where weather can be extreme and unpredictable for significant portions of the year, it is crucial to be able to provide voter registration opportunities to students indoors, where they can comfortably take their time in understanding the voter registration materials.
9. I have also organized events where Forward Montana staff and volunteers have registered voters outside of football games on the Montana State University campus. These registration efforts have generally occurred outside of the stadium and around campus on game days.
10. I plan and expect to conduct similar voter registration activities throughout 2022, with appropriate accommodations for the COVID-19 pandemic.
11. If SB319 were implemented, it would severely alter the impact of our work. We set out to provide easy access to voter registration to all young people. To do that effectively, we must make ourselves available to students in the places they frequent the most.

12. Being prohibited from registering voters in residential, dining, and athletic facilities across the board would hugely reduce our availability to students. Students count on Forward Montana to be in these locations and to provide these opportunities. Few if any alternatives exist that facilitate student voter registration.

I declare under penalty of perjury that the foregoing statements are true.

DATED this 3rd day of January, 2022.

Amara Reese-Hansell
AMARA REESE-HANSELL



State of Montana
County of Gallatin
This instrument was acknowledged before me
on 3rd day of January by Amara Reese-Hansell
2022 Print name of signer(s)
Shelley Beal
Notary Signature