

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
GAINESVILLE DIVISION**

MARTA VALENTINA RIVERA
MADERA, on behalf of herself and all
others similarly situated; FAITH IN
FLORIDA, HISPANIC FEDERATION,
MI FAMILIA VOTA EDUCATION
FUND, UNIDOSUS, and VAMOS4PR,

PLAINTIFFS,

v.

KEN DETZNER, in his official
capacity as Secretary of State for the
State of Florida; and KIM A. BARTON,
in her official capacity as Alachua
County Supervisor of Elections, on
behalf of herself and similarly-situated
County Supervisors of Elections,

DEFENDANTS.

Case No.

1:18-cv-00152-MW-GRJ

**CORRECTED DECLARATION OF MARTA VALENTINA RIVERA
MADERA IN SUPPORT OF MOTION FOR PRELIMINARY
INJUNCTION, MOTION FOR PLAINTIFF CLASS CERTIFICATION,
AND MOTION FOR DEFENDANT CLASS CERTIFICATION**

I, Marta Valentina Rivera Madera, declare the following based on my
personal knowledge:

1. I am a named plaintiff in this lawsuit. I am an adult United States
citizen, and I am a resident of Alachua County, Florida. I am eligible and
registered to vote in Alachua County.

2. I was born in Santa Isabel, Puerto Rico. I attended Jesús Maria Quiñones elementary school from first grade to sixth grade, attended Escuela Pre-técnica Federico Asenjo middle school from seventh grade to ninth grade, and graduated from Albert Einstein high school. All of the schools I attended are in San Juan, Puerto Rico. Instruction at my schools was mostly in Spanish.

3. I lived in Puerto Rico for most of my life. In the summer of 2017, I decided to move part-time to Florida to be closer to my daughter. I lived in Florida for approximately one month with my daughter in Gainesville that summer before returning to Puerto Rico. Before Hurricane Maria, I lived in San Juan, Puerto Rico. After Hurricane Maria, there was no electricity or water in San Juan and medicine was scarce. Water seeped in through the windows of my house after the hurricane, we had damage to the interior of our home, and we lost our furniture and beds. As a result, I decided to move to Florida permanently. I left Puerto Rico and moved to Alachua County, Florida on October 8, 2017 to live close to my daughter.

4. Spanish is my primary language.

5. I cannot read, speak, or understand English well. I do not understand ballots, voting instructions, or other election-related information provided only in English. I am not able to vote effectively using an English-only ballot.

6. In Puerto Rico, all voters are given the option to have their election-related documents and information provided in Spanish or English. When I lived and voted in Puerto Rico, I always chose Spanish-language materials.

7. I became registered to vote in Florida last summer when I went to the DMV to obtain my Florida Identification Card. My daughter accompanied me to the DMV. The attendant, who spoke in English, advised my daughter that I was able to register to vote and my daughter translated for me and asked me if I wanted to register. I told my daughter that I wanted to register, and we were directed to another attendant who helped me fill out the registration card. I believe the registration card I was given was in English. If my daughter had not been available to help me, I would not have been able to register to vote using English-only voter registration materials.

8. I want and intend to vote in Florida's November 6, 2018 general election. I will not be able to vote effectively without access to Spanish-language election materials.

9. My daughter is not always available to assist me or to translate materials to Spanish for me. She might not be available or able to come to the polls with me to help me vote by translating the ballot or other voting materials to Spanish. I also do not know if the State of Florida allows voters to bring family members or others to the polls to translate the ballots or provide other assistance.

Even if it does, I do not want to have someone accompany me when I vote because I do not want to give up my right to vote in private.

10. I understand that I am being proposed as a representative for a class action on behalf of other Spanish-speaking people who attended school in Puerto Rico, are eligible to vote in Florida, and are similarly-situated to me, and that we are requesting together that Florida counties, including Alachua County, that conduct English-only elections but that are home to many Spanish-speaking Puerto Ricans, provide Spanish-language election materials and voting assistance.

11. I want to be a class representative for this lawsuit. I understand the responsibilities of being a class representative, including that I am seeking to represent all members of the class for which I am proposed.

12. I brought this lawsuit on behalf of myself and all other similarly-situated individuals who are unable to vote effectively with English-only materials because I believe that Spanish-speaking people from Puerto Rico are entitled to vote in a language we understand. I do not believe that I have interests that are inconsistent with the interests of the class members I seek to represent, and I believe I will adequately represent those class members.

13. As a class representative I will always consider the interests of class members just as I would consider my own interests and I understand that in some cases I must put the interests of class members before my own interests. I have

participated and will continue to participate actively in this lawsuit as necessary, and I will help in any way I can. I recognize and accept that any resolution of this lawsuit is subject to court approval and must be designed in the best interest of the class as a whole.

The above was read to me in Spanish. I declare under penalty of perjury that the foregoing statements are true and correct and are based on my personal knowledge.

RESPECTFULLY SUBMITTED

Dated: August 21, 2018
Gainesville, Florida

By:

DocuSigned by:
Marta Rivera Madera
21/08/2018 9:28:15 PDT
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Marta Rivera Madera

**DECLARATION OF KIRA ROMERO-CRAFT REGARDING
TRANSLATION OF CORRECTED DECLARATION OF MARTA
VALENTINA RIVERA MADERA**

I, Kira Romero-Craft, have personal knowledge of the following facts:

1. I am Managing Attorney at LatinoJustice PRLDEF and co-counsel for the named plaintiffs in this action.

2. I am fluent in both the Spanish and English languages.

3. I read the attached Corrected Declaration of Marta Valentina Rivera Madera to Ms. Rivera in Spanish before she signed it.

I declare under penalty of perjury under the laws of the United States of America that the contents of this declaration are true and correct.

Executed this 21st day of August 2018 at Orlando, Florida.

/s/ Kira Romero-Craft
Kira Romero-Craft