

COMMONWEALTH OF MASSACHUSETTS
SUPREME JUDICIAL COURT

SUFFOLK, ss.

No. SJ-2020-12931

ROBERT GOLDSTEIN, KEVIN O'CONNOR, MELISSA BOWER SMITH,
on behalf of themselves and others similarly situated,

Petitioners,

v.

WILLIAM FRANCIS GALVIN, in his Official Capacity as
Secretary of the Commonwealth of Massachusetts,

Respondent

AFFIDAVIT OF CHRISTINA KNOWLES
IN SUPPORT OF EMERGENCY PETITION FOR RELIEF

I, Christina Knowles, state the following based upon
my own personal knowledge and belief:

1. I am the Campaign Manager for Petitioner Robert Goldstein, who is running in the Democratic Primary to be the United States Representative for Massachusetts' Eighth Congressional District.

2. The Eighth Congressional District includes twenty-four cities and towns. In order to file Petitioner Goldstein's nomination papers with sufficient certified signatures, I have recently been in communication with local election officials in each of these municipalities

in order to ascertain how best to submit collected signatures.

3. Early this year, our campaign compiled a list of town clerks and all relevant contact information for each municipality in our district. I have been in direct communication with each town clerk during the last two weeks to inquire about the process for submitting signatures, given the series of COVID-19 protective measures issued by the state.

4. I have emailed and/or called the offices of all twenty-four city/town clerks asking about any changes in local processes, to check on clerk availability, and inquire as to any other changes in practice potentially implicated by COVID-19 response measures.

5. To date, I have received responses from twenty-one of the officials I have contacted. Three have not responded.

6. My survey indicates that nearly all of the twenty-one offices have been affected by the COVID-19 response measures. None of the officers are conducting normal operations during normal business hours. Some offices are closed, others are operating at limited capacity. All of the offices which responded to me accept signatures by mail. Some prefer to receive to signatures

by mail. Several also accept physical drop-offs of collected signatures.

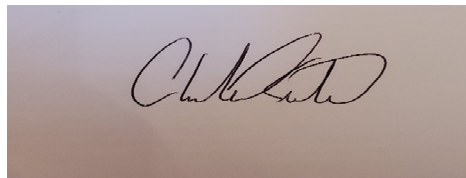
7. Our campaign has decided to heed advice we received from the Secretary of Commonwealth's office to mail our papers to the clerks' offices. We have also adopted this course of action because physically dropping off the materials to the various clerks' offices would require coordinating limited and variable appointment times, while increasing the opportunity for campaign staff and volunteers, including me, to be exposed to the coronavirus.

8. The process of mailing signatures caused me to recently make four different trips to post offices and stationery stores in order to secure the stamps, envelopes, and paper copies needed so that we can mail nomination papers for individual voters to sign and return to the campaign via a self addressed and stamped envelope, which we then must send to the town clerks.

9. Based on my experience as a volunteer and staffer on previous political campaigns in Massachusetts, this process for submitting signatures is far more cumbersome and unresponsive than in previous years. Typically, campaigns will receive much quicker feedback on what percentage of collected signatures have been certified by

local officials. As a result of COVID-19, it has been harder to engage with municipal election officials in a real-time exchange of information regarding the yield of a given batch of collected signatures, and more difficult to ascertain the magnitude of signatures that our campaign has collected. Further, since many clerks are working from home or keeping irregular hours, I am uncertain as to how rapidly the clerks have been able to verify and tabulate the signatures we have submitted.

10. Signed under the pains and penalties of perjury this 14th day of April, 2020.

A rectangular box containing a handwritten signature in black ink. The signature is cursive and appears to read 'Christina Knowles'.

Christina Knowles