

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

<p>ILLINOIS REPUBLICAN PARTY, <i>et al.</i>,</p> <p style="text-align: center;">Plaintiffs,</p> <p>v.</p> <p>J.B. PRITZKER,</p> <p style="text-align: center;">Defendant.</p>	<p style="text-align: center;">No.</p> <p style="text-align: center;">Declaration of Joseph C. Folisi</p>
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Pursuant to 28 U.S.C. § 1746, I declare that the following facts are true, to the best of my knowledge, information, and belief:

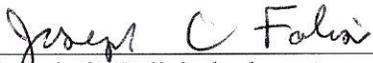
1. I am a resident of the Township of Schaumburg (the “Township”), Cook County, Illinois.
2. I am the duly elected Republican Township Committeeman of the Township and the Chairman of the regular Republican organization of the Township, which is a state political committee called the Schaumburg Township Republican Organization.
3. As the Republican organization for the Township of Schaumburg, our Organization is responsible for reaching over 100,000 residents of Schaumburg, Roselle, Hoffman Estates, Elk Grove Village, Hanover Park, Rolling Meadows, and Streamwood with our Republican message in order to elect our Republican candidates.
4. I have been a resident of Schaumburg for forty plus years, and am a former elected trustee of the Township.
5. Each summer our organization hosts a member picnic in July to help our members connect with one another and our candidates. We typically have several dozen people

attend. We cannot go forward with our picnic in July this year because of the Governor's ban on group gatherings.

6. As Committeeman, one of my responsibilities each year is to participate in the Illinois Republican Party's state convention. This year I am a delegate, but the convention will be held only online via Zoom because of the Governor's ban on group gatherings. An online convention is not as effective at creating in-person connections and collaborations across units, which is one of the primary functions of the convention from my vantage.
7. Our Organization's leadership team meets once a month to plan events, budget funds, and stay on track for our activities. Due to the Governor's ban on group gatherings, we have been doing these meetings via Zoom the past several months. The Zoom meetings are a poor substitute for in-person, direct conversations to work through sometimes tough but important issues.
8. Usually, our election activities include a number of undertakings that involve groups of ten or more gathering, which we cannot do under the Governor's ban. These include phone banks, rallies, and meet-the-candidate coffees or socials. To fund these activities, we host receptions or other events with a per-ticket price to support our party. All of these events are currently impossible because of the Governor's ban on group gatherings. Our inability to undertake them in the coming months will severely hamper our ability to organize and engage our voters for November.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: June 12, 2020



Joseph C. Folisi, declarant

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

<p>ILLINOIS REPUBLICAN PARTY, <i>et al.</i>,</p> <p style="text-align: center;">Plaintiffs,</p> <p>v.</p> <p>J.B. PRITZKER,</p> <p style="text-align: center;">Defendant.</p>	<p>No.</p> <p style="text-align: center;">Declaration of George Pearson</p>
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Pursuant to 28 U.S.C. § 1746, I declare that the following facts are true, to the best of my knowledge, information, and belief:

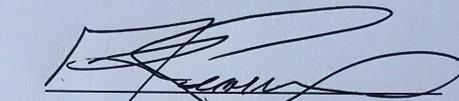
1. I am a resident of Monee, Will County, Illinois.
2. I am the chairman of the Will County Republican Central Committee.
3. As the Republican organization for Will County, our Committee is responsible for reaching 440,000 plus registered voters spread across 307 precincts in 24 townships with our Republican message in order to elect our Republican candidates.
4. Each spring our Committee hosts a Lincoln Day Dinner to honor Illinois' greatest contribution to our nation, Republican president Abraham Lincoln. Last year our Dinner in May 2019 drew a record crowd to hear economist and author Stephen Moore discuss President Trump's economic agenda. This year we were not able to hold the dinner because of the Governor's ban on group gatherings.
5. As chairman, one of my responsibilities each year is to participate in the Illinois Republican Party's state convention. This year I am a delegate, but the convention will be held only online via Zoom because of the Governor's ban on group gatherings. An

online convention is not as effective at creating in-person connections and collaborations across counties, which is one of the primary functions of the convention from my vantage.

6. Our Committee meets once a month to plan events, budget funds, and stay on track for our activities. Due to the Governor's ban on group gatherings, we have been doing these meetings via Zoom the past several months. The Zoom meetings are a poor substitute for in-person, direct conversations to work through sometimes tough but important issues.
7. Our Committee originally had planned to host a Juneteenth Day celebration on June 19, but decided to cancel it because of the Governor's ban on group gatherings. We are now planning a July 4 celebration. We are working with a local farmer to host it on his property in order to have ample room for people to maintain safe distances while still participating in a fun, outdoor event with speakers, food, and hopefully fireworks.
8. This July 4 celebration will be the kickoff for our push to the election in November 2020. We plan to undertake a number of election-oriented activities to deliver victory for our Republican candidates for local, state, and federal offices.
9. Usually, our election activities include a number of undertakings that involve groups of ten or more gathering, which we cannot do under the Governor's ban. These include phone banks, rallies, meet-the-candidate coffees or socials, and press conferences. To fund these activities, we host receptions or other events with a per-ticket price to support our party. All of these events are currently impossible because of the Governor's ban on group gatherings. Our inability to undertake them in the coming months will severely hamper our ability to organize and engage our voters for November.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: June 10, 2020


George Pearson, declarant

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

<p>ILLINOIS REPUBLICAN PARTY, <i>et al.</i>,</p> <p style="text-align: center;">Plaintiffs,</p> <p>v.</p> <p>J.B. PRITZKER,</p> <p style="text-align: center;">Defendant.</p>	<p>No.</p> <p style="text-align: center;">Declaration of Matt Podgorski</p>
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Pursuant to 28 U.S.C. § 1746, I declare that the following facts are true, to the best of my knowledge, information, and belief:

1. I am a resident of Chicago, Cook County, Illinois.
2. I am the chairman of the Northwest Side GOP Club.
3. As the Republican organization for the Northwest side of Chicago, our Committee is responsible for reaching registered voters in Chicago’s 38th, 39th, 41st, and 45th Wards, plus the township of Norwood Park.
4. As chairman, one of my responsibilities each year is to participate in the Illinois Republican Party’s state convention. This year I am a delegate, but the convention will be held only online via Zoom because of the Governor’s ban on group gatherings. An online convention is not as effective at creating in-person connections and collaborations across counties, which is one of the primary functions of the convention in my view.
5. Our Committee meets once a month to plan events, budget funds, and stay on track for our activities. Due to the Governor’s ban on group gatherings, these meetings have been cancelled, and we are forced to rely instead on emails and one-to-one phone calls, which

are a poor substitute for in-person, direct conversations to work through sometimes tough but important issues.

6. Between now and the November election, we are planning a number of election-oriented activities to deliver victory for our Republican candidates for local, state, and federal offices. In particular, we are enthusiastic to host a rally for 50-100 people in support of Judge Pat O'Brien, the Republican candidate for Cook County State's Attorney. We also want to host rallies supporting our candidates for state representative and state senate, both of whom are active members of our club.
7. Our club usually hosts 3 to 4 major events each year which provide the vast majority of the funds for our operations each year. This year we only held one such event in January before the Governor's ban on group gatherings went into effect, and as a result our fundraising has been severely hampered. Calls and letters are no substitute for the enthusiasm and interest generated by a speaker or the opportunity to network with new friends or gather with old ones.
8. Usually, our election activities include a number of undertakings that involve groups of ten or more gathering, which we cannot do under the Governor's ban. These include phone banks, rallies, and meet-the-candidate coffees or socials. To fund these activities, we host receptions or other events with a per-ticket price to support our party. All of these events are currently impossible because of the Governor's ban on group gatherings. Our inability to undertake them in the coming months will severely hamper our ability to organize and engage our voters for November.
9. We are a grassroots organization. We do not have the huge war chest or infrastructure to purchase TV and radio advertising. We rely on voter-to-voter, neighbor-to-neighbor

contact. This sort of volunteer-driven outreach is not only more affordable, but we believe it's more effective in delivering our message. The Governor's ban on group gatherings as small as ten makes it significantly harder for our corps of grassroots activists to engage one another and other voters in support of our candidates.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: 6/10/2020

DocuSigned by:
Matt Podgorski
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Matt Podgorski, declarant

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

ILLINOIS REPUBLICAN PARTY, *et al.*,

Plaintiffs,

v.

J.B. PRITZKER,

Defendant.

No.

Declaration of Tim Schneider

Pursuant to 28 U.S.C. § 1746, I declare that the following facts are true, to the best of my knowledge, information, and belief:

1. I am a resident of Hanover Township, Cook County, Illinois.
2. I am the chairman of the Illinois Republican Party, a post which I have held since 2014. I am a former Cook County Board Commissioner and Hanover Township Trustee.
3. The Illinois Republican Party is the statewide political organization recognized by the State of Illinois and the Republican National Committee as the official entity responsible for representing one of Illinois' two major, established political parties. As the party opposed to the party that currently runs state government, our party plays a vital role as a civil-society check on the complete control of state government by the other side, demanding accountability and transparency from our state government.
4. Our mission is to elect Republicans to federal, state, and local office, and to advocate for our platform.

5. Just as the Illinois Republican Party is the official statewide partner of the Republican National Committee, the Party has local and regional units that are independent but integrated, responsible for the party's "boots on the ground" activities in their areas.
6. Every four years, the state party hosts a state convention, at which we may conduct business, elect national convention delegates, elect national officers, select presidential electors, hear speakers, and adopt our platform. As chairman, one of my responsibilities is to convene and lead our state convention. This year, we were compelled to conduct a significant portion of our convention online because of the Governor's ban on group gatherings. While we made the best of our circumstances, the fact is that an online convention is not nearly as effective at creating in-person connections and collaborations between elected officials, grassroots activists, donors, campaign and party staff, and the media, which is one of the primary goals of hosting the convention alongside its formal business.
7. As the state Republican Party, meetings of more than ten are part-and-parcel of our business. We routinely would host meetings and gatherings of more than ten at our state headquarters, offices, or other meeting spaces. Such meetings include formal gatherings, such as a meeting of all our county party chairmen or a formal session of our State Central Committee (with one representative from each of the state's 18 congressional districts), or informal gatherings of our state and federal elected officials, campaign staff and consultants, grassroots activists and donors.
8. Events are also a major part of our business. This includes fundraising receptions or house parties that sell per-ticket events to meet and hear from major state and national leaders. It also includes rallies, bus tours, and similar grassroots and public events that

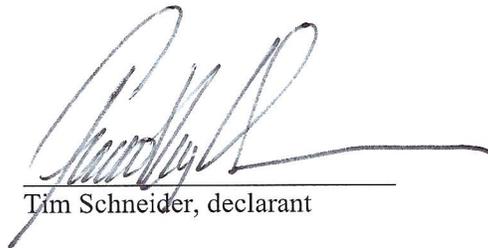
support our entire slate of Republican candidates up and down the ticket. The party also conducts numerous training sessions that equip grassroots activists, local party leaders, and candidates with the tools they need to organize and win.

9. Due to the Governor's ban on group gatherings, many of our meetings and events are suspended indefinitely through Election Day on November 3, 2020.
10. The inability to meet, gather, and hold events is a huge burden on our ability to succeed as a party. Because gatherings of ten or more are integral to our operations, a ban on these gatherings creates a major barrier to our continued operations.
11. Moreover, the ban severely limits in-person contact. In my judgment and experience as state party chair and as a previously elected official, there is no better way to convince a voter to support a candidate or cause than an in-person connection, whether through a door-knock in a neighborhood or, failing that, attendance at a rally or other event where the voter can size the candidate up, hear him directly, perhaps ask a question or make a comment, and shake a hand.
12. That said, in-person contact can be limited and managed in ways that are safe and responsible amidst the current COVID-19 situation. Tables at a fundraising dinner, TV crews at a press conference, or stations at a phone bank can be spaced six feet apart. Meals at that fundraising dinner can be served plated rather than buffet-style. Staff can be required and attendees can be encouraged to wear masks. Hand sanitizer can be provided for all employees and attendees. High-touch surfaces can be regularly sanitized. In short, the Party would observe recommended best practices while still engaging in the in-person gatherings that are essential to our efforts.

13. This ban is especially problematic for two additional reasons. First, November 3, 2020, is the most important day for our party in a four-year cycle. There is nothing like a presidential election to motivate donors, activists, and voters to engage. These next five months are the most vital of the 48 months in this cycle. Political activity and engagement during this time period is at its zenith.
14. Second, our Party as an institution is absolutely critical to generating public attention to our candidates and issues because the other party currently controls all of the levers of state government. The Governor can meet with his cabinet or senior advisors, and the Speaker can meet with his staff or caucus, and all of this is exempted from the order as government business (see Executive Order 2020-38, 2.j.c.). But the opposition party cannot hold a meeting of its central committee because of the Order's ban on gathering on ten or more. This fundamental unfairness between the two sides results in an organizing and media imbalance that only reinforces the status quo power structure.
15. Immediate relief is necessary so that we can organize effectively and without undue restraint in these crucial months immediately preceding the 2020 presidential election.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: June _____, 2020



Tim Schneider, declarant