

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

PAUL GOLDMAN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 3:23-cv-00590-MHL
	)	
SUSAN BEALS, in her official capacity as	)	
Commissioner of the Virginia Department of	)	
Elections et al.,	)	
	)	
Defendants.	)	

DECLARATION OF SUSAN BEALS

I, Susan Beals, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I currently serve as the Commissioner of Elections for the Commonwealth of Virginia. I have been in this role since March 18, 2022.
2. In my capacity as Commissioner of Elections, I serve as the principal administrative officer of the Virginia Department of Elections (the “Department”).
3. I make this declaration to place certain information and documents before the Court regarding the Department’s process by which a member of the public may request the list of those who voted (“LTWV”), under Va. Code § 24.2-406.
4. A person who wishes to request the LTWV may do so by submitting a written Voter List Request Form.
5. Upon receiving a completed Voter List Request Form, the Department reviews the request to ensure it complies with Va. Code § 24.2-406.
6. Currently, the Department does not ask an otherwise qualified person who has requested the LTWV to provide his or her proposed communication for approval. Indeed, the

Department has not requested to review a proposed communication since September 29, 2023. The Department also has updated its standard operating procedures (“SOP”) and has removed any indication that Department staff should request the proposed communication. I have further directed my staff that they should not ask to see a proposed communication before approving a request for the LTWV from a member of the general public.

7. Since September 29, 2023, my understanding is that the Department has processed at least one request for the LTWV by a member of the public and is processing at least two other such requests and has not asked to review any of the proposed communications.

8. The Department continues to enforce Va. Code § 24.2-407, which requires a person requesting the LTWV to sign a statement affirming that he or she will only use the list for purposes as specified in Va. Code § 24.2-406. The invoice also contains a statement that the list shall only be used for purposes as specified in Va. Code § 24.2-406. These statements do not require the person receiving the list to seek the Department’s approval of their proposed communications, and, to my knowledge, the Department has not requested proposed communications under either of these policies.

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

Executed on October 16, 2023.

A handwritten signature in black ink, appearing to read "Susan Beals", written over a horizontal line.

Susan Beals
Commissioner of Elections