

MONTANA THIRTEENTH JUDICIAL DISTRICT COURT,  
YELLOWSTONE COUNTY

<p>Montana Youth Action; Forward Montana Foundation; and Montana Public Interest Research Group,</p> <p style="text-align: right;"><i>Plaintiffs,</i></p> <p style="text-align: center;">vs.</p> <p>CHRISTI JACOBSEN, in her official capacity as Montana Secretary of State,</p> <p style="text-align: right;"><i>Defendant.</i></p>	<p>Cause No. DV 21-1097</p> <p style="text-align: center;"><b>DECLARATION OF SCOTT LOCKWOOD</b></p>
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I, SCOTT LOCKWOOD, state as follows:

1. I am over 18 years old and a resident of Lewis and Clark County, Montana. The matters set forth in this Declaration are based on my personal knowledge.
2. I registered to vote shortly after I turned 18 in 1967. I was living in Helena at the time.
3. In the fall of 1968, I moved to Bozeman to attend Montana State University.
4. While I clearly recall the important issues in the 1968 presidential election, I did not vote because I was unsure how to go about it.

5. That fall, I was occupied with classes, and I needed to register for the draft. I also thought that I could not vote in Bozeman because I was from Helena.
6. I simply did not try to get registered to vote while in college in Bozeman.
7. After graduating from MSU, I moved back to Helena and began working in the same building as the Lewis and Clark County clerk. My proximity made it easy to become quite familiar with the finer details of voter registration.
8. Around 1974, I moved across town. I had an infant son at the time and remember worrying that I would be late to work. When I arrived at my polling place, I found I had gone to the wrong precinct.
9. Thankfully, I knew the poll workers personally and they were able to send me to my correct polling place.
10. I felt lucky because I was not at all intimidated or worried when the poll workers told me I was in the wrong place. I felt no skepticism that they were sending me on a wild goose chase or misleading me in any way. But I think that if I had not been familiar with the voting process and with the poll workers, I could well have been deterred from voting.
11. I made it to the correct polling place and was able to vote, but I was late for work. When I think back on that time now, I reflect that I was

also lucky to have stable employment and an employer who didn't fire me—or even punish me—for arriving late that day.

12. These reflections occur to me because I believe that I have been very fortunate and have generally faced fewer barriers in my life than many others do. It is also my sense that when barriers to block my path, particularly in the voting context, I have an easier time navigating those barriers because of the resources at my disposal.
13. I continue to vote in every election, and I now vote absentee.
14. My wife and I often travel to Arizona in the winters. We are proud, consistent voters and we rely on being able to vote absentee.
15. I prefer to vote by mail. I believe it is essential to effectively and thoughtfully participating in democracy. I appreciate the extra time it gives me to spend with my ballot and the convenience it allows when I'm on the move.
16. Mail-in ballots have also been hugely important to me since the start of the COVID-19 pandemic, as they reduce opportunities for contracting and spreading the virus.
17. It frustrates me to know voting by mail isn't as readily available to others who may most need the flexibility and time it offers.

I declare under penalty of perjury and under the laws of the state of Montana that  
the foregoing is true and correct.

DATED this 6 day of January, 2022.

LOCATION when signed: Mesa AZ

  
SCOTT LOCKWOOD

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## CERTIFICATE OF SERVICE

I, Rylee Sommers-Flanagan, hereby certify that I have served true and accurate copies of the foregoing Affidavit - Affidavit to the following on 01-12-2022:

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Electronically Signed By: Rylee Sommers-Flanagan  
Dated: 01-12-2022