

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON**

PEOPLE NOT POLITICIANS OREGON;  
COMMON CAUSE; LEAGUE OF WOMEN  
VOTERS OF OREGON; NAACP OF  
EUGENE/SPRINGFIELD; INDEPENDENT  
PARTY OF OREGON; C. NORMAN  
TURRILL,

Plaintiffs,

v.

BEVERLY CLARNO, Oregon Secretary of  
State,

Defendants.

Case No. 6:20-cv-01053-MC

**SECOND DECLARATION OF C. NORMAN TURRILL**

I, C. Norman Turrill, declare:

1. I was a Chief Petitioner for Initiative Petition (“IP”) 57. I am currently the Chair of People Not Politicians Oregon (“PNP”).

2. PNP is a nonpartisan coalition of good government and civic participation groups dedicated to creating a more transparent, participatory and inclusive redistricting process in the state of Oregon.

3. On December 20, 2019, the Secretary of State verified 1,656 signatures submitted by PNP for IP 57 and began the ballot title draft process pursuant to Or. Rev. Stat. § 250.065 and Or. Rev. Stat. § 250.067.

4. On June 29, 2020, PNP requested that the Secretary of State take steps to ensure that PNP’s First Amendment right to participate in the initiative process was adequately protected during the Covid-19 pandemic. The Secretary of State took no action in response to PNP’s request. Specifically, the Secretary of State declined to modify signature requirements and made no adjustment to pre-pandemic requirements to account for the current exceptional circumstances and burdens on signature-gathering activities.

5. After the Court issued its preliminary injunction order in this case, PNP mailed an additional 200,000 petition packets to Oregon households to ensure that there would be a sufficient number of valid signatures for IP 57 after the Oregon Secretary of State discarded petitions that were not printed on 20-pound paper, were printed single-sided, or were not returned with an additional witness signature that was dated after the signatures of the petition signers.

6. Following the November 3, 2020, election, several of the nonprofit groups anchoring PNP have convened to restart discussions about the most effective strategies for ensuring a less partisan and more transparent redistricting process in Oregon. These options include advocacy to encourage public testimony to legislators about Oregon communities, support for reform legislation, and a 2022 ballot initiative to create an independent citizens redistricting commission.

7. Despite the ongoing pandemic, PNP is progressing towards the immediate filing of a new initiative. I recently worked with another coalition member to produce and circulate to the PNP Executive Committee an initial draft of a 2022 ballot initiative with technical changes to IP 57 that are needed to reflect a post-2021 timeline. The Executive Committee will discuss this draft and finalize a path forward in upcoming meetings.

Executed this 9th day of February, 2021, at Portland, Oregon.

I declare under penalty of perjury under the laws of the State of Oregon that the foregoing is true and correct.

  
C. Norman Turrill

## CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2021, I electronically filed the foregoing **SECOND DECLARATION OF C. NORMAN TURRILL** with the Clerk of the Court for the U.S. District Court of Oregon by using the CM-ECF system.

I certify that all participants in the case are registered CM-ECF users and that services will be accomplished by the CM-ECF system.

Dated: February 24, 2021

*/s/ Daniel Meek*

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INDEPENDENT PARTY OF OREGON,  
and C. NORMAN TURRILL