

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

TATI ABU KING and TONI HEATH JOHNSON,

Plaintiffs,

v.

JOHN O'BANNON, *in his official capacity as Chairman of the State Board of Elections for the Commonwealth of Virginia*; ROSALYN R. DANCE, *in her official capacity as Vice Chair of the State Board of Elections for the Commonwealth of Virginia*; GEORGIA ALVIS-LONG, *in her official capacity as Secretary of the State Board of Elections for the Commonwealth of Virginia*; DONALD W. MERRICKS, *in his official capacity as a member of the State Board of Elections for the Commonwealth of Virginia*; MATTHEW WEINSTEIN, *in his official capacity as a member of the State Board of Elections for the Commonwealth of Virginia*; SUSAN BEALS, *in her official capacity as Commissioner of the Department of Elections for the Commonwealth of Virginia*; ERIC SPICER, *in his official capacity as the General Registrar of Fairfax County, Virginia*; and SANDY C. ELSWICK, *in her official capacity as the General Registrar of Smyth County, Virginia*,

Defendants.

Case No. 3:23-cv-00408 (JAG)

**DECLARATION OF BRITTANY BLUEITT AMADI IN SUPPORT OF  
PLAINTIFFS' MOTION TO ENFORCE THE COURT'S ORDER**

I, Brittany Blueitt Amadi, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner at Wilmer Cutler Pickering Hale and Dorr LLP. I represent Plaintiffs in the above-captioned action. I am familiar with the facts set forth in this declaration. I am competent and willing to testify to the matters contained in this declaration.

2. I submit this declaration in support of Plaintiffs' Motion to Enforce the Court's Order.

3. Attached as Exhibit A is a true and correct copy of email correspondence between counsel for Plaintiffs and counsel for Defendants dated January 27 through April 22, 2026.

4. Attached as Exhibit B is a true and correct copy of correspondence between counsel for Plaintiffs and counsel for Defendants dated April 27 through May 20, 2026.

5. Attached as Exhibit C is a true and correct copy of a spreadsheet transmitted by counsel for Plaintiffs to counsel for Defendants on May 14, 2026, identifying offenses Plaintiffs contended should be removed from the Commonwealth's proposed list of disqualifying felonies. The spreadsheet reproduces the list Defendants provided on May 1, 2026 and adds analysis informed by the expert report of Professor Carissa Byrne Hessick (Dkt. 153-3). Present-day Virginia statutory felonies Plaintiffs contend should be excluded from Defendants' May 1, 2026 list are highlighted in red.

6. Attached as Exhibit D is a true and correct copy of a May 18, 2026 letter from counsel for Plaintiffs to counsel for Defendants.

7. Attached as Exhibit E is a true and correct copy of the Virginia Department of Elections webpage titled "Felony Convictions and Voter Eligibility," which was retrieved from the Virginia Department of Elections website at

<https://www.elections.virginia.gov/registration/felony-convictions-and-voter-eligibility/> on June 2, 2026. The document is submitted as it appeared on that date.

8. Attached as Exhibit F is a true and correct copy of the Virginia Department of Elections webpage titled “Election and Voter FAQ,” which was retrieved from the Virginia Department of Elections website at <https://www.elections.virginia.gov/registration/election-voter-faq/> on June 2, 2026. The document is submitted as it appeared on that date.

9. Attached as Exhibit G is a true and correct copy of the Virginia Department of Elections webpage titled “How to Register,” which was retrieved from the Virginia Department of Elections website at <https://www.elections.virginia.gov/registration/how-to-register/> on June 2, 2026. The document is submitted as it appeared on that date.

10. Attached as Exhibit H is a true and correct copy of the Virginia voter registration application, which was retrieved from the Virginia Department of Elections website at <https://www.elections.virginia.gov/media/formwarehouse/veris-voter-registration/applications/VA-NVRA-1-Voter-Registration-Application-rev-5-2024.pdf> on June 2, 2026.

11. Attached as Exhibit I is a true and correct copy of a June 4, 2026 letter from counsel for Plaintiffs to counsel for Defendants.

12. Attached as Exhibit J is a true and correct copy of email correspondence between counsel for Plaintiffs and counsel for Defendants dated June 4 through June 15, 2026.

13. Attached as Exhibit K is a true and correct copy of a document titled “VIRGINIA CRIMES APPLICABLE TO COMMON LAW FELONIES IN 1870,” which was retrieved from the Virginia Department of Elections website at <https://www.elections.virginia.gov/media/electionadministration/electionlaw/Virginia-Crimes->

Applicable-to-Common-Law-Felonies-in-1870.pdf on June 2, 2026. The document is submitted as it appeared on that date.

14. Attached as Exhibit L is a true and correct copy of a document titled “VIRGINIA CRIMES THAT MAY BE APPLICABLE TO COMMON LAW FELONIES IN 1870: REQUIRES INDIVIDUAL EVALUATION,” which was retrieved from the Virginia Department of Elections website at <https://www.elections.virginia.gov/media/electionadministration/electionlaw/Virginia-Crimes-Requiring-Additional-Evaluation.pdf> on June 2, 2026. The document is submitted as it appeared on that date.

15. Counsel for Plaintiffs requested a meet and confer regarding the issues raised in Plaintiffs’ Motion to Enforce the Court’s Order pursuant to Local Rule 7(E) on June 4, June 10, and June 13. Counsel for Defendants declined Plaintiffs’ requests to meet and confer.

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

Dated: June 18, 2026

/s/ Brittany Blueitt Amadi  
Brittany Blueitt Amadi (VSB No. 80078)  
Counsel for Plaintiff