

**IN THE UNITED STATES DISTRICT COURT  
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 TAJ MAHON-HAFT IN SUPPORT OF  
PLAINTIFFS' MOTION TO ENFORCE**

I, Taj Mahon-Haft, hereby declare:

1. I am over the age of eighteen and fully competent to make this declaration. I have personal knowledge of the facts stated herein and declare the following to be true and correct.

2. I am the director and co-founder of the Humanization Project (“THP”), a 501(c)(3) organization working to amplify, uplift, and engage individuals who have been impacted by the justice system. We do so by hosting in-person and virtual events, engaging in legislative reform efforts and community organizing, and producing research on the justice-impacted community. THP aims to help people connect with opportunities and answers at all stages of their experience with the justice system.
3. I have served as director since 2023. I also hold a PhD in Sociology from Washington State University, with a focus on inequality, criminology, and research methods.
4. Beyond my role at THP, I serve on the Virginia Coalition Against Solitary, the Expungement Council, the New River Valley Reentry Council, the Fines & Fees Advisory Board, and the Restorative Justice Legislative Coalition.
5. As director of THP, I lead policy initiatives and organizing efforts, conduct outreach with justice-impacted people, direct research, plan community events, train public speakers, and manage the majority of administrative tasks.
6. I oversee approximately fifty team members who regularly volunteer and are assigned specific roles and projects. Through one-on-one conversations with individuals, virtual and in-person events, our email list, newsletters, and social media posts, THP serves at least 5,000-7,000 unique justice-impacted people per year. In addition to our direct outreach and engagement, we share our resources with partner organizations to ensure our information can reach wider audiences.
7. THP was founded in Virginia, and the majority of the people we serve are in Virginia.
8. THP furthers its mission in part by providing voting resources to individuals returning from incarceration. Research and THP’s own experience both show that when returning

individuals can register to vote, they are less likely to re-enter the criminal justice system and more likely to make a positive impact in their communities. Voting is also a way for justice-involved individuals—who have deep personal experience with and a strong stake in the justice system—to meaningfully express their political views about laws that affect them. It is our goal to make the voting process more accessible and less discouraging for justice-impacted people.

9. THP circulates information about returning individuals' right to vote and voter registration methods both through one-on-one outreach with justice-impacted people and through information-sharing events. I have personally helped people with the voting rights restoration process multiple times and often refer individuals to external resources on voting rights and how to vote when those resources are available.
10. I understand that in *King v. O'Bannon*, the Court ordered the Commonwealth not to deny the registration of all individuals who were convicted of felonies besides those that were felonies at common law in 1870.
11. Since the order in *King v. O'Bannon*, I have had approximately two dozen conversations, in my capacity as director of THP, with different individuals who were previously disenfranchised due to felony convictions but believe they may be eligible to vote after the Court's order. All these individuals expressed confusion and uncertainty about whether they are now able to vote and how to register if they are able to vote. Some expressed fear about potential criminal liability if they attempted to register to vote but were later found to be ineligible, even where they had a good-faith basis to believe they were entitled to register to vote. Others worried that unsuccessfully attempting to register to vote would jeopardize their parole. Others expressed frustration at the unclear nature

of the process and decided they did not have the time to investigate and figure out how to register—given the lack of information available regarding similarly situated individuals.

12. None of the individuals I have spoken with have received any clarifying information about their eligibility or the voter registration process from the Virginia Department of Elections or their local registrar's office. None of the individuals have successfully registered to vote.
13. Based on these conversations and my own experience working with formerly incarcerated individuals, I believe that clear guidance outlining the exact process for registering to vote, identifying which felonies remain disqualifying, and explaining why certain convictions remain disqualifying would help ease some of this confusion and fear. I also believe the existing voter registration form, both paper and electronic, needs to be updated to reflect the change in eligibility. In the absence of such changes, I expect that confusion and fear will continue to prevent and discourage many individuals whose rights were restored by the *King v. O'Bannon* decision from registering to vote.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 17, 2026.



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Taj Mahon-Haft