

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
WESTERN DIVISION

Dakotans for Health, Rick Weiland, and  
and Adam Weiland,

Plaintiffs,

v.

Bob Ewing, Brandon Flanagan, Randy  
Deibert, Richard Sleep, and Eric  
Jennings, Lawrence County  
Commissioners, all sued in their  
official capacities,

Defendants.

Civ. \_\_\_\_\_

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**Declaration of Rick Weiland**

I declare under penalty of perjury:

1. Dakotans for Health is a South Dakota ballot question committee, and a healthcare advocacy network dedicated to improving healthcare and health outcomes.
2. I am the Chair of Dakotans for Health, and I manage Dakotans for Health with my son, Adam Weiland.

*Dakotans for Health v. Ewing*  
Declaration of Rick Weiland  
June 19, 2023  
Page 2

3. Dakotans for Health, Adam Weiland, and I engage in core First Amendment activities seeking political change, including petition circulation to place initiated measures on the ballot, and political action to pass those measures.

4. Plaintiffs drafted and are now, through our agents and employees, circulating petitions that seek to place on the November 2024 ballot initiated measures that would allow the people of South Dakota to choose to restore their *Roe v. Wade* rights, and to eliminate the state sales tax on food.

5. Plaintiffs use volunteer and paid circulators to circulate petitions to obtain signatures needed to qualify these measures for the ballot.

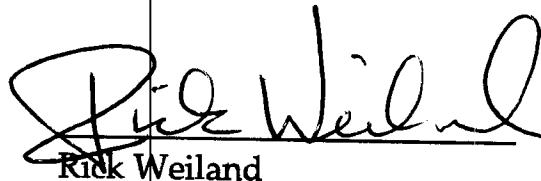
6. For the November 2024 election, 35,017 signatures are needed to place the *Roe v. Wade* initiated constitutional amendment on the ballot, and 17,509 signatures are needed to place the initiated law to eliminate the state sales tax on food on the ballot.

*Dakotans for Health v. Ewing*  
Declaration of Rick Weiland  
June 19, 2023  
Page 3

7. Our petition circulators have collected signatures at the Lawrence County Courthouse and Administrative Annex Building, and will continue to do so in the future.

8. The Lawrence County Political Activity Policy prevents us from having access to areas on what it calls the "Lawrence County Campus" where we believe we are entitled to have access to seek and obtain petition signatures.

I declare under penalty of perjury that the foregoing is true and correct.  
executed on June 19, 2023.



Rick Weiland