Brian Davis respectfully declares as follows:

1. I serve as a community organizer with the Northeast Ohio Coalition for the Homeless ("NEOCH") and have principle responsibility for our voting-rights assistance. I have personal knowledge of the matters about which I am testifying.

2. I previously executed declarations in conjunction with NEOCH’s challenge to Ohio’s voter-identification laws (ECF #102-4, #102-5, #311, #362-1). The purpose of the current declaration is to provide information related to the Social Security Administration’s (“SSA”) new rules for obtaining replacement cards and social-security printouts. These new rules have created additional challenges for people, including homeless and indigent people, in obtaining documentation to vote.

3. NEOCH is a non-profit charitable organization operating in the City of Cleveland. NEOCH is a coalition of service providers, housing activists, members, and homeless people. Approximately 10% of our members are homeless.

4. The mission of NEOCH is to organize and empower homeless and at-risk men, women, and children to break the cycle of poverty through public education, advocacy, and the creation of nurturing environments.

5. NEOCH administers a number of programs that serve homeless people. Among its advocacy objectives are ensuring that homeless people are registered to vote and reducing barriers that prevent homeless people from registering and voting. This includes assistance with obtaining identification to vote. We devote considerable resources to this assistance.
6. We see and assist approximately 23,000 homeless people in Cleveland each year. Between 20% to 30% of this population does not have any form of identification. The percentage in 2013 without ID is going up because of federal budget cuts. Those cuts harm the ability of local shelters to devote resources to assist individuals in obtaining ID. And about 78% of those whom we assist are African-American, and 7% are Latino.

7. One of the types of ID we help homeless people obtain is state-issued non-driver identification card (“state ID”).

8. To obtain a state ID card in Ohio, an individual must present multiple forms of proof of identification. For homeless and indigent individuals, the most common are the birth certificate and a social-security card or printout. It is not sufficient to present one of these to obtain the state ID card; both must be presented.

9. In other declarations in this case, I have testified about the difficulty in obtaining birth certificates.

10. Until June 24, 2013, it was relatively straightforward to obtain a social-security printout. An individual could simply go to the SSA offices and execute an affirmation attesting to his or her identity. He or she would also have to present a birth certificate.

11. Through our advocacy and assistance work on behalf of the homeless, we recently became aware, however, that effective June 24, 2013, the SSA changed the requirements for obtaining a replacement social-security card or social-security printout. The SSA now requires individuals to present certain specified forms of identification to obtain the card or printout. A letter from the SSA outlining this change is attached to this declaration as Ex. A, and a fact sheet containing information for advocates is attached as Ex. B.

12. Besides a state ID, the SSA will also accept the following forms of ID to provide a replacement card or printout: a U.S. driver’s license, a U.S. passport, an employee card, a student ID card, a health-insurance card, and a U.S. military card. (The preceding information is available on the SSA’s website, attached as Ex. C.) Homeless and indigent people, however, are unlikely to have these forms of ID. They are highly itinerant and so, even if they had these forms of ID at one point, may have lost them along the way. These other forms of ID, moreover, often require a state ID, so those who lack state ID to begin with are unlikely to be able to obtain these other source documents.

13. With its new ID requirement, the SSA puts homeless and indigent people who lack ID in a catch-22, and effectively shuts them out of the voting process: to get a state ID, an individual needs a social-security card or printout, but to get that card or printout, he or she needs an ID.

14. The new SSA requirements have made it more difficult for people, including homeless and indigent people, to obtain the state ID that would permit them to vote a regular ballot. The chances are higher, therefore, that they will have to cast a provisional ballot in future elections. And being forced to cast a provisional ballot increases the likelihood that one’s vote will not be counted.
15. In light of the greater difficulty obtaining state ID cards and the resulting likelihood of having to cast provisional ballots, the *NEOCH* Consent Decree takes on added significance. Its continuation is imperative to protecting SSN-4 voters’ right to vote, including by having uniform rules that ensure such provisional ballots are counted.

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

Executed on July 11, 2013.

[Signature]

Brian Davis
CERTIFICATE OF SERVICE

I certify that on July 11, 2013, my office filed the foregoing document using the Court’s online-filing system, which will send a copy of the foregoing to all counsel of record.

/s/ Subodh Chandra
One of the Attorneys for Plaintiffs