

DECLARATION OF BRIAN DAVIS PURSUANT TO 28 U.S.C. §1746

Brian Davis respectfully states as follows:

1. My name is Brian Davis. I am the Executive Director of the Northeast Ohio Coalition for the Homeless ("NEOCH").
2. 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 ten percent of our members are homeless.
3. There are many reasons why people are homeless. According to the National Coalition for the Homeless, one common reason is the growing shortage of affordable rental housing. Another common reason is the increase in poverty over the past 20-25 years which has been caused, in part, by eroding employment opportunities for large segments of the workforce and the declining value and availability of public assistance. Other reasons include the lack of affordable health care, domestic violence, mental illness and addiction disorders.
4. The mission of the 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, including a voice mail system, a housing assistance program, a street newspaper and a legal assistance program. Over the last year, NEOCH has also helped hundreds of homeless people register to vote.
6. We see approximately 25,000 homeless people in Cleveland each year. Between twenty to thirty percent of that population does not have any form of identification depending on

birth certificate fund availability for any given year. The cost of a birth certificate in Cleveland is nineteen dollars.

7. A birth certificate is the basis for all forms of identification. However, there is no national standard for the issuance of a birth certificate. In fact, a few states make it nearly impossible for a homeless person to get a legitimate copy of their own birth certificate.

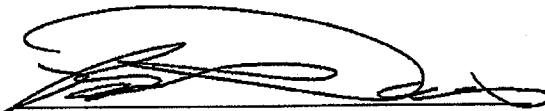
8. It is very difficult to obtain identification in the post-September 11th world, particularly for those without a home. In some instances it is easier to travel to one's place of birth in order to obtain a birth certificate, but that is often not an option for homeless people.

9. The process of obtaining a birth certificate is expensive and time-consuming. Some homeless people must wait six, eight or ten months to receive a birth certificate.

10. Because many homeless people do not have identification or lose their identification, and because of the expense and delay associated with obtaining such identification, the new voter-identification laws in House Bill 3 will effectively deprive a substantial number of homeless people of their right to vote.

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

Executed on October 18, 2006



Brian Davis