

**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. 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.
4. NEOCH provides advocacy services for homeless people, including its homeless members, in the areas of housing, health care, economic justice and civil rights. A list of NEOCH's Homeless Advocacy Initiatives for 2005-2010 is attached.
5. As stated in paragraph 13 of the attached list, one of NEOCH's Civil Rights Initiatives is to "[w]ork to assure that all homeless people are registered to vote, and reduce barriers to registering and homeless people actually voting. This includes assistance with obtaining identification in order to vote."
6. NEOCH has helped hundreds of homeless people, including some of its homeless members, register to vote and obtain the necessary identification to register to vote.
7. We see and assist approximately 25,000 homeless people in Cleveland each year. Between twenty to thirty percent of that population does not have any form of identification.
8. A birth certificate is the basis for all forms of identification. However, the process of obtaining a birth certificate is expensive and time-consuming. 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. Even homeless people who have identification papers typically find it difficult to maintain and keep track of those documents.

10. In my experience, almost all homeless people have Social Security numbers.

11. NEOCH has homeless members who do not have the identification required by House Bill 3 but do have Social Security numbers.

a. Anthony Willis has been a member of NEOCH since on or before October 18, 2006.

b. James Caldwell has been a member of NEOCH since on or before October 18, 2006.

c. Edward Rinn has been a member of NEOCH since on or before October 18, 2006.

d. Micky Trammell has been a member of NEOCH since on or before October 18, 2006.

12. NEOCH also has homeless members who do have the identification required by House Bill 3.

a. Cindy Miller has been a member of NEOCH since on or before October 18, 2006, and just completed in March 2008 her term as a Board member of the Coalition.

b. Gloria Wilson Jones has been a member of NEOCH since on or before October 18, 2006.

- c. Tony Gentile has been a member of NEOCH since on or before October 18, 2006.
- d. Margaret Buzas has been a member of NEOCH since on or before October 18, 2006.
- e. Trina Morgan has been a member of NEOCH since on or before October 18, 2006.

13. The voter identification laws have harmed, and will continue to harm, NEOCH's members who do not possess the required identification but do possess a Social Security number, and who will face the challenges described in this lawsuit when attempting to exercise their right to vote.

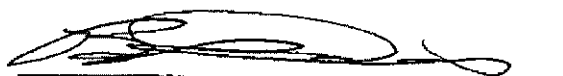
14. The voter identification laws have harmed, and will continue to harm, NEOCH's members who do possess the required identification, and who will face the challenges described in this lawsuit when attempting to exercise their right to vote.

15. The voter identification laws have harmed, and will continue to harm, NEOCH's ability to carry out its stated goal of working to "reduce barriers to homeless people actually voting."

16. NEOCH's organizational interest is negatively affected by the Defendants' enforcement of the voter identification laws.

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

Executed on April 3, 2008.

  
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Brian Davis



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# Northeast Ohio Coalition for the Homeless

## HOMELESS ADVOCACY INITIATIVES

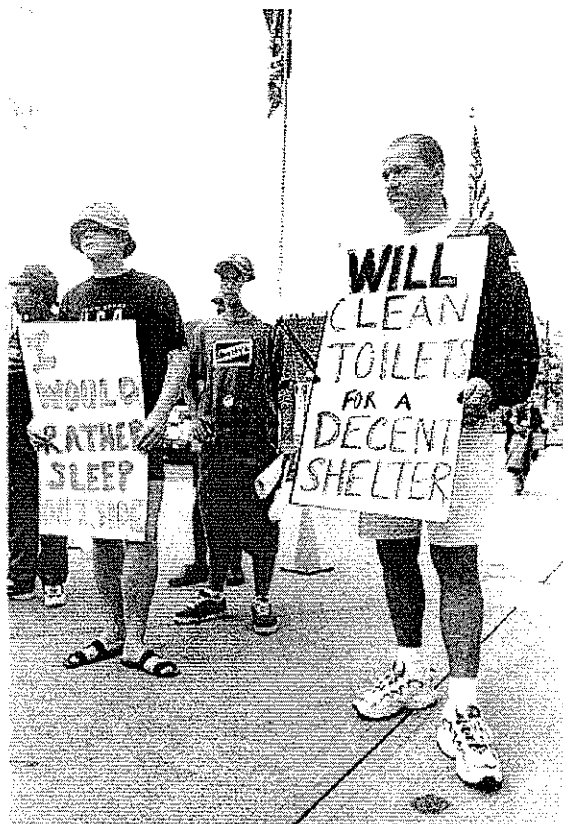


Photo by Steve Cagen

### ■ *Internships in Advocacy*

### Advocacy Priorities from 2000

### Goals for the Northeast Ohio Coalition for the Homeless

2005-2010

#### General Principles:

1. NEOCH should confine its advocacy efforts to local positions since state and federal advocacy will be nearly impossible to see any results.

2. Over the next four years it is anticipated that there are going to be large cuts to homeless funding from the state and national governments. Since there is unlikely to be any ability to change these budget shortages, NEOCH should not get involved in advocacy around reductions in funding.
3. NEOCH will concentrate on four areas and will attempt to maintain and where possible improve local services in the area of housing, health care, economic justice and civil rights.

#### Housing:

4. Housing: NEOCH will assist with monthly housing preservation meetings to assure that the community is aware of possible foreclosures or reductions in affordable housing.
5. Housing: Work on a local strategy for those leaving the corrections system and enter shelter and especially those with sexually based offence.
6. Housing: Continue to monitor the three large subsidized housing programs locally including Public Housing, and both forms of the Section 8 program to ensure no loss in affordable housing.
7. Housing: Work with other groups in the community to develop alternatives to shelter in the community for those experiencing a housing emergency.
8. Housing: Expand the marketing of the website [www.housingcleveland.org](http://www.housingcleveland.org) to assure that all subsidized landlords are participating, and that the homeless community is aware of the website. The long term goal should be to host a center in which homeless people can come to get referrals and use the various websites in the community.

#### Civil Rights:

9. Civil Rights: Monitoring and documentation of civil rights violations or violence against homeless people. Reiterate with the Cleveland Police the agreement preventing harassment for purely innocent behavior.
10. Civil Rights: Develop a set of standards for local shelters to ensure that NEOCH is not excluded from the shelters, a consistent process for grievances, and some standard for dissemination of information about the programs.
11. Civil Rights: Protection of the privacy rights of homeless people in reporting confidential information to enter the local shelters.
12. Civil Rights: Pass legislation that would make attacks on homeless people a hate crime.
13. Civil Rights: Work to assure that all homeless people are registered to vote, and reduce barriers to registering and homeless people actually voting. This includes assistance with obtaining identification in order to vote.

**Health Care:**

14. Health Care: Work with all local public entities to assure access by homeless people to alcohol/drug services, mental health and emergency medical care.
15. Health Care: Work to develop a better approach to homeless people with a substance abuse problem. This needs to involve better use of existing resources and the expansion of resources.
16. Health Care: NEOCH will work with the Center for Community Solutions to apply for a comprehensive health care grant to serve homeless people in collaboration with all the hospitals and health service providers.
17. Health Care: NEOCH will work with other local advocates to develop a better strategy for assistance to homeless people with a mental illness. This should include expansion of drop in services and specialized care to those without disabilities.

**Economic Justice Issues:**

18. Economic Justice: Work with other local advocates to pass legislation to protect the rights of those who work at temporary labor companies including the expansion of the job training opportunities developed specifically to serve homeless people.
19. Economic Justice: Demand reform of Social Security Disability, Medicare and Medicaid hearings so that those with a mental illness and a physical disability do not have to wait extended periods of time for a hearing on their cases.

**Recent Additions Based on Advocacy Meetings and events over the last year**

1. Disaster Plan: We need a plan for evacuating homeless people in the event of a natural or man made disaster within the Downtown area of Cleveland.
2. Empowerment: Develop a representative body of homeless people to divide up local resources and set policy for the social services. This should include the creation of leaders who are currently homeless.
3. Shelter overcrowding: Assure that the overflow shelters are not closed without a suitable replacement put in place to accommodate everyone in need of a place to sleep. The

Coalition should also look at the extent of suburban and even neighboring counties are utilizing the homeless services, but not providing any funds.

4. Outreach: With recent removal of homeless people from the airport and the Convention Center, we need better coordination of outreach efforts. The City needs one entity to turn to in order to dispatch social service help to a person in need instead of law enforcement. There needs to be some coordination of the churches that come downtown to provide a meal especially on Sunday night and holidays.
5. Transportation: With the increases in bus fare and the decreasing availability of bus passes, the Coalition should investigate ways to make transportation of homeless people to meetings with landlords, jobs, health care meetings, and classes more readily available.