DECLARATION OF BRIAN DAVIS, EXECUTIVE DIRECTOR, NORTHEAST OHIO COALITION FOR THE HOMELESS

I, Brian Davis, being of sound mind, declare as follows:

1. My name is Brian Davis.

2. I am the Executive Director of the Northeast Ohio Coalition for the Homeless (NEOCH), and have led the Coalition for over 14 years.

3. NEOCH is headquartered at 3631 Perkins Avenue #3A, Cleveland, OH 44114.

4. NEOCH is a non-profit, non-partisan membership organization. Approximately ten percent of its members are homeless. Most of those members are also eligible to vote in Ohio.

5. NEOCH provides services to approximately 20,000 homeless people each year.

6. Membership in the organization is available to individuals and organizations who share its goals. Members typically pay yearly dues of $25 for individuals and $50 for organizations. There is a discount for very low income and homeless people.

7. Members must renew their membership on a yearly basis by completing a form and sending it into NEOCH that states their support for the mission of the Coalition.

8. NEOCH's mission 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. One of NEOCH's goals is to work to assure that all homeless people are registered to vote, and reduce barriers to registering and homeless people actually voting.

9. In furtherance of its mission and goals, NEOCH plans to run shuttles to the Boards of Elections during the time period of September 30, 2008 through October 6, 2008, in order
to help homeless individuals to register and vote absentee. NEOCH expects to serve approximately 2,000 homeless voters, including but not limited to its members, by this service.

10. NEOCH has administered non-partisan registration activities and campaigns to get homeless people to vote since its founding in 1989.

11. Homeless individuals experience significant barriers to voting that can be minimized or alleviated by registering and immediately requesting or casting an absentee ballot. For example, many homeless individuals lack transportation, so making one trip to register and a second trip to vote poses a substantial hardship. Many homeless people need to change their address having recently lost their homes, and most have a difficult time receiving mail, such as an absentee ballot, inside the local homeless shelters. NEOCH intends to remove those barriers by providing free transportation and assistance during the 5-day window between the beginning of absentee voting and the close of registration.

12. NEOCH has previously engaged in litigation to protect voting rights of homeless individuals, including its challenge to the structure of Ohio’s voter identification requirement in *NEOCH v. Blackwell* (2006).

13. Members of NEOCH support its mission and voter mobilization activities. As such, members are civic activists with a strong interest in voting, efficient and fair elections, and equal access to the ballot.

14. Some NEOCH members, in particular homeless members, wish to themselves register between now and October 6, 2008 and vote early, or help others register and vote early for the November 4, 2008 election. Due to the pending mandamus case filed by Rhonda Colvin and C. Douglas Moody, and the opinion of some Ohio county prosecutors to their
boards of elections, NEOCH and its members are fearful that the absentee ballots of newly registered voters such as themselves and those they serve may not be counted.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed this _18th day of September 2008 in Cuyahoga County, Ohio.

[signature]

_Brian P. Davis_______[print name]