

## **DECLARATION OF LAWRENCE BRESLER**

(pursuant to 28 U.S.C. § 1746)

I, Lawrence Bresler, hereby declare as follows:

### **Personal Background**

1. I am over the age of 18, and I make this declaration based on my personal knowledge.
2. I live in Cleveland, Ohio.
3. I have over 40 years of experience organizing protests, as well as doing non-profit management and community organizing. I also currently serve as an adjunct professor at Case Western Reserve University School of Applied Social Sciences teaching classes on Poverty Strategies for Social Workers, Community Practice Policy, Analyzing and Changing Social Policy, and Macro Practice and Policy Skills, and undergraduate courses on child poverty and community organizing.
4. I currently work, unpaid, as the Executive Director at Organize Ohio. I started with Organize Ohio and as the Executive Director in 2002. I took time off from Organize Ohio from 2008-2010 to work as the Director of the Poor People's Economic Human Rights Campaign. Though that is a national organization I was working out of Cleveland at that time.
5. Organize Ohio is a non-profit located on the Near West Side of Cleveland, and was formed in 1998. The mission of Organize Ohio is to advance and encourage community organizing as a strategy for progressive change in Ohio. Organize Ohio strives to build a system of support for community organizing efforts across the state by bringing together groups and organizations. A central part of community organizing is working with

groups to communicate their messages to the appropriate parties in order to affect community and societal change.

### **Effect of Regulations and Delay on Organize Ohio's Planning Process**

6. Organize Ohio applied for a parade permit using the general Parade Permit Application on March 16, 2016. This application included our original proposed route that started at E 55<sup>th</sup> St. and Euclid Ave. and ended at Tower City.
7. We received a call from the city about 5-7 days later saying they would be making decisions on the permits two weeks before Convention. It is my understanding that other organizations who submitted permits got similar calls.
8. That permit application was never acted on. The city did not grant or deny us any permit.
9. The City held a press conference on May 25, 2016 outlining some new parade requirements. Though I did not attend, I watched it live. I found the new requirements totally unacceptable (as explained further below) and, together with two other people, wrote a press release outlining our complaints, which we sent to TV stations, WCPN, and the Plain Dealer by email approximately half an hour after the City press conference finished. Channels 3, Channel 5, and Channel 8 followed up by interviewing us, and Channel 5 published the press release on their website.
10. We were told by the city that they would notify us by phone of the date that we could file a new permit application, and that priority would be given in the order the old applications were received. When the City did notify us, they granted us 24 hours to submit the new permit application or lose our priority.
11. The new permit application did not allow us the option of having a rally and parade – it forced us to choose either one or the other. So, when I filled out the new application, I

did not mark any boxes as the application requested, but rather stated that we were maintaining our former request and that we were sending this new permit application for the sole purpose of maintaining our place in line in the permit approval process.

12. The new permit application also allowed only one parade route, a route that is unacceptable to Organize Ohio for purposes of expressing the message we want to convey. It also allowed marches of only 50 minutes, and imposed other impractical limitations that will severely limit our march. I discuss these issues further below.
13. This new permit application was supposed to be submitted online by clicking a link on the City's website. However, the link did not work; when I clicked on the link, nothing happened. So, I sent the materials to the email address that I saw on the website, all before the 24-hour deadline in order to maintain our priority.
14. Our march has a projected attendance of 5,000, with groups and individuals traveling from across the country to attend our march. We have based this estimate on the attendance at a similar march done in 2008 at the RNC in St. Paul, Minnesota (March for Our Lives, organized by the Poor People's Economic Human Rights Campaign), as well as on a realistic assessment of our outreach capacity.
15. Many groups and individuals are travelling from across the state of Ohio, as well as from different parts of the country. Examples of groups from coming from other parts of the country include The Refuge from Florida (30 people), the Poverty Initiative from New York City, Women in Transition from Louisville, the Michigan Welfare Rights Union from Detroit, and the Poor People's Economic Human Rights Campaign from Philadelphia.

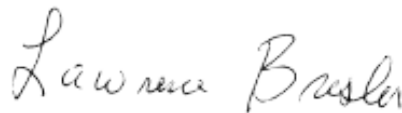
16. We have over 20 partner organizations for the End Poverty Now march. These include Organize Ohio's four partner organizations: Northeast Ohioans for Budget Lending Equality, United Clevelanders Against Poverty, Shaker Square Alliance, and Ohio Fair Lending Coalition, all of which are independent and self-governing, yet supported and coordinated by Organize Ohio. Additional partner organizations for the march are Cleveland Jobs for Justice, American Friends Service Committee, InterReligious Task Force on Central America, Northeast Ohio Coalition for the Homeless, Cleveland Peace Action, Cleveland Environmental Action Network, Poor People's Economic Human Rights Campaign, Single Payer Action Network Ohio, Workers United, Common Good Ohio, Cuyahoga County Black Lives Matter, Workers World Party, A Peace of Mind, Carl Stokes Brigade, El Centro, Greater Civil and Human Rights Coalition, Stop Targeting Ohio's Poor, Cleveland Homeless Congress, Peace in the Hood, and Cleveland Percolator.
17. The City's delay in approving our permit has hindered our ability to finalize planning and publicity for the event. As of now we are only able to publicize the (planned for) date of the event but not the location. This is very difficult for us and our supporters.
18. Organize Ohio is also expending time and energy to find lodging for march attendees. We are contacting numerous individuals and churches who may be able to host people. We are currently searching for lodging for approximately several hundred people, though that number is constantly increasing. We also may soon need to give some financial support to various churches so that they may compensate staff to provide security for attendees' possessions left in the building during the day.

19. There are 28 partner groups that are part of the march planning. We began meeting in September, and our planning meetings consist of 25-35 individuals on average. Any substantial decisions are made by this planning group by consensus, whenever feasible, and by a simple vote if we cannot reach consensus.
20. The restrictions and confusion surrounding the permit process have taken away my and my organization's time, energy, and ability to work on other important efforts such as securing housing for those traveling from out of town, doing community outreach, and fundraising.
21. The City's designated parade route will not allow us to convey our message. It is crucial to our message that the march begins on the east side. Our march is a march to end poverty and the east side of Cleveland has the greatest amount of poverty. Additionally, July 18<sup>th</sup>, the day we intend to march, is the 50<sup>th</sup> anniversary of the Hough riots. We hope to march along the edge of the Hough neighborhood, as our proposed route does, to commemorate this anniversary.
22. We also have a desire to march through a central part of Cleveland-- with people, traffic, commercial areas, and houses-- to most effectively spread our message. These are all things the City's official parade route lacks.
23. The City's restriction prohibiting vehicles of any kind from being used in the march, including to pick up people who are tired or to serve as water distributors, harms our group. We intend for our march to have 5,000 participants of diverse ages and abilities, some of whom may need water or assistance during the march.

24. The City's restriction on the duration of marches to just 50 minutes will not allow us to fully convey our message. Due to our projected attendance of 5,000 people, it is highly unlikely that we will be able to complete the march in the given time frame.
25. Additionally, we are harmed by the City's regulation that we must start the march within 10 minutes of our assigned start time or risk forfeiture of our ability to march. This is impractical for a group of our size and is out of our control, because, especially given the limited time to march, the previous march may not be cleared from the route.
26. There is no provision for having any rallies either before or after the marches. Our intent has always been to have a rally first, with many individuals speaking, to drum up momentum for the march. Without a rally, our message will not be as strong.
27. On the Monday we hope to have our march, the city regulations limit marches to set times between 2-4 pm. These designated times are not the times that the delegates are to be at the convention, so we will not be able to address our intended audience. Additionally, because the designated time for marches that day is so short, it is very likely that our march and the message we convey will be competing with another very similar march slated to take place the same day. Many of that march's participants have expressed their desire to participate in our march and vice versa, but they may be hindered from doing so because there is no time for a break between the two marches.

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

Executed on June 13, 2016.

A handwritten signature in cursive script that reads "Lawrence Bresler". The signature is written in black ink and is positioned above a horizontal line.

Lawrence Bresler