<u>DECLARATION OF RAY WOOD</u> (pursuant to 28 U.S.C. Section 1776)

My name is Ray Wood and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I declare the following:

Personal Background

- 1. I was born in Toledo, Ohio in 1953 and spent much of my childhood there.
- 2. I am African-American.
- 3. I have long been a member of the United Automobile Workers (UAW) labor union and am currently President of UAW Local, who represents employees of General Motors.
- 4. About seven years ago, I joined the Toledo Branch of the NAACP ("NAACP Toledo").
- I joined the NAACP because I felt that the UAW and the NAACP shared many important roots. Walter Reuther, a white union leader in the UAW, marched together with Martin Luther King, and Dr. King had intimate connections with the UAW. Dr. King's first "I Have a Dream" speech was given in Detroit. When Dr. King gave that speech in Washington D.C., Walter Reuther was one of a handful of people standing with Dr. King.
- 6. I also felt that many of the guidelines and precepts of the UAW were similar to those of the NAACP. Some of my relatives were also in the NAACP.
- 7. About four years ago, I became the First Vice President of NAACP Toledo.
- 8. Last year, I became the President of NAACP Toledo.
- 9. NAACP Toledo has about 700 members.

Get-Out-The-Vote Efforts

10. I think it is very important for the African-American community to vote. If we want to make a change, we have to be a part of the process. For so many years, African

- Americans were discouraged about voting but all of that changed in 2008. We continue to face challenges and need to express our voice.
- It is also important because many people who vote also take the time to learn about the issues and the candidates. This leads to better education about the issues in the African-American community.
- 12. In 2008 and 2012, I was involved in get-out-the-vote efforts on behalf of the NAACP, first as a member, then as First Vice President.
- 13. I was also personally involved with other get-out-the-vote efforts in 2010, but on behalf of the UAW, not the NAACP.
- 14. NAACP Toledo partnered with about a dozen other organizations in Toledo to provide transportation to the polls.

Souls to the Polls

- 15. I would estimate that hundreds of voters in Toledo were taken to the polls mainly on Sundays – in 2008 and again in 2012. Those voters were primarily African-American.
- 16. We also partnered with about 80 to 90 African-American churches in Toledo to provide transportation for their congregations. Many of those churches contributed vans—there were probably about a dozen vans.
- 17. There are many African-American churches in Toledo within a one-mile radius you might have over a dozen churches. Many of them are small, while others are larger and more established.
- 18. We passed out leaflets to all of these churches. These leaflets listed the established days and times that we were taking people to the polls and the contact information of the designated group responsible for transportation in that area.

- 19. The leaflets also explained how people could sign up to be taken to the polls if none of those times worked for them. We tried our best to accommodate people who could not make those times by finding volunteer drivers. It was easier to find drivers on weekends.
- 20. I personally drove a van in 2008 to take people to the polls. I made about three trips to the polls, and took about 50 people to the polls on Sundays.
- 21. In both 2008 and 2012, on behalf of the NAACP I personally went to about 30 or so African-American churches to pass out leaflets.
- 22. In 2008 and 2012, I also went to maybe about a half dozen African-American churches to speak to the congregations about the transportation that we were providing after church services. Maybe about 40 or so people, including pastors, were tasked with speaking to African-American congregations about the transportation availability after church services.
- 23. One of those established days was Sundays after church services. We focused our efforts on Sundays because so many African Americans in Toledo wanted that, and it was so much easier to coordinate transportation and drivers on Sunday.
- While we provide transportation on Saturday, there was a much bigger focus on Sunday.

 Traditionally, in the Toledo African-American community, Sunday has always been the day of the week when everyone gets together. Many older and elderly African

 Americans simply do not leave the house all week except on Sundays. Many generations of African Americans get together for church, and then gather together for the Sunday meal. For instance, on Sundays, you simply cannot get into any soul food restaurant in Toledo; the lines are out the door. The movie "Soul Food," which is about an African-

- American family that gets together for Sunday dinner every week, really captures the African-American tradition in Toledo.
- 25. Sunday was a focal point also because many churches already provide transportation to take people to church, and carpools are also arranged so that everyone is together.
- 26. I recall that multiple Sundays were available for voting in 2008. I personally observed a very high percentage of African Americans standing in long lines in 2008 on Sundays.
- 27. NAACP Toledo believes strongly in consistent voter engagement not just in presidential elections. Gubernatorial and local elections are just as important if not more important than presidential elections.
- 28. If Sunday voting were allowed in 2014, we would continue to provide transportation on Sundays.
- 29. Without Sunday voting, the African Americans I've worked with in Toledo will be confused, because they have become accustomed to it. A substantial number of people will miss the opportunity to vote. I think we need the same early voting hours in every election because then people know what to expect and won't get confused. When you do the same thing consistently at every voting event, people will lock in on that.
- 30. Voting by mail is not acceptable to many of the African Americans that I've personally spoken with. They don't think their vote is being counted. When they go to a machine, they can actually feel like their vote is counted. They are hesitant to vote by mail. In the African-American community in Toledo, the mail system is not one of the venues where they feel comfortable or feel like it is an option for them.
- 31. "Souls to the Polls" has definitely become a part of African-American culture in Toledo.

Case: 2:14-cv-00404-PCE-NMK Doc #: 18-10 Filed: 06/30/14 Page: 5 of 6 PAGEID #: 392

32. We definitely need more than one Sunday, because then people are not pressured into a single event on Sunday. That is why early voting is so important, because we need multiple opportunities to vote, and events such as illness or weather can prevent you from voting on a single available day like Election Day. When we had multiple Sundays in 2008, it was much easier for us to coordinate "Souls to the Polls" among the 80-90 African-American churches because those activities were spread out. In 2012, I felt a lot more pressure and under the gun.

33. Evening voting is also especially important. Some people simply can't vote during their lunch break or on their way to work. As a union leader, I know that there are many people with hourly wage jobs who cannot vote from 9 a.m. to 5 p.m. and do not have the time to vote during their lunch break.

Golden Week

- 34. We also made people aware of Golden Week and that they could register and vote at the same time. We set up tables at various places in primarily lower-income areas, like shopping centers, parking lots, McDonald's, and if they weren't registered to vote, we gave them the materials to do it. We purposefully used the term "Golden Week" to help people realize that this was a good opportunity.
- 35. NAACP Toledo and other organizations also provided transportation to the polls during Golden Week on several days.
- 36. About four out of ten people that we talked to did not know that they had to update their registration when they moved. Many people still don't know this. People in the African-American community in Toledo move around a lot, especially after 2008 when the

Case: 2:14-cv-00404-PCE-NMK Doc #: 18-10 Filed: 06/30/14 Page: 6 of 6 PAGEID #: 393

economy crashed. Many young people moved back home, and many people moved in with their relatives to save money.

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

Executed on June 19, 2014.

Ray Wood

Ray Wood