

**DECLARATION OF DALE SNYDER**

My name is Dale Snyder 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 and raised in Cleveland, Ohio.
2. I obtained a Bachelor of Science in Business Administration at David N. Myers University, a Diploma of Theology and Black Church Studies at Ashland Theological Seminary, and Supervisors Management Certifications at NC State University. I have also obtained several Certifications in Construction through the Ohio Laborers Training School.
3. I have served in the United States Army as a Chemical Operations Specialist.
4. I have been the Senior Pastor of Bethel African Methodist Episcopal Church (“Bethel AME”) in Columbus, Ohio, since 2007.

**The African Methodist Episcopal Church**

5. The AME Church has a long and unique history. It was born as a protest against slavery – against the dehumanization of African people, brought to the American continent as labor. It was founded in 1793 by Richard Allen and other free blacks who were founding members of the Free African Society, who left the Methodist Episcopal Church because of its segregationist policies, including forcing blacks to sit in separate galleries during church services.

6. The AME Church is the first major religious denomination in the western world that developed because of sociological rather than theological differences, and the first African-American denomination organized and incorporated in the United States.
7. In the 19th century, the AME Church of Ohio collaborated with the Methodist Episcopal Church, a predominantly white denomination, in sponsoring the second independent historically black college, Wilberforce University, in Ohio.
8. The Mission of the AME Church is to minister to the spiritual, intellectual, physical, emotional, and environmental needs of all people by spreading Christ's liberating gospel through word and deed. At every level and in every local church, the AME Church engages in carrying out the spirit of the original Free African Society out of which the AME Church evolved: that is, to seek out and save the lost, and serve the needy.
9. The AME Church structure is as follows: The General Conference is the supreme body of the AME Church, comprised of bishops and other ministerial and lay delegates from around the country, meets every four years, and is based in Tennessee. The Council of Bishops is the executive branch of the AME Church and provides general oversight, and typically meets annually. Bishops appoint presiding elders, who supervise the preachers in a presiding elder's district – we are in the Third District, which spans across three states. Pastors receive an appointment to a local AME church on the recommendation of the presiding elder and with the approval and final appointment of the bishop.
10. The Bethel AME Church in Columbus, Ohio has over 200 members, and its congregation is predominantly African-American.

11. The neighborhood surrounding Bethel AME is also predominantly African-American, and has very high rates of poverty. People in the neighborhood are very transient – many people only stay around for about 6-8 months.
12. Bethel AME believes strongly in the importance of civic engagement by the African-American community, because the right to vote is a precious treasure. Our African-American ancestors in the faith fought, sacrificed, and in some cases, gave their lives to secure this right.
13. Many of the members of Bethel AME marched to get the right to vote and were part of the Civil Rights Movement.
14. That is why Bethel AME believes strongly in encouraging African Americans in our congregation and in our community to vote.

**Souls to the Polls and Other GOTV Work**

15. Bethel AME strives to help people vote in every election.
16. The presiding elder for my district typically organizes a Voter Registration Campaign, where ministerial and lay persons from local AME churches gather to be trained on Get-Out-The-Vote, voter registration, neighborhood canvassing, phone banking, and voter verification. About 20-30 people from Bethel AME typically attend this training.
17. During Golden Week – the first week of the early voting period when you could register and vote at the same time – Bethel AME walked the neighborhood and registered people to vote. We specifically told people that they were eligible to vote the same day that they were registered at the Board of Elections. This was very important especially because people in the neighborhood are so transient, and so have to update their registrations.

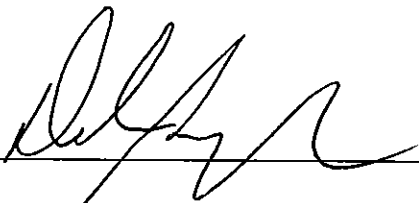
18. Bethel AME also conducted "Souls to the Polls" voting drives on Sundays, including in the 2010 elections. After Sunday morning service when early voting was available, Bethel-AME would make several vans available to take our congregants to the polls.
19. In 2012, I also coordinated "Souls to the Polls" voting drives among other churches, including five AME churches in Columbus and several other African-American churches. I believe we had about 29 vans available among all the churches.
20. "Souls to the Polls" was critical to helping African Americans in my congregation and my community to vote. Many of them cannot vote during regular business hours because they cannot get off of work.
21. During the 2012 elections, there was only one Sunday available for early voting. On that Sunday, I saw long lines of voters in my community, most of whom were African-American.
22. Without "Souls to the Polls," many of the people around the church and poor neighborhoods won't be able to exercise their right to vote because of the lack of transportation, babysitting, and lack of information about the important issues on the ballot.
23. Early voting has become very important to the African Americans in my congregation and community. It has allowed people to make arrangements for babysitters to vote on their days off work. It allows people to arrange times to pick up their loved ones who may be at a nursing home or homebound. Early voting also eliminates the time it takes for one to vote. The people in my community remember waiting in the long lines when we had to vote in a single day on Election Day.

24. "Souls to the Polls" is important to the African Americans in my congregation and community. It is a way for family members across 2 and 3 generations to vote together. As we take bus rides to the polls, we share the stories of the sacrifices that people have made to give us the right to vote. We share with the younger generation of voters what Jim Crow was like. We sing freedom songs on the way to the polls. It is a sense of pride and honor that most of our young people don't get to experience living here in America. Many of our young people are discouraged and won't participate in the electoral process unless older generations encourage them.
25. Over the last few years, "Souls to the Polls" has become a cultural fixture and a tradition among the African-American churches in my community. It is a way for the Christian community to exercise their faith by sharing their civic and voting experiences with members from the community and the church. This is Christian faith in action because we know that if we can get more people to vote, chances are we will get elected officials to hear our concerns. We share a meal. We share our hearts. We talk about the concerns of the community, the issues on the ballot and we share our hopes and dreams of a better America.
26. Golden Week is also important to the African Americans in my congregation and community. Golden Week allowed younger voters to register and vote the same week and it also helped those who were recently released from prison who may not know they had a right to vote, to register to vote and vote in the same week.
27. Evening voting has helped those individuals in my congregation and community who work during the day and do not have vacation or sick time that can be used to vote at the polls.

28. Bethel AME wants to continue doing "Souls to the Polls" and helping people vote during Golden Week and the evenings but won't be able to because of the recent early voting cutbacks. --

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

Executed on April 25, 2014.



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Reverend Dale Snyder