

**DECLARATION OF JAMIE SIMPSON**

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

**Personal Background**

1. I was born and raised in Dayton, Ohio.
2. I grew up in a predominantly African-American neighborhood. My grandmother was very active in Model City, which encouraged people to register to vote and be active in the community.
3. I graduated from Dunbar High School, obtained a B.A. in Business Administration from Central State University and an Associate's Degree in Childhood Education at Sinclair Community College.
4. I have been a professional childcare provider for the last 16 years, and own my own business. I currently live in a neighborhood in Dayton that is mostly African-American.
5. I was taught from a young age the importance of voting. I started my efforts in helping people to vote since the age of 16 and have been doing so for at least the last three decades.
6. I have been a member of Omega Baptist Church in Dayton, Ohio for 15 years.
7. I believe strongly in the importance of registering younger voters. I often go to predominantly African-American high schools and speak to the students about the importance of voting. Having come out of slavery, African Americans died and shed their blood for the right to vote. As a result, I believe it is my duty to teach young people about this history, and I believe it is especially important for African Americans to vote.

Souls to the Polls

8. Omega Baptist Church believes strongly in encouraging people to vote. It believes that voting is our God-given right, and that it is our duty to exercise it.
9. There are two church services every Sunday. I believe that about 900 people attend both services every Sunday total.
10. As a member of Omega Baptist Church, I coordinated with the Pastor and the church's Transportation Department to help take people to the polls during the early voting period, and especially on Sundays.
11. The church's Transportation Department consists of about four church members who are responsible for coordinating church vans to help pick people up for both of our Sunday church services, and drop them off afterwards. I believe the church has two vans for this purpose.
12. On Sundays, our practice of taking people to the polls during the early voting period became known as "Souls to the Polls." This is a term used throughout Dayton to describe the efforts of many African-American churches to take people to the polls on Sundays.
13. At the Sunday service, the Pastor would let me speak from the pulpit and tell the congregation that we were taking people to the polls after each Sunday service – at around 11am and 2pm.
14. We tell the congregants that they should show up at a particular location after the Sunday service, and then they will be taken to the polls. If some were late, the driver of the van would get a call and come back to pick them up.

15. In addition to the vans, some volunteers drove people to the polls in their cars. I believe that about five people volunteered their cars in 2012, and some of them made multiple trips. I own a van myself, and drove about 12 people to vote at different times.
16. The vans were packed during Souls to the Polls. I believe that about 45-50 people were taken to vote on the one Sunday that early voting was available in 2012.
17. On the one Sunday of early voting in 2012, I saw long lines at the Board of Elections. There was a community room with chairs where people could take a number, sit down, and wait to be called. The people in the lines that I saw were predominantly African-American.
18. The African Americans in my church relied most heavily on Sunday to vote, because it was right after the church service.
19. There was a widespread understanding in my community that you can vote after church. People expect it now.
20. If Sundays are eliminated from the early voting period, many people will ask me why Sunday voting isn't available anymore this year. I don't know how we will continue to coordinate transportation without Sunday voting.

**Transportation on Other Days of the Week**

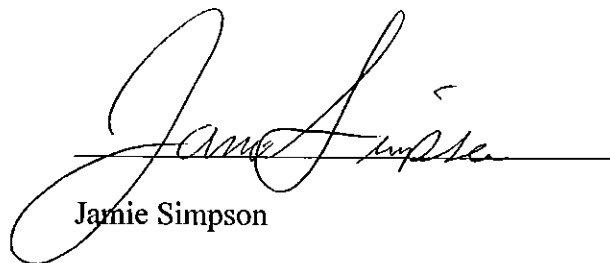
21. During the first week of early voting, when you could register and vote at the same time, I took two high school students to vote. They were turning 18 just before Election Day. I told them that they could register and vote at the same time and they were excited to vote for the first time.
22. We also had a sign-up sheet where people could sign up to be taken to vote on other days of the week. They would write down their name and the time in which they would need a

ride to the polls. We would then figure out when would be the best times to have people meet at the church, where we would then take them to vote.

23. Several people wanted to vote in the evenings.
24. Many of the African Americans in my community voted near the beginning of the early voting period, and by the time Election Day arrived, it seemed that many had already voted.
25. I also witnessed long lines throughout the early voting period during the week, and the lines were comprised mostly of African Americans.
26. Many people in my community are scared to vote by mail and are very apprehensive about it. They can be confused by the forms, which are unfamiliar. Many do not believe that their vote will be counted if they vote by mail, including elderly people. I encountered many people who were apprehensive about voting by mail who I drove to the polls.
27. I believe that we took about 200 people to go vote in 2012.

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

Executed on April 22, 2014.

  
Jamie Simpson