

DECLARATION OF ROBERT E. JONES
(pursuant to 28 U.S.C. Section 1776)

My name is Robert E. Jones 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 1942 in North Carolina and grew up on a tenant farm, where most of the workers were African-American.
2. I obtained a B.A. at the College of Huston-Tillotson in History and Sociology, with a minor in Psychology. After graduation, I obtained a Bachelor of Divinity and Masters of Sacred Theology at Yale Divinity School.
3. In 1977, I came to Dayton, Ohio and became a pastor at College Hill Community Church Presbyterian, U.S.A. ("College Hill"), and also a staff member with the United Church of Christ. At that time, many United Church of Christ churches were predominantly white, while the surrounding communities were becoming more African-American due to white flight into the suburbs. As a result, those churches were losing their members, and it was my goal to integrate the churches.
4. In the early 1980's, I became a part-time faculty member at United Theological Seminary in Dayton and was Director of their Urban Ministry Program. Urban ministry focuses on the broader issue of diversity in cities and urban areas and on helping churches in urban areas to be more inclusive, and to embrace people who are different, which strengthens the ministry. I taught classes and brought students and church leaders (predominantly white) in from the suburbs to have them experience the churches in the city.

5. I was and am passionate about urban ministry because I grew up in the South and fought against segregation. I was especially moved by Dr. Martin Luther King's statement that Sunday mornings was the most segregated time in the country.
6. I became a full-time pastor at College Hill in the mid 1980's, and in 1994, I obtained a Doctorate of Ministry from United Theological Seminary.
7. I retired from being pastor in March 2014.

College Hill Community Church Presbyterian, U.S.A.

8. During the holiday season of 1943, Dr. Ray Davis, Synodical Superintendent of the Second Synod of the United Presbyterian Church and Dr. Ronald E. Boyer, then pastor of the First United Presbyterian Church of Dayton, first conceived the idea of what was to become College Hill Community Church. They convinced a young seminarian, J. Wiley Prugh (a native Daytonian) then completing his divinity training in the Pittsburgh-Xenia Theological Seminary, Pittsburgh, Pennsylvania, to lead the "charge." Prugh and a few other enthusiastic workers began ringing doorbells in the Cornell Heights area of Dayton, Ohio. They succeeded in garnering interest, and services began in Fairview High School on September 10, 1944. The first service was held at the Philadelphia Drive campus was on April 10, 1949.
9. College Hill was active during the civil rights movement. When it was time to integrate the schools in Dayton, College Hill played an active role in helping ensure that the integration process was nonviolent.
10. In the 1960's and 1970's, many in the church leadership believed that College Hill – which was predominantly white at the time – was not going to survive because of white flight, and there was a proposal to sell the building and move north into the suburbs. A

congregational meeting was called, and by only a few votes, the congregation voted against leaving.

11. More recently, there have been attempts to expand I-675 to create a ring around central Dayton, which is mostly lower-income and African-American. This ring would discourage businesses and other people with economic interests from investing in the city, which is suffering. College Hill came out strenuously against the construction of I-675 around Dayton and tried to block it in court.
12. Today College Hill Community Church is a multi-cultural / multi-ethnic congregation located in a predominantly African-American neighborhood in Dayton. It currently has a membership of 223. The church is involved with many different community groups that address the issues of poverty, justice and empowerment. We believe that as Christians, we are called to ensure that the Kingdom of God is realized on earth as it is in heaven. There is a necessary relationship between one's ethical and spiritual life and the action of the church. You cannot be spiritual and religious about human life and not be involved in human struggles.

Get-Out-the-Vote Efforts

13. College Hill is politically active, and advocates for issues that relate to social and economic justice. As part of that mission, College Hill encourages people to register to vote, vote and express their views to their elected officials. The Church has taken part in efforts to encourage early voting and helped transport voters to the polling place during early voting periods.

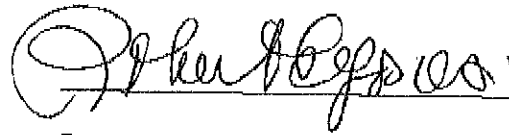
14. There is a coalition of Dayton churches called the Dayton Christian Ministers Association ("DCMA"). There are approximately nine churches in the DCMA, nearly all of which are predominantly African-American.
15. In 2004, there were long lines at the polls, and many people left in frustration without voting. Later, when early in-person voting became an option, the nine churches in the DCMA promoted voting after Sunday service, and they contributed vans to help transport people to the polls after Sunday services.
16. College Hill has one van that it has used to help transport people to the polls, and each of the other churches contributed at least one van each.
17. If Sunday voting is eliminated, we will lose voters. It is a good time for people who are working, since it's a day off that they don't have to be at work that day.
18. Sunday voting has also become church work for the African-American churches I've worked with. For College Hill and these other churches in Dayton, Sunday voting has become a communal event. After church, you usually have a social hour, so the people are already there, and the fellowship and camaraderie is there. There's a certain esprit de corps of being together and then voting together.
19. It was also easier for the African-American churches I worked with to take people to the polls on Sunday because many churches already have drivers that take people to the Sunday service.
20. Many lower-income people look at society and think that their vote is not worth it, that their vote doesn't count because they don't see a direct impact from it. More privileged people, however, do see the worth of voting, and they vote to make sure they keep the wealth that they have.

- 21. As a church, we tried to counter this perception by educating people about the issues and telling people about the importance of voting and the impact that voting will have on making their lives better. That advocacy, coupled with the availability of Sunday voting, helped turn out the vote, especially among lower-income people. Without Sunday voting, there will not be that turnout.
- 22. Sunday voting is also important because we need to keep people in the habit of voting. When someone skips voting for one election, it becomes easier for them to skip the next one.

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

Executed on ~~May~~, 2014

June 4, 2014



Reverend Robert E. Jones (Ret.)