

**DECLARATION OF DELORES FREEMAN**  
**(pursuant to 28 U.S.C. § 1776)**

My name is Delores Freeman 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 Youngstown, Ohio.
2. I am African-American.
3. I attended East High School and Choffin School of Practical Nursing in Youngstown, Ohio.
4. I worked at St. Elizabeth Health Center for 15 years before going to work at the General Motors (GM) Lordstown Plant in May 1973. I worked at GM for over 28 years.
5. It was at GM that I learned about labor unions and I became involved with the United Automobile Workers (UAW) in Lordstown. I served on UAW Lordstown's Civil Rights Committee and was chair of the Women's Committee for 5 years.
6. A close friend of mine, who knew of my involvement with the UAW, introduced me to the A. Philip Randolph Institute.
7. I joined, and have remained a member of, the A. Philip Randolph Institute (APRI) because I share the Institute's goal of promoting political and social freedom and economic justice.
8. I have been a member of the APRI Youngstown Chapter for approximately 20 years and have served as the Chapter's president for 10 years.
9. I am also treasurer of the Greater Youngstown Community Mobilization Coalition (GYCMC), which consists of about 16 organizations committed to increasing political

awareness and assisting individuals in exercising their right to vote. APRI Youngstown Chapter is one of the organizations that are part of the GYCMC.

**Get-Out-the-Vote Efforts**

10. APRI Youngstown Chapter has been involved in a variety of Get-Out-the-Vote (GOTV) efforts for about 5 or 6 years and our efforts to register voters span even further back in time.
11. For the last two years, our efforts have been in collaboration with the GYCMC.
12. Both APRI Youngstown Chapter and the GYCMC are non-partisan organizations.
13. We have worked on efforts to educate voters on state and local issues, increase interest in the political process, register voters, transport individuals to the polls both during the early voting period and on Election Day, assist voters in casting absentee ballots, and remind voters to go out and vote both during the early voting time period and on Election Day.
14. We have registered voters through a number of different efforts. For example, we have gone to Youngstown State University, local high schools, and local churches. We also posted people at the bus station where individuals stop when coming into and going from work.
15. We have also conducted street fairs on different sides of town. When we conduct street fairs, we get permits from the city to block off a part of a street, have games for kids, and hold voter registration drives.
16. In addition, we send out canvassers to wards and areas where there is low voter turnout as part of our voter registration efforts. We then follow-up after registering voters to make sure that they have a way to get to the polls and vote.

17. A lot of the areas that we target have high numbers of African American and Latino voters.
18. We have also assisted voters in casting absentee ballots and had a headquarters set up for people to call if they needed a ride to the polls either during the early voting period or on Election Day. We distributed information with the number of our headquarters through canvassers, churches, and at political forums and street fairs.
19. During the early voting period, we would pick-up people who needed rides and transport them to and from the early voting site. On Election Day, some African-American churches offered their vans to transport individuals to the polls.
20. We also worked with African-American churches on Souls to the Polls efforts and helped increase awareness about these efforts.
21. In the 2014 primary, we provided about 25-30 people with rides to the polls and in 2012 we provided rides to approximately 100 individuals. Most of the individuals who requested rides were African American.
22. APRI Youngstown Chapter would like to continue its work on GOTV efforts with the same intensity that it has in the past, but the cuts to early voting in Ohio make it hard for us to do so.

**The Importance of Early In-Person Voting to Individuals in Youngstown**

23. I know a large number of people who participate in early voting, and I believe that early voting is something that the Youngstown community really needs.
24. I have a niece and a couple of friends who work from 10 a.m. to 6 p.m., and without evening hours, it would be very difficult for them and others with similar schedules to get to the early voting site prior to close.


25. Additionally, there are a lot of senior citizens in our community who live in assisted living and have come to rely on the early voting time period.
26. Furthermore, a lot of people do not trust the vote-by-mail system. We consistently had a large number of people ask us to deliver their absentee ballots to the Board of Elections because they did not trust that their ballots would otherwise be processed.

**The 2004 Presidential Election**

27. In 2004, I took my sister to vote in the 5th Ward, which is a fairly mixed in terms of the race of registered voters.
28. We did not experience as long of lines as those that I saw reported in other areas of the state. However, the voting line at the 5th Ward went out of the building and along the sidewalk, and the length of wait was still approximately an hour long.
29. My sister had surgery about 2 months before the time of the election, so I took her to vote and had to keep a check on her because of the length of the wait.
30. While we were standing in line, I saw three to four people leave the line. One girl who I saw leaving the line without voting told me that she had to go to work and could not wait any longer.

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

Executed on June ~~14~~<sup>16</sup>, 2014.

  
Delores Freeman