

**DECLARATION OF DAVID MORGAN**  
**(pursuant to 28 U.S.C. § 1776)**

My name is David Morgan 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 Auburn, Alabama and raised in Warren, Ohio.
2. I am African-American.
3. I attended Warren G. Harding High School in Warren, Ohio.
4. I worked at Packard Electric Company for approximately 35 years, before retiring in 1991.
5. Since 1981, I have worked as a Staff Representative for the International Union of Electronic, Electrical, Salaried, Machine and Furniture Workers - Communications Workers of America (IUE-CWA).
6. I have been a member of APRI Trumbull County Chapter for more than 40 years.
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. I believe APRI provides minorities with the opportunity to bring forth issues of importance to them that would otherwise go unaddressed.
8. I have served as the APRI Trumbull County Chapter Coordinator for about 8 years and am the past president of APRI in Ohio.

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

9. APRI Trumbull County Chapter has a long history of involvement in a Get-Out-the-Vote (GOTV) efforts.

10. We are actively involved in efforts to educate and register voters, assist voters in casting absentee ballots, and provide voters transportation to the polls throughout the early voting time period.
11. We begin our GOTV efforts at least 2 to 2.5 months prior the Election Day.
12. Well before individuals can cast their votes, we begin our efforts to register voters. And, we have continued with these efforts through Golden Week. In 2012, we registered approximately 350 people.
13. APRI Trumbull County Chapter undertakes a number of voter registration efforts. For instance, we register homeless voters, members have cookouts in their yards and provide voter information, and we engage the community in other ways. In the past, we have set up tents and had a live band play at voter registration drives.
14. Additionally, we assign two people to go door-to-door in predominately minority precincts in the 1st, 2nd, 4th, and 7th Wards, and we work in the 6th Ward, which is approximately 99 percent African American. When going door-to-door, we help them register and ask them whether they want an absentee ballot or need a ride to the polls.
15. Because public transportation is very minimal in the Warren area, we provide rides to the polls from the time that early voting starts. We place hundreds of flyers at churches, barbershops, beauty salons, and at other places throughout the city with numbers where people can call if they need a ride. We also take a sign-up sheet with us when we are traveling door-to-door so that individuals can sign up for a ride on a date and at a time that is convenient for them.

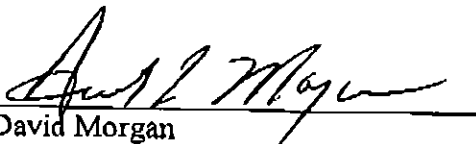
16. During the early voting period, we receive frequent requests for rides and have driven over a hundred people to the polls during the early voting periods in both presidential and gubernatorial election years.
17. The individuals that we registered and provided rides to were predominately African American.
18. A large number of the people I spoke to went to participate in early in-person voting on their way home from work.
19. I spoke to individuals who stated that they could only go to vote after they had gotten off of work for the day. Some individuals have to travel more than 20 miles to get to the county board of elections and do not get off of work until 4:30 p.m.
20. In addition, APRI Trumbull County Chapter helped to coordinate efforts to transport individuals to the early voting location from churches after Sunday services ("Souls to the Polls"). We got churches to use their vehicles.
21. Because of the fact that there are no satellite locations to vote on Sundays and because the early voting site is not open very long on Sunday, lines can get long. For this reason, we have attempted to assist individuals in voting during the course of the week.
22. Additionally, having only one Sunday available for early voting is not sufficient. People do not attend church every Sunday and there will be Sundays when individuals may be working. I believe that there needs to be more than one Sunday of early voting available to ensure that people are able to vote.
23. APRI Trumbull County 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 Trumbull County**

24. I know a large number of people who participate in early voting, and I believe having evenings and more than one Sunday available are important in ensuring that many of the individuals I work with are able to vote.
25. Additionally, a lot of people in the communities I work with favor early in-person voting over vote-by-mail. The African-American community had to fight to earn the right to vote, so the ability to actually go to a voting site and cast a ballot for one's candidate of choice is empowering and especially important to some of the older members of the community.

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

Executed on June 23, 2014.

  
David Morgan