

DECLARATION OF ANTHONY BRICE
(pursuant to 28 U.S.C. § 1776)

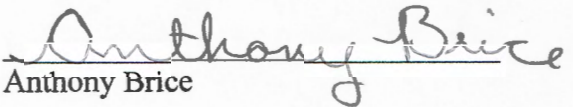
My name is Anthony Brice and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I declare the following:

1. I was born and raised in Cincinnati, Ohio.
2. I am African-American.
3. I attended Woodward High School in Cincinnati, Ohio.
4. I work at Laborers' International Union of North America, Local No. 265.
5. A co-worker of mine introduced me to the work of the A. Philip Randolph Institute (APRI) and, because I share the Institute's goal of promoting political and social freedom and economic justice, I began volunteering with APRI and assisting in their Get-Out-the-Vote (GOTV) efforts.
6. I have been a member of APRI Greater Cincinnati Chapter for 12 years and have been president of the Greater Cincinnati Chapter for approximately 6 years.
7. APRI Greater Cincinnati Chapter has a long history of involvement in Get-Out-the-Vote (GOTV) efforts. We engage in efforts to register voters, assist voters in casting absentee ballots, and provide voters transportation to the polls throughout the early voting time period. The communities we target are those which, according to records kept by the local board of elections, have high numbers of unregistered voters. These communities are predominately African American.
8. In 2008, I witnessed long lines at the polls throughout the early voting period and on Election Day.
9. Because I work during the day, the time that I assisted individuals in getting to the early voting location in 2008 was after regular business hours.

10. Many people went to vote after 5 p.m., which was around the time that they got off work.
11. There is only one early voting location in Hamilton County and, during the early voting time period, I witnessed individuals waiting for at least an hour to cast early in-person ballots after getting off of work.

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

Executed on June 24, 2014.


Anthony Brice