

DECLARATION OF GERALD A. COOPER
(Pursuant to 28 U.S.C. § 1776)

My name is Gerald A. Cooper 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 Cleveland, Ohio in a working class, historically African-American community.
2. I attended the College of Wooster where I received my Bachelor of Arts Degree in Economics. I then attended Capital University Law School, and after graduating, I became an associate at Thompson Hine LLP. In 2000, I received my Masters of Divinity from Payne Theological School in Wilberforce, Ohio.
3. In October of 2001, I moved to Cleveland, Ohio and became Pastor of St. James African Methodist Episcopal Church. I began my current position as Pastor at Wayman Chapel African Methodist Episcopal Church ("Wayman Chapel") in Dayton, Ohio in December of 2013.
4. Wayman Chapel has approximately 600 mostly African-American congregants and is located in a predominantly African-American neighborhood in Dayton, Ohio.

Get-Out-The-Vote

5. I encourage the congregants at Wayman Chapel to vote. I believe it is very important for people, particularly African Americans, to vote because if an African-American person doesn't vote, then that person's voice won't be heard, and the issues that affect the African-American community won't be addressed.
6. I have also informed individuals of the importance of voting early. Before Golden Week was eliminated, I emphasized the importance of Golden Week, which is the period in

which a person can both register and vote at the same time. I emphasized the importance of Golden Week because it is an excellent opportunity for people not yet registered to get immediately involved. I encourage people to vote early because they can avoid potential barriers that might restrict them from voting on Election Day like work, becoming sick, emergencies or other barriers.

2014 Get-Out-the-Vote Efforts

7. At Wayman Chapel, we get-out-the-vote by encouraging people at services to vote and having them sign voter pledge cards.
8. In 2014, we intend to help with voter registration by canvassing parts of West Dayton, which are predominantly African-American, and educating voters about the issues, by holding issues forums.
9. We also want to help people vote by taking people to the polls after church services on Sundays ("Souls to the Polls"). We would engage in Souls to the Polls efforts this year and in future elections on all Sundays that were available for early voting. Wayman Chapel owns a mini-bus that holds about 15 people. If Sundays were available for early voting, we would use the minivan for our Souls to the Polls efforts. I would conduct a Souls to the Polls campaign because it makes it easier for people to vote and gives some people access to the polls that might not have been able to get there. If we have multiple Sundays, we will not have to conduct all of our Souls to the Polls efforts on a single day, and can help more people get to the polls if any of them are unable to make one of the Sundays. Souls to the Polls also encourages other people in the community to vote, because Souls to the Polls engages the community.

10. One Sunday for Souls to the Polls is not enough for people in my community. There are many working-class people who do not have the flexibility to take time off, if they are working that Sunday. I am also aware that some people even have a rotating schedule where one Sunday they may be off and the next week they will have to work. With only having one Sunday, some people's opportunity to vote will be restricted.
11. One Sunday for Souls to the Polls will also pose a logistical challenge to Wayman Chapel. If there are a lot of people that want to take advantage of Souls to the Polls, we will end up having to coordinate more runs to the polls. Driving people to the polls involves a lot of coordination and guesswork because there are many variables including the number of people to take, how long the lines are and when to leave the polls to get back in time for another group.
12. I am concerned that people don't know about these cutbacks to early voting. I am concerned that some people will assume they can vote on days or times that were eliminated because that's what they did before and they rely on it. Also, based on my extensive experience in working with working-class populations, working people need to know there are no evening hours because many don't have the ability to go vote during business hours.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 17, 2014.



Pastor Gerald A. Cooper