

DECLARATION OF SHAWN BRAXTON
(pursuant to 28 U.S.C. § 1776)

My name is Shawn Braxton 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.
2. I obtained B.A. in Education from Central State University in Wilberforce, Ohio and a master's degree in Education from Cleveland State University in Cleveland, Ohio.
3. I served as an Associate Minister at Omega Baptist Church for eight years.
4. I have been the Pastor at New Life Cathedral in East Cleveland for 5 years and the President of the East Cleveland Concerned Pastors for Progress for 2 years. I am also currently a member of United Pastors in Mission.

Working on Get-Out-the-Vote Efforts with African-American Churches

5. I have personally worked with African-American churches, Service Employees International Union, and labor organizations on Get-Out-the-Vote efforts for approximately 4 years.
6. When working with African-American churches, I assisted on Get-Out-the-Vote efforts that assisted congregation members in voting on Sunday after church ("Souls to the Polls") and during the evening hours of the early voting period.
7. The turnout for these efforts was great. We operated a 45-55 person bus and there were times both on Sundays and during the evening voting hours where one bus was not enough and we had to take several loads of people.
8. Church members also sometimes carpooled to the early voting location when there was not enough space on the bus.

9. Additionally, churches I worked with provided transport to the early voting location during Golden Week. Other organizations were focused on registering people to vote during Golden Week and then we would provide individuals with rides to the early voting site.
10. The churches that I work with want to continue their efforts to assist their congregations in voting after Sunday services and during other times of the early voting period, however we will not be able to effectively engage in such efforts as a result of the cuts to early voting.

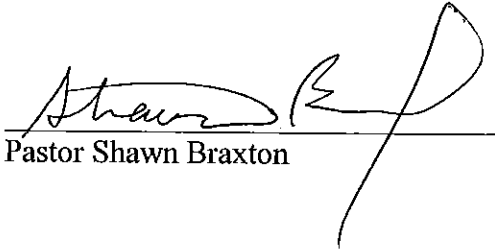
The Importance of Early In-Person Voting to the African-American Churches and Communities I have Worked With

11. Voting is especially important to the African-American community because we were denied the right to vote for so many years.
12. Many people do not have jobs that permit them to get to the polls during their normal hours of operation. Individuals in the communities I work with, which are predominately African American, cannot use their vacation days to take Election Day off work and they need to rely on public transportation in order to get to the voting location.
13. After the Spring 2014 Primary Election, I asked members of my congregation how many of them had voted at a Tuesday night Bible Study and many of them had not been able to vote during the times available because their work schedules had not permitted it.
14. The cuts to early voting have clearly inhibited the ability to vote for individuals in my congregation and other congregations that I work with.
15. Vote-by-Mail is not a sufficient alternative to early in-person voting. First, most of the people I interact with regularly do not even pay their bills by mail anymore, so many people overlook traditional mail as a means to cast their vote since it is not a traditional

medium for voting. And, second, minority communities I have worked with distrust the vote-by-mail system and want to see their ballots actually processed. This distrust has been further fueled by the fact that people feel the cuts to Sunday voting was a direct attack on African-American churches.

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

Executed on June 5th, 2014.



Pastor Shawn Braxton