

**DECLARATION OF JACK FRECH**  
**(pursuant to 28 U.S.C. Section 1776)**

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

**Background**

1. I am the Director of the Athens County Department of Job & Family Services. I have held this position for over 30 years.
2. Athens County is a rural county in southeast Ohio, within the Appalachian region of Ohio. The total population is a little over 60,000 people.
3. The Athens County Department of Job & Family Services is a county agency that receives federal, state and local funding.
4. Our mission is to help Athens County families and individuals who experience poverty, hunger, homelessness, and ill health. In other words, we serve the poor and the working-class families and individuals in Athens County.
5. Our programs provide assistance with food, cash, medical care, child care, child support, adult education, job training, job searches, resumes, care for senior citizens, transportation, and numerous other areas of assistance.
6. This includes processing applications for, and distributing, food stamps and welfare benefits.
7. The people in Athens County are especially low-income. Our poverty rate is 32%, which is substantially higher than the statewide poverty rate, which I believe is 15%.
8. Most of our clients are working-class or in poverty, and have very little education.

**Voter Registration Opportunities**

9. We are considered a “public assistance agency” under the federal “motor voter” law, which means we are required to provide voter registration opportunities for our clients.
10. We have always provided voter registration opportunities in connection with public assistance transactions. As a result of litigation a few years ago, other public assistance agencies across Ohio began also providing voter registration opportunities (the opportunity to newly register or update registration) whenever our clients applied for public assistance, renewed these applications, or changed their address. These voter registration opportunities were provided in-person. If the transaction was over the phone, they would be mailed a voter registration form, or directed to the Secretary of State website.
11. Whenever we provide voter registration opportunities in person, our clients overwhelmingly take that opportunity to register to vote or update their registration, because we provide them assistance in filling out the forms.
12. However, when we provide that opportunity over the phone, they almost never take that opportunity. Directing them to a website is futile because many of them do not have access to the Internet, a computer, or a printer, or understand how to navigate a website, much less download a PDF.
13. Voter registration forms that are mailed to them are almost never filled out and returned. This is for several reasons. Our clients move around a lot, so finding the right address is a challenge. Around half our clients haven’t finished high school and have functioning and literacy problems, which is an ongoing challenge whenever we work with them. And in general, I know from my decades of experience working with this population that our

clients' day-to-day life is chaotic and focused on survival. Taking the time to fill out a voter registration form and then finding transportation to get to a post office is simply not going to happen for many of our clients.

14. In addition, many of our clients are nervous about filling out the voter registration form without someone there in-person to guide them. We face this issue all the time when working with clients on other forms they have to fill out. In their world, they feel that they need permission to do anything, like they need someone in authority to explicitly say, "It is OK to fill out this form." Many of them live in fear that anything they send in the mail – or anything they do *not* send in the mail – will lead to the denial of benefits. They think that if they check the wrong box or fill out a form incorrectly they will lose benefits. We constantly have to assure them of these things when we help them fill out voter registration forms.
15. In addition, many of our clients ask us if they still have the right to vote even though they are on welfare. Without the in-person assurance that they have the right to vote, and that filling out a voter registration form is OK and will not lead to the denial of benefits, they simply will not feel comfortable mailing in a government form.
16. Our clients are very wary of the mail system in general. They strongly prefer to fill out and submit forms in-person in our office. They are worried about things getting lost in the mail, and they often do not receive things in the mail that they were expecting, so they believe that the mail system is not trustworthy. They generally distrust government systems in general, and that includes the mail system.
17. Providing voter registration services in-person is especially important for our clients, who change residences very frequently. In general, our clients change residences several

times a year. Almost none of them own homes, and they must often move because they can no longer afford to pay the rent, or they are evicted. They do not always notify us when they change addresses, but when they do, we provide them voter registration opportunities, which is especially helpful because they have to update their voter registration anyway.

18. I know from speaking with and observing our clients that when they talk about voting, it is the only time where they feel equally as powerful as people such as Bill Gates or Oprah, the one time where they feel they have just as much say in our democracy as the rich.
19. Our clients are generally unaware that they have to update their voter registration whenever they move. We constantly remind them that they have to update their voter registration whenever they move. We have to constantly remind them to let us know when they change their address too.
20. In the last several years, the Governor of Ohio has been throwing people off of certain public assistance programs. I am concerned about my clients who are thrown off of these programs because they are losing access to basic needs such as food and employment. I am also concerned because by throwing them off of these programs, they also lose the voter registration opportunities that we provide them, since those opportunities are given with each transaction.
21. The Ohio Department of Job and Family Services is encouraging people to apply for public assistance online. Again, this will result in much lower voter registration rates because the applicant may not know how to download the voter registration form, or have

a printer, an envelope, or the postage required to print and mail one, especially without live assistance. There is no online voter registration.

22. For instance, in 2011 and 2012, I believe that over 195,000 voter registration forms were distributed by public assistance agencies statewide.

23. However, in 2013, the number of forms that were distributed dropped by nearly half.

**Impact of Early Voting Cutbacks on the Poor in Athens County**

24. I am very concerned about the impact of the recent early voting cutbacks on the poor in Athens County, because the cutbacks seem to target the times and days most needed by the poor to vote.

25. Our clients who are employed cannot easily take unpaid time off of work during weekday business hours. The most common job held by our clients is in fast food, followed by seasonal, outdoor jobs like landscaping.

26. The clients we have who are unemployed are usually unemployed because of health problems, so they spend much of their day trying to get health care, figuring out where they will live, making arrangements to get to the soup kitchen or food pantry, or taking care of other family members who are living together. Our clients are almost always doubled or tripled up in housing. Often what happens with poor families in Athens County is that if you are unemployed, you end up taking care of elderly or disabled relatives or the kids.

27. Our clients also spend much of the day meeting with our caseworkers or caseworkers in other agencies.

28. Our office hours are from 8 a.m. to 5 p.m. on weekdays.

29. About 80% of people on cash assistance in Athens County do not own a vehicle. Outside of Athens City itself, I am aware of only one method of public transportation in Athens County, and that is a bus route that goes back and forth from The Plains (a small town of about 1,500 people) to Athens City, but the bus route only runs from about 9 a.m. to 5 p.m. and it does not run frequently enough for our clients whose work shifts are during that same exact time period. Athens City and The Plains only occupy less than 10% of Athens County.
30. Our clients are extremely dependent upon their friends and neighbors for transportation, and are often at their mercy when it comes to getting places. Friends and neighbors with vehicles are probably employed, and will also have to take time off during the weekday to give rides to the polls.
31. Our clients cannot reach our office by public transportation, so we pick them up ourselves and bring them to our offices. We have a van that we send out several times a day to pick people up and drop them off.
32. Although we are in a sparsely populated, rural county, the poor people in our county need these evenings and Sunday voting opportunities just as much as the poor in more populated counties need them.

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

Executed on June 10, 2014.

  
\_\_\_\_\_  
Jack Frech