

DECLARATION OF JOSH SPRING

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

Personal Background

1. I was born in eastern Kentucky, then moved to Louisville, KY where I attended school in the inner city, and later moved to Ohio.
2. I graduated from the College of Social Work at Xavier University in 2007.
3. During school, I had an internship with the Children's Home of Cincinnati working on adoption issues, and was employed by Tender Mercies, where I worked with people who recently exited homelessness and were facing chronic mental illness. Through the work I did with these organizations, I became interested in homelessness issues and how to solve them.
4. I then interned with Over-The-Rhine Community Housing (OTRCH) doing social work, and worked there full-time after graduating. While there, I worked with about 300 households to help them obtain and maintain housing. Almost everyone I worked with encountered the same systematic problems: inability to find employment, make ends meet, or access safety net services. The households I worked with also faced a lack of access and means to change that system.
5. As a result, I became very active in organizing and advocacy. This included helping tenants – who were disproportionately African-American – maintain their housing in the face of gentrification, as well as helping families in predominantly lower-income African-American communities prevent the shutdown of local schools.

Greater Cincinnati Homeless Coalition

6. In the summer of 2009, I became the Executive Director of the Greater Cincinnati Homeless Coalition, where I continued my organizing and advocacy efforts. This included a federal lawsuit alleging racial steering, which led to an unprecedented settlement award in favor of predominantly African-American tenants.
7. The Greater Cincinnati Homeless Coalition is a unified social action agency, fully committed to its ultimate goal: the eradication of homelessness with respect for the dignity and diversity of its membership, people experiencing homelessness, and the community. The Coalition works towards this goal by coordinating services, educating the public, and engaging in grassroots organizing and advocacy.
8. The Coalition was formed in May of 1984 for one purpose: the eradication of homelessness in Cincinnati. What started out as a coalition of 15 volunteers meeting weekly in an unheated church basement has since grown into a Coalition of over 53 agencies and hundreds of volunteers.
9. The Coalition's work focuses on four areas: 1) Coordination of Services: By coordinating services within the community, we help our member agencies provide their services, share their resources, and work with people experiencing homelessness. 2) Advocacy: The Coalition works with local officials, the community and people experiencing homelessness to ensure that the rights of persons experiencing homelessness are preserved, that the trend of criminalization of homelessness is reversed and that just social policy is enacted to end homelessness. We are also a regional site for the National Homeless Civil Rights Organizing Project, which seeks to document and end hate crimes

against people experiencing homelessness and to educate and organize individuals experiencing homelessness to protect their civil rights. 3) Education: Through our education opportunities and resources, we provide the groundwork for understanding the complexities of homelessness so that our community can work towards sustainable solutions. For nearly twenty years, the Greater Cincinnati Homeless Coalition has been providing educational opportunities to churches, companies, schools and universities in Cincinnati. 4) Streetvibes is a newspaper that covers the issues of homelessness, social justice, and poverty. It is easily the most recognizable educational tool that the Greater Cincinnati Homeless Coalition offers. Streetvibes Distributors purchase papers for 50 cents and sell them to the public for a \$1.50 donation, keeping the profit they have earned.

10. Our organizing and advocacy efforts include fighting against the marginalization of individuals experiencing homelessness. In one case, zoning code amendments were proposed in the Cincinnati City Council, one of which would have prohibited any social service agency from being within 1,000 feet of a school, park, areas zoned single-family residential and each other as well as other locations where wealthier, white individuals frequently gather. It was only after the Greater Cincinnati Coalition for the Homeless filed litigation that the amendments were not passed.
11. The population experiencing homelessness that we serve in Cincinnati is disproportionately African-American. According to one study, roughly 66% of people experiencing homelessness in Cincinnati are African-American. From my experience, this is likely to be an underestimate. That is because the study is based on U.S. Department of Housing and Urban Development (HUD) counting methodology, which

ignores people experiencing homelessness who are receiving services at a homeless shelter not officially affiliated with HUD. Furthermore, HUD does not count people experiencing homelessness who are living from couch to couch – an especially large category of individuals who are also predominantly African-American.

12. In my experience with organizing and advocacy, I have witnessed citizens and even government officials express resentment, fear and alarm whenever there is a proposal that tends to bring primarily low-income African-American populations into their communities. For instance, I have heard people oppose affordable housing because “it’s going to bring drugs,” “‘their’ kids will bring drugs to school,” “they will teach our kids to do bad things,” “it will increase crime,” and “get out, we don’t want you here.” I have also heard businesses oppose zoning measures that would bring more low-income African Americans into the area by saying things such as, consumers “will feel afraid to come into our district,” “we are afraid that people will break into our trucks and steal things,” “people will sleep in front of our business and scare people away,” or “people will urinate or defecate on our property.”
13. I have also witnessed extreme stigmatization of the predominantly African-American population experiencing homelessness, by businesses and government officials. During a debate concerning the renovation of Washington Park, I heard a police department representative say comments to the effect of “we should put a fence around the entire park” so that “when we take it down, the [homeless] people there won’t be there anymore,” and another attendee say “we should give a T-shirt to everyone at the Drop-Inn Center that says ‘I sleep at the Drop-Inn Center’ so that they can be easily identified.”

One Cincinnati city councilmember even proposed requiring panhandlers to have licenses and to wear a city-made sign that says “I am homeless.”

Get-Out-the-Vote Efforts

14. From my experience, it is very important to help individuals wrestling with homelessness to vote. Voting is empowering. Individuals experiencing homelessness often feel very marginalized and feel like they do not have any control around them. Based on my observations, when an individual experiencing homelessness comes back from registering and voting, they feel stronger, and more connected to the system.
15. Feeling more connected to the system builds trust in the system. Individuals experiencing homelessness frequently lack trust in the system – many of them do not even trust our outreach workers on first contact. Often some of them develop a fatalistic attitude, wondering what it is that they can do. The more you distrust the system, the less likely you are to access the resources that are available.
16. Voting can be a way for a group of people to discuss how they are going to vote, and it's a way to get control, when everything ordinarily feels like it is out of your hands. When people experiencing homelessness are part of a larger process where people are actively supporting an issue or opposing it, even if you lose, you will have worked with other people on the issue, which is still empowering.
17. Giving people experiencing homelessness a voice is also important on a systematic level. The only people who can truly voice the struggles of people experiencing homelessness are people who have actually experienced it. And these are the people who can best explain what the system can do to help them get out of homelessness.

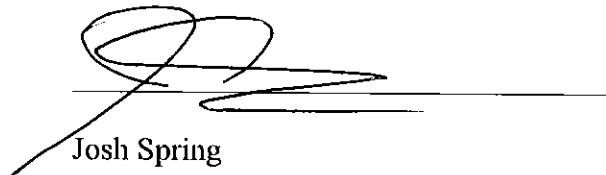
18. For these reasons, we endeavor to help people experiencing homelessness register and vote in every election.
19. During the 2010 and 2012 elections, in the period when you could register and vote at the same time, we would speak with various homeless shelters in Cincinnati, educate their clients about the registration and voting process, and encourage people to register and vote. These shelters included the Drop-Inn Center in downtown Cincinnati which serves about 225 people a night, Joseph House which serves approximately 100 veterans experiencing homelessness, and a local Catholic worker house which serves about 14 people experiencing homelessness. We also set up a table outside a local soup kitchen which serves about 300 people during lunch time.
20. In 2010, we attempted, unsuccessfully, to have the Drop-Inn Center be a polling location.
21. Being able to register and vote simultaneously is especially important to this population because it is a one-step process. Most of these individuals spend their days looking for housing, jobs, social services, and meeting with caseworkers. A single missed meeting can mean the loss of food, housing, or employment.
22. Without the ability to register and vote at the same time, I believe from my experience that many of these individuals experiencing homelessness will be disenfranchised.
23. Because much of the weekday is spent looking for housing, jobs, social services, and meeting with caseworkers, being able to vote in the evenings and weekends is also important.
24. Mailing in registration forms or ballots can be very problematic for individuals experiencing homelessness. Many people experiencing homelessness lack a fundamental trust in the system, because their interactions with government agencies and other

organizations are often frustrating and have led to negative outcomes such as the denial of benefits. This lack of trust in the system can even include a lack of confidence in the postal service. There is a constant fear that anything you send in the mail will get lost, especially if you place mail into an unfamiliar box (i.e., not your own home mailbox). Indeed, in my experience from working with individuals experiencing homelessness, many forms or other documents sent by mail to government agencies for the purposes of obtaining benefits, such as food stamps or welfare payments, often get ignored or lost. As a result, individuals experiencing homelessness are often predisposed to think that the system will lose your paperwork if you don't hand it in in-person.

25. In our past efforts to help people register and vote, we relied significantly on the fact that the early voting location – the Board of Elections – was in downtown Cincinnati and within walking distance of several homeless shelters, and the Greater Cincinnati Homeless Coalition itself. I understand that this polling location might be moved into the suburbs. If this occurs, it will be located at the end of the bus line and will be especially difficult to reach for many of the individuals experiencing homelessness that we serve.
26. There are long lines throughout the early voting period in Cincinnati, which has become common knowledge in our community. I personally observed long lines throughout the early voting period in 2010.

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

Executed on April 21, 2014.



Josh Spring

