

DECLARATION OF MARK FREEMAN

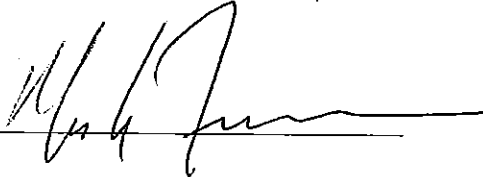
My name is Mark Freeman and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I state the following:

1. I am Executive in Residence at Cleveland State University, College of Education and Human Services. Formerly, for 25 years, I was the Superintendent of the Shaker Heights City School District, which comprises the municipality of Shaker Heights, an inner ring suburb of Cleveland, Ohio, plus a portion of the city of Cleveland itself.
2. During my superintendancy, several school buildings in the School District were routinely utilized as polling places on Election Day. Among these, specifically, the gymnasium of Woodbury School, 15400 South Woodland Road, Shaker Heights, Ohio, was often used as a polling place. Woodbury was the voting location for several precincts in Shaker Heights and in Cleveland, and was one of the largest polling places in our School District.
3. During the November, 2004 election, in the early part of the day, I traveled to the school, which was not far from the administration building, to see how voting was going.
4. When I arrived, I saw that the people waiting to vote were standing in incredibly long lines that were snaking around the entire gymnasium. I telephoned the Cuyahoga County Board of Elections to make sure that the problem was reported, and urged them to do something to fix the situation – for instance to deliver more voting machines to the school.
5. I returned to Woodbury School at least two additional times during the day to monitor the situation. The long lines only became even longer. I estimate that one or more lines at their peak were about 75 persons long.
6. I observed that many people who were waiting to vote left the line without voting. They told me things like, “I have to go back to work,” and “I have to pick up my kids.” Some people said that they just got tired of standing for so long.
7. At one point during the day, I instructed the school custodian to bring in about 20-25 folding chairs so that elderly and tired people could sit while in line.
8. The long lines moved slowly. Standing in line was seemingly taking forever. Nevertheless, as frustrated as the people were, the atmosphere was friendly. I observed that people would save a place in line for each other to allow each other to leave the line for a while and get a little relief from standing or tend to some pressing matter.
9. I estimate that a quarter to a third of the people voting at Woodbury School in 2004 were African American.

10. I later learned that, by evening, Federal District Court Judge Dan Polster issued an order requiring some polls to remain open beyond the scheduled closing time.

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

Executed on June 10, 2014.

A handwritten signature in black ink, appearing to read 'Mark Freeman', is written over a horizontal line. The signature is stylized and cursive.

Mark Freeman