

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

PROJECT VOTE, ASSOCIATION OF COMMUNITY)
ORGANIZATIONS FOR REFORM NOW, COMMON)
CAUSE/OHIO, PEOPLE FOR THE AMERICAN WAY)
FOUNDATION, COMMUNITY OF FAITH)
ASSEMBLIES CHURCH, AMERICAN)
ASSOCIATION OF PEOPLE WITH DISABILITIES,)
MARY KEITH, JOHN R. T. MAY, and LINDA)
SCAMMICCA,)

Case. No. 1:06-cv-01628

Plaintiffs,

v.

J. KENNETH BLACKWELL, individually and in his)
official capacity as Secretary of State, WILLIAM D.)
MASON, as Prosecuting Attorney for **Cuyahoga**)
County, Ohio, and SHERRI BEVAN WALSH, as)
Prosecuting Attorney for **Summit** County, Ohio,)
Defendants.)

DECLARATION OF SAMUEL GRESHAM

I, Samuel Gresham, hereby declare as follows:

Background on Common Cause

1. I am the Acting Executive Director the Ohio office of Common Cause, a nonpartisan, 501(c)(4) non-profit advocacy organization incorporated in Washington, DC, where our principal place of business is located. Our Ohio office is located at 50 West Broad Street, Suite 1705, Columbus, OH 43215. I am a citizen and resident of Ohio and reside at 2491 Waterfall Lane, Columbus, OH 43209. I submit this declaration in support of plaintiffs' motion for a preliminary injunction.
2. Since our founding in 1970, Common Cause has been a vehicle for citizens to make their voices heard in the political process through voting, mobilization and lobbying for the public interest. We have nearly 300,000 members and supporters nationwide and 38 state organizations.
3. Our mission is to work at the state and local level to reform the system of voting in the United States. We support easing barriers to voting, election administration

designed for the voters, openness throughout the process, nonpartisan supervision of elections, and making the way Americans vote a higher priority at all levels of government.

Voter Registration Drives

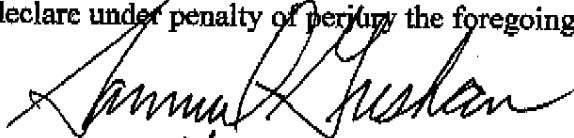
4. The national Common Cause was founded in 1971 and has registered voters continuously since then.
5. I personally have been helping people register to vote for nearly thirty-five years, throughout various professional affiliations.
6. In Ohio, Common Cause conducts nonpartisan voter registration drives primarily when we support particular ballot issues. Voter registration is an integral part of Common Cause's mission to enhance citizen participation and government accountability.
7. As an organization with limited funds, we associate with other nonpartisan groups, including fraternal societies, churches, social clubs, and unions, to run collaborative voter registration drives, when issues we care about are at stake in an election.
8. In addition to issue advocacy reasons, Common Cause/OH conducts voter registration because expanding the franchise relates directly to our mission of increasing faith and confidence in democracy. We believe that voting is an important part of free expression and is at the heart of democracy. Increasing the electorate promotes fair elections and higher ethical standards among politicians.
9. In 2004, we participated in a coalition of several organizations collaborating to assist citizens to register to vote in Ohio. As part of that coalition, we had responsibility in Franklin County and eight surrounding counties for recruiting volunteers, training them in proper voter registration procedures, coordinating their registration efforts within their communities, collecting their forms when complete, checking those forms for completeness and accuracy, and regularly returning them to local boards of elections. In 2004 we registered approximately 2,500 voters.
10. To start a voter registration drive, we recruit volunteers through promotion and marketing, including a volunteer hotline. We sort those volunteers into groups of twenty-five, which we then train on the laws and rules surrounding voter registration, including how to properly complete forms. We prepare trainings in written form from materials provided by the boards of elections, and present them both as a printed manual and a PowerPoint presentation during training sessions.
11. In order to reach and engage a diverse group of Ohio citizens, we both went door-to-door drives (usually captained by a resident of the neighborhood) and tabled at

- events or outdoor locations, such as block parties, concerts, churches, clubs, malls, and other gathering places.
12. For instance, sometimes we would set up tables with registration forms at a local beauty or barber shop, train a shop staff member in how to complete and collect the forms, and then pick up completed forms each week.
 13. During our voter registration drives, our volunteers would encourage citizens to register and vote. Several people would staff the same table during the course of the day.
 14. For door-to-door drives, we cluster volunteers by their residences, so that volunteers are encouraging their own neighbors to register and vote. One volunteer in a cluster serves as block captain, and we give them additional training on quality control. The captain's house, if she lives in the area, is a rallying and collection point for the volunteers out in the neighborhood. We give our volunteers food, and if the targeted neighborhood is geographically dispersed, we provide them a car. The block captain collects completed forms from volunteers, reviews the forms for accuracy and completeness, and returns the forms in a batch to our office at the end of every week. For both tabling and door-to-door drives, we have our volunteers mark their initials on each form they collect.
 15. At headquarters, our staff, both paid and volunteer, again checks the forms for completeness and accuracy; common mistakes include missing signatures or incomplete addresses. When incomplete forms are found, our staff contacts voters and tries to secure the missing information.
 16. We store collected forms at our Common Cause office while we do the second round of quality control, and personally bring completed forms to the boards of elections every week.
 17. Most of the time, our volunteers and staff conduct simultaneous voter education on the issue and registration if a person is eligible to vote and unregistered. Volunteers have a script to help them give passersby a reason to want to vote—for example, the need to combat corruption or raise school funding in Ohio. In 2005, we produced small placards to hand out while canvassing, to summarize ballot issues we were supporting for the potential voter.
 18. Once the registration deadline has passed, we go back to the same neighborhoods we targeted during registration drives to do get-out-the-vote work, concentrating on areas where we have registered the largest numbers of voters.

Effect of the New Law

19. Common Cause/OH would ordinarily do voter registration in connection with a redistricting initiative we hope to place on the November ballot. However, if these new restrictions remain in place, we will be unable to do voter registration.
20. For instance, the direct return provision, if interpreted to require volunteers to return the forms they collected directly to the state and not to our office, would make it impossible for us to do any kind of quality control and may result in incomplete or inaccurate registrations being returned to the state. We would be unable to guarantee our volunteers were completing forms properly, or that they were returning forms in a timely manner.
21. It would also be a large burden on our volunteers, who would have to return their forms themselves in the proper manner or risk a felony conviction. Not all of our volunteers have cars, and getting to the elections office on a weekly basis would be difficult.
22. In addition, for example, if "compensation" is interpreted broadly to include persons who are given food, transportation, or trinkets like T-shirts, our volunteers would have to register and train online, which would be impossible, as we do not have sufficient resources to allow every one of them to get on the Internet through our office and complete training.
23. These and other rules threaten our voter registration operations, and we will not engage in voter registration in Ohio, as we have done for years, unless the rules are changed.

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



Executed this 14 day of June 2006, in Columbus, Ohio.