STATE OF NORTH CAROLINA

COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
18 CVS 15292

JABARI HOLMES, FRED CULP, DANIEL E. SMITH, BRENDON JADEN PEAY, SHAKOYA CARRIE BROWN, and PAUL KEARNEY, SR.,

Plaintiffs,

v.

TIMOTHY K. MOORE *in his official capacity as Speaker of the North Carolina House of Representatives;* PHILLIP E. BERGER *in his official capacity as President Pro Tempore of the North Carolina Senate;* DAVID R. LEWIS, *in his official capacity as Chairman of the House Select Committee on Elections for the 2018 Third Extra Session;* RALPH E. HISE, *in his official capacity as Chairman of the Senate Select Committee on Election for the 2018 Third Extra Session*; THE STATE OF NORTH CAROLINA; *and* THE NORTH CAROLINA STATE BOARD OF ELECTIONS,

Defendants.

FILED
2019 MAY 15 AM 11:59
WAKE COUNTY, C.S.C.
BY

NOTICE OF FILING

Plaintiffs respectfully submit the following affidavits in support of their Motion for a Preliminary Injunction in the above-captioned case:

1. Affidavit of Elizabeth Holmes
2. Affidavit of Fred Culp
3. Affidavit of Paul Kearney
4. Affidavit of Daniel Smith

5. Affidavit of Lynda Benson
6. Affidavit of Mina Ezikpe
7. Affidavit of Noah Van Hook
8. Affidavit of Pricey Harrison
9. Affidavit of Mike Woodard
10. Affidavit of Ben Clark
11. Affidavit of Greg Flynn
12. Affidavit of John Quinn
13. Affidavit of Noah Read
14. Affidavit of Courtney Patterson
15. Affidavit of Kevin Quinn
16. Affidavit of Christopher Dalton Ketchie
17. Affidavit of Isela Gutierrez
18. Affidavit of Kate Fellman
19. Affidavit of Ivy A. Johnson

Respectfully submitted this the 15th day of May, 2019.

Allison J. Riggs, State Bar No. 40028
Jaclyn A. Maffetore, State Bar No. 50849
John F. Carella, State Bar No. 42729
Jeffrey Loperfido, State Bar No. 52939
Gregory Moss, State Bar No. 49419
SOUTHERN COALITION FOR SOCIAL JUSTICE
1415 W. Highway 54, Suite 101
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/s/ Andrew J. Ehrlich
Andrew J. Ehrlich*
Paul D. Brachman*
Apeksha Vora*
Patrick Kessock*
Ethan Merel*
Ben Moskowitz*
(*Admitted *pro hac vice*)
PAUL,WEISS, RIFKIND,
WHARTON & GARRISON LLP
1285 Avenue of the Americas
New York, NY 10019-6064
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

This is to certify that the undersigned has this day submitted a copy of the foregoing Notice of Filing in the above titled action with the Clerk of Superior Court in Wake County, and served the document via electronic mail and, if requested, by U.S. Mail to the following parties:

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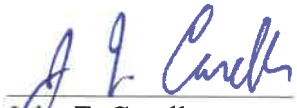
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This, the 15th day of March, 2019.



John F. Carella
Southern Coalition for Social Justice

STATE OF NORTH CAROLINA

COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
18 CVS 15292

JABARI HOLMES, FRED CULP, DANIEL E. SMITH, BRENDON JADEN PEAY, SHAKOYA CARRIE BROWN, and PAUL KEARNEY, SR., *Plaintiffs,* v. TIMOTHY K. MOORE *in his official capacity as Speaker of the North Carolina House of Representatives;* PHILLIP E. BERGER *in his official capacity as President Pro Tempore of the North Carolina Senate;* DAVID R. LEWIS, *in his official capacity as Chairman of the House Select Committee on Elections for the 2018 Third Extra Session;* RALPH E. HISE, *in his official capacity as Chairman of the Senate Select Committee on Election for the 2018 Third Extra Session*; THE STATE OF NORTH CAROLINA; *and* THE NORTH CAROLINA STATE BOARD OF ELECTIONS, *Defendants.*	**AFFIDAVIT OF ELIZABETH HOLMES**

I, Elizabeth Holmes, swear under penalty of perjury, that the following information is true to the best of my knowledge and state as follows:

1. I am over the age of eighteen years old and am competent to give this affidavit.

2. I am a 70-year-old white female and a resident and registered voter in Wake County, North Carolina. I live with my husband and son Jabari Holmes in Wendell, North Carolina. Our town has a population of only about 5,000 people. Most people think of Wake County as urban, but we live in a very rural, remote part of the county.

3. My son Jabari is a 43-year-old bi-racial man with severe cerebral palsy that confines him to a wheelchair. I care for my son, with the help of a nurse. It usually takes all day to

meet his basic needs. My husband has severe health issues, some of which limit his strength and mobility, and therefore, I take the lead in caring for Jabari.

4. Because of his medical condition, Jabari is non-verbal, but he uses a communication board, voice activator and an eye gaze computer to communicate with his family and the world. He is also able to write out sentences using that technology. He graduated from high school in 1997.

5. Jabari watches the news daily to stay informed on political issues. He has regularly voted in person on Election Day because our polling place is just a six-minute drive from our home. He asks that I take him to vote in person on Election Day because he has made it clear to me that voting in person makes him feel included in his government and part of our community. Jabari views voting as a means for all of us to contribute to the political process, and for this reason has consistently voted in-person for the last 20 years. In the past, on Election Day, when I would come home from a long day of work and perhaps not really want to go back out to vote, Jabari would be the one to encourage me to take the family to vote. Over the years, he has made me a more diligent voter.

6. Transporting Jabari to our Election Day polling place is relatively easy for me. Jabari has never voted at any one-stop early voting site or by absentee ballot, because there is no closer one-stop early voting site and because voting in-person is so important to him.

7. After North Carolina enacted a voter ID law in 2013, I attempted to get Jabari a North Carolina Department of Motor Vehicles ("NCDMV") non-operator's license. It can be physically painful for Jabari to sit in one position for too long, so I made an appointment at a DMV office sometime around 2015, to the best of my recollection. I received a mailing from elections officials telling me what I needed to bring with me to get Jabari an ID, but based on my reading of it, I thought I just needed to bring his social security number, not his social security card. I do not have a copy of Jabari's social security card. Although we know Jabari's social security number, we cannot locate the card.

8. After my unsuccessful attempt at the DMV office, I tried to get a new copy of Jabari's social security card. I made several phone calls to the Social Security Administration, but they did not want to give me a copy of his social security card because I could not provide enough identifying information for Jabari. At one point, I even mailed his Medicaid card to the social security office to try to get a copy of his social security card, and was still unsuccessful. All of this time and effort is burdensome on me and detracts from the time and strength I need to devote to caring for Jabari.

9. In March of 2016, while the previous voter ID law was in place, I took Jabari to vote in the primary election. Because Jabari only has an old high school ID, we were pulled aside. We went to a separate table and poll workers asked us several questions. I explained that Jabari did not have the identification requested and how hard it had been to attempt to obtain an ID. One poll worker told us that Jabari could not vote. A second poll worker informed us that he could cast a reasonable impediment provisional ballot. Ultimately, Jabari was forced to cast a provisional

ballot for the first time in his life. The whole process took about an hour and a half and was burdensome for Jabari and me.

10. Because Jabari still does not have photo identification that is sufficient under Senate Bill 824, he will be required to cast a reasonable impediment ballot every time he votes. We risk encountering poll workers like the first one we encountered in 2016, who told us he could not vote. We will be pulled aside from other voters and asked several extra questions every election. Jabari will be subjected to additional time and potential pain in order to cast his ballot. In addition, Jabari risks his provisional ballot not being counted when voting in the future.

11. The State's solution to provide free IDs for voters does not assist Jabari. Jabari would be unable to obtain a Voter Identification Card from the Wake County Board of Elections because the office is located in downtown Raleigh, on a busy road with no handicapped parking spots. The closest handicapped spot is inconveniently located and far from where we would be able to obtain that alternate form of ID.

12. Moreover, given the challenges in transportation for our family, a trip to the Wake County Board of Elections, even if there was convenient handicapped parking that would give Jabari easy access to the office, would take at least an hour, round-trip, and could take much longer depending on Raleigh traffic. As I have mentioned, Jabari can experience significant pain when forced to remain in one position for a prolonged period of time. Thus, forcing Jabari to travel to the Wake County Board of Elections office is significantly burdensome for him.

13. The only other option is to obtain a free ID from the NCDMV. The NCDMV policy requires the applicant to provide a social security card—documentation I do not possess for him. I have had difficulty acquiring this same ID in the past for Jabari.

14. Jabari has followed North Carolina's voter ID legislation. He believes Senate Bill 824 prevents him and others from having a fair and easy access to voting, an important right.

15. I believe Senate Bill 824 raises serious concerns for voters with physical challenges that do not have family members to assist them. I worry about the future, when I may not be able to advocate for Jabari's right to vote like I can now. Jabari is a passionate, informed, and eligible regular voter. Because my son does not have a photo ID, he is at risk of being disenfranchised by Senate Bill 824 in every election cycle going forward. Jabari should be able to vote without the incredible physical, logistical and administrative burdens that this new law places on him and our family.

This the 20 day of February, 2019.

Elizabeth B Holmes
Elizabeth Holmes

I, Samantha Birdsong Manning, a Notary Public of the County and State aforesaid, hereby certify that Elizabeth B. Holmes, personally known to me to be the affiant in the foregoing affidavit, personally appeared before me this day and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

This the 20 day of February, 2019.

(SEAL)

Samantha Birdsong Manning
Notary Public

My Commission Expires: 10/16/2020

SAMANTHA BIRDSONG MANNING
NOTARY
PUBLIC
WAKE COUNTY, NC

STATE OF NORTH CAROLINA

COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
18 CVS 15292

JABARI HOLMES, FRED CULP, DANIEL E. SMITH, BRENDON JADEN PEAY, SHAKOYA CARRIE BROWN, and PAUL KEARNEY, SR., *Plaintiffs,* v. TIMOTHY K. MOORE *in his official capacity as Speaker of the North Carolina House of Representatives;* PHILLIP E. BERGER *in his official capacity as President Pro Tempore of the North Carolina Senate;* DAVID R. LEWIS, *in his official capacity as Chairman of the House Select Committee on Elections for the 2018 Third Extra Session;* RALPH E. HISE, *in his official capacity as Chairman of the Senate Select Committee on Election for the 2018 Third Extra Session*; THE STATE OF NORTH CAROLINA; *and* THE NORTH CAROLINA STATE BOARD OF ELECTIONS, *Defendants.*	**AFFIDAVIT OF FRED CULP**

I, Fred Culp, swear under penalty of perjury, that the following information is true to the best of my knowledge and state as follows:

1. I am over the age of eighteen years old and am competent to give this affidavit.

2. I am a 78-year-old African-American male, and a resident and registered voter in Union County, North Carolina.

3. North Carolina has been my home for almost 50 years. I moved to North Carolina from South Carolina after I got married to my wife, Mildred Culp.

4. For more than 20 years I have drawn social security and have not been able to work due to a disability caused by a neck injury. I have difficulty moving like I used to and my neck causes me a lot of pain.

5. Because of my disability, I no longer drive. When I want to leave the house, I rely on my wife who drives us where we need to go. I have not had a driver's license for 15 years.

6. I am a regular voter. I make it a point to go to the polls in person, and I know that my ballot will be counted. I am aware of the absentee ballot process and how it functions. However, I am less confident in the mail-in process, especially in light of the absentee ballot investigation that is being conducted in our State right now. My wife and I usually vote early at the fire department site near my house because, it is a short trip, and I can manage it even with my disability.

7. Voting is important to me because I like to see things change for the better, and I like to be part of that change. I know how much politics plays into everything that happens in this country, and I stay updated on the news and what is happening.

8. Not having a license never caused me any trouble until the voter ID law was passed in 2013. When I heard that I would need to show a photo ID in order to cast a regular ballot, I was upset because I no longer have a valid photo ID.

9. To get a North Carolina Department of Motor Vehicles (DMV) ID, I would need to get a copy of my South Carolina birth certificate, which I have not been able to do despite my best attempts. I also do not have a social security card because I do not have the documents needed to verify my age, identity and citizenship to acquire the card.

10. The only photo ID that I have is an expired South Carolina non-operators ID. I was only able to get this ID because my niece worked for the South Carolina DMV and she was able to verify my identity.

11. I cannot remember the exact dates, but some time between the early and mid 2000s, I tried to get a copy of my birth certificate from the health department in South Carolina. At this time, I was temporarily staying with my brother who is a pastor in Rock Hill, South Carolina. He was able to drive me where I needed to go. We made the trip to the health department. When I got there, the staff filled out paper work on my behalf in order for me to get my birth certificate. They asked me several questions and told me that they would be in touch with me. The health department never contacted me. In response, my brother and I made a second trip to the health department. When we arrived the staff told me that I could not get my birth certificate. The staff showed me documentation that had my mother's name spelled wrong. My mother's name is Maggie Culp but the documentation had her name spelled as Mattie Culp. I suspect that, years ago, the health department staff incorrectly recorded my mother's name.

This major mistake prevented the health department from verifying my identity, so the health department would not issue me a copy of my birth certificate.

12. Since the last unsuccessful attempts to get my birth certificate, in the early to mid 2000s, I have not had anyone to take me back to South Carolina to try again. I would have to find someone to drive me, it is difficult and sometimes painful for me to travel, and I do not believe I would be any more successful now than I was years ago.

13. During the March 2016 primary when the previous photo ID requirement was in effect, I was forced to cast a provisional ballot because my only photo ID – my expired South Carolina ID – was not considered a sufficient photo ID for voting. Having to cast a provisional ballot seemed unnecessary to me because I have lived in the community for years and the poll workers knew me personally. Moreover, casting a provisional ballot bothered me because I did not know if my vote was going to count. I have always gone to vote in person because it is important to me to know that my vote will count.

14. Upon information and belief, my expired South Carolina ID also will not be considered sufficient photo ID for voting under Senate Bill 824.

15. The General Assembly's methods providing for free IDs are not helpful to me. I do not have a social security card or birth certificate, and because I was born in South Carolina, I am not eligible to receive a free birth certificate under the law. It will be difficult, if not impossible, for me to meet the requirements to obtain a free North Carolina DMV ID.

16. In addition, due to my disability, it would be burdensome and costly for me to get a Voter Identification Card from the Union County Board of Elections. I live in Waxhaw, North Carolina and the Union County Board of Elections in Monroe would be approximately a 40-minute round-trip. This is much further than the one-stop early voting site where I regularly vote with my wife, which is only a few minutes down the road from my house.

17. Before the voter ID law passed, I never had trouble voting, and voting at my early voting site without an ID has been stress-free. It is hard for me to understand why not having a photo ID should keep me from voting now. The government has trusted me enough to send me social security checks for over 20 years, and it is frustrating that the government would not trust me to vote a regular ballot.

18. This matter is urgent to me because without proper identification the voter ID law mandates that I cast a provisional ballot for the rest of my life, and risk my vote not counting. It upsets me that if I am unable to endure the burden and cost of obtaining a valid photo ID, I will be forced to go through the provisional ballot process in order to cast a ballot that I cannot even be confident will count.

This the 16th day of February, 2019.

Fred Culp

I, Roslyn Sanchez, a Notary Public of the County and State aforesaid, hereby certify that Fred Culp, personally known to me to be the affiant in the foregoing affidavit, personally appeared before me this day and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

This the 16 day of February, 2019.

(SEAL)

ROSLYN SANCHEZ NOTARY PUBLIC MECKLENBURG COUNTY, NC

Roslyn Sanchez
Notary Public

My Commission Expires: 03/11/22

STATE OF NORTH CAROLINA

COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
18 CVS 15292

JABARI HOLMES, FRED CULP, DANIEL E. SMITH, BRENDON JADEN PEAY, SHAKOYA CARRIE BROWN, and PAUL KEARNEY, SR.,

Plaintiffs,

v.

TIMOTHY K. MOORE *in his official capacity as Speaker of the North Carolina House of Representatives;* PHILLIP E. BERGER *in his official capacity as President Pro Tempore of the North Carolina Senate;* DAVID R. LEWIS, *in his official capacity as Chairman of the House Select Committee on Elections for the 2018 Third Extra Session;* RALPH E. HISE, *in his official capacity as Chairman of the Senate Select Committee on Election for the 2018 Third Extra Session*; THE STATE OF NORTH CAROLINA; *and* THE NORTH CAROLINA STATE BOARD OF ELECTIONS,

Defendants.

AFFIDAVIT OF PAUL KEARNEY

I, Paul Kearney, swear under penalty of perjury, that the following information is true to the best of my knowledge and state as follows:

1. I am over the age of eighteen years old and I am competent to give this affidavit.

2. I am a 69-year-old African-American male and a resident and registered voter in Warren County, North Carolina.

3. I live outside of Warrenton, North Carolina. My town has a population of approximately 845 people. It is a tight-knit community where everyone knows each other on a first-name basis.

4. My family has been in this community for four generations. After my father passed away I took on the responsibility of taking care of the family farm. For employment, I tend to the farm and run a construction business with my son.

5. I am a regular voter and have never before had any issues voting. However, I was disenfranchised during the March 2016 primary.

6. On Election Day one of my cows got out of its fenced pasture. I had to track down the missing cow and return it to the pasture. I changed clothes to handle the situation, which would likely entail me getting dirty. My wallet was in the clothes I was wearing before I had to chase the missing cow.

7. After I returned the cow to the pasture, I attempted to vote, but it was late in the day. I did not get to the polling place until the polls were almost about to close.

8. When I arrived at the precinct, the polling staff greeted me by name. Even though everyone could identify me, I was told that I still needed to show an ID in order to vote. I realized then that I had left my ID in my other clothes and I did not have time to go home to get it before the polls closed.

9. There was a lot of confusion from the polling staff regarding what I needed in order to vote or how to rectify my situation to ensure that my voted counted. It was clear to me that the polling staff was not prepared to handle the situation ~~and, in my small town, this was the first time the issue came up all day~~. I believe that the staff was well-intentioned, but just did not know how to properly deal with my situation or what information I should be given about my voting options. I was told that my only option was to cast a provisional ballot. I was not informed of the option of filling out a reasonable impediment declaration. Nor was I informed that I would need to follow up with the county board of elections if I casted a regular provisional ballot. Although my family has been voting in the same precinct for generations, my vote was not counted during this election.

P.D.K

10. The experience was troubling to me because, in the past, my father voted without having to show an ID. I also voted most of my life, in my community, without having to show ID and without any issue. I am very displeased that my voice was silenced when my vote was not counted.

11. I understand that I am submitting this affidavit in support of an effort to get an injunction from this law going into effect this year. This matter is urgent because well-intentioned, but inadequately trained poll workers may not inform voters what they need to do to cure a provisional ballot, as happened in my situation.

12. In my view, these laws are reminiscent of the barriers African Americans faced to vote in the past. I am suspicious of Senate Bill 824 because I know that the law would serve no purpose in my community where everyone knows one another and I was identified as soon as I stepped in the door.

This the 28 day of FEB., 2019.

Paul Kearney

I, Nastassia N. Debnam, a Notary Public of the County and State aforesaid, hereby certify that Paul Kearney, personally known to me to be the affiant in the foregoing affidavit, personally appeared before me this day and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

This the 28 day of February, 2019.

(SEAL)

NASTASSIA N DEBNAM NOTARY PUBLIC VANCE COUNTY, NC

Nastassia N. Debnam
Notary Public

My Commission Expires: 5/17/2020

STATE OF NORTH CAROLINA

COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
18 CVS 15292

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TIMOTHY K. MOORE *in his official capacity as Speaker of the North Carolina House of Representatives;* PHILLIP E. BERGER *in his official capacity as President Pro Tempore of the North Carolina Senate;* DAVID R. LEWIS, *in his official capacity as Chairman of the House Select Committee on Elections for the 2018 Third Extra Session;* RALPH E. HISE, *in his official capacity as Chairman of the Senate Select Committee on Election for the 2018 Third Extra Session*; THE STATE OF NORTH CAROLINA; *and* THE NORTH CAROLINA STATE BOARD OF ELECTIONS,

Defendants.

AFFIDAVIT OF DANIEL SMITH

I, Daniel Smith, swear under penalty of perjury, that the following information is true to the best of my knowledge and state as follows:

1. I am over the age of eighteen years old and am competent to give this affidavit.

2. I am a 49-year-old African-American male and a resident and registered voter in Cabarrus County, North Carolina.

3. I have lived in Concord for five years now, and have been a regular voter ever since moving to the state from New Jersey in 2013.

4. In 2016, I had to get a new North Carolina driver's license because I lost my old license. The North Carolina Department of Motor Vehicles (NC DMV) gave me temporary driving certificate to use until my official replacement came in the mail.

5. The temporary driving certificate looked just like a NC driver's license, except it was printed on paper. It included the same personal information as my NC driver's license, such as my name, my date of birth, my address, and a photograph of my face, and also had a seal and barcode on the back.

6. The NC DMV told me that my temporary driving certificate would serve the same purpose as my regular license and could be used until my regular license arrived in the mail.

7. I had not received my replacement license in the mail by the time of the March 2016 primary election. Despite bringing with me and presenting what I was told was as good as an NC DMV-issued license, when I went to vote on that Election Day, I had issues casting a ballot.

8. The poll-workers at my polling place refused to accept the temporary driving certificate when I presented it to vote. I was then pulled out of line and felt singled out embarrassed. Next, the polling place staff began to talk among themselves while I was standing in front of them. I was frustrated because I did not know what was going on. Subsequently, I was told that I would not be able to vote using the temporary driving certificate.

9. I was not offered a reasonable impediment provisional ballot or informed of it as an option for voting. Instead, I was only given the option to cast a regular provisional ballot, which is what I cast. The poll workers, however, did not inform me of the process for curing my provisional ballot, and, ultimately, my provisional ballot was not counted in that election. Had the poll workers told me how to cure my provisional ballot, my vote still would not have counted because I did not at the time have a passport and my driver's license did not arrive in the mail until after the deadline for curing provisional ballots.

10. I was disenfranchised, even though I was a registered voter and had a government-issued certificate that had my name, date of birth, address and photograph on it.

11. The same reasonable impediment "safeguard" in place now, under Senate Bill 824, existed in 2016 and still failed to adequately protect my vote.

12. I have concerns that the reasonable impediment "safeguards" will not protect other North Carolina voters in the future. Given what I have experienced, I worry that any voter who has a temporary paper license, like I did back in 2016, will be disenfranchised. The new voter ID law seems designed to discourage people from going to the polls and using their voice to make a difference.

13. I believe all Americans should be able to vote and that the process should be simple and fair. This voter ID law increases the chances that North Carolina voters will have experiences similar to mine.

This the 1 day of March, 2019.

Daniel Smith

I, Ebony Scott, a Notary Public of the County and State aforesaid, hereby certify that Daniel Smith, personally known to me to be the affiant in the foregoing affidavit, personally appeared before me this day and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

This the 1 day of March, 2019.

(SEAL)

Notary Public

My Commission Expires: 7/31/2021

Ebony Scott
Notary Public
Mecklenburg County
State of North Carolina
My Commission expires
July 31, 2021

STATE OF NORTH CAROLINA COUNTY OF WAKE	IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 18 CVS 15292

JABARI HOLMES, FRED CULP, DANIEL E. SMITH, BRENDON JADEN PEAY, SHAKOYA CARRIE BROWN, and PAUL KEARNEY, SR., *Plaintiffs,* v. TIMOTHY K. MOORE *in his official capacity as Speaker of the North Carolina House of Representatives;* PHILLIP E. BERGER *in his official capacity as President Pro Tempore of the North Carolina Senate;* DAVID R. LEWIS, *in his official capacity as Chairman of the House Select Committee on Elections for the 2018 Third Extra Session;* RALPH E. HISE, *in his official capacity as Chairman of the Senate Select Committee on Election for the 2018 Third Extra Session*; THE STATE OF NORTH CAROLINA; *and* THE NORTH CAROLINA STATE BOARD OF ELECTIONS, *Defendants.*	**AFFIDAVIT OF LYNDA BENSON**

I, Lynda Benson, swear under penalty of perjury, that the following information is true to the best of my knowledge and state as follows:

1. I am over the age of eighteen years old and a registered voter in Buncombe County, North Carolina and am competent to give this affidavit.

2. I am a 64 year-old African-American female. I am originally from California but I moved to Asheville, North Carolina in 2015.

3. When I moved to Asheville, I attempted to get a new North Carolina ID from the North Carolina Department of Motor Vehicles (DMV). However, the DMV would not issue me a North Carolina ID because the name on my social security card did not exactly match my name on my California ID. A DMV employee informed me that I needed to get this issue

resolved with the Social Security office. Ultimately, I left the DMV without a North Carolina ID.

4. The experience discouraged me from going through another bureaucratic process to attempt to get proper identification. Furthermore, I knew that I did not have any other documents that could assist me in getting a North Carolina ID. My birth certificate was stolen along with other possessions while I was in California.

5. I wanted to vote in the March 2016 primary, but did not vote in that election because I knew there was a voter ID requirement in place and I did not have a North Carolina ID.

This the 25 day of Feb, 2019.

Lynda Benson

I, Cattleya B. Gaines, a Notary Public of the County and State aforesaid, hereby certify that Lynda Gale Benson, personally known to me to be the affiant in the foregoing affidavit, personally appeared before me this day and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

This the 25th day of February, 2019.

(SEAL) BUNCOMBE COUNTY, N.C. NOTARY PUBLIC CATTLEYA B. GAINES

Cattleya B. Gaines
Notary Public

My Commission Expires: 7/12/2021

STATE OF NORTH CAROLINA

COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
18 CVS 15292

JABARI HOLMES, FRED CULP, DANIEL E. SMITH, BRENDON JADEN PEAY, SHAKOYA CARRIE BROWN, and PAUL KEARNEY, SR., *Plaintiffs,* v. TIMOTHY K. MOORE *in his official capacity as Speaker of the North Carolina House of Representatives;* PHILLIP E. BERGER *in his official capacity as President Pro Tempore of the North Carolina Senate;* DAVID R. LEWIS, *in his official capacity as Chairman of the House Select Committee on Elections for the 2018 Third Extra Session;* RALPH E. HISE, *in his official capacity as Chairman of the Senate Select Committee on Election for the 2018 Third Extra Session*; THE STATE OF NORTH CAROLINA; *and* THE NORTH CAROLINA STATE BOARD OF ELECTIONS, *Defendants.*	**AFFIDAVIT OF MINA EZIKPE**

I, Mina Ezikpe, swear under penalty of perjury, that the following information is true to the best of my knowledge and state as follows:

1. I am over the age of eighteen years old and a registered voter in Durham County, North Carolina and am competent to give this affidavit.

2. I am a 24 year-old African-American female. I am originally from Georgia. I moved to Durham to attend Duke University in 2013. I graduated from Duke in 2017 and currently live and work in Durham. For employment after college, I managed a team that registered young people to vote. I still believe in this work because voting is essential to our democracy. I believe that our electoral process should be designed to make voting easy and to give all eligible voters a voice.

3. While attending college, the only forms of picture ID I had were a Georgia driver's license and a Duke student ID.

4. Before the 2016 March primary, while I was still a student at Duke, I received an email encouraging the student body to vote. At the time I wanted to vote in Durham because I lived here and was actively engaged with my local community.

5. I decided to go to early voting and arrived at an early voting site with my Georgia driver's license and my Duke student ID. I went just days before the end of the early voting period. My photo was on both identification cards. The polling staff told me that these documents were insufficient to satisfy the North Carolina voter ID requirement that was in place at the time. I was not informed about the option of casting a provisional ballot. I was not informed of the reasonable impediment provisional process. Instead, when I asked what my options were, I was told that I could come back and bring a passport or go to the North Carolina Department of Motor Vehicles (DMV) to get a North Carolina ID. I now understand that this information is not accurate.

6. These incorrect instructions were an insurmountable barrier to voting for me. I was a full-time student, without a vehicle, living on campus and it would have been difficult for me to get to a local DMV office. Moreover, in the midst of school and other responsibilities, I did not have time to obtain the documents needed to get a North Carolina driver's license before the voting period ended. My birth certificate, social security card and other required documents were at my family home in Georgia. Even if I had asked my parents to send me these documents via mail, they would not have arrived in time for me to go to a DMV office and get an ID before the end of voting.

7. Thus, based on the erroneous instructions given to me by the poll worker, I was prevented from casting a ballot in 2016 and I understand that there is no record that I attempted to vote but was prevented from doing so because of the ID requirement.

8. I was disappointed and disheartened that I did not get to vote. I wanted to vote and, indeed, recognize that I was denied a fundamental right to participate in the political process.

9. I am worried that an unidentified number of other voters like myself were turned away from the polls in 2016. Similarly, I am concerned that out-of-state students without North

Carolina IDs will be disenfranchised in upcoming elections if their school is unable to satisfy Senate Bill 824's requirements for student IDs to be used for voting purposes.

This the 26th day of Feb, 2019.

Mina Ezikpe

I, James Ernest Lewis, a Notary Public of the County and State aforesaid, hereby certify that Mina Ezikpe, personally known to me to be the affiant in the foregoing affidavit, personally appeared before me this day and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

This the 26th day of Feb, 2019.

(SEAL)

JAMES ERNEST LEWIS
NOTARY PUBLIC
DURHAM COUNTY
STATE OF NORTH CAROLINA

Notary Public

My Commission Expires: 3/7/2019

STATE OF NORTH CAROLINA

COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
18 CVS 15292

JABARI HOLMES, FRED CULP, DANIEL E. SMITH, BRENDON JADEN PEAY, SHAKOYA CARRIE BROWN, and PAUL KEARNEY, SR., *Plaintiffs,* v. TIMOTHY K. MOORE *in his official capacity as Speaker of the North Carolina House of Representatives;* PHILLIP E. BERGER *in his official capacity as President Pro Tempore of the North Carolina Senate;* DAVID R. LEWIS, *in his official capacity as Chairman of the House Select Committee on Elections for the 2018 Third Extra Session;* RALPH E. HISE, *in his official capacity as Chairman of the Senate Select Committee on Election for the 2018 Third Extra Session*; THE STATE OF NORTH CAROLINA; *and* THE NORTH CAROLINA STATE BOARD OF ELECTIONS, *Defendants.*	**AFFIDAVIT OF NOAH VAN HOOK**

I, Noah Van Hook, swear under penalty of perjury, that the following information is true to the best of my knowledge and state as follows:

1. I am over the age of eighteen years old and a registered voter in Orange County, North Carolina and am competent to give this affidavit.

2. I am a ~~19~~ 20-year-old white male originally from Vermont. My family moved to Carrboro, North Carolina four years ago. Currently, I am a student at the University of North Carolina at Chapel Hill where I major in Computer Science and Mathematics.

3. During my free time I stay abreast of the legislation passed by our General Assembly. While I am not often involved in direct political action, I see voting as my vehicle to make my voice heard.

4. I turned 18 years old in high school and became eligible to vote for the first time in the 2016 North Carolina March primary, when a voter ID requirement was in effect. Unfortunately, I was disenfranchised during my first voting experience because I did not have sufficient ID.

5. At the time of the election, I did not have a North Carolina driver's license or learner's permit. The only form of ID I had was my high school ID. However, this ID contained information that identified me including a photo of my face and full name.

6. When I went to go vote in March of 2016, I was excited to participate in the electoral process for the first time. I took my student ID and voter registration card to the precinct. However, I was not aware that my student ID and voter registration card would be considered inadequate identification under the law. Because I did not have what was deemed acceptable ID, I had to fill out a provisional ballot. I was not offered a reasonable impediment declaration. Although I was informed how I might cure my provisional ballot, I did not have any of the acceptable forms of IDs to bring to the county board of elections by the deadline.

7. Ultimately, my provisional vote was not counted and I was disenfranchised. As a student voting for the first time, this experience challenged my faith in our democracy. I felt like an outsider rather than an American. I was upset that I took time out of day to vote but was ultimately silenced. The experience made me question why our state focused on disenfranchising voters as opposed to addressing real issues.

8. I understand that, much like the voter ID law in effect during the March 2016 primary, the current voter ID law will not allow high school students – many of whom may be voting for the first time - to present their high school ID for voting purposes.

9. I am concerned that Senate Bill 824 will disenfranchise qualified high school students who are eager to engage in the political process, but do not have a driver's license or learners permit.

This the 21 ST day of Feb., 2019.

Noah Van Hook

I, James Ernest Lewis, a Notary Public of the County and State aforesaid, hereby certify that Noah Van Hook, personally known to me to be the affiant in the foregoing affidavit, personally appeared before me this day and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

This the 21 ST day of Feb, 2019.

(SEAL)

Notary Public James Ernest Lewis

My Commission Expires: 3/7/2021

JAMES ERNEST LEWIS
NOTARY PUBLIC
DURHAM COUNTY
STATE OF NORTH CAROLINA

STATE OF NORTH CAROLINA

COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
18 CVS 15292

JABARI HOLMES, FRED CULP, DANIEL E. SMITH, BRENDON JADEN PEAY, SHAKOYA CARRIE BROWN, and PAUL KEARNEY, SR., *Plaintiffs,* v. TIMOTHY K. MOORE *in his official capacity as Speaker of the North Carolina House of Representatives;* PHILLIP E. BERGER *in his official capacity as President Pro Tempore of the North Carolina Senate;* DAVID R. LEWIS, *in his official capacity as Chairman of the House Select Committee on Elections for the 2018 Third Extra Session;* RALPH E. HISE, *in his official capacity as Chairman of the Senate Select Committee on Election for the 2018 Third Extra Session*; THE STATE OF NORTH CAROLINA; *and* THE NORTH CAROLINA STATE BOARD OF ELECTIONS, *Defendants.*	**AFFIDAVIT OF REPRESENTATIVE PRICEY HARRISON**

I, Mary Price "Pricey" Harrison, swear under penalty of perjury, that the following information is true to the best of my knowledge and state as follows:

1. I am over the age of 18 years old and am competent to give this affidavit. I currently represent North Carolina House District 61, which encompasses part of Greensboro, North Carolina and surrounding areas of Guilford County.

2. I grew up in Greensboro, North Carolina and received my Bachelor's Degree from Duke University in 1980, along with my Juris Doctorate from the University of North Carolina School of Law in 1985.

3. During my 14 years as a member of the General Assembly, I have sponsored or co-sponsored more than 35 elections-related bills. Of these bills, 2 have been enacted into law. Additionally, I served on the Joint Legislative Elections Oversight Committee from 2013 until 2015, when the previous voter ID law, HB 589, was passed in the legislature, and have served on the House Elections and Ethics Law Committee since 2005, dealing with election-related issues across the state.

4. I have further been active as a member of my community, volunteering at the polls during early voting and on Election Day, and door-knocking to assist in voter registration and education. I am committed to voter enfranchisement and fair elections.

5. I have served in the North Carolina General Assembly since 2005. I was serving in the State House when Senate Bill 824 (2018) ("SB 824") was passed by the General Assembly. My service as a member of the North Carolina House of Representatives over the past decade, along with my active participation in the legislative debates pertaining to SB 824, allow me to speak with experience about the standard legislative process and departures from that process, and the legislative consideration of the impact of SB 824.

The 2018 Legislative Process Relating to Voter ID

6. In November 2018, North Carolinians approved a constitutional ballot initiative mandating voters to show photographic identification when reporting to vote in person ("ID constitutional amendment"). However, the procedure that legislative leadership employed in placing the ID constitutional amendment on the ballot departed from the procedure normally followed.

7. The General Assembly rushed the process for placing the ID constitutional amendment on the ballot. The legislative leadership employed the same rushed process to place five other constitutional amendments on the ballot as well. In North Carolina, it is highly unusual for voters to see as many as six amendments on their ballot. Additionally, the ballot language and the language of the ID constitutional amendment were, based on my personal experience with other constitutional amendments, vague and potentially misleading. Based on extensive engagement in my community, it is my sense that the vague language and crowded nature of the ballot prevented voters from fully appreciating the import and gravity of the ID constitutional amendment on which they would be voting.

8. I also believe that the legislative process leading to the enactment of SB 824 deviated significantly from proper substantive and procedural legislative practices. The legislative process for SB 824 followed an abbreviated and inadequately-deliberative pattern that the General Assembly has only in recent years seemed to have adopted for controversial legislation. Instead of allowing for a proper and thorough debate, the legislative process was truncated.

9. Though North Carolinians approved the ID constitutional amendment in November 2018, mandating voters to show identification upon voting, voters also expressed a desire to see significant changes in the General Assembly. Republicans lost their veto-proof supermajorities in both the State House and Senate during the 2018 midterm.

10. Yet, instead of allowing newly elected officials to craft enabling legislation in accordance with the approved ID constitutional amendment once they took office, the lame-duck legislature reconvened the 2017-2018 Session in late November of 2018 to take up the task. Legislative leaders expedited the passage of SB 824 rather than taking the time to ensure the protection of voters' constitutional rights. Consequently, the General Assembly enacted enabling legislation affecting over 7 million registered North Carolina voters – and overrode a gubernatorial veto of that legislation – in just over 21 days.

11. Consideration of the enabling legislation for the constitutional amendment began on November 27, 2018 and SB 824 passed the North Carolina House by a vote of 67-40 on December 5, 2018. Over a span of only 8 days—with only limited debate and outdated data to inform legislative decisions—the General Assembly enacted enabling legislation impacting millions of North Carolinians for years to come.

12. Because of the legislature's failure to consider public input, failure to use updated data, failure to allow a thorough debate, and failure to take into account all implications of the bill's potential impact on voters, it is my belief that SB 824 as passed fails to sufficiently balance the need to legislatively implement the ID constitutional amendment with the need to preserve all other rights that the North Carolina Constitution affords.

13. Specifically, the House failed to give adequate notice of the meeting to discuss the proposed language for SB 824, and circulated the proposed language only the night before its consideration. Several House members, including myself, had to arrange last minute travel back to Raleigh and cancel other scheduled events and meetings in order to attend the Session.

14. Further, public comment was limited to allow only 30 individuals to speak on the proposed bill. Such a limitation deviates from typical procedure for a bill of this magnitude that relates to fundamental constitutional rights. In my experience, with regard to bills of this magnitude that affect issues such as voting rights or redistricting, the legislature has provided much more opportunity for lengthy and balanced public comment. In this instance, only a few individuals had the opportunity to speak in opposition to the proposed bill. Again, this is a deviation from standard procedure.

15. In my experience, it is a deviation from normal procedure to limit discussion of a bill of this magnitude to just a few hours. The scope of SB 824 necessitated a significantly extended timeline in order to properly understand its far-reaching implications on the ability of North Carolina citizens to vote.

16. Given the expedited timeline that the General Assembly pursued in passing SB 824, there was no opportunity—as would be available during a normal legislative process—to access relevant and critical data regarding voter information. It is my understanding that much of the data available to us was outdated. As such, the particulars of SB 824 fail to accurately reflect the current state of voter specific information in North Carolina.

17. Legislators were presented with data from 2015 for their consideration when enacting SB 824, rather than more appropriate, up-to-date figures. For example, the General Assembly was presented with significantly outdated "no-match" data demonstrating how many North Carolina voters lacked photo ID as of 2015, and to my knowledge did not even attempt to ascertain how many voters lacked such ID at the time SB 824 was on the floor for discussion.

18. By contrast, the General Assembly was made aware of data—through a presentation delivered to the Joint Legislative Elections Oversight Committee—that showed SB 824 would disenfranchise thousands of voters. Nevertheless, the General Assembly enacted SB 824.

19. Consequently, I believe that thousands of additional voters will be disenfranchised on the basis of this unnecessarily rushed legislative process that failed to account for the full scope of relevant information.

Lack of Ameliorative Amendments to SB 824

20. In addition to the limitations placed on the legislative process for SB 824, the General Assembly also erred in failing to approve a series of ameliorative amendments aimed at addressing potential constitutional concerns. This failure resulted in a final version of SB 824 that disproportionately impacts African-American voters, American-Indian voters, voters with disabilities, elderly voters, and college students.

21. I oversaw the efforts to introduce ameliorative amendments during both committee and floor debate. A number of Democratic members of the House presented amendments that would have lessened the burden on the aforementioned groups, but nearly all were either ruled out of order or voted down by the Majority on the floor of the General Assembly.

22. For instance, I introduced an amendment in committee that would have allowed for a student's school schedule, in addition to work schedule, to be listed as a reasonable impediment to obtaining a voter ID, but this amendment was voted down largely along party lines. Additionally, amendments that would have enabled high school students to use their student ID for voting purposes (introduced by Rep. Fisher), and would have enabled the recipients of federal and state public assistance to use their public assistance IDs for voting purposes (introduced by Rep. B. Richardson) were also rejected. The justification provided by Representative Lewis for the rejection of public assistance IDs was that the General Assembly does not have the ability to impose its standards on the federal government; however, Representative Lewis acknowledged that the same is true for military IDs, and that was nonetheless included as an acceptable form of photo ID.

23. Further, an ameliorative amendment that would have allowed for a voter to cure their provisional ballot at the polling place by receiving the signature of two witnesses who could attest to the voter's identity (introduced by Rep. Jackson) was initially passed in committee, but was subsequently removed in a later version of the bill due to an amendment introduced by Representative Lewis.

24. Two amendments offered by Representative Marcia Morey that would have allowed for (1) more overall flexibility for county boards in early voting hours, and (2) would have required early voting on the last Saturday before Election Day, in order to ensure that voters would be able to obtain a free County Board ID on at least one weekend day and on the day at which the rate of voting is the generally the highest, were ruled out of order as not germane to the bill and were not even permitted to be considered.

25. House leadership was aware that Democratic House members intended to propose additional ameliorative amendments during third reading, and members attempted to object to third reading to do so, but were told that their objection came too late despite the fact that it was lodged within seconds. This highly unusual departure from typical procedure prevented the introduction of additional amendments to SB 824 before it was ordered engrossed.

26. There were renewed attempts to make ameliorative amendments to SB 824 through the technical corrections process. I introduced an amendment seeking to allow for temporary DMV-issued photo ID to be used for voting purposes, but this amendment failed largely along party lines. Representative Bobbie Richardson again introduced an amendment to enable the recipients of federal and state public assistance to use their public assistance ID for voting purposes, but this also failed largely along party lines.

27. I also re-introduced during technical corrections the amendment to allow for a student's school schedule, in addition to work schedule, to be listed as a reasonable impediment to obtaining a voter ID. Though this amendment passed with bipartisan support in the House, it was removed from the Conference Report that was ultimately adopted by both chambers.

28. I believe that each of the above amendments would have ensured widespread compliance with enacted enabling legislation, both among the general populace and within the aforementioned disproportionately impacted groups. However, the General Assembly's failure to implement these amendments into SB 824 resulted in a bill I believe will disenfranchise tens of thousands of eligible North Carolina voters.

This the 8th day of May, 2019.

Mary Price Taylor Harrison

I, Stacy Hamilton, a Notary Public of the County and State aforesaid, hereby certify that Mary Price Taylor Harrison, personally known to me to be the affiant in the foregoing affidavit, personally appeared before me this day and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

This the 8th day of May, 2019.

(SEAL)

STACY HAMILTON
NOTARY PUBLIC
WAKE COUNTY, NC
My Commission Expires 12/10/2022

Notary Public

My Commission Expires: 12/10/22

STATE OF NORTH CAROLINA

COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
18 CVS 15292

JABARI HOLMES, FRED CULP, DANIEL E. SMITH, BRENDON JADEN PEAY, SHAKOYA CARRIE BROWN, and PAUL KEARNEY, SR., *Plaintiffs,* v. TIMOTHY K. MOORE *in his official capacity as Speaker of the North Carolina House of Representatives;* PHILLIP E. BERGER *in his official capacity as President Pro Tempore of the North Carolina Senate;* DAVID R. LEWIS, *in his official capacity as Chairman of the House Select Committee on Elections for the 2018 Third Extra Session;* RALPH E. HISE, *in his official capacity as Chairman of the Senate Select Committee on Election for the 2018 Third Extra Session*; THE STATE OF NORTH CAROLINA; *and* THE NORTH CAROLINA STATE BOARD OF ELECTIONS, *Defendants.*	**AFFIDAVIT OF SENATOR MIKE WOODARD**

I, Mike Woodard, swear under penalty of perjury, that the following information is true to the best of my knowledge and state as follows:

1. I am a U.S. citizen, resident of Durham County, a registered voter, and I am competent to give this affidavit. I currently represent North Carolina Senate District 22, which encompasses Granville County, Person County, and parts of Durham County.

2. I grew up in Wilson, North Carolina and received my Bachelor's Degree from Duke University in 1981.

3. During my six years as a member of the General Assembly, I have sponsored or co-sponsored more than ten bills on voter enfranchisement. Additionally, I have served on

the Joint Legislative Elections Oversight Committee for two terms dealing with election-related issues across the state.

4. I have further been active as a member of my community, serving in leadership roles on numerous boards and committees. Through this work, I have demonstrated a commitment to various non-profit and human services organizations in the Triangle Area.

5. I have served in the North Carolina General Assembly since 2013. I was serving in the State Senate when Senate Bill 824 (2018) ("SB 824") was passed by the General Assembly. My service as a member of the North Carolina Senate over the past six years, along with my active participation in the legislative debates pertaining to SB 824, enable me to speak with credibility about the standard legislative process and departures from that process, and the legislative consideration of the impact of SB 824.

The 2018 Legislative Process Relating to Voter ID

6. In November 2018, North Carolinians approved a constitutional ballot initiative mandating voters to show identification upon voting ("constitutional amendment"). But the General Assembly deliberately rushed the process for putting the constitutional amendment on the ballot. All in all, the constitutional amendment was filed and passed both houses of the General Assembly ***in under one month***. The intent of the constitutional amendment was to disenfranchise voters. I was disappointed by the implementation of the constitutional amendment and the vague language placed on the ballot. Changes to the State Constitution should be taken seriously. The General Assembly has the responsibility to be thoughtful and intentional about making changes to the constitution that could impact generations of voters to come.

7. In enacting SB 824, the General Assembly similarly failed to take these principles into consideration. The legislative process for SB 824 deviated significantly from proper substantive and procedural legislative practices. The legislative process for SB 824 followed an abbreviated and inadequately-deliberative pattern that the General Assembly has only in recent years adopted for controversial legislation.

8. Consideration of the enabling legislation for the constitutional amendment began on November 27, 2018. On this date, SB 824 was referred to the Select Committee on Elections and passed with only a handful of votes. There was no public comment. Subsequently, the Senate had less than 24 hours to review the bill before it was debated on the floor the next day. As a result of the artificially abbreviated timeline, members of the Senate were forced to cram to understand the bill and had insufficient time—under one day—to reach out to the county board of elections, the state board, and election experts. Nonetheless, after roughly an hour and ten minutes of discussion, the bill passed in just two days. Subsequently, SB 824 passed the North Carolina House by a vote of 67-40 on December 5, 2018.

9. Between November 27—when consideration of the bill began—and December 5, the General Assembly held limited debate based on insufficient data. Specifically, the General Assembly lacked a new no-match list to inform its decisions. In just seven days,

the General Assembly enacted enabling legislation impacting millions of North Carolinians for years to come.

10. As a direct result of artificial limitations on the process, it is my belief that SB 824 as passed fails to sufficiently balance North Carolinians' constitutional rights with the recently passed constitutional amendment. The scope of SB 824 necessitated a significantly longer timeline for legislative consideration in order to allow the people's representatives to properly understand its wide-reaching legislative implications and to ensure standardized implementation across the state.

11. Additionally, the General Assembly based its legislative decisions on outdated data from 2015 when enacting SB 824, rather than seeking out more recent information so as to better understand the implications of SB 824. In fact, the General Assembly was made aware—through a presentation delivered to the Joint Legislative Elections Oversight Committee, of which I am a member—that SB 824 would disenfranchise thousands of voters. The presentation put the General Assembly on notice that voters and poll workers were not adequately educated about voter ID during an almost three year rollout for the last voter ID law. My colleagues were aware that a rollout to require voter ID for the 2019 primaries would be devastating and yet persisted to push the bill through the curtailed process. Furthermore, the expedited timeline that the General Assembly pursued in passing SB 824 failed to provide the opportunity—as would be available during a normal legislative process—to access relevant and critical data regarding voter information.

12. Consequently, I believe that North Carolina voters will be disenfranchised on the basis of this unnecessarily rushed legislative process that failed to account for the full scope of relevant information. The General Assembly has failed to adopt a well-thought-out approach to alleviate the burden on voters and ensure that the process is simple and easy.

Lack of Ameliorative Amendments to SB 824

13. At the outset, Senator Clark and I drafted Senate Bill 822, an alternative bill that would have required voter ID to go into effect in 2021. This is significantly longer than SB 824's rushed initial 2019 effective date. To avoid widespread confusion, SB 824's provisions requiring ID to be shown while voting in person has since been pushed back to 2020. This was done to accommodate those voting in the new elections for the 3rd and 9th Congressional Districts in 2019. If the bill Senator Clark and I proposed had passed, it would not have been necessary to push back the effective date for showing photo ID, thus adding to likely voter confusion.

14. The General Assembly also failed to approve a series of ameliorative amendments aimed at prophylactically addressing potential constitutional concerns. This failure resulted in a final version of SB 824 that unconstitutionally and disproportionately impacts African-American voters, American-Indian voters, voters with disabilities, elderly voters, and college students.

15. For instance, a number of Democratic members of the State Senate presented amendments that would have lessened the burden on the aforementioned groups, but nearly all were summarily dismissed by Republicans on the floor of the General Assembly. These amendments included an amendment to approve all state government IDs that have an expiration date (Woodard), extending the deadline for the county board of elections to offer voter photo identification cards to July 2019 (Van Duyn); and allowing one stop voting on the last day before Election Day (Lowe). I also advocated for tabling SB 824 altogether for a significantly longer rollout. I believe all these changes are important and would have improved the bill. However, the General Assembly's failure to implement these amendments and recommendations into SB 824 resulted in a bill sure to disenfranchise thousands of eligible North Carolina voters.

Negative Impact of SB 824

16. The language of SB 824 reveals that the law is aimed at furthering the Senate Republican majority's political agenda rather than protecting voters' constitutional rights. For instance, government employee IDs can be approved by the State Board of Elections, but identification cards offered to the people the employees serve cannot. A housing authority employee ID card can be approved, but a public housing resident ID card cannot. A public housing resident without other sufficient forms of identification will have to make extra arrangements to get adequate identification from the DMV or County Board of Elections. On the contrary, voters with proper government identification such as approved state employee ID or a Military ID do not have to navigate the same obstacles. The various requirements in SB 824 highlight who the General Assembly would like to vote and which voters are targeted for the purpose of creating hurdles to voting.

17. Furthermore, the effective date for the 100 county board of elections to offer voter photo identification cards is extremely short. Despite the effective date for several provisions being pushed back, the various board of elections were required to have staff trained and ensure that equipment was installed and properly functioning by May 1, 2019. I am concerned that smaller counties will face unique challenges. County Board of Elections that employ only a few staff members will be held to the same standard as Wake or Mecklenburg County, which employs many staff members.

18. Lastly, I am concerned that there is insufficient time to properly educate voters on the requirements of SB 824. Over the years, the State has gone back and forth with respect to whether voter ID is needed. Making matters worse, voters were told that ID would be required to cast a vote during 2019 only to subsequently be informed that the effective date will be pushed back to 2020. Ultimately, my constituents, who often inquire about the status of voter ID, are the individuals impacted.

This the 14th day of May, 2019.

Mike Woodard

I, Cynthia Wright Davis, a Notary Public of the County and State aforesaid, hereby certify that Mike Woodard, personally known to me to be the affiant in the foregoing affidavit, personally appeared before me this day and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

This the 14 day of May, 2019.

(SEAL)

CYNTHIA WRIGHT DAVIS NOTARY PUBLIC JOHNSTON COUNTY, NC

Cynthia Wright Davis
Notary Public

My Commission Expires: 5/7/2022

STATE OF NORTH CAROLINA

COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
18 CVS 15292

JABARI HOLMES, FRED CULP, DANIEL E. SMITH, BRENDON JADEN PEAY, SHAKOYA CARRIE BROWN, and PAUL KEARNEY, SR., *Plaintiffs,* v. TIMOTHY K. MOORE *in his official capacity as Speaker of the North Carolina House of Representatives;* PHILLIP E. BERGER *in his official capacity as President Pro Tempore of the North Carolina Senate;* DAVID R. LEWIS, *in his official capacity as Chairman of the House Select Committee on Elections for the 2018 Third Extra Session;* RALPH E. HISE, *in his official capacity as Chairman of the Senate Select Committee on Election for the 2018 Third Extra Session*; THE STATE OF NORTH CAROLINA; *and* THE NORTH CAROLINA STATE BOARD OF ELECTIONS, *Defendants.*	**AFFIDAVIT OF REPRESENTATIVE BEN CLARK**

I, Ben Clark, swear under penalty of perjury, that the following information is true to the best of my knowledge and state as follows:

1. I am a U.S. citizen, resident of Hoke County, a registered voter, and I am competent to give this affidavit. I currently represent North Carolina Senate District 21, which encompasses all of Hoke County and part of Cumberland County, North Carolina.

2. I grew up in Cumberland County, and received my Bachelor's Degree from North Carolina Agricultural and Technical State University. I received my Master's Degree from Southern Illinois University at Edwardsville.

3. During my six years as a member of the General Assembly, I have sponsored or co-sponsored several bills on voter enfranchisement. Additionally, I have served on the Redistricting and Elections Committee dealing with election-related issues across the state.

4. I have served in the North Carolina General Assembly since January 2013. I was serving in the State Senate when Senate Bill 824 (2018) ("SB 824") was passed by the General Assembly. My service as a member of the North Carolina Senate over the past six years, along with my active participation in the legislative debates pertaining to SB 824, enable me to speak with credibility about the standard legislative process and departures from it, as well as the legislative consideration of the impact of SB 824.

5. North Carolinians approved a constitutional ballot initiative in November 2018 mandating voters to show identification upon voting. I initially voted in favor of SB 824, the implementing legislation for the voter ID constitutional amendment. I expected the Bill to be improved in the House Chamber before it was passed and enacted, so that it would sufficiently protect North Carolina voters. However, the bill that was ultimately enacted does more harm than good by making it difficult for North Carolinians without photo identification or unapproved forms of identification to cast a regular ballot.

6. SB 824 requires the State Board of Elections to write new rules to address policy that should have been addressed in the legislation. Fleshing out the details of implementation is the responsibility of the General Assembly; however, this responsibility was abdicated and improperly delegated to the State Board of Elections.

7. It is my belief that SB 824 as passed fails to sufficiently balance North Carolinians' constitutional rights with the recently passed constitutional amendment and represents the legislature's failure to craft a voter ID law that respects other constitutional rights. Though North Carolinians approved a constitutional ballot initiative in November 2018 mandating voters to show identification upon voting, voters also expressed a desire to see significant changes in the General Assembly. Republicans lost their veto-proof supermajorities in both the State House and Senate during the 2018 midterm. Yet, rather than respecting this repudiation by the people and revising SB 824 in light of Governor Cooper's December 14th veto – or deferring to the newly elected legislature to craft the enabling legislation – the supermajorities in both chambers took one of their final opportunities to override the veto of SB 824 on December 18 and 19, 2018.

8. In 2013, I filed a bill, Senate Bill 235, that would implement a photo ID option. In pertinent part, the bill would have allowed a voter to have his or her photograph taken by a designated election official and sign a voter photo affidavit, affirming that he or she is in fact the registered voter in whose name they are requesting a ballot. The bill was referred to the Committee on Rules and Operations of the Senate but was not heard in Committee, nor was the bill was passed.

9. Subsequently, I initially voted in favor of SB 824, demonstrating that I am not opposed to voter ID legislation that adequately protects voters. However, I voted on December 18, 2018, to sustain the gubernatorial veto of SB 824. In my view, the "final" piece of

legislation was inadequate in that it would create more confusion and barriers to voting than it would create election security and integrity.

10. SB 824 substantially replicates an unconstitutional and unethical voter ID law in effect during in the March 2016 primaries. SB 824 applies the same reasonable impediment mechanism that disenfranchised over 1,200 voters during the 2016 primaries. The law does not create adequate fail-safe mechanisms to protect the right of every eligible voter. Election officials across North Carolina's 100 counties will determine whether the voters' provisional ballots will count, subjecting them to arbitrary treatment and thereby increasing the risks of disenfranchisement. Additionally, a significant increase in provisional ballots will put a burden on local election officials and create uncertainty in election results.

11. I am also fearful that SB Bill 824 will result in the disenfranchisement of legitimate North Carolina voters who do not have proper ID while ignoring the real and documented occurrences of major election fraud through illegal ballot harvesting that have truly threatened the integrity of our elections.

12. Moreover, although Senate Bill 824 requires each county board of elections to offer voter photo identification cards, the law precludes the voter from using the identification card for any other purpose. This is a missed opportunity to provide voters without a photo ID the chance to obtain identification and use it as a tool to improve their lives. The identification card's lack of utility decreases the incentive for voters to spend time and money to make the trip to their county board of elections to obtain a card for the sole purpose of voting.

13. Lastly, I am concerned that the proposed law creates enormous, unfunded burdens on universities and employers to modify how they issue photo IDs in order to bring those IDs into compliance with the proposed laws. In addition, I fear that the onerous requirements of this mandate acts as a deterrent rather than a mechanism to enable college students and state employees in North Carolina to vote.

14. SB Bill 824 does nothing to proactively mitigate against the widespread defrauding or disenfranchisement of legitimate North Carolina voters. While I initially supported S.B. 824, the final version of the bill failed to implement sensible requirements to protect North Carolina voters from being disenfranchised. Therefore, I could not support its enactment, and do not support its continued enforcement.

This the 14 day of May, 2019.

Ben Clark

I, Lynn Lowry, a Notary Public of the County and State aforesaid, hereby certify that Ben Clark, personally known to me to be the affiant in the foregoing affidavit, personally appeared before me this day and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

This the 14th day of May, 2019.

(SEAL)

LYNN LOWRY
NOTARY PUBLIC
Wake County
North Carolina
My Commission Expires Feb. 9, 2020

Notary Public

My Commission Expires: 02/09/2020

STATE OF NORTH CAROLINA COUNTY OF WAKE	IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 18 CVS 15292
JABARI HOLMES, FRED CULP, DANIEL E. SMITH, BRENDON JADEN PEAY, SHAKOYA CARRIE BROWN, and PAUL KEARNEY, SR., *Plaintiffs,* v. TIMOTHY K. MOORE *in his official capacity as Speaker of the North Carolina House of Representatives;* PHILLIP E. BERGER *in his official capacity as President Pro Tempore of the North Carolina Senate;* DAVID R. LEWIS, *in his official capacity as Chairman of the House Select Committee on Elections for the 2018 Third Extra Session;* RALPH E. HISE, *in his official capacity as Chairman of the Senate Select Committee on Election for the 2018 Third Extra Session*; THE STATE OF NORTH CAROLINA; *and* THE NORTH CAROLINA STATE BOARD OF ELECTIONS, *Defendants.*	**AFFIDAVIT OF GREG FLYNN**

I, Greg Flynn, swear under penalty of perjury, that the following information is true to the best of my knowledge and state as follows:

1. I am over the age of eighteen years old and am competent to give this affidavit.

2. I am 59 years old and a resident and registered voter in Wake County, North Carolina.

3. I was appointed to the Wake County Board of Elections (the Board) as Chair on February 13, 2019. I have been on the Board for just over one year. I was an observer of the Board for four years. These statements are made in a personal, not official, capacity.

4. I have concerns about county board requirements for issuing voter photo identification cards pursuant to Senate Bill 824. The members of the State Board of Elections ("State Board") were not appointed until January 31, 2019. This is troubling because the State Board is responsible for creating rules pertaining to producing the voter photo identification cards and coordinating with the counties to inform voters about the identification cards. Additionally, the Wake County Board members were unable to act and not fully sworn in until February 18, 2019. Notwithstanding the complications mentioned above, each county board of elections was required to start producing voter photo identification cards by May 1, 2019. This is an entirely new function that the Wake County Board has had to learn on top of the Board's current duties, which include conducting elections, training precinct staff, and maintaining and providing voting related information. Even with the staff's best efforts, this window of time is much too narrow and challenges our staff's ability to provide the best service possible.

5. To my knowledge there has not been clear communication between the Wake County Board and the State Board regarding production of free voting photo identification cards. Despite the lack of communication, our staff is dedicated to ensuring that we are able to provide cards for voters. We will have to do what it takes to get the job done, while understanding that the complications outlined in this statement make it difficult to adequately serve our voters.

6. Our staff has conducted tests to determine how long it takes to process an application and issue photo ID. The Board estimates that the program will cost $170,000 for the 2019-2020 budget year. We also estimate that we will need additional staff members dedicated to this project, as well as a number of customer service representatives to answer questions, help people with the process, and assist voters with getting to our location to obtain an ID.

7. Despite our consistent efforts to move forward, the uncertainty pertaining to funding and guidance places an undue burden on our staff. The State Board has informed the county boards that the each county will get one machine and will be reimbursed for supplies purchased. The State Board will "consider" reimbursing counties that want to use more than one machine. Currently, we have purchased extra machines with our own resources to adequately assist voters that do not have photo ID.

8. As late as March 21, 2019, we were instructed to hold off on making the decision to offer IDs elsewhere until more guidance was given by the State Board. For months this uncertainty made it difficult to make decisions about offering IDs at events or other locations. We have now been informed that voters can apply for ID offsite and the ID can be mailed to the voter. However, their personal information must be verified at the County Board of Elections through our secure system. The State Board has not communicated to the Wake County Board regarding how the $850,000 allocated for this project will be divided among the 100 counties. I am concerned that insufficient funding has been appropriated to assist the county boards with providing voter photo identification cards.

9. The ambiguity with respect to funding has made it difficult to budget for the fiscal year 2019-2020 and creates a financial burden to implementing Senate Bill 824's requirements. Recently, the Board submitted a budget to the County Commission to cover our anticipated expenses. The initial proposal was rejected. The confusion caused by Senate Bill 824 related to funding interferes with my ability and the ability of the Board's staff to perform normal election administration functions, and it obviously presents a financial burden for my County.

10. In the absence of clear guidance from the State the Wake County Board of Elections has anticipated the burden of training staff on how to use the voter photo identification card equipment. Issuing IDs is not the Wake County Board's primary function. Our staff is accustomed to handling data in bulk and producing voter registration cards. However, the Wake Court Board of Elections is not familiar with producing a single identification card for an individual on site. The Board is also responsible for training poll workers to educate voters about voter ID requirements and subsequently implementing them. Notwithstanding these challenges I am confident our staff will rise to the occasion.

11. The Board is putting in place new voting equipment recently acquired for future elections. Moreover, our office is moving our staff from across the county to one central location. Thus, training staff to use the photo ID equipment creates an extra burden on a staff that is transitioning to a new location, training for revised absentee ballot processing and training to operate new voting equipment. Senate Bill 824's requirements yield one more hurdle for a staff that is currently facing several other pressing tasks.

12. Another concern is the potential surge in the number of IDs we will have to produce to assists students. Several colleges and universities in Wake County failed to meet Senate Bill 824's requirements to ensure that students could use their student ID cards to vote during the 2020 elections. In addition, students that live in Wake County and attend the University of North Carolina at Chapel Hill may also seek voter photo identification cards from the Wake County Board of Elections because their school IDs were not approved by the State Board. The Wake County Board of Elections may now be forced to take on the burden of ensuring that students from various schools in Wake County will have photo ID that allows them to vote. The University of North Carolina at Chapel Hill employer identification cards were also not approved. The UNC health care system, which is affiliated with the school, has several facilities in Wake County. A subset of the UNC health care system workers for whom their work ID is their only form of photo ID, and other similarly situated individuals in Wake County, would likely be candidates for voter ID. The Board may have to provide identification for these voters as well.

13. Lastly, I am concerned about the smaller counties around the state that have fewer resources. Wake County is fortunate to have a well-supported election staff and more resources than most counties to provide voter photo identification cards. Smaller counties with less resources and truncated business hours will face their own unique challenges.

This the 14th day of May, 2019.

Greg Flynn

I, Shelby J. Payne, a Notary Public of the County and State aforesaid, hereby certify that Greg Flynn, personally known to me to be the affiant in the foregoing affidavit, personally appeared before me this day and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

This the 14th day of May, 2019.

SHELBY J. PAYNE NOTARY (SEAL) PUBLIC JOHNSTON COUNTY, N.C.

Notary Public

My Commission Expires: 05/10/2024

STATE OF NORTH CAROLINA

COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
18 CVS 15292

JABARI HOLMES, FRED CULP, DANIEL E. SMITH, BRENDON JADEN PEAY, SHAKOYA CARRIE BROWN, and PAUL KEARNEY, SR., *Plaintiffs,* v. TIMOTHY K. MOORE *in his official capacity as Speaker of the North Carolina House of Representatives;* PHILLIP E. BERGER *in his official capacity as President Pro Tempore of the North Carolina Senate;* DAVID R. LEWIS, *in his official capacity as Chairman of the House Select Committee on Elections for the 2018 Third Extra Session;* RALPH E. HISE, *in his official capacity as Chairman of the Senate Select Committee on Election for the 2018 Third Extra Session*; THE STATE OF NORTH CAROLINA; *and* THE NORTH CAROLINA STATE BOARD OF ELECTIONS, *Defendants.*	**AFFIDAVIT OF JOHN QUINN**

I, John Quinn, swear under penalty of perjury, that the following information is true to the best of my knowledge and state as follows:

1. I am over the age of eighteen years old and am competent to give this affidavit.

2. I am 66 years old and a resident and registered voter in Buncombe County, North Carolina.

3. I was appointed as the Buncombe County Board of Elections Chair on February 15, 2019.

4. From April 2, 2018, to December 28, 2018, I served on the Buncombe County Board of Elections as secretary and as a member.

5. As Chair of the Buncombe County Board of Elections, I have concerns about our requirements for issuing voter photo identification cards pursuant to Senate Bill 824.

6. The Buncombe County Board of Elections is comprised of a dedicated and talented staff that has consistently exceeded expectations to ensure that elections run smoothly. Our election services staff consists of nine people. I am concerned about Senate Bill 824's impact on temporary election staff and voters in our community.

7. Our staff was required to start producing compliant identification cards by May 1, 2019, notwithstanding the effective date for requiring voters to show photo identification when voting in person being pushed back to 2020. Even with the staff's best efforts, this window of time was much too narrow. The near-constant change in voting laws in recent years, in dramatic and sudden ways, has challenged our staff's ability to provide the best service possible to our voters. The new mandate that we produce voter photo identification cards – an activity that has never been a core function of election services – will require extra resources and hinder our ability to address other pressing election administration concerns. As just one example, the Board must ensure that elections run smoothly despite local elections transitioning from at-large to district-based elections. As another example, it has also been suggested that the General Assembly move municipal elections across the county from odd years to even years. Our election services staff must adapt to all these changes and fulfil its primary obligation to properly administer elections. This new requirement that we produce photo ID cards for voters is just one more task our staff must balance with regular election administration duties.

8. In addition, I am concerned that insufficient money has been appropriated to assist the county boards with providing voter photo identification cards. Few details have been fleshed out about how the money appropriated in Senate Bill 824 will be allocated. I am not confident that the expenses above the cost of the equipment were considered. Indeed, the Buncombe County Board of Elections was only allocated one machine to provide ID cards to voters. Our County purchased extra machines with our own resources further indicating that Senate Bill 824's burdens fall on the various county boards of elections.

9. I have yet to have a formal conversation with the State Board regarding how funds to produce the photo voter identification cards will be allocated to each county. To the best of my knowledge our staff has not received guidance regarding the allocation of funds. Based on our interpretation of Senate Bill 824, the State Board was only given $750,000 to implement the project. Another $850,000 is to be allocated to the various county boards of elections for printing equipment and other related purposes. I do not know how much funding Buncombe County will receive. I do not know how much additional money I will need to seek from my county commission in order to comply with the statute. If I underestimate the supplemental amount I may need from my county, I will likely need to go back to my county commission for additional funding. This unnecessary process interferes with my ability and the ability of my staff to do our normal election administration functions, and it obviously presents a financial burden for my county.

10. Our dedication to make free IDs available to as many Buncombe County voters as possible requires the Board to navigate hurdles related to providing resources. We are not certain about the amount of resources needed to sufficiently serve voters that need ID. We have no way of knowing how many voters will react to the Board of Elections offering free ID. There is no way to anticipate the number of people that will requests identification.

11. Another major issue is that our first real test for implementing a process for the issuance of free IDs will occur while we are also administering the 2020 elections. The General Assembly changed the Asheville city council elections to fall on even years instead of odd years. Thus, Buncombe County will not be conducting Asheville municipal elections in 2019. Several other municipalities in the county are attempting to follow Asheville and hold municipal elections in 2020 instead of 2019. It is unclear how many elections will be conducted in 2019. Municipal elections tend to be smaller and give election judges and poll workers a less intense environment to learn their roles and responsibilities. This ensures that our staff is ready for the larger 2020 elections. Thus, changing when elections are held results in staff losing a vital training opportunity. The totality of the issues mentioned above coupled with Senate Bill 824's requirements are burdensome and could result in longer lines on Election Day.

12. Additionally, I am concerned for the smaller counties around the state that have fewer resources to implement the requirements for offering voter photo identification cards in Senate Bill 824. Buncombe County is fortunate to have a county commission that makes access to the ballot box a high priority, a talented election services staff, and more resources than most counties to provide voter photo identification cards.

13. While I believe in my staff and their ability to produce voter photo identification cards, the time constraints, appropriations, and training issues place an undue strain on my staff, which ultimately impacts our voters' experiences. I am concerned that the constantly changing landscape of North Carolina's voting laws will undermine the quality of our services thereby decreasing voters' faith in the electoral process.

This the 14 day of May, 2019.

John Quinn

I, Keith R. Green, a Notary Public of the County and State aforesaid, hereby certify that John Quinn, personally known to me to be the affiant in the foregoing affidavit, personally appeared before me this day and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

This the 14 day of May, 2019.

(SEAL)

KEITH R. GREEN NOTARY PUBLIC BUNCOMBE COUNTY, N.C.

Keith R. Green
Notary Public

My Commission Expires: 7/12/2021

STATE OF NORTH CAROLINA COUNTY OF WAKE	IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 18 CVS 15292
JABARI HOLMES, FRED CULP, DANIEL E. SMITH, BRENDON JADEN PEAY, SHAKOYA CARRIE BROWN, and PAUL KEARNEY, SR., *Plaintiffs,* v. TIMOTHY K. MOORE *in his official capacity as Speaker of the North Carolina House of Representatives;* PHILLIP E. BERGER *in his official capacity as President Pro Tempore of the North Carolina Senate;* DAVID R. LEWIS, *in his official capacity as Chairman of the House Select Committee on Elections for the 2018 Third Extra Session;* RALPH E. HISE, *in his official capacity as Chairman of the Senate Select Committee on Election for the 2018 Third Extra Session*; THE STATE OF NORTH CAROLINA; *and* THE NORTH CAROLINA STATE BOARD OF ELECTIONS, *Defendants.*	**AFFIDAVIT OF NOAH READ**

I, Noah Read, swear that the following information, under the penalty of perjury, is true to the best of my knowledge and state as follows:

1. I am over the age of eighteen years and am competent to give this affidavit.

2. I currently serve as a member of the Alamance County Board of Elections ("CBE"). I was first seated as a member of the CBE in April 2018, and served in that capacity until the CBE was disbanded by court order in December 2018. I was reappointed to the CBE on February 7, 2019.

3. The CBE has had three business meeting so far this year – one on March 26, 2019, one on April 9, 2019, and one on May 6, 2019. I attended all three of these meetings. Concerning the April 9th meeting, I was delayed at work and was only able to get to the meeting as it ended. I did meet immediately after the meeting with the Director to discuss what I had missed and sign a document.

4. The CBE and our elections staff face a number of financial and logistical challenges for 2019 and 2020. The County Commission has held the CBE to a flat budget since 2014, despite sustained population growth in Alamance County each year and additional election-related expenses. In 2018, we requested money for a salary increases in the budget in order to retain staff, and the Alamance County Commission rejected our request. We then lost two talented staff members – one full time staff member and one part-time staff member – right after the November 2018 election. One of those staff member's duties included investigating and resolving provisional ballots. We have since hired replacements who had to be trained.

5. In 2018, the CBE and our Director had hoped to add an additional One Stop Early Voting site in Alamance County to increase voter access. When the North Carolina General Assembly established the hours and locations required for early voting in a way that required us to keep each site open for longer hours, we had to shelve those plans and focus on preserving our existing One Stop sites and days of early voting in the face of increasing costs. We ultimately had to borrow money from a fund otherwise reserved to pay for a possible recount in order to avoid serious cuts to the early voting opportunities we could provide Alamance County voters.

6. Alamance County currently has Direct Record Electronic ("DRE") voting machines, which it must replace before they are decertified by law on December 1, 2019. There was no increase in our budget to account for this obligation, and at our most recent meeting the CBE passed a resolution asking the County Commission to request more time from the Legislature to comply with the requirement for new voting machines. The County Commission passed its own resolution unanimously, but at time of affidavit, the North Carolina General Assembly had not extended the deadline. I understand that a bill has been introduced that would move the deadline to 2021, but I do not know if that bill will pass in this session.

7. The CBE currently plans to split two precincts that have become too large due to population changes. This is another expense that is necessary in order for us to adequately serve the voters of Alamance County. Earlier this year, the State Board of Elections informed us that it would issue guidance regarding the creation of additional voting precincts in Alamance County. We do not currently know the status of this guidance; it may no longer be necessary to make the additional splits. The addition of more precincts beyond the two already planned would have substantially increased our expenses for the coming year, and the possibility of those splits made it nearly impossible to set a budget for this year and took attention away from other pressing issues, including the new Voter ID requirements.

8. I am aware of the requirements of Senate Bill 824 and the proposed administrative rules from the State Board of Elections. I also attended a recent conference for Board of Elections Directors at which I was able to see the machine that the State Board of Elections plans to provide to the CBE for producing free voter ID cards. We have now received our single ID machine to be used only at the CBE office.

9. Discussion of the obligation to provide voter ID cards at the Board of Elections office and train staff for that purpose has taken up relatively little time at our recent CBE meetings because of the other urgent issues we face. However, the unfunded requirement to train at least one staff member and provide free photo IDs at the Board of Elections office concerns the CBE, as it adds to the list of administrative and financial burdens we face in our effort to provide voters with free and fair access to the ballot in Alamance County.

10. Unless the future final regulations issued by the State Board of Elections require us to do otherwise, we likely only have the resources to issue free Voter IDs at the CBE office in Graham. The CBE office is only about a mile from the DMV, and there is no dedicated public transportation to bring voters to the county government complex in Graham. Because of the location and lack of transportation to the CBE office, I think that providing free Voter IDs at that location will do little to make it easier for Alamance County citizens who do not have ID from the DMV to obtain a free ID for voting.

11. The city of Graham, the location of our CBE office, has declined to participate in recent efforts by the city of Burlington to provide some limited public transportation in Alamance County. One bus stop was put in downtown Graham on a route that extends from Burlington to the Alamance Community College, but that route would only be available to a limited number of our county's voters. Consequently, most voters in our county without personal transportation have difficulty finding affordable transportation to the CBE office.

12. Our CBE will not be able to fully assess or begin to meet the challenge of complying with the additional requirements of Senate Bill 824 until we understand the urgency and depth of the other challenges we face, including the deadline for replacing all of our DRE voting machines, the number of precincts we will split, and our budget for this year. Our Director submitted a 2019-20 budget to the County Commission that was 50% larger than the flat budget to which we have been held since 2014, but the Commission must consider input from the County Manager, who has previously opposed budget increases, and hold another meeting before we know our actual budget. We are also waiting for the State Board of Elections to issue the final Voter ID regulations with which we must comply.

13. Given the challenges we face in Alamance County and our limited resources, the General Assembly's delay of the full implementation of the Voter ID requirement until 2020 will do little to ease the burden of complying with this unfunded directive.

Further the affiant sayeth not.

This the 9 day of May, 2019.

Noah Read

Noah ~~Reed~~ Read

I, Chekeitha Chambers, a Notary Public of the County and State aforesaid, hereby certify that Noah Read, personally known to me to be the affiant in the foregoing affidavit, personally appeared before me this day and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

This the 9th day of May, 2019.

(SEAL) CHEKEITHA CHAMBERS NOTARY PUBLIC ALAMANCE COUNTY, NC

Chekeitha Chambers

Notary Public

My Commission Expires: 04/04/2020

STATE OF NORTH CAROLINA COUNTY OF WAKE	IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 18 CVS 15292
JABARI HOLMES, FRED CULP, DANIEL E. SMITH, BRENDON JADEN PEAY, SHAKOYA CARRIE BROWN, and PAUL KEARNEY, SR., *Plaintiffs,* v. TIMOTHY K. MOORE *in his official capacity as Speaker of the North Carolina House of Representatives;* PHILLIP E. BERGER *in his official capacity as President Pro Tempore of the North Carolina Senate;* DAVID R. LEWIS, *in his official capacity as Chairman of the House Select Committee on Elections for the 2018 Third Extra Session;* RALPH E. HISE, *in his official capacity as Chairman of the Senate Select Committee on Election for the 2018 Third Extra Session;* THE STATE OF NORTH CAROLINA; *and* THE NORTH CAROLINA STATE BOARD OF ELECTIONS, *Defendants.*	**AFFIDAVIT OF COURTNEY PATTERSON**

I, Courtney Patterson, swear that the following information, under the penalty of perjury, is true to the best of my knowledge and state as follows:

1. I am over the age of eighteen years and am competent to give this affidavit.

2. I currently serve as Chair of the Lenoir County Board of Elections ("CBE"). I have been a member of the CBE since 2011, and I was re-appointed as Chair on February 20, 2019.

3. The CBE's last meeting in 2018 was on Friday, November 16, 2018, for the county canvass of the 2018 general election. At that time, the General Assembly had not yet passed enabling legislation for the new constitutional amendment requiring voter ID. We did not know what that legislation would require of voters of the CBE, so we could not make any specific preparations at that time.

4. The CBE was disbanded at the end of 2018 pursuant to court order, and Lenoir County did not have a full CBE again until February 20, 2019, when I was appointed. The reconstituted CBE held its first meeting shortly thereafter.

5. I am aware of the voter ID requirements in Senate Bill 824. Lenoir CBE is still waiting on training from the State Board of Elections (SBOE) on these requirements, which is scheduled to take place July 29-30, 2019 in Research Triangle Park.

6. The State Board of Elections is providing Lenoir County with one ID printing machine. We did not allocate room in the budget to purchase additional equipment, and do not have the funds to do so. If any additional expenses associated with the implementation of voter ID arise, we would need to go before the County Manager and ask to pull funds from other areas of the county budget.

7. Lenoir County received the ID printing equipment late March 2019, but the SBOE has not providing formal training for staff on how to use the equipment.

8. Lenoir CBE currently employs three full time staff persons, including the Executive Director, and one part time staff person, none of whom have had formal training from SBOE on the voter ID requirements or ID printing machine. At one point in the past we had four full-time staff persons, but one position was left open after a retirement in 2010 or 2011. Attempts to create an additional full time staff position in the past were denied by the County, and the part-time staff position was created instead. As such, Lenoir County does not have plans to hire any additional staff to provide the free ID service, and time spent training for and providing free photo IDs will take away from time that the staff would have spent on other activities.

9. Like the vast majority of counties in North Carolina, Lenoir County only has one CBE office, which is located in Kinston, North Carolina. The normal office hours at the CBE are from 8:30 a.m. to 5:00 p.m., Monday through Friday. With only one machine to produce IDs, this is the only location where our CBE will be able to provide free IDs. Some voters would need to travel as much as 20 miles to reach the CBE office.

10. The CBE has not discussed plans to provide transportation to the CBE office for voters to obtain a free ID. I am aware that voting advocates raised the issue of transportation before the General Assembly delayed implementation of the ID requirement.

11. Lenoir CBE does not have plans in place to educate voters about the ID requirement, nor are there funds to do so. In the past, local civic groups, such as the local chapter of the NAACP, have engaged the CBE to provide educational forums on changes in voting laws, but at this point we have not been engaged to conduct community trainings and have no such trainings scheduled.

12. In addition to the expenses associated with the voter ID, Lenoir County has had to purchase new voting machines to comply with a new state law which requires the use of paper ballots. We do not have the machines yet, but they will be in place for the November 2019 Municipal elections.

13. Lenoir just concluded a primary race for the Congressional District 3 Special Election on April 30, 2019. Because no candidate received a majority of the votes in the initial primary, there will be a runoff on July 9, 2019 for the Republican primary, and a general election on September 10, 2019. Administering these elections has consumed much of the CBE's time and will continue to do so through the post-election canvass in September.

14. Voters and poll workers are confused about when the photo ID requirement is to go into effect. During the Special Congressional Primary, I walked into a polling place where a poll worker asked if voters are required to show ID. I then followed up with the Director of Elections, Dana King, and asked that she send a memo to all poll workers and staff to remind them that photo ID is not required for the Special Election. I also witnessed voters preparing to show their ID outside the polling place, under the impression that photo ID is required to vote for this election. My concern is that if there is not a clear message, someone may be requesting ID when they should not be.

15. Lenoir County has limited resources to train its staff and poll workers about the requirement, provide free ID services, and educate voters about the ID requirement. The delay of implementation of the bill has done little to ease these burdens, particularly given the special election and need to buy new voting machines.

Further the affiant sayeth not.

This 14 day of May, 2019.

COURTNEY PATTERSON

STATE OF NORTH CAROLINA

LENOIR COUNTY

Courtney Patterson, first duly sworn, deposes and says that he has read the foregoing Affidavit and knows the contents thereof; that the same are true except as to those matters and things stated therein upon information and belief, and as to those he believes them to be true.
Subscribed and sworn to before me, Courtney Patterson,

This 14 day of May, 2019.

Official Signature of Notary

Clemonte C. Mills, Notary Public (SEAL)

Printed/Typed Name

CLEMONTE C. MILLS
NOTARY PUBLIC
Pitt County
North Carolina
My Commission Expires Aug 31, 2022

My commission expires: Aug 31, 2022

STATE OF NORTH CAROLINA COUNTY OF WAKE	IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION

JABARI HOLMES, FRED CULP, DANIEL E. SMITH, BRENDON JADEN PEAY, SHAKOYA CARRIE BROWN, and PAUL KEARNEY, SR., *Plaintiffs,* v. TIMOTHY K. MOORE *in his official capacity as Speaker of the North Carolina House of Representatives;* PHILLIP E. BERGER *in his official capacity as President Pro Tempore of the North Carolina Senate;* DAVID R. LEWIS, *in his official capacity as Chairman of the House Select Committee on Elections for the 2018 Third Extra Session;* RALPH E. HISE, *in his official capacity as Chairman of the Senate Select Committee on Election for the 2018 Third Extra Session*; THE STATE OF NORTH CAROLINA; *and* THE NORTH CAROLINA STATE BOARD OF ELECTIONS, *Defendants.*	Civil Action No. 18 CVS 15292

AFFIDAVIT OF KEVIN QUINN, Ph.D.

I, Kevin Quinn, declare as follows:

1. I am over 18 years of age, legally competent to give this Affidavit, and have personal knowledge of the facts set forth in this Affidavit.

I. BACKGROUND AND QUALIFICATIONS

2. I have a Ph.D. and an A.M. in political science from Washington University in St. Louis as well as a B.A. in political science from the Johns Hopkins University.

3. I am a Professor of Political Science and Statistics at the University of Michigan.

4. Prior to joining the Michigan faculty in 2017, I was a Professor of Law at the University of California, Berkeley; an Associate Professor and Assistant Professor of Government at Harvard University; and an Assistant Professor of Political Science and an Adjunct Assistant Professor of Statistics at the University of Washington.

5. My general research areas are empirical legal studies and statistical methods for law and social science. This work has appeared in leading journals in the fields of Political Science and Statistics, such as the *American Journal of Political Science*; *Quarterly Journal of Political Science*; *Journal of Law, Economics, and Organization*; *Political Analysis*; *Journal of the American Statistical Association*; *Journal of the Royal Statistical Society*; and the *Annals of Applied Statistics*, as well as leading law reviews such as the *Stanford Law Review*, *Columbia Law Review*, *California Law Review*, *University of Pennsylvania Law Review*, and the *Northwestern University Law Review.*

6. My research has been frequently supported by the National Science Foundation, and I am a three-time winner of the Harold Gosnell Prize for best paper in political methodology. From 2009 to 2012 I served as an Associate Editor at the *Journal of the American Statistical Association.* I am currently a Co-Editor at the *Journal of Law, Economics, & Organization*. I am also an editorial board member at *Political Analysis* and the *Journal of Politics*. I served as President of the Society for Political Methodology from 2013 to 2015. I was elected a Fellow of the Society for Political Methodology in 2018.

7. In 2015, I served as a testifying expert for the plaintiffs in *Currie, et al. v. State of North Carolina et al.,* No. 13-CVS-1419 (Orange Cnty. Sup. Ct.).

8. In 2012, I served as a testifying expert for the defendant-intervenors in *South Carolina v. United States, et al.,* No. 1:12-cv-203 (D.D.C.).

9. In 2011, I provided expert services to the Honorable Margaret B. Seymour under 5 U.S.C. §3109 in the Voting Rights Act case *Levy, et al. v. Lexington Cnty. S.C. Sch. Dist. Three, et al.*, No. 3:03-cv-03093-MBS (S.D.N.C.).

10. A current copy of my full CV is attached as Appendix A to this report.

11. I am compensated at the rate of $400 per hour.

II. STATEMENT OF INQUIRY

12. Senate Bill 824 ("SB 824"), enacted in December of 2018, requires that all individuals who present to vote in person in North Carolina present certain forms of identification that contain a photograph of the registered voter. The specific requirements of SB 824 are laid out in detail *infra* ¶¶ 37-38.

13. I have been retained by the plaintiffs to examine North Carolinians' possession rates of forms of photo identification that comply with the requirements of SB 824 ("acceptable ID") and to determine whether changes in the voter ID requirement disproportionately impact certain types of North Carolina voters.

14. In my expert opinion, the best way to accomplish this is a matching analysis that attempts to link each individual currently in the North Carolina voter registration file with current records in the North Carolina driver's license database, federal databases of passport, military ID, and veteran's ID holders, and other ID databases that comply with the photo ID requirements of SB 824.

15. Current data from these databases have neither been produced in this case nor provided to me at this time. Further, it is my understanding that the legislative record for SB 824 did not contain current data from these databases, but rather considered data from analyses conducted in 2015 or earlier in connection with House Bill 589 ("HB 589"), North Carolina's previous voter ID requirement.

16. In light of the data available both to me and to the legislature at the time that SB 824 was enacted, I take a different approach in my analysis. Namely, I evaluate historical evidence of photo ID possession among North Carolina voters using the 2014 data that I previously analyzed in conjunction with HB 589 to then examine the likelihood that those possession rates have shifted due to changes in the composition of the voter registration file and changes in aggregate rates of ID possession among all North Carolinians.

17. I reserve the right to update my opinion when contemporaneous data is available.

III. SUMMARY OF CONCLUSIONS

18. The paragraphs that follow detail the conclusions reached in this report.

19. The percentage of the North Carolina 15-and-older population in possession of a North Carolina driver's license in 2019 is forecast to be statistically indistinguishable from the 2014 percentage. More specifically, I forecast that 88.8% of this group will have a North Carolina driver's license in 2019 with a 95% confidence interval equal to (86.1%, 91.2%). The observed 2014 percentage is 87.4%.

20. The demographic makeup of the North Carolina voter registration file in February 2019 is extremely substantively similar to the demographic makeup of the voter file in July of 2014.

21. The lack of dramatic changes to either the aggregate rates of driver's license possession or the demographics of the voter registration file lead me to conclude that the relationships between voter characteristics (such as race and active/inactive status) and ID possession in 2019 remain consistent with my previous 2015 analysis. Given the data available to me now, my expert opinion is that the rates of photo ID possession by race and active / inactive status that I documented in my 2015 report remain accurate estimates of the corresponding rates of photo ID possession in 2019. *See* Appendix B, Expert Report of Kevin Quinn, *Currie, et al. v. State of North Carolina et al.,* No. 13-CVS-1419 (Orange Cnty. Sup. Ct.).

22. Through my 2015 analysis, I found the following:

a. In 2015, at least 5.9% of registered North Carolina voters lacked identification required to vote under HB 589. This number could have been as high as 12.5%.

b. In 2015, African Americans were more than twice as likely as whites to lack identification required to vote under HB 589. A conservative analysis revealed that 9.6% of black registered voters lacked acceptable ID, whereas 4.5% of white registered voters lacked acceptable ID under HB 589. An alternative analysis showed that 24.4% of African Americans and 8.4% of whites lacked acceptable ID under HB 589.

c. In 2015, the black-white disparity in ID possession was larger among likely voters than among likely non-voters. For instance, African Americans who voted in recent elections were 3.8 times more likely to not have acceptable ID under HB 589 than were whites who voted in the same elections. African Americans who did not vote in recent elections were 1.9 times more likely to lack acceptable ID than whites who did not vote in the same elections.

IV. 2015 ANALYSIS: METHODOLOGY AND KEY FINDINGS

23. In this section, I describe the methodology and key findings of my 2015 analysis.[1]

24. In my 2015 analysis, I examined North Carolinians' possession rates of photographic ID considered acceptable for voting purposes under HB 589, and I sought to determine whether HB 589's voter ID requirements disproportionately impacted certain types of North Carolina voters.

25. To conduct this 2015 analysis, I matched records in the North Carolina voter registration file with records in the North Carolina driver's license database and federal databases of passport, military ID, and veteran's ID holders. For each voter record in the North Carolina voter file, I created an indicator of whether that voter record could be matched to one of these forms of ID, which were considered acceptable photographic ID for voting purposes under HB 589. I compiled a list of voters in the voting file who did not have a corresponding record in the ID databases described above; throughout this report, I use the term "no-match list" to refer to this list.

26. This record matching process allowed me to construct accurate estimates of: a) the total number of registered voters that did not possess forms of photo ID required by HB 589, b) the number of African-American registered voters that did not possess forms of photo ID required by HB 589, and c) the number of white registered voters that did not possess forms of photo ID required by HB 589.

27. I found that 5.87% of North Carolina voters could not be matched to records in the North Carolina driver's license database, the U.S. passport database, the U.S. military ID database, or the veteran's ID database. In other words, the no-match list contained 5.87% of the voters in the 2014 voter registration file.

[1] My full 2015 analysis is attached as Appendix B

28. I also found that black voters were over 2 times more likely to appear on the no-match list than were white voters. More specifically, I found that 9.60% of black voters appeared on the no-match list while 4.46% of white voters appeared on the no-match list. The ratio of 9.60 to 4.46 is 2.15.

29. The racial disparity was even greater among the subset of voters who had an active status code in the voter file. I found that 8.09% of active black voters appeared on the no-match list while 3.14% of active white voters appeared on the no-match list. The ratio of 8.09 to 3.14 is 2.58. Put simply, I found that active African-American voters were over two-and-a-half times more likely to lack appropriate photo ID than were active white voters. This is important because the practical effects of a voter ID law will be most pronounced for voters who are likely to try to vote in the future, and active voters are more likely to turn out than inactive voters.

V. COMPARISON OF 2014 TO 2019

30. In order to ascertain the degree to which my 2015 findings are consistent with the effects of SB 824 today, I analyze a) the practical differences between the HB 589 and SB 824 photo ID requirements, b) changes in ID possession rates among North Carolinians from 2014 to 2019, and c) changes to the demographics of the North Carolina voter population. Through this analysis, I conclude that the relationship between voter characteristics (such as race and active/inactive status) and ID possession in 2019 remain consistent with the 2015 findings detailed above.

A. Comparing HB 589 to SB 824

31. HB 589 was passed by the North Carolina state legislature on July 25, 2013 and signed into law by then-Governor McCrory on August 12, 2013. HB 589 was struck down by the United

States Court of Appeals for the Fourth Circuit on July 29, 2016. *See NC NAACP v. McCrory,* 831 F.3d 204 (4th Cir. 2016).

32. Under HB 589, all individuals who presented to vote in person were required to "present photo identification bearing any reasonable resemblance to that voter to a local election official at the voting place before voting."[2]

33. The forms of photo identification acceptable under HB 589 were the following:

a. "A North Carolina drivers [sic] license issued under Article 2 of Chapter 20 of the General Statutes, including a learner's permit or a provisional license."

b. "A special identification card for nonoperators issued under G.S. 20-37.7"

c. "A United States passport."

d. "A United States military identification card"

e. "A Veterans Identification Card issued by the United States Department of Veterans Affairs for use at Veterans Administration medical facilities."

f. "A tribal enrollment card issued by a federally recognized tribe."

g. "A tribal enrollment card issued by a tribe recognized by [the state of North Carolina]"

h. "A drivers [sic] license or nonoperators [sic] identification card issued by another state, the District of Columbia, or a territory or commonwealth of the United States, but only if the voter's voter registration was within 90 days of the election."[3]

34. HB 589 required these forms of photo ID to have "a printed expiration date and . . . be unexpired" except for military identification cards and veteran's identification cards, neither of which are required to have a printed expiration date. Voters who had "attained the age of 70 years

[2] HB 589 Part 2 § 2.1(a)
[3] HB 589 Part 2 § 2.1(e)

at the time of presentation at the voting place shall be permitted to present an expired form of any of the [required forms of photo ID] that was unexpired on the voter's 70th birthday."[4]

35. There are many similarities between HB 589 and SB 824.

36. SB 824 was ratified by the North Carolina state legislature on December 6, 2018. Governor Cooper vetoed the legislation and the state legislature overrode this veto on December 19, 2018.

37. Under SB 824, all individuals who present to vote in person "shall produce any of the following forms of identification that contain a photograph of the registered voter":

a. "Any of the following that is valid and unexpired, or has been expired for one year or less:"

   i. "A North Carolina drivers [sic] license."

   ii. "A special identification card for nonoperators issued under G.S. 20-37.7 or other form of nontemporary identification issued by the Division of Motor Vehicles of the Department of Transportation."

   iii. "A United States passport."

   iv. "*A North Carolina voter photo identification card of the registered voter issued pursuant to G.S. 163A-869.1."*

   v. "A tribal enrollment card issued by a State or federal recognized tribe."

   vi. *"A student identification card issued by a constituent institution of the University of North Carolina, a community college, as defined in G.S. 115D-2(2), or eligible private postsecondary institution as defined in G.S. 116-280(3), provided that card is issued in accordance with G.S. 163A-1145.2."*

[4] *Ibid.*

vii. *"An employee identification card issued by a state or local government entity, including a charter school, provided that card is issued in accordance with G.S. 163A-1145.3."*

viii. "A drivers [sic] license or special identification card for nonoperators issued by another state, the District of Columbia, or a territory or commonwealth of the United States, but only if the voter's voter registration was within 90 days of the election."

b. "Any of the following, regardless of whether the identification contains a printed expiration or issuance date:"

i. "A military identification card issued by the United States Government."

ii. "A Veterans Identification Card issued by the United States Department of Veterans Affairs for use at Veterans Administration medical facilities."

c. "Any expired form of identification allowed in this subsection presented by a registered voter having attained the age of 65 years at the time of presentation at the voting place, provided that the identification was unexpired on the registered voter's sixty-fifth birthday."[5]

38. In the above, I have italicized subsections that allow forms of ID that were not allowed under HB 589.[6] Three forms of ID that were not allowed under HB 589 for voting purposes are allowed by SB 824. They are: qualifying North Carolina Voter identification cards, qualifying

[5] SB 824 Part I § 163A-1145.1(a)

[6] I have not italicized subsection 3) dealing with expired ID for registered voters who are 65 years-of-age and over. HB 589 had a similar provision for those age 70 and over.

student identification cards, and qualifying employee identification cards issued by a state or local government entity.[7]

39. County Boards of Elections were only required to begin issuing North Carolina Voter identification cards starting on May 1, 2019. To the best of my knowledge, there is no publicly available data to suggest that this provision of SB 824 altered acceptable photo ID possession rates in North Carolina.

40. The available data on qualifying student identification cards and qualifying government employee identification cards shows that relatively few institutions have had their student and employee IDs approved by the State Board of Elections.

41. In a March 15, 2019 memo to the Co-Chairs of the Joint Legislative elections Oversight Committee, the Redistricting and Elections Committee, and the Elections and Ethics Law Committee, Kim Westbrook Strach, the Executive Director of the North Carolina State Board of Elections wrote that "[o]f the approximately 850 universities, colleges, state and local employers . . . that were eligible to have their identification cards approved, 81 institutions submitted requests to the State Board of Elections."[8] Of these, only 72 institutions had some of their IDs approved.

42. Inspection of the list of approved IDs provided by the State Board of Elections shows that a) some of these 72 institutions had some IDs approved but other IDs not approved, and b) that several large institutions have not had their IDs approved.[9]

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[7] I understand that both HB 589 and SB 824 contain exceptions that may allow certain voters to cast a provisional ballot, even if they do not have a qualifying photo ID. These so-called "reasonable impediment" exceptions are not relevant to my analysis, which is to determine only the extent to which North Carolina voters hold forms of photo ID considered acceptable for voting

[8] *See* https://s3.amazonaws.com/dl.ncsbe.gov/Voter%20ID/Correspondence%20to%20Co-Chairs%202019-03-15.pdf (accessed March 22, 2019)

[9] *See* https://s3.amazonaws.com/dl.ncsbe.gov/Voter%20ID/Student%2C%20Employee%20and%20Tribal%20ID%20Approvals.pdf (accessed March 22, 2019)

43. For instance, Fayetteville State University, North Carolina School of Science and Math, UNC. Wilmington, and Winston-Salem State University are counted among the 72 institutions with approved IDs, but these schools only had employee IDs approved – student IDs at these institutions were not approved. Indeed, only 26 schools have had student IDs approved.

44. Further, many large institutions have not had their IDs approved. For instance, UNC Chapel Hill, East Carolina University, UNC Charlotte, UNC Greensboro, Western Carolina University, and the UNC Healthcare System have not had any of their IDs approved.

45. The fact that only 72 of approximately 850 institutions have had *some* of their IDs approved by the State Board of Elections leads me to conclude that at the present time, the new forms of ID allowed under SB 824 have not had a large impact on the current rate of acceptable ID possession.

46. To summarize, while there are some differences between HB 589 and SB 824, most of the key voter photo ID requirements in both laws are largely the same. It is my expert opinion, given the information available at this time, that the differences that do exist are unlikely to have an appreciable effect on the racial disparities in ID possession that I found in my 2015 analysis.

B. Information on ID Possession in 2014 v. 2019

47. It is next necessary to examine the extent to which driver's license possession has changed in North Carolina from 2014 to 2019. To do this, aggregate data is used to forecast the percentage of the North Carolina population that currently has a North Carolina driver's license.[10] Comparing this percentage to the corresponding percentage from 2014 allows me to form an expert opinion about the extent to which driver's license possession has changed. I find that the 2019 forecast is statistically indistinguishable from the 2014 percentage.

[10] 2014 data demonstrates that driver's licenses are the most commonly held acceptable ID in North Carolina, held by 91.28% of all North Carolina registered voters. *See Table 4: Results of Matching NC Voter File with Identification Databases,* Appendix B at 23.

48. The starting point for this analysis is a dataset from the Federal Highway Administration (FHWA) on the number of licensed drivers in each state. The FHWA collects and disseminates these data on a yearly basis.[11] The most recent data are from 2017.

49. The second dataset used in this analysis consists of yearly estimates of the size of the North Carolina population old enough to have a driver's license. The Census Bureau only reports yearly population estimates in 5-year age bins. As such, I use the Census Bureau's yearly estimates of the North Carolina population that is 15 years of age or older.[12]

50. I use these two datasets to calculate the percentage of the North Carolina 15-and-over population that has a North Carolina driver's license by taking the FHWA data on driver's license possession and dividing by the Census Bureau's estimates of the size of the 15-and-over population.[13] I do this for the years 2010, 2011, 2012, 2013, 2014, 2015, 2016, and 2017.

51. I forecast the likely values of the 2018 and 2019 percentages using a standard statistical model based on the observed data from 2010 to 2017.[14] This approach allows me to construct both a forecast for the 2019 percentage of the 15-and-over North Carolina population with a North Carolina driver's license as well as a statistical confidence interval for this forecast.

[11] These data are disseminated as Table DL-22 and are available on the FHWA website. For instance, the 2017 data are available here: https://www.fhwa.dot.gov/policyinformation/statistics/2017/d122.cfm.
[12] These data are in the table titled: Annual Estimates of the Resident Population for Selected Age Groups by Sex for the United States, States, Counties, and Puerto Rico Commonwealth and Municipios: April 1, 2010 to July 1, 2017. https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk
[13] Note that my use of the 15-and-over population in the denominator will slightly underestimate the percentage of the North Carolina population with a North Carolina driver's license.
[14] Specifically, I specify a second order polynomial dynamic linear model using the dlm package for the R language. I fit the model using maximum likelihood estimation.

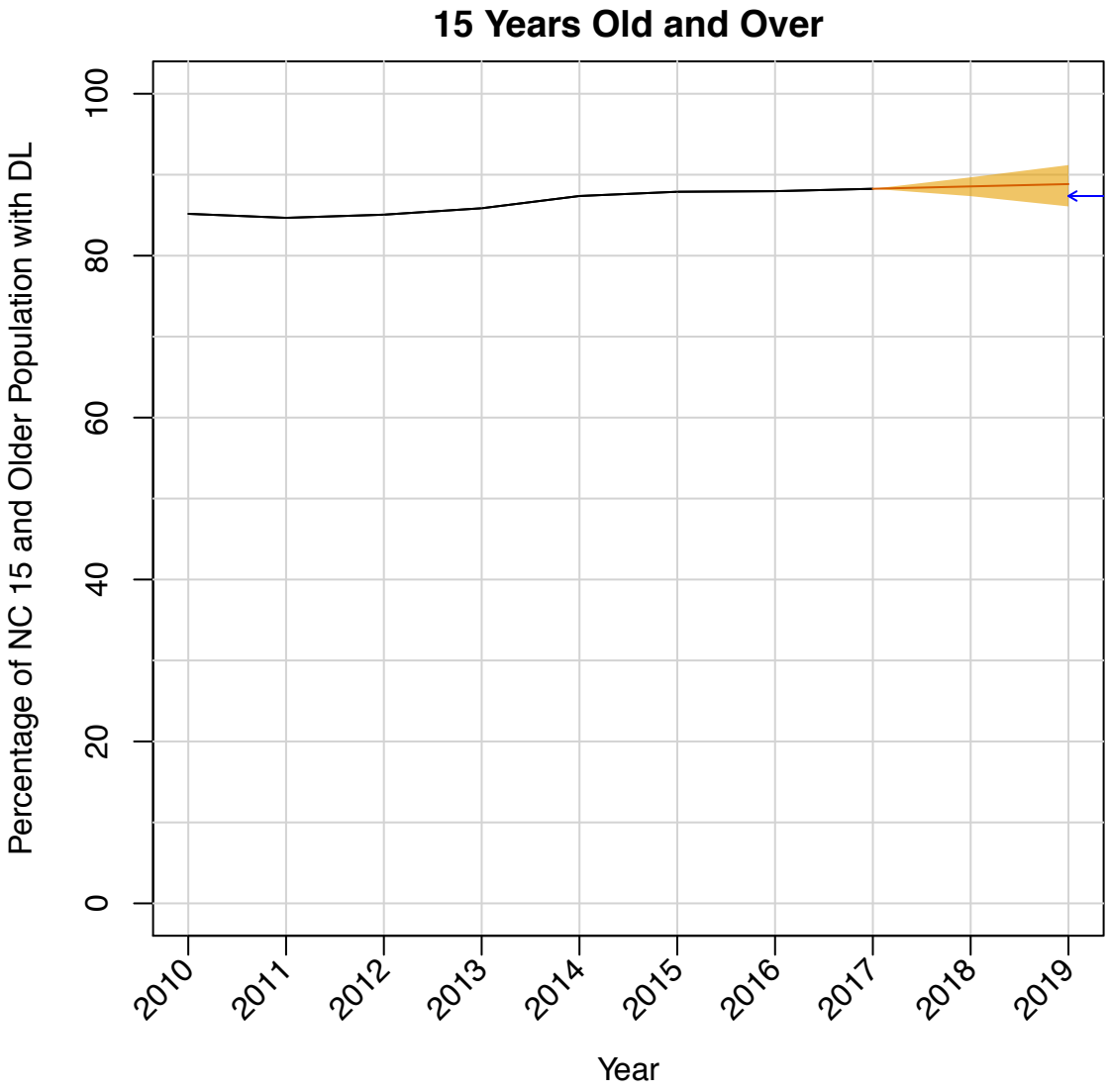


Figure 1: Percentage of North Carolina 15-and-Older Population with Driver's License. The observed data are given by the black line, the forecasts are given by the dark orange line, and the 95% confidence region is given by the lighter orange region. The observed 2014 percentage is given by the blue arrow to the right. The 95% confidence interval for the 2019 forecast is (86.1%, 91.2%) and the observed 2014 percentage is 87.4%. Thus we cannot reject the null hypothesis that the 2019 fraction of the North Carolina 15-and-over population with a driver's license is the same as the 2014 fraction.

52. Figure 1 plots the observed yearly percentages of the North Carolina 15-and-over population with a North Carolina driver's license in black along with the forecasts for 2018 and 2019 in orange. From 2014 to 2017, the percentage of the North Carolina 15-and-over population with a driver's license was essentially flat with only slight increases. More specifically, we see that 87.4% of the North Carolina 15-and-over population had a North Carolina driver's license in 2014. I forecast that 88.8% of the 15-and-over population has a driver's license in 2019 with a 95% confidence interval equal to (86.1%, 91.2%).

53. Because the observed percentage from 2014 (87.4%) is within this confidence interval, I cannot reject the null hypothesis that the 2019 percentage is the same as the observed 2014 percentage. As a result, I conclude that the 2019 forecast is not statistically distinguishable from the observed 2014 percentage.

C. The Voter File in 2014 v. 2019

54. I next assess the degree to which the 2019 voter registration file differs from the 2014 voter registration file.[15] Because the voters in the 2019 file appear similar to the voters in the 2014 file, this provides additional reason to conclude that the relationships between voter characteristics (such as race and active/inactive status) and ID possession in 2019 remain consistent with the findings from my 2015 analysis.

i. Active and Inactive Voters

55. I begin by looking at the distribution of five key voter characteristics in the 2014 and 2019 voter files for both active and inactive voters. These characteristics are the voter's:

[15] The 2019 voter registration file was downloaded from the State Board of Elections website on February 2, 2019. The filename was ncvoter_statewide.txt. The 2014 voter file data are from an archived subset of the data I used in my 2015 analysis that have been maintained by the Southern Coalition for Social Justice. These data did not include data fields that were required to be destroyed per protective orders entered in cases related to HB 589 litigation. The voter file data is from July 14, 2014. In conducting the data analysis described in this report, I had the research assistance of Stephen Goggin, Ph.D.

- status code (active or inactive)
- partisanship
- sex
- birth state
- race

56. Table 1 displays information on the distribution of these characteristics for both active and inactive voters. Looking at Table 1 we see that the differences in proportions between the 2014 and 2019 voter file are all small and, with a few notable exceptions, less than 0.03.

Variable	Values	2014 Proportion	2019 Proportion	Difference of Proportions
Status Code	Active	0.89	0.86	-0.03
Status Code	Inactive	0.11	0.14	0.03
Partisanship	Democrat	0.42	0.37	-0.05
Partisanship	Republican	0.31	0.30	-0.00
Partisanship	Unaffiliated	0.27	0.32	0.05
Partisanship	Other	0.00	0.01	0.00
Sex	Female	0.54	0.53	-0.01
Sex	Male	0.45	0.44	-0.01
Sex	Other	0.01	0.03	0.02
NC Birth	FALSE	0.57	0.58	0.01
NC Birth	TRUE	0.43	0.42	-0.01
Race	American Indian	0.01	0.01	-0.00
Race	Asian	0.01	0.01	0.00
Race	Black	0.22	0.22	-0.01
Race	Mixed	0.01	0.01	0.00
Race	Other	0.02	0.03	0.01
Race	Unknown	0.02	0.04	0.02
Race	White	0.71	0.68	-0.03

Table 1: 2014-2019 Voter File Comparison (Active and Inactive Voters)

57. The exceptions are the following:

a. Active voters decreased (and inactive voters increased) by 3 percentage points from 2014 to 2019.

b. Democratic voters decreased by 5 percentage points and unaffiliated voters increased by 5 percentage points from 2014 to 2019. As I will demonstrate below, most of this change is due to young voters being much more likely to register as unaffiliated than as Democrats in 2019.

c. White voters decreased by 3 percentage points from 2014 to 2019.

58. My 2015 analysis demonstrated that white voters were less likely to lack photo ID acceptable under HB 589 than almost all other racial groups,[16] and active voters were less likely to lack ID than inactive voters. Thus, if the relationship between race and ID possession and the relationship between active/inactive status and ID possession remain similar from 2014 to the present, the decrease in white voters and active voters implies that even more voters may lack appropriate ID in 2019 than in 2014.

59. Another characteristic of interest is the voter's age. The publicly available voter files do not contain voters' full (day/month/year) dates of birth. However, the files do contain year of birth which provides a rough approximation to age.

60. Because age (and year of birth) take a large number of ordered values, it is not feasible to tabulate values and present differences of proportions as in Table 1. A better approach to judge the degree to which age (and year of birth) differ between the 2014 and 2019 voter files is to use what statisticians refer to as a quantile-quantile-plot or QQ-plot.[17]

[16] The one exception is Asian voters, who were slightly less likely to lack ID than white voters. *See Table 6: Percentage of Racial Groups on the No-Match List,* Appendix B at 24.

[17] Such a plot is constructed as follows: First the percentiles of year of birth are calculated using just the data from the 2014 voter file. Technically, a percentile is a particular instance of the more general concept of a quantile. For ease of explanation, I stick to using percentiles throughout. Recall that, by definition, 1% of the birth years in the voter file are less than or equal to the first percentile, 2% of the birth years in the voter file are less than or equal to the second percentile, etc. Second, the percentiles of year of birth are calculated using the data from the 2019 voter file. This gives us 100 percentile values from the 2014 voter file and 100 percentile values from the 2019 voter file. The third step is to pair percentiles from the two files so that the first percentile from the 2014 voter file is paired with the first percentile from the 2019 voter file, the second percentile from the 2014 voter file is paired with the second percentile from the 2019 voter file, etc. The final step in creating a QQ-plot is to create a scatterplot of these paired percentiles.

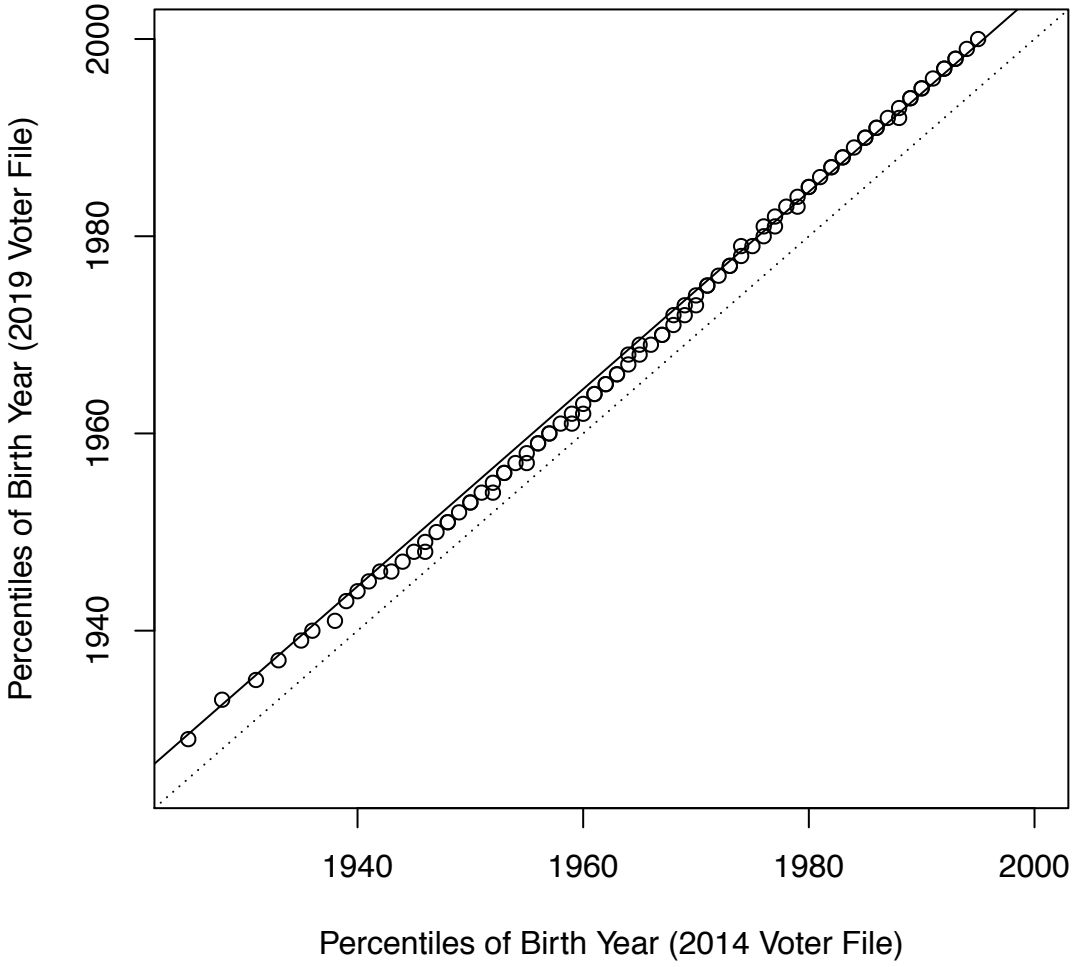


Figure 2: Quantile-Quantile Plot of Birth Year in 2014 Voter File and Birth Year in 2019 Voter File (Active and Inactive Voters). The dotted 45-degree line is the line depicting equality of birth year percentiles (intercept =0 and slope =1). The solid 45-degree line is the line depicting equality of age (intercept = 4.5 and slope = 1).

The *x*-axis of the plot corresponds to the birth year percentiles from the 2014 voter file and the *y*-axis corresponds to the birth year percentiles from the 2019 voter file. Each dot in the scatterplot represents one pair of matched percentiles. This will give us a scatterplot with 100 dots, each corresponding to a percentile pair.

If the distribution of birth year is the same in the 2014 voter file as in the 2019 voter file, the percentiles will also be equal. This implies that the QQ-plot will have 100 dots on the 45=degree line where the *x* value is equal to the *y* value resulting in a line with intercept = 0 and slope = 1. Because the 2014 voter file utilized was from July 2014, and the 2019 voter file utilized is from February 2019, a voter who appears in both files will be about 4.5 years older in the 2019 voter file. As a result, if voter age is equal in the two voter files, then the 100 dots in the QQ-plot will also line up on a 45 degree line, but shifted up 4.5 units (a line with intercept = 4.5 and slope = 1).

61. Figure 2 displays the QQ-plot based on all voters (active and inactive) in the two voter files. Figure 2 shows that the paired percentiles closely follow the solid line (intercept =4.5 and slope =1), which is consistent with age being equal between the two voter files. This provides evidence that the distribution of voter age is effectively the same in the two voter files.

62. Overall, the data in Table 1 and Figure 2 show that key voter characteristics are effectively the same in the 2014 voter file and the 2019 voter file.

63. Finally, I provide evidence to support my conclusion that the increase of unaffiliated voters and the decrease in Democratic voters from 2014 to 2019 is the result of younger voters being much more likely to register as unaffiliated than as Democrats in 2019.

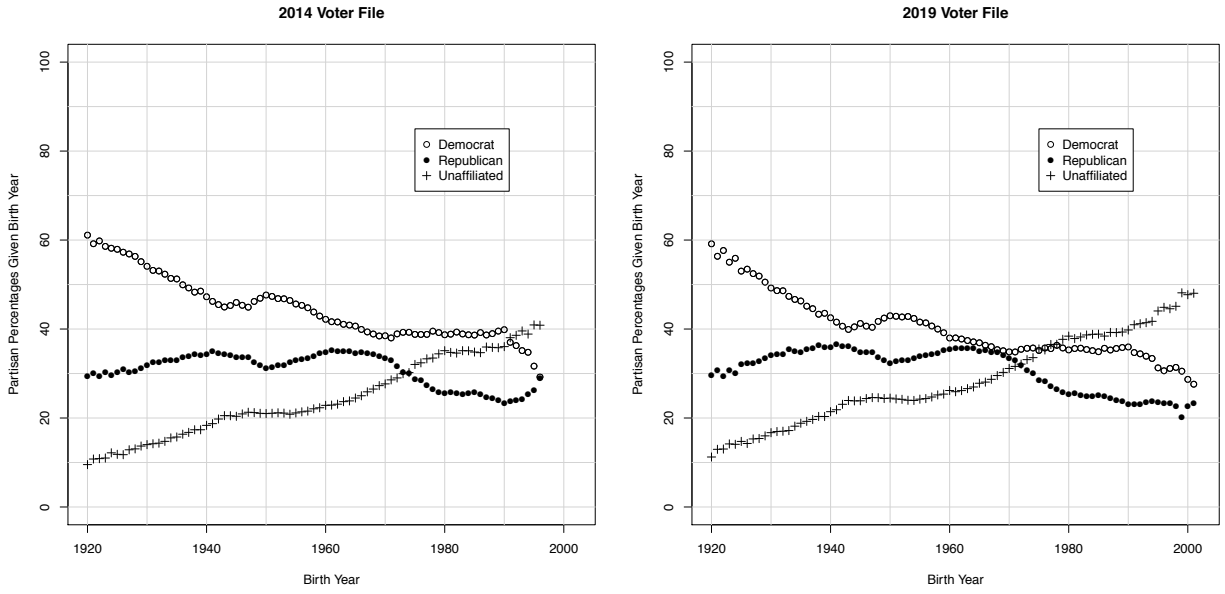


Figure 3: Percentage of Partisan Affiliations with Birth-Year Cohorts (Active and Inactive Voters in 2014 and 2019 Voter Files)

64. Figure 3 plots the percentage of partisan affiliations within each birth year cohort for the 2014 and 2019 voter files. This is done for both active and inactive voters. Note that the percentages of Democrat, Republican, and Unaffiliated voters generally look quite similar in the two plots for voters who were born before approximately 1990.

65. Where the percentages begin to noticeably differ in the two plots is for younger voters – those born after approximately 1990. In particular, we see that these younger voters are much more likely to be registered as unaffiliated than as Democrats in 2019. This gap between the percentage of young Unaffiliated voters and young Democratic voters is much larger in 2019 than in 2014.

ii. Active Voters

66. The analysis above looks at both active and inactive voters. However, since active voters are more likely than inactive voters to turn out and attempt to vote, it is especially relevant whether the active voters in the 2014 voter file are, on average, very similar to the active voters in the 2019 voter file.

Variable	Values	2014 Proportion	2019 Proportion	Difference of Proportions
Partisanship	Democrat	0.42	0.37	-0.05
Partisanship	Republican	0.31	0.31	0.00
Partisanship	Unaffiliated	0.26	0.31	0.05
Partisanship	Other	0.00	0.01	0.00
Sex	Female	0.54	0.53	-0.01
Sex	Male	0.45	0.44	-0.01
Sex	Other	0.01	0.03	0.02
NC Birth	FALSE	0.56	0.57	0.02
NC Birth	TRUE	0.44	0.43	-0.02
Race	American Indian	0.01	0.01	-0.00
Race	Asian	0.01	0.01	0.00
Race	Black	0.22	0.21	-0.01
Race	Mixed	0.01	0.01	0.00
Race	Other	0.02	0.02	0.01
Race	Unknown	0.02	0.04	0.02
Race	White	0.72	0.70	-0.02

Table 2: 2014-2019 Voter File Comparison (Active Voters Only)

67. Table 2 displays information on the distribution of voter characteristics among active voters in the 2014 and 2019 voter files. Looking at table 2, we see that the differences among active voters are very similar to those among voters overall. More specifically, the differences among active voters are generally the same or smaller than the differences among all voters (active

and inactive). The one exception to this is the difference in state of birth among active voters, which is slightly larger than the equivalent difference in proportions among all voters.

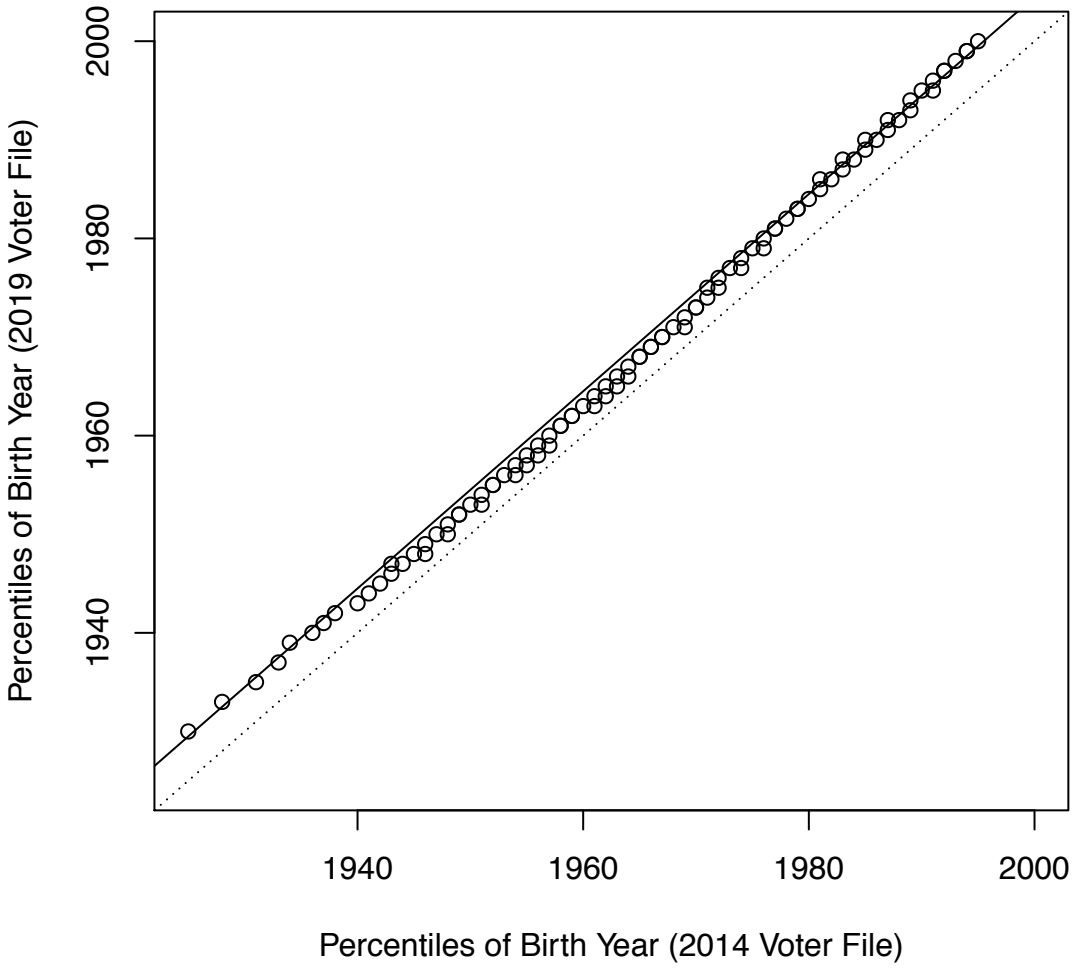


Figure 4: Quantile-Quantile Plot of Birth Year in 2014 Voter File and Birth Year in 2019 Voter File (Active Voters). The dotted 45-degree line is the line depicting equality of birth year percentiles (intercept =0 and slope =1). The solid 45-degree line is the line depicting equality of age (intercept = 4.5 and slope = 1).

68. We can also look at birth year and age by constructing a QQ-plot using just the data from active voters in the two voter files. Figure 4 displays this plot. Again, we see evidence that distribution of age is effectively the same in the two voter files.

69. Overall, the data in Table 2 and Figure 4 show that the key voter characteristics are effectively the same for active voters in the 2014 voter file and the 2019 voter file.

iii. Inactive Voters

70. For completeness, I also tabulate the differences between inactive voters in the 2014 and 2019 voter files. These results appear in Table 3 below.

Variable	Values	2014 Proportion	2019 Proportion	Difference of Proportion
Partisanship	Democrat	0.43	0.39	-0.04
Partisanship	Republican	0.25	0.23	-0.02
Partisanship	Unaffiliated	0.32	0.37	0.05
Partisanship	Other	0.00	0.01	0.00
Sex	Female	0.54	0.50	-0.04
Sex	Male	0.45	0.47	0.02
Sex	Other	0.02	0.03	0.02
NC Birth	FALSE	0.68	0.61	-0.06
NC Birth	TRUE	0.32	0.39	0.06
Race	American Indian	0.01	0.01	0.00
Race	Asian	0.01	0.02	0.00
Race	Black	0.25	0.28	0.03
Race	Mixed	0.01	0.01	0.00
Race	Other	0.03	0.04	0.01
Race	Unknown	0.03	0.05	0.02
Race	White	0.66	0.59	-0.07

Table 3: 2014-2019 Voter File Comparison (Inactive Voters Only)

71. Looking at Table 3, one sees that some of the differences of proportions are larger for inactive voters than for active voters. For instance, among inactive voters, white voters decreased by 7 percentage points from 2014-2019, whereas among active voters, white voters decreased by 2 percentage points. Among inactive voters, women decreased by 4 percentage points from 2014

to 2019, whereas among active voters, the decrease was 1 percentage point. Among inactive voters, those born in North Carolina increased by 6 percentage points from 2014 to 2019. Among active voters, those born in North Carolina actually decreased by 2 percentage points from 2014 to 2019.

72. I also examine the distribution of birth year and age among inactive voters in the 2014 and 2019 voter files. Figure 5 below displays the QQ-plot of birth year for inactive voters.

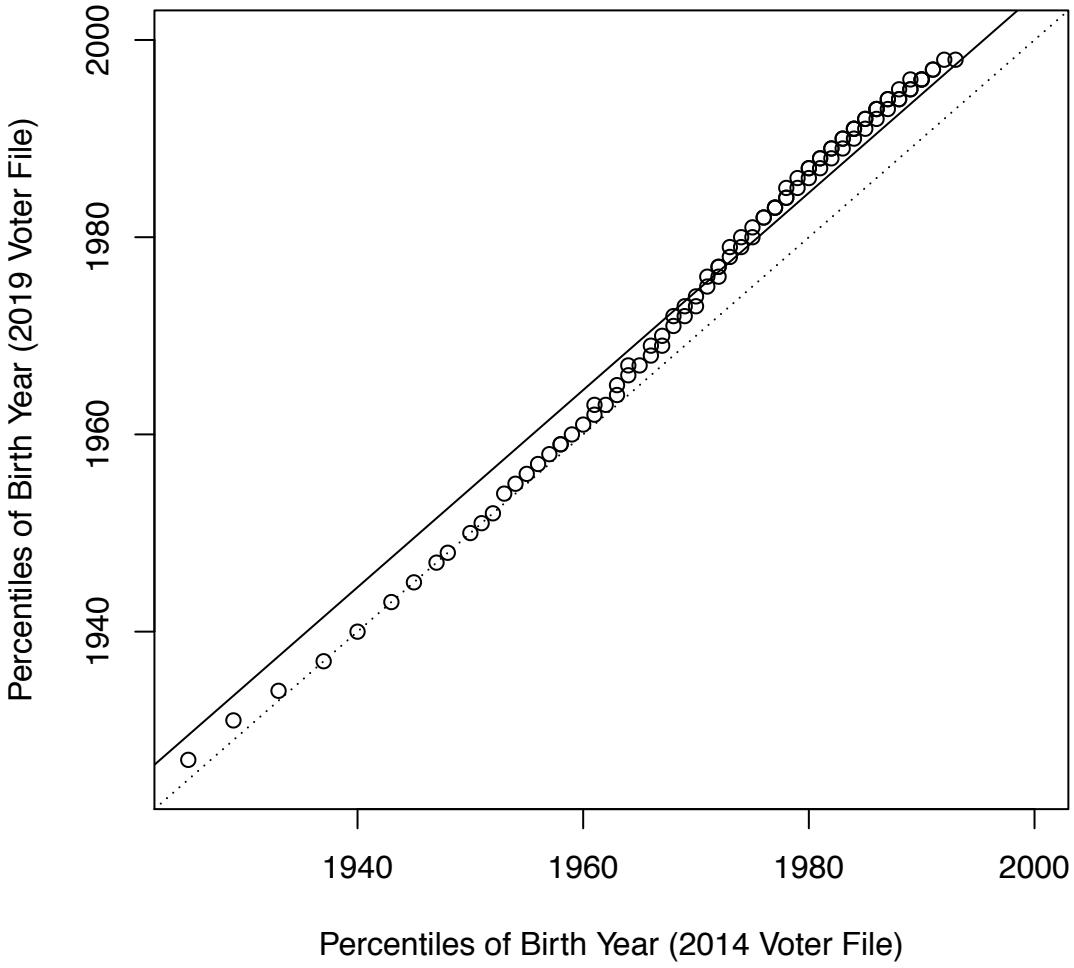


Figure 5: Quantile-Quantile Plot of Birth Year in 2014 Voter File and Birth Year in 2019 Voter File (Inactive Voters). The dotted 45-degree line is the line depicting equality of birth year percentiles (intercept = 0 and slope = 1). The solid 45-degree line is the line depicting equality of age (intercept = 4.5 and slope = 1).

73. Here we see that the distribution of age in the two voter files is fairly similar for voters who were born after about 1970. On the other hand, the distribution of birth year is approximately equal for the voter records with birth years prior to about 1960.

74. To summarize, this section of the report has examined relevant differences between the world in 2014 and 2019. While some minor differences exist, there are strong similarities between: a) the two voter Voter ID laws in question, b) the aggregate percentage of North Carolinians with North Carolina driver's licenses, and c) the characteristics of voters in the two voter files.

75. These similarities lead me to conclude that the available 2019 data are consistent with my 2015 analysis and findings.

VIII. CONCLUSIONS

76. To reiterate, my conclusions are the following.

77. The percentage of the North Carolina 15-and-older population in possession of a North Carolina driver's license in 2019 is forecast to be statistically indistinguishable from the 2014 percentage. More specifically, I forecast that 88.8% of this group will have a North Carolina driver's license in 2019 with a 95% confidence interval equal to (86.1%, 91.2%). The observed 2014 percentage is 87.4%.

78. The demographic makeup of the North Carolina voter registration file in February 2019 is extremely substantively similar to the demographic makeup of the voter file in July of 2014.

79. The lack of dramatic changes to either the aggregate rates of driver's license possession or the demographics of the voter registration file lead me to conclude that the relationships between voter characteristics (such as race and active/inactive status) and ID possession in 2019 remain consistent with my previous 2015 analysis. Given the data available to me now, my expert opinion is that the rates of photo ID possession by race and active / inactive status that I documented in my 2015 report remain accurate estimates of the corresponding rates of photo ID possession in 2019. *See* Appendix B.

80. Through my 2015 analysis, I found the following:

a. In 2015, at least 5.9% of registered North Carolina voters lacked identification required to vote under HB 589. This number could have been as high as 12.5%.

b. In 2015, African Americans were more than twice as likely as whites to lack identification required to vote under HB 589. A conservative analysis revealed that 9.6% of black registered voters lacked acceptable ID, whereas 4.5% of white registered voters lacked acceptable ID under HB 589. An alternative analysis showed that 24.4% of African Americans and 8.4% of whites lacked acceptable ID under HB 589.

c. In 2015, the black-white disparity in ID possession was larger among likely voters than among likely non-voters. For instance, African Americans who voted in recent elections were 3.8 times more likely to not have acceptable ID under HB 589 than were whites who voted in the same elections. African Americans who did not vote in recent elections were 1.9 times more likely to lack acceptable ID than whites who did not vote in the same elections.

This the 13 day of May, 2019.

Kevin Quinn, Ph.D.

I, SHASANK C. PATEL, a Notary Public of the County and State aforesaid, hereby certify that KEVIN QUINN, personally known to me to be the affiant in the foregoing affidavit, personally appeared before me this day and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

This the 13th day of MAY, 2019.

SHASANK C. PATEL
NOTARY PUBLIC, STATE OF MI
COUNTY OF WAYNE
ACTING IN COUNTY OF WASHTENAW
My Commission Expires Mar 8, 2023

(SEAL)

Notary Public

My Commission Expires: 03/08/2023

Appendix A

Curriculum Vitae

Kevin M. Quinn

Office
Center for Political Studies
Institute for Social Research 4436
University of Michigan
426 Thompson Street
Ann Arbor, MI 48106-1248
Email: kmq@umich.edu

Academic Positions

Professor, Department of Political Science, University of Michigan – Ann Arbor, (2017 – present).

Professor (by courtesy), Department of Statistics, University of Michigan – Ann Arbor, (2018 – present).

Research Professor, Michigan Institute for Data Science (MIDAS), University of Michigan – Ann Arbor, (2017 – present).

Faculty Associate, Center for Political Studies, University of Michigan – Ann Arbor, (2017 – present).

Professor of Law, UC Berkeley School of Law, (2009 – 2017).

Associate Professor (untenured), Department of Government, Harvard University, (2007 – 2009).

Fellow, Center for Advanced Study in the Behavioral Sciences, Palo Alto, CA, (2006 – 2007).

Assistant Professor, Department of Government, Harvard University, (2003 – 2007).

Assistant Professor, Department of Political Science, University of Washington, (2000 – 2003).

Adjunct Assistant Professor, Department of Statistics, University of Washington, (2000 – 2003).

Core Member, Center for Statistics and the Social Sciences, University of Washington, (2000 – 2003).

Visiting Research Scholar, Center for Basic Research in the Social Sciences, Harvard University, (1999 – 2000).

Education

Ph.D., Washington University in St. Louis, 1999, Political Science.

A.M., Washington University in St. Louis, 1994, Political Science.

B.A., The Johns Hopkins University, 1992, Major: Political Science.

Grants

Co-Principal Investigator (with Marisa Abrajano and Christopher Elemndorf), National Science Foundation Grant SES 16-59922, *Collaborative Research: Measuring Apparent Race and Ethnicity with Applications to the Study of Discrimination* ($397,036 total).

Co-Principal Investigator (with Robert Franzese), National Science Foundation Grant SES 13-24159, *Workshop: Support for Conferences and Mentoring of Underrepresented Groups in Political Methodology.* ($307,722 total).

Co-Principal Investigator (with Daniel Ho), National Science Foundation Grant SES 07-51834, *The Third Branch in the Fourth Estate: The Media's Role in the Diffusion of Legal Knowledge.* ($213,000 total).

Co-Principal Investigator (with Steven Abney, Michael Colaresi, Burt Monroe, and Dragomir Radev), National Science Foundation Grant BCS 05-27513, *DHB: The Dynamics of Political Representation and Political Rhetoric.* ($749,724 total).

Co-Principal Investigator (with Andrew Martin), National Science Foundation Grants SES 03-50613 and SES 03-50646, *Collaborative Research: A Computational Environment for Bayesian Inference in the Social Sciences.* ($240,010 total).

Co-Principal Investigator (with Andrew Martin), National Science Foundation Grants SES 01-36679 and SES 01-35855, *Collaborative Research: The Dimensions of Supreme Court Decision Making, 1946-2000.* ($94,661 total).

Co-Principal Investigator (with Michael Hechter and Erik Wibbels), University of Washington Center for Statistics and the Social Sciences Seed Grant, *Measuring State Strength.* ($25,529).

Co-Principal Investigator (with Andrew Martin), Washington University Weidenbaum Center Small Research Grant, *The Dynamics of Supreme Court Decision Making, 1946-2000.* ($9,700).

Harvard University Clark Fund. ($5,876).

National Science Foundation Grant SES 97-09617, *Doctoral Dissertation Research: The Ethnic Bases of Bargaining Power in Post-Soviet Russia.* ($4,912).

Publications

Articles

Abrajano, Marisa A.; Christopher S. Elmendorf; and Kevin M. Quinn. 2018. "Labels vs. Pictures: Treatment-Mode Effects in Experiments About Discrimination." *Political Analysis.* 26: 20-33.

Keele, Luke and Kevin M. Quinn. 2017. "Bayesian Sensitivity Analysis for Causal Effects from 2 $\times$ 2 Tables in the Presence of Unmeasured Confounding with Application to Presidential Campaign Visits." *Annals of Applied Statistics.* 11: 1974-1997.

Elmendorf, Christopher S.; Kevin M. Quinn; and Marisa A. Abrajano. 2016. "Racially Polarized Voting." *University of Chicago Law Review.* 83: 587-692.

Herron, Michael C. and Kevin M. Quinn. 2016. "A Careful Look at Modern Case Selection Methods." *Sociological Methods and Research.* 45: 458-492.

Unkovic, Cait; Maya Sen; and Kevin M. Quinn. 2016. "Does Encouragement Matter in Improving Gender Imbalances in Technical Fields? Evidence from a Randomized Controlled Trial." *PLOS ONE.*

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Greiner, D. James and Kevin M. Quinn. 2012. "Long Live the Exit Poll." *Daedalus.* 141: 9-22.

Gergen, Mark P. and Kevin M. Quinn. 2012. "Common Law Judicial Decision Making: The Case of the New York Court of Appeals 1900-1941." *Buffalo Law Review.* 60: 897-1002.

Cobb, Rachael V.; D. James Greiner; and Kevin M. Quinn. 2012. "Can Voter ID Laws Be Administered in a Race-Neutral Manner? Evidence from the City of Boston in 2008." *Quarterly Journal of Political Science.* 7: 1-33.

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Ho, Daniel E. and Kevin M. Quinn. 2010. "How Not To Lie with Judicial Votes: Misconceptions, Measurement, and Models." *California Law Review*. 98: 813-876.

Spirling, Arthur and Kevin M. Quinn. 2010. "Identifying Intra-Party Voting Blocs in the UK House of Commons." *Journal of the American Statistical Association*. 105: 447-457.

Quinn, Kevin M.; Burt Monroe; Michael Colaresi; Michael Crespin; and Drago Radev. 2010. "How to Analyze Political Attention with Minimal Assumptions and Costs." *American Journal of Political Science*. 54: 209-228.

Glynn, Adam N. and Kevin M. Quinn. 2010. "An Introduction to the Augmented Inverse Propensity Weighted Estimator." *Political Analysis*. 18: 36-56.

Ho, Daniel E. and Kevin M. Quinn. 2010. "Did a Switch in Time Save Nine?" *Journal of Legal Analysis*. 2: 1-45.

Ho, Daniel E. and Kevin M. Quinn. 2009. "Viewpoint Diversity and Media Consolidation: An Empirical Study." *Stanford Law Review*. 61: 781-868. (Reprinted in *First Amendment Law Handbook*. 2010. Rodney A. Smolla (ed.) Thomson Reuters / West.)

Epstein, Lee; Andrew D. Martin; Kevin M. Quinn; and Jeffrey A. Segal. 2009. "Circuit Effects: How the Norm of Federal Judicial Experience Biases the Supreme Court." *University of Pennsylvania Law Review*. 157: 101-146.

Greiner, D. James and Kevin M. Quinn. 2009. "$R \times C$ Ecological Inference: Bounds, Correlations, Flexibility, and Transparency of Assumptions." *Journal of the Royal Statistical Society, Series A*. 172: 67-81.

Monroe, Burt; Michael Colaresi; and Kevin M. Quinn. 2008. "Fightin' Words: Lexical Feature Selection and Evaluation for Identifying the Content of Political Conflict." *Political Analysis*. 16: 372-403.

Ho, Daniel E. and Kevin M. Quinn. 2008. "Measuring Explicit Political Positions of Media." *Quarterly Journal of Political Science*. 3: 353-377.

Ho, Daniel E. and Kevin M. Quinn. 2008. "Improving the Presentation and Interpretation of Online Ratings Data with Model-based Figures." *The American Statistician*. 62: 279-288.

Epstein, Lee; Andrew D. Martin; Kevin Quinn; and Jeffrey A. Segal. 2008. "The Bush Imprint on the Supreme Court: Why Conservatives Should Continue to Yearn and Liberals Should Not Fear." *Tulsa Law Review*. 43: 651-672. (Symposium)

Epstein, Lee; Kevin Quinn; Andrew D. Martin; and Jeffrey A. Segal. 2008. "On the Perils of Drawing Inferences about Supreme Court Justices from their First Few Years of Service." *Judicature*. 91: 168-179. (Reprinted in *The Green Bag Almanac and Reader*. 2009. Ross E. Davies (ed.) Green Bag Press.)

Hassan, Ahmed; Anthony Fader, Michael H. Crespin, Kevin M. Quinn, Burt L. Monroe, Michael Colaresi, and Dragomir R. Radev. 2008. "Tracking the Dynamic Evolution of Participant Salience in a Discussion." *Proceedings of the 22nd International Conference on Computational Linguistics (Coling 2008)*. 313-320.

Martin, Andrew D. and Kevin M. Quinn. 2007. "Assessing Preference Change on the U.S. Supreme Court." *Journal of Law, Economics, and Organization*. 23: 365-385.

Epstein, Lee; Andrew D. Martin; Kevin M. Quinn; and Jeffrey A. Segal. 2007. "Ideological Drift among Supreme Court Justices: Who, When, and How Important?" *Northwestern University Law Review*. 101: 1483-1542.

Fader, Anthony; Dragomir R. Radev; Michael H. Crespin; Burt L. Monroe; Kevin M. Quinn; and Michael Colaresi. 2007. "MavenRank: Identifying Influential Members of the US Senate Using Lexical Centrality." *Proceedings of the Conference of Empirical Methods in Natural Language Processing (EMNLP '07)*. Prague, Czech Republic.

Martin, Andrew D. and Kevin M. Quinn. 2006. "Applied Bayesian Inference in R using MCMCpack." *R News*.

Martin, Andrew D.; Kevin M. Quinn; and Lee Epstein. 2005. "The Median Justice on the U.S. Supreme Court." *North Carolina Law Review*. 83: 1275-1322. (Symposium)

Quinn, Kevin M. 2004. "Bayesian Factor Analysis for Mixed Ordinal and Continuous Responses." *Political Analysis*. 12: 338-353.

Martin, Andrew D.; Kevin M. Quinn; Theodore W. Ruger; and Pauline T. Kim. 2004."Competing Approaches to Predicting Supreme Court Decisionmaking." *Perspectives on Politics*. 2: 761-767.

Ruger, Theodore W.; Pauline T. Kim; Andrew D. Martin; and Kevin M. Quinn. 2004. "The Supreme Court Forecasting Project: Legal and Political Science Approaches to Predicting Supreme Court Decision-Making." *Columbia Law Review*. 104: 1150-1210.

Quinn, Kevin M. and Andrew D. Martin. 2002. "An Integrated Computational Model of Multiparty Electoral Competition." *Statistical Science*. 17: 405-419.

Martin, Andrew D. and Kevin M. Quinn. 2002. "Dynamic Ideal Point Estimation via Markov Chain Monte Carlo for the U.S. Supreme Court, 1953-1999." *Political Analysis*. 10: 134-153. (Selected for inclusion in Oxford's Centenary Celebration Volume of 100 seminal papers in Oxford journals.)

Quinn, Kevin M.; Andrew D. Martin; and Andrew B. Whitford. 1999. "Voter Choice in a Multi-Party Democracy: A Test of Competing Theories and Models." *American Journal of Political Science*, 43: 1231-1247.

Schofield, Norman J.; Andrew D. Martin; Kevin M. Quinn; and Andrew B. Whitford. 1998. "Multiparty Electoral Competition in the Netherlands and Germany: A Model Based on Multinomial Probit." *Public Choice*. 97: 257-293. (Reprinted in *Empirical Studies in Comparative Politics*. 1999. Melvin J. Hinich and Michael C. Munger (eds.) Kluwer.)

Martin, Andrew D., and Kevin M. Quinn. 1996. "Using Computational Methods to Perform Counterfactual Analyses of Formal Theories." *Rationality and Society*. 8: 295-323.

Reviews, Notes, and Miscellaneous

Quinn, Kevin M. 2012. "The Academic Study of Decisionmaking on Multi-Member Courts." *California Law Review* (Symposium).

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Ho, Daniel E. and Kevin M. Quinn. 2009 "The Role of Theory and Evidence in Media Regulation and Law: A Response to Baker and a Defense of Empirical Legal Studies." *Federal Communications Law Journal*. 61: 673-714.

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URL: http://cran.r-project.org/src/contrib/Views/Bayesian.html.

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Quinn, Kevin M. 2003. "Markov Chain Monte Carlo". Contribution to *Encyclopedia of Social Science Research Methods*, Michael Lewis-Beck, Alan Bryman, and Tim Futing Liao (eds.). Thousand Oaks: Sage.

Quinn, Kevin M. 1999. Review of *Making Votes Count: Strategic Coordination in the World's Electoral Systems*. by Gary W. Cox. *Comparative Political Studies*, 32: 648-651.

Martin, Andrew D., and Kevin M. Quinn. 1996. "A Review of Discrete Optimization Heuristics." *The Political Methodologist*. 7: 6-10.

Book Chapters

Epstein, Lee; Andrew D. Martin; Kevin M. Quinn; and Jeffrey A. Segal. 2019. "Politics and the Legal System." In *The Oxford Handbook of Public Choice*. Roger D. Congleton, Bernard Grofman, and Stefan Voigt (eds.). Oxford: Oxford University Press.

Epstein, Lee; Andrew D. Martin; Kevin M. Quinn; and Jeffrey A. Segal. 2012. "Ideology and the Study of Judicial Behavior." In *Ideology, Psychology, and Law*. John Hanson (ed.). Oxford: Oxford University Press.

Quinn, Kevin. 2004. "Ecological Inference in the Presence of Temporal Dependence." In *Ecological Inference: New Methodological Strategies*. Gary King, Ori Rosen, and Martin A. Tanner (eds.). New York: Cambridge University Press.

Software

Glynn, Adam N. and Kevin M. Quinn. CausalGAM, version 0.1-1 (an `R` package for the estimation of causal effects with generalized additive models).
URL: http://cran.r-project.org/web/packages/CausalGAM/index.html.

Greiner, D. James, Paul Baines, and Kevin M. Quinn. RxCEcolInf, version 0.1-1 (an `R` package for ecological inference in arbitrary two-way tables).
URL: http://cran.r-project.org/web/packages/RxCEcolInf/index.html.

Quinn, Kevin M. SimpleTable, version 0.1-1 (an `R` package for Bayesian inference and sensitivity analysis for causal effects from 2×2 and $2 \times 2 \times K$ tables in the presence of unmeasured confounding).
URL: http://cran.r-project.org/web/packages/SimpleTable/index.html.

Martin, Andrew D., Kevin M. Quinn and Jong Hee Park. MCMCpack, version 1.3-4 (an `R` package for Markov chain Monte Carlo).
URL: http://mcmcpack.wustl.edu.

Quinn, Kevin M. and Daniel E. Ho. Ratings, version 0.1-1 (an `R` package for model-based figures of ratings data).
URL: http://cran.r-project.org/web/packages/Ratings/index.html.

Martin, Andrew D., Kevin M. Quinn, and Daniel Pemstein. Scythe Statistical Library, release 1.0.3 (an open source C++ library for statistical computation).
URL: http://scythe.wustl.edu.

Honors

Elected Fellow of the Society for Political Methodology 2018.

2016 Law & Courts Lasting Contribution Award for "Dynamic Ideal Point Estimation via Markov Chain Monte Carlo for the U.S. Supreme Court, 1953-1999." *Political Analysis*. 10: 134-153 (with Andrew D. Martin).

2013 Society for Political Methodology Statistical Software Award for `MCMCpack` (with Andrew D. Martin and Jong Hee Park).

Center for Advanced Studies of the Ludwig-Maximilians-Universität München Visiting Fellowship (June 2013).

2010 Robert H. Durr Award for the best paper applying quantitative methods to a substantive problem in political science for "Can Voter ID Laws Be Administered in a Race-Neutral Manner? Evidence from the City of Boston in 2008" (with Rachael V. Cobb and D. James Greiner).

2008 Harold Gosnell Prize for best work in political methodology presented at any political science conference during 2007-2008 for "What Can Be Learned from a Simple Table? Bayesian Inference and Sensitivity Analysis for Causal Effects from 2×2 and $2 \times 2 \times K$ Tables in the Presence of Unmeasured Confounding".

Searle Visiting Fellow, Northwestern University School of Law (Spring, 2008).

2006 Harold Gosnell Prize for best work in political methodology presented at any political science conference during 2005-2006 for "An Automated Method of Topic-Coding Legislative Speech Over Time with Application to the 105th-108th U.S. Senate." (with Burt L. Monroe, Michael Colaresi, Michael H. Crespin, and Dragomir R. Radev).

Center for Advanced Study in the Behavioral Sciences Residential Fellowship (2006-2007)

Inclusion in Oxford's Centenary Celebration Volume of 100 seminal papers in Oxford journals for "Dynamic Ideal Point Estimation via Markov Chain Monte Carlo for the US. Supreme Court, 1953-1999" from *Political Analysis*.

2001 Harold Gosnell Prize for best work in political methodology presented at any political science conference during 2000-2001 for "Bayesian Learning about Ideal Points of U.S. Supreme Court Justices, 1953-1999." (with Andrew D. Martin).

Program on Human Security Research Scholar. (2000 – 2001). Center for Basic Research in the Social Sciences. Harvard University.

Center in Political Economy Post-Doctoral Fellow. (2000 – 2001). Washington University in St. Louis.

Dean's Dissertation Fellowship (1998 – 1999). Washington University in St. Louis.

Invited Lectures (Last Five Years)

Data Science Seminar Series, London School of Economics, March 17, 2019.

Conference on Ideal Point Models, MIT, May 1-2, 2015.

Political Institutions and Methodology Colloquium, Emory University, February 10, 2015.

Interdisciplinary Seminar in Quantitative Methods, University of Michigan. November 5, 2014.

American Politics Speaker Series, MIT. May 5, 2014.

Seminar on Law and Political Science, Harvard University. April 18, 2014.

Short Courses

"The Spatial Model of Voting: Theory and Empirics." Center for the Study of Law and Society Methodology Workshop, UC Berkeley, November 16, 2012.

"Interpreting Treatment Effects." Summer Workshop on Research Design for Causal Inference, Northwestern University, August 16-20, 2010.

"Operationalization of Spatial Models." Empirical Implications of Theoretical Models (EITM) Summer Institute, Universität Mannheim, July 7-10, 2009.

"Operationalization of Spatial Models." Empirical Implications of Theoretical Models (EITM) Summer Institute, Washington University in St. Louis, June 9-13, 2003; June 23-27, 2005; June 23-26, 2006.

"An Introduction to Bayesian Inference and Hierarchical Modeling for Political Scientists." Texas A&M University. September 15, 2001 (rescheduled to May 18, 2002).

Conference Participation

Annual Meeting of the American Political Science Association

- Political Methodology Division Chair: 2005.
- Paper Presenter: 2015-2014, 2011-2005, 2003, 2001-2000, 1998-1996.
- Discussant: 2009-2007, 2004, 2001-2000, 1997.
- Panel Chair: 2015, 2012.

Annual Meeting of the Midwest Political Science Association

- Political Methodology Division Chair: 2007.
- Paper Presenter: 2015-2014, 2009-2006, 2004, 2002-2000, 1998-1995.
- Discussant: 2005-2004, 2002.
- Panel Chair: 2005, 2002, 2000.

Annual Meeting of the Society for Political Methodology

- Conference Co-organizer: 2002.
- Member, Program Committee: 2015-2014, 2007, 2002.
- Paper Presenter: 2015, 2007-2004, 2001.
- Discussant: 2013-2012, 2004, 2001, 1998.
- Invited Participant: 2015-2012, 2007-2004, 2002-2000, 1998-1997.

Annual Conference on Empirical Legal Studies

- Member, Conference Program Committee: 2014.
- Paper Presenter: 2014, 2010-2008.
- Discussant: 2014, 2012, 2009, 2007.
- Panel Chair: 2009.

Annual Meeting of the Association of American Law Schools

- Chair, Section on Law and the Social Sciences: 2011.
- Chair-Elect, Section on Law and the Social Sciences: 2010.

Annual Asian Political Methodology Conference

- Invited Speaker, 2015.

Annual Meeting of the Law and Society Association

- Roundtable Participant: 2005.
- Paper Presenter: 2002.

Joint Statistical Meetings

- Paper Presenter: 2005.

Annual General Conference of the European Political Science Association

- Panel Chair: 2014.
- Paper Presenter: 2017, 2015-2014, 2012.

UseR!: The R User Conference

- Paper Presenter: 2006, 2004.

Teaching Experience

Professor (2017 – present), University of Michigan
Courses Taught:

- POLSCI 688 Selected Topic: Seminar on Judicial Politics (Winter 2018, Graduate)
- POLSCI 688 Selected Topic: Bayesian Inference for the Social Sciences (Winter 2018, Graduate)
- POLSCI 496 Seminar on American Government: Judicial Decision Making (Fall 2017, Undergraduate)

Professor (2009 – 2017), UC Berkeley School of Law
Courses Taught:

- LAW 201 Torts (Spring 2017)
- LAW 209.3 Introductory Statistics (Fall 2013, 2014, 2015, 2016, Graduate)
- LAW 209.3 Quantitative Methods I (Spring 2010, Fall 2010, Graduate)
- LAW 209.32 Intermediate Statistics (Spring 2012, 2013, 2014)
- LAW 209.6 Topics in Quantitative Methods (Causal Inference) (Spring 2010, Graduate)
- LAW 219.7 Judicial Decision Making (Spring 2011, 2012, Fall 2012, 2015 Graduate)
- LAW 226.6 Political Economy of Public Law (Spring 2016, Graduate)
- LAW 241.2 E-Discovery (Spring 2014, Spring 2016, Graduate)
- LAW 244.4 Litigation and Statistics (Fall 2015, Graduate)
- LS 138 The Supreme Court and Public Policy (Fall 2011, Spring 2013, Fall 2014, Undergraduate)

Associate Professor (2007 – 2009), Assistant Professor (2003 – 2007), Harvard University
Courses Taught:

- GOV 90bc Courts and Social Change (Spring 2006, 2008, Undergraduate)
- GOV 1000 Quantitative Methods for Political Science I (Fall 2004, Graduate)
- GOV 2000 Quantitative Methods for Political Science I (Fall 2005, Graduate)

- GOV 2000 Quantitative Methods for Political Science II (Spring 2004, Graduate)
- GOV 2002 Topics in Political Methodology (Fall 2007, Graduate)
- GOV 2003 Bayesian Hierarchical Modeling (Spring 2004, 2005, and 2008, Graduate)
- GOV 2453 / LAW 35255A Practical and Theoretical Regulation of Voting (Fall 2008, Graduate)

Assistant Professor (2000 – 2003), University of Washington
Courses Taught:

- POL 447 Comparative Democratic Institutions (Winter 2001, Undergraduate/Graduate)
- POL 492 Quantitative Political Methodology (Winter 2003, Graduate)
- CSSS/POL 494 Advanced Quantitative Political Methodology (Spring 2002, Graduate)
- CSSS/SOC/STAT 536 Logistic Regression and Loglinear Modeling for the Social Sciences (Fall 2000, 2001, & 2002, Graduate)
- CSSS/POL/STAT 560 Hierarchical Modeling for the Social Sciences (Winter 2001 & 2002, Graduate)

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Service

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Co-Editor: *Journal of Law, Economics, and Organization* (2017 – present).

Editorial Board Member: *Journal of Politics* (2015 – present).

Editorial Board Member: *Political Analysis* (2010 – present).

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Member: Society for Political Methodology Nominations Committee (2016 – present).

Member: Society for Political Methodology Long-Range Planning Committee (2017 – present).

Member: APSA Law & Courts Lasting Contribution Award Committee (2017).

President: Society for Political Methodology (2013 – 2015).

Vice-President: Society for Political Methodology (2011 – 2013).

Associate Editor: *Journal of the American Statistical Association, Applications and Case-Studies* (2009 – 2012).

Manuscript Referee: *American Journal of Political Science*; *American Political Science Review*; *Annals of Applied Statistics*; *British Journal of Political Science*; *Comparative Political Studies*; *Electoral Studies*; *European Union Politics*; *International Organization*; *Journal of the American Society for Information Science and Technology*; *Journal of the American Statistical Association*; *Journal of Empirical Legal Studies*; *Journal of Law, Economics, and Organization*; *Journal of Peace Research*; *Journal of Politics*; *Journal of Public Administration Research and Theory*; *Journal of the Royal Statistical Society*; *Jurimetrics*; *Law and Social Inquiry*; *Law and Society Review*; *Legislative Studies Quarterly*; *Nature Human Behavior*; *Policy Studies Journal*; *Political Analysis*; *Political Geography*; *Political Research Quarterly*; *Political Science Research and Methods*; *Proceedings of the National Academy of Sciences*; *Public Choice*; *Public Opinion Quarterly*; *Quarterly Journal of Political Science*; *R News*; *Review of Economics and Statistics*; *Sociological Methods and Research*; *Springer*; *Statistica Sinica*; *Statistical Methodology*; *Studies in Comparative International Development*; *The American Statistician*; *Yale University Press*.

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Member: Law School Admission Council Grants Subcommittee (2014 – 2015).

Member: APSA Law & Courts Nominating Committee (2012).

Member: Society for Political Methodology Emerging Scholar Award Selection Committee (2010 – 2012).

Member: Executive Committee of the Law and Courts Section of the American Political Science Association (2008 – 2009).

At Large Member: Council of the Political Forecasting Group (2008 – 2009).

Member: Program Committee for the Annual Meeting of the Society for Political Methodology (2007).

Member: Robert H. Durr Award Selection Committee (2002).

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Member, Faculty Appointments Committee, UC Berkeley School of Law (2014-2017)

Member, JSP Admissions Committee (2014-2015, 2012-2013, 2010-2011)

Member, Ph.D. Programs Committee, UC Berkeley School of Law (2013-2014)

Member, JSP Student Diversity Committee (2013-2014).

Member, Center for the Study of Law and Society Advisory Committee (2009-2015).

Member, Review Committee for Berkeley Empirical Legal Studies Fellowships (2009-2015).

Member, Academic and Degree Program Committee, UC Berkeley School of Law (2010-2011)

Member, JSP Graduate Program Review Committee (2009-2011).

References
Available upon request

Appendix B

1 Statement of Inquiry

I have been retained by the Southern Coalition for Social Justice to examine North Carolinians' possession rates of acceptable ID under HB 589 and to determine whether changes in the voter ID requirement disproportionately impact certain types of North Carolina voters.

My analysis is based on matching records in the North Carolina voter registration file with records in the North Carolina driver's license database and federal databases of passport, military ID, and veteran's ID holders. This record matching process allows me to construct accurate estimates of: a) the total number of registered voters that do not possess forms of photo ID required by HB 589, b) the number of African-American registered voters that do not possess forms of photo ID required by HB 589, and c) the number of white registered voters that do not possess forms of photo ID required by HB 589. I will be testifying to the accuracy of such complex database matching processes.

2 Background and Qualifications

I am a Professor of Law at the University of California, Berkeley. Prior to joining the Berkeley faculty I was an Associate Professor of Government at Harvard University, an Assistant Professor of Government at Harvard University, an Assistant Professor of Political Science at the University of Washington and an Adjunct Assistant Professor of Statistics at the University of Washington. I have a Ph.D. and an A.M. in political science from Washington University in St. Louis as well as a B.A. in political science from the Johns Hopkins University.

My general research areas are empirical legal studies and statistical methods for law and social science. This work has appeared in leading law reviews such as the *Stanford Law Review*, *Columbia Law Review*, *California Law Review*, *University of Pennsylvania Law Review*, and the *Northwestern University Law Review*, as well as leading journals in the fields of Political Science and Statistics such as the *American Journal of Political Science*; *Quarterly Journal of Political*

Science; *Journal of Law, Economics, and Organization*; *Political Analysis*; *Journal of the American Statistical Association*; *Journal of the Royal Statistical Society*; and the *Annals of Applied Statistics*.

My research has been frequently supported by the National Science Foundation and I am a three-time winner of the Harold Gosnell Prize for best paper in political methodology. From 2009 to 2012 I served as an Associate Editor at the *Journal of the American Statistical Association*. I am currently an editorial board member at *Political Analysis* and the *Journal of Politics*. I am the current President of the Society for Political Methodology.

In 2012, I served as a testifying expert for the Defendant-Intervenors in *South Carolina v. United States, et al.*, No. 1:12-cv-203 (D.D.C.).

In 2011, I provided expert services to the Honorable Margaret B. Seymour (U.S. District Court for the District of South Carolina) under 5 U.S.C. §3109 in Voting Rights Act Case No. 3:03-cv-03093-MBS, *Levy et al. v. Lexington County SC School District Three, et al.*

A current copy of my full CV is attached to this report. I am compensated at the rate of $350 per hour.

3 Executive Summary

In this report I reach the following conclusions:

1. At least 5.9% of registered North Carolina voters lack identification required to vote under HB 589. This number could be as high as 12.5%.

2. African Americans are more than twice as likely as whites to lack identification required to vote under HB 589. A conservative analysis reveals that 9.6% of black registered voters lack acceptable ID, whereas 4.5% of white registered voters lack acceptable ID under HB 589. An alternative analysis shows that 24.4% of African Americans and 8.4% of whites lack acceptable ID under HB 589.

3. The black-white disparity in ID possession is larger among likely voters than among likely non-voters. For instance, African Americans who voted in recent elections are 3.8 times more likely to not have acceptable ID under HB 589 than are whites who voted in the same elections. African Americans who did not vote in recent elections are 1.9 times more likely to lack acceptable ID than are whites who did not vote in the same elections.

4 Voter Identification in North Carolina

HB 589, which was passed by the North Carolina state legislature on July 25, 2013 and signed into law by Governor McCrory on August 12, 2013, changed North Carolina's election laws in a number of ways. The changes that are the subject of this expert report are those dealing with voter identification. I will sketch the voter identification provisions of HB 589 in Section 4.2 of this report. Before doing that I will briefly sketch voter identification requirements under North Carolina law prior to HB 589.

4.1 Voter Identification in North Carolina Prior to HB 589

The voter identification provisions of HB 589 go into effect on January 1, 2016.[1] Currently, a North Carolina voter simply signs a poll book, affirming under penalty of perjury that s/he is the listed voter, prior to voting and is not required to show any form of ID in order to vote.[2] The exception to this is for voters who have registered by mail and who have not previously voted in a federal election, subject to certain exemptions. These voters are subject to the HAVA minimum voter identification standard. These voters are required to present "a current and valid photo identification; or ... a copy of a current utility bill, bank statement, government check, paycheck, or other government document that shows the name and address of the voter".[3]

4.2 Voter Identification in North Carolina Under HB 589

Under HB 589 all individuals presenting to vote in person "shall present photo identification bearing any reasonable resemblance to that voter to a local election official at the voting place before voting".[4] The only exceptions to this photo ID requirement are: a) registered voters voting curbside who must present identification as required under NC GS §163-166.9,[5] b) registered vot-

[1] HB 589 Part 6 §6.2 (2).

[2] See, http://www.ncsl.org/research/elections-and-campaigns/voter-id.aspx (visited 5/12/2015)

[3] Public Law 107-252, Sec. 303(b)(2)(A)(i).

[4] HB 589 Part 2 §2.1 (a)

[5] HB 589 Part 2 §2.1 (a)(1)

ers with "sincerely held religious objection[s] to be photographed" who have filed a declaration at least 25 days prior to the election,[6] and c) registered voters who are the victims of a natural disaster declared by either the President of the United States or the Governor of North Carolina who file declarations stating that their lack of photo ID was caused by the natural disaster. [7].

The only forms of photo identification acceptable under HB 589 are the following:[8]

1. "A North Carolina drivers [sic] license issued under Article 2 of Chapter 20 of the General Statutes, including a learner's permit or a provisional license."
2. "A special identification card for nonoperators issued under G.S. 20-37.7."
3. "A United States passport."
4. "A United States military identification card"
5. "A Veterans Identification Card issued by the United States Department of Veterans Affairs for use at Veterans Administration medical facilities facilities"
6. "A tribal enrollment card issued by a federally recognized tribe."
7. "A tribal enrollment card issued by a tribe recognized by [the state of North Carolina]"
8. "A drivers [sic] license or nonoperators [sic] identification card issued by another state, the District of Columbia, or a territory or commonwealth of the United States, but only if the voter's voter registration was within 90 days of the election."

HB 589 requires these forms of photo ID to have "a printed expiration date and [...] be unexpired" except for: military identification cards and veteran's identification cards—neither of which are required to have a printed expiration date. Voters who have "attained the age of 70 years at the time of presentation at the voting place shall be permitted to present an expired form of any of the [required forms of photo ID] that was unexpired on the voter's 70th birthday." [9]

Voters who present to vote in person without a required form of photo ID are not permitted to cast a regular ballot. Voters lacking the required forms of photo ID are permitted to vote a provisional ballot. This provisional ballot will only be counted if the voter appears at the county

[6]HB 589 Part 2 §2.1 (a)(1)
[7]HB 589 Part 2 §2.1 (a)(3)
[8]HB 589 Part 2 §2.1 (e)
[9]HB 589 Part 2 §2.1 (e)

board of elections and either: a) presents one of the required forms of photo identification, or b) declares that s/he has "sincerely held religious objections to being photographed."[10]

5 Determining the Burdens of the HB 589 Photo ID Requirement

As stated above, my goal in this report is to estimate: a) the number of registered North Carolina voters who possess a form of photo ID required by HB 589, and b) the number of registered North Carolina voters who do not possess such a form of ID. Cross-tabulating those figures by voter race allows me to assess whether the burdens imposed by HB 589 fall disproportionately on members of specific racial groups.

In principle, the method of accomplishing these tasks is straightforward. One begins with a list of all registered North Carolina voters at a given point in time as well as lists of all individuals who possess the various forms of required ID at the same point in time. Then, for each voter on the voter list, one checks to see if that individual appears on one (or more) of the ID lists. A voter who appears on an ID list is called a *match* and a voter who does not show up on an ID list is called a *non-match*. The number of matches is the number of voters with HB 589 photo ID (the types of identification allowed under HB 589, hereinafter "HB 589 photo ID" or "HB 589 ID"). The number of non-matches is the number of voters who lack the required forms of photo ID. The number of African American non-matches divided by the total number of registered African American voters is the fraction of African American voters who lack the required forms of photo ID. One can think of this as the probability that a randomly selected African American voter will lack the forms of photo ID required by HB 589. The number of white non-matches divided by the total number of registered white voters is the fraction of white voters who lack the required forms of photo ID. One can think of this as the probability that a randomly selected white voter will lack the forms of photo ID required by HB 589.

[10] HB 589 Part 2 §2.1 (e), NC G.S. §163-182.1A.

The ratio of these two probabilities (probability of a randomly selected African American voter lacking ID / probability of a randomly selected white voter lacking ID) provides a measure of the burden placed on black voters relative to the burden placed on white voters. When this ratio is greater than 1, blacks voters are over-burdened relative to whites.

While this process is conceptually straightforward, several complications arise in practice. The first complication is how one should determine whether a particular individual in the voter list also appears in one of the ID lists, i.e. is a match. This is a question of *data matching* or *record linkage*.[11]

At a basic level, a *record* refers to a single row in a rectangular dataset such as an spreadsheet. A key point is that the voter and ID lists discussed above are actually large files that contain numerous pieces of information for each voter and ID holder, e.g., first name, last name, date of birth, ZIP code, etc. A record in the voter file corresponds to all of the information on a registered voter that has been recorded. Similarly, a record in an ID file corresponds to all of the information on an ID holder that has been recorded. Data matching or record linkage is the process of finding records in one file (say an ID file) that refer to the same entity (say a voter) in another file (say the voter registration file).

If there is a piece of information that uniquely identifies each individual and that piece of information is present in both of the data files to be matched, then the matching or linkage can be done by looking for records (individuals) in the two data files (say the voter file and an ID file) who match on that unique identifier. A full nine-digit Social Security number would effectively be such a unique identifier. Unfortunately, (and as discussed more fully below) the North Carolina voter registration file does not contain a full nine-digit Social Security number.

In data matching applications lacking such a common unique identifier, it is standard practice to combine pieces of information in ways that will create a unique, or nearly unique, identifier for

[11] See Thomas N. Herzog, Fritz J. Scheuren, and William E. Winkler, 2007. *Data Quality and Record Linkage Techniques*. Springer.

each record (individual). When doing this, it is important that the pieces of information used to construct the new identifier appear in both of the data files that are to be matched. For example, if first name, last name, and driver's license number appear in both the voter file and the North Carolina DMV data file, then we could construct an identifier which is the concatenation of first name, last name, and driver's license number and match records in the two files on the basis of this newly constructed identifier.

Additional complications remain. In many cases, records in two data files that refer to the same individual will have slightly different values for the same piece of information. For instance, the last name "McCoy" may appear as "McCoy" in one data file but appear as "MCCOY" in the other file. Failure to standardize the text strings across the two files (in this case by converting all last names in both files to all upper case letters) will result in failures to match individuals who should be matched—what is referred to as a *false negative*. This is but one instance of a *data cleaning* step. Data cleaning is very important when attempting to match large data files. The data cleaning procedures that I have used are discussed more fully in Appendix B.

In some cases, one or more of the component pieces used to create the new identifier is missing for some individuals in a datafile. These individuals do not have well-defined values of the identifer and thus cannot be matched across datasets. For instance, if first name, last name, and driver's license number are used to constuct the new identifier and 17% of the voters in the voter file do not have a recorded driver's license number then these individuals cannot be matched based on this identifier. The solution to this complication is to construct multiple identifiers using different component pieces of information and to say that two individuals match if they match on any one of the many identifiers that were constructed. For instance, to deal with the individuals who are missing a driver's licence number we could construct a new identifier using first name, last name, and date of birth and look for records that match on these characteristics.

It is also the case that some records will contain pieces of information with data entry errors or other typographical errors. In some cases, these data issues cannot be easily corrected by the data

cleaning methods referenced above and in Appendix B. These data errors will be a source of false negatives—records that should match but don't because of the data entry error. The use of multiple identifiers, each constructed from different pieces of information serves to reduce the number of such false negatives. Because a voter is said to match an ID record if any one of these multiple identifiers matches across files, data entry errors in some fields should create very few, if any, false negatives.

In what follows in Subsections 5.1 and 5.2 I discuss the data files containing information on registered North Carolina voters and HB 589 ID holders respectively. It is important to note that for a data matching procedure to be accurate the data files to be matched should provide information on the population of registered voters and the population of HB 589 ID holders at the same point in time. As noted below, the data files that I used for the matching procedure were snapshots from summer of 2014. Subsection 5.3 provides a high-level overview of the data matching procedure I used.

5.1 The North Carolina Voter Registration File

The voter registration file I used was named `VOTER_REG_20140716 - HIGHLY CONFIDENTIAL.txt`. The name of the file suggest that this is a snapshot of the voter registration file on July 16, 2014.

Inspection of the file revealed that a small fraction of the records had machine-readable control characters[12] inserted into some data fields. This caused each of these records to spill over more than one line, thus making each of these individual records appear to be multiple records. Part of the data cleaning process I employed involved the removal of these control characters so that the

[12]Such control characters provide instructions to do things such as insert a tab (as the tab key does on a manual typewriter) or to end a line of text (much as the carriage return key does on a manual typewriter). The inclusion of control characters at unexpected places in a data file creates problems for reading that data file into data processing applications. The reason for this is that procedures for reading data typically rely on control characters to mark the end of data records. If control characters have been inserted at places other than the end of data records, there is a potential for the data to be read incorrectly.

associated records appeared correctly in the data file.[13] In addition to this data cleaning step, a number of additional data cleaning steps were undertaken. Appendix B provides additional details of the data cleaning process.

The voter file included records for voters listed as "active", "inactive", "denied", "removed", and "temporary". The voter records that I am interested in for the purposes of this report are those listed as either "active" or "inactive"—that is, voters who were registered to vote in July 2014. I thus subsetted the data to include only those voter records listed as "active" or "inactive". This resulted in a voter file with 6,525,173 registered voters.

It was also important to remove any voters in the voter file who had died prior to the creation of the voter file I was working with. To do this I used a file from the North Carolina Department of Health and Human Services named `DHHS_DEATH - HIGHLY CONFIDENTIAL.txt`. This file was cleaned and matched to the voter file as described in Appendix B. 39,127 individuals in the voter file were matched to the death file and were removed, resulting in a voter file with 6,486,046 registered voters. 5,752,913 of these voters were listed as "active" and 733,133 were listed as "inactive". This is the set of voter records that were used for the record matching analyses in this report.

5.2 Sources of HB 589 Photo ID

As noted above, HB 589 requires a voter to present one of eight types of photo ID in order to vote. The remainder of this section discusses data sources for possession of each of these eight forms of photo ID.

5.2.1 North Carolina Driver's License Database

Two forms of photo ID—driver's licenses and non-operator's ID cards—appear in the North Carolina Driver's License Database. The files that were extracted from that database and used in

[13] In conducting the data analysis described in this report, I had the research assistance of Stephen Goggin, PhD Candidate, Department of Political Science, UC Berkeley.

my analysis are listed in Appendix A. The name of the main driver's license file implied that it was from July 20, 2014. I cleaned the driver's license file using the same procedures used on the voter registration file.

Inspection of the cleaned driver's license file revealed that it had over 12.7 million records. This is nearly twice as many records as licensed North Carolina drivers.[14] Further inspection revealed that many of these 12.7 million records were expired licenses. A separate data file from the North Carolina DMV contained the issuance date and expiration date of all licenses in the file as of July 21, 2014. I merged this file with the earlier file by using the driver's license number as an identifier. Accounting for the age provision of HB 589, I then removed expired licenses, except those for individuals who had attained the age of 70 years and who had an unexpired license on their 70th birthday. This resulted in a file of 8,935,240 unexpired DMV IDs. These are the records that are matched against the voter registration file discussed above.

5.2.2 Federal ID Databases

I did not have direct access to the relevant federal ID databases (passports, military IDs, and Veterans IDs). Indeed, to the best of my knowledge, no expert has had direct access to these databases—either within the context of this proceeding or the related federal case—due to the fact that the relevant federal agencies would not release the underlying ID databases.

Professor Charles Stewart (a testifying expert for the United States in the related federal case) does state in his declaration for the federal proceeding that he sent the July voter file that I have used in this report to information technology personnel at the U.S. Department of State, Department of Defense, and Department of Veterans Affairs along with detailed instructions for cleaning and processing the ID data and matching the North Carolina voter records to records in the relevant federal ID databases.[15] The data cleaning steps and composite match fields used by Professor

[14]The U.S. Department of Transportation reported that there were 6,677,693 licensed drivers North Carolina drivers in 2012. See `http://www.fhwa.dot.gov/policyinformation/statistics/2012/pdf/dl1c.pdf`. The 2013 American Community Survey reports that there are 7,938,624 North Carolina residents who are 15 years of age or older.

[15]The verbatim instructions sent to the federal agencies can be found in Appendix C of "Declaration of Charles

Stewart are identical to those that I have used in this report when working with the North Carolina voter file and DMV file.

I received the results of the matching procedures conducted by the federal government. I have made use of these matching results in this report.

5.2.3 Tribal Enrollment Cards

I did not have access to any data on possession of the tribal enrollment cards that can be used as Photo ID under HB 589.

The state of North Carolina recognizes eight tribes. One of these tribes, the Eastern Band of the Cherokee Nation is recognized by the federal government. Another, the Lumbee, is partially recognized by the federal government.[16]

The North Carolina Commission of Indian Affairs reports that there are over 78,000 members of these tribes in North Carolina. Table 1 presents a breakdown of membership by tribe. Based on data from the 2011-2013 American Community Survey, 115,298 North Carolinians self-identified as Native American. 85,519 of these people were 18 years of age or older.[17] The 2011-2013 American Community Survey estimates the total number of North Carolinians who are 18 and over to be 7,466,097. Thus the fraction of the North Carolina voting age population that self-identifies as Native American is 0.011 or 1.1%.

The inability to match voter records to tribal enrollment cards means that my basic matching approach will slightly underestimate the ID possession rate. Nevertheless, the small relative size of the North Carolina Native American population means that the degree of underestimation will be small. Indeed, considering the extreme hypothetical that all Native American registered voters do in fact have HB 589 photo ID does not appreciably change my basic results (see Subsection

Stewart III, Ph.D" *United States of America v. The State of North Carolina, et al.* Civil Action No. 1:13-CV-861.

[16]See `http://www.doa.nc.gov/cia/faq.aspx`.

[17]U.S. Census Bureau, America Community Survey 20112013, Table B01001C, Sex by age (American Indian and Alaska Native alone). These numbers represent individuals who self-identify as Native American and no other racial group. Table B02010 from the 2011-2013 American Community Survey estimates the number of North Carolinians who identify as Native American alone or in combination with one or more other racial groups as 189,934. This table does not break this total down by age.

6.1).

Table 1: State-Recognized Tribes in North Carolina

Tribe	Size (Individuals)
Coharie	2,700
Eastern Band of the Cherokee Nation	13,000
Haliwa-Saponi	3,800
Lumbee	55,000
Meherrin	Not reported
Occaneechi Band of the Saponi Nation	1,100+
Sappony	850
Waccamaw	2,000+
Total	78,450+

Source: `http://www.doa.nc.gov/cia/tribes.aspx`

5.2.4 Out-of-State Driver's Licenses

As noted above, HB 589 allows a voter to vote after displaying "[a] drivers [sic] license or nonoperators [sic] identification card issued by another state, the District of Columbia, or a territory or commonwealth of the United States, but only if the voter's voter registration was within 90 days of the election." Thus one would like to match the subset of the North Carolina voter file consisting of individuals have registered to vote within the last 90 days with all 49 other state DMV databases plus that from the District of Columbia.

There is no centralized clearinghouse for state DMV data. Consequently, the large-scale matching procedure described in the previous paragraph is simply not practical. The difficulty of performing this series of matches is compounded by the fact that many states contribute to North Carolina in-migration. It is thus not feasible to focus attention a small number of states.

For example, Virginia is estimated to have contributed 30,058 new residents to North Carolina in 2013.[18] This was the largest source of in-migration in North Carolina in that year, yet it was only 10.9% of the total North Carolina in-migration. Indeed, one would have to look at data from seven states (Virginia, Florida, South Carolina, New York, Georgia, California, and Maryland) to

[18] 2013 American Community Survey 1-Year Estimates.

capture about half of the in-migration to North Carolina.

There are several reasons to conclude that this inability to match voter records to out of state driver's licenses will not appreciably affect the results in this report.

First, a small fraction of 2013 North Carolina residents lived in a different state in 2012. Specifically, the 2013 American Community Survey estimates that the percentage of North Carolina residents 1-year and older who lived in a different state in 2012 was 2.8%. The corresponding numbers for whites and blacks are 2.9% and 2.3% respectively.[19] Because most of those moving to North Carolina are white rather than black, including matches from out of state DMV files would likely increase the black-white disparities in my results.

Finally, the out of state driver's license provision only applies to those who have registered to vote within 90 days of an election. Only 0.5% of registered voters in the North Carolina voter file had registered in the 90 days before the creation of that file. Not matching to out of state DMV files will thus have very little effect on the results that I report.

5.3 Matching Voter Records to Photo ID Records

In this subsection I provide a high-level overview of the procedure used to match North Carolina voter records to North Carolina Driver's License Database records.[20]

As noted above, the North Carolina voter file does not contain a true unique identifier, such as full nine-digit social security number, for each individual in the file. This complicates the matching procedure.

Attempting to match on a field that is not unique, say last name by itself, will result in reported matches that should not be counted as matches. For instance, if one only looks for matches based on last name, then Mary Jones in the voter file could be matched to Fred Jones in the driver's

[19] "Geographic Mobility by Selected Characteristics in the United States" 2013 American Community Survey 1-Year Estimates.

[20] Analagous procedures were used by information technology personnel at the U.S Department of State, Department of Defense, and Department of Veterans Affairs to find matches between the North Carolina voter file and the passport database, the military ID database, and the veteran's ID database. See and Appendix C of "Declaration of Charles Stewart III, Ph.D" *United States of America v. The State of North Carolina, et al.* Civil Action No. 1:13-CV-861.

license file. Such a reported match that should not be counted as a match is known as a ***false positive***.

On the other hand, if one requires all common fields in the voter file and the driver's license file to be identical in order to declare a match, then many records that actually do represent the same person in both files will be incorrectly reported to be non-matches. For instance, imagine that Mary Jones (with true date of birth 1-1-1956) has a record in both the voter file and the DMV file. However, a typographical error occurred when Ms. Jone's data were being entered into the voter file and her date of birth was incorrectly entered as 1-1-1965). Every other piece of Ms. Jone's information (driver's license number, ZIP code, house number, etc.) that appears in both the voter file and the DMV file is correctly recorded and present in both files. Nonetheless, if we require matching records to be identical on all common fields (including date of birth) then Ms. Jone's voter record will not match her driver's license record. Such a situation where a reported non-match should in fact be counted as a match is known as a ***false negative***.

The solution to the problem of false positives is to constuct composite match fields from several non-unique fields of information. When doing this it is important that each of the component fields of the new match field appear in both the voter file and the DMV file. If this creation of a new match field is done thoughtfully, the resulting composite match field will be unique, or nearly so, making false positives unlikely.

As an example, suppose that the records in the voter file and the DMV file have the following fields: first name, last name, and date of birth. We could then create a new field to match on by concatenating the data in these three fields. For instance, the new match field for Mary Jones in the voter file with date of birth 1-1-1965 would be "MARYJONES19650101" and the new match field for Fred Jones in the DMV file with date of birth 7-15-1980 would be "FREDJONES19800715". These records do not match on this composite match field thus eliminating the false positive we discussed above.

A problem still remains though because our Mary Jones in the voter file (with composite match

field "MARYJONES19650101") still does not match her record in the DMV file (with composite match field "MARYJONES19560101"). The false negative remains. The solution to this problem is to construct multiple composite match fields using different pieces of information and declaring a match to occur if a match is found on any one of these composite match fields.

In the running example we have assumed that Mary Jones' information (other than date of birth) is present and without typographical or other errors in both the voter file and the DMV file. Suppose the Ms. Jones' ZIP code and house number are 27703 and 510 respectively. Now, if one constructed a second match field as the concatenation of first name, last name, ZIP code, and house number the value of this match field for Ms. Jones' voter file record would be "MARYJONES27703510" and in the DMV file it would also be "MARYJONES27703510". Matching on this second composite match field eliminates the false negative.

This simple running example illustrates the benefits of constructing multiple composite match fields from simpler, non-unique component fields. In practice, because most data fields will have some number of inconsistencies across the two files to be matched it is good practice to use more than just two composite match fields. Care is needed here. If many of these multiple match fields are not unique identifiers (or very nearly so), then the number of false positives can increase as one searches for matches across increasing numbers of composite match fields.

It is possible to gauge the extent of this problem by manually checking a random sample of matches to determine which of those matches appear to be false positives. I perform this analysis in Subsection 6.5.

5.3.1 The Composite Matching Fields

I made use of 19 composite matching fields[21] for the matching of voter registration records to driver's license file records. These 19 composite match fields were constructed from nine pieces of information found in, or derived from, data fields in the two files to be matched.

[21] Throughout the report I will use the terms: composite matching field, composite matching string, composite matching criterion, matching field, matching string, and matching criterion to generally to refer to the same thing.

The data fields that I used to construct composite matching fields in the North Carolina voter file and in the DMV file are the following:

1. First name
2. First initial
3. Last name
4. A phonetic coding of the last name using the Soundex algorithm
5. North Carolina driver's license number
6. Last four digits of the Social Security number (SSN4)
7. Birth date
8. ZIP code
9. House number

The 19 composite match fields were constructed from these original data fields by concatenating the data in these fields into 19 string variables.

Table 2 visually depicts how the 19 composite match fields were created from the original nine component data fields. These composite matching fields are numbered 1 to 19 for ease of reference. These same 19 composite matching fields were used by the federal government to match North Carolina voter records to the three federal ID databases.

For completeness, Table 2 also displays two composite matching fields that were not used by me to match voters file records to DMV file records, but were used by the federal government to match voter records to federal ID records with non-North Carolina addresses. These two strings make use of an individual's middle initial and are numbered 101 and 102. Professor Stewart's instructions to the federal information technology personnel doing this matching stated that strings 101 and 102 should only be used for voters who were not matched on composite match fields 1 to 19.[22]

[22] As noted above, strings 101 and 102 were not used to match voter records to DMV records. Using these strings to match voter records to DMV records produces no new matches in addition to those already found using match strings 1 to 19.

Table 2: Constituent Parts of Composite Matching Fields

Composite Matching Field Number	First Name	First Initial	Last Name	Soundex Last Name	Middle Initial	N.C. D.L. #	SSN4	Birth Date	ZIP Code	House #
1	✓		✓			✓				
2	✓		✓				✓			
3	✓		✓					✓		
4	✓		✓						✓	✓
5	✓			✓		✓				
6	✓			✓			✓	✓		
7	✓			✓			✓		✓	✓
8	✓			✓				✓	✓	✓
9		✓	✓			✓				
10		✓	✓				✓	✓		
11		✓	✓				✓		✓	✓
12		✓	✓					✓	✓	✓
13			✓			✓				
14			✓				✓	✓		
15			✓				✓		✓	✓
16			✓					✓	✓	✓
17						✓		✓		
18						✓				
19							✓	✓		
101	✓		✓		✓			✓		
102	✓		✓				✓	✓		

Composite matching fields 101 and 102 were only used to match to records in the federal databases that included non-North Carolina addresses.

In what follows, I briefly describe these 19 composite matching fields along with the logic behind their creation and use.

Composite match fields 1 to 4 all make use of first name and last name. With over 6 million voters, first name - last name combinations will not be unique. To make fields 1 to 4 more nearly unique, an additional piece of information—North Carolina driver's license number for 1, SSN4 for 2, birth date for 3, and ZIP along with house number for 4—is added. As discussed above, this serves to minimize the likelihood of false positives.

Composite match fields 5 to 8 all contain first name and the Soundex encoding of the last name along with additional pieces of information to make the composite match fields more nearly unique. The Soundex algorithm is a method that is widely accepted and commonly used by database professionals to match last names that are phonetically similar but are spelled differently. Such differences could arise because of differences in spelling (Tomczak vs. Tymczak) or because of typographical errors (Gutierrez vs. Gutierez).

The soundex encoding of a name is made up of a letter and three numbers. The letter is the first letter of the name. The numbers encode the first three consonant *sounds* in the name. For instance, "Gutierrez" is encoded as G362 (G for first letter of name, 3 for the T, 6 for the first R, second R is ignored, and 2 for the Z). Appendix C provides a full description of the Soundex algorithm.

Soundex encoding can be particularly useful in dealing with compound last names. For instance, the same individual may have a last name listed as "Gutierrez" in one data file but, perhaps because of marriage, the individual's last name is listed as "Gutierrez-Rodriguez" in another data file. Both of these last names are Soundex encoded as G362.

Soundex codings convert many distinct names into equivalent Soundex codes. As such, there is the potential for finding false positives if one is not thoughtful about the construction of the composite match fields. In order to make match fields 5 to 8 very nearly close to unique identifiers, I add additional information to these composite match fields. More specifically, I make use of driver's license number, SSN4, birth date, ZIP code, and house number.

Composite match fields 9 to 12 all make use of the initial of the individual's first name and the last name. In databases of the size of the North Carolina voter file and DMV file, it is common to see variations in the first name field across two databases. For instance, an individual might list her first name as "Margaret" in the voter file but "Maggie" in the DMV file. Using just the first initial rather than the full first name field helps to address such problems. Of course, the combination of first initial and last name is not even approximately a unique identifier. To make match fields 9 to 12 very nearly unique identifiers I add combinations of the driver's license number, SSN4, birth date, ZIP code, and house number.

Extreme versions of the Margaret / Maggie problem arise when the two versions of an individual's first name do not share a common first letter. An example is "William" and "Bill". To deal with this situation, composite match fields 13 to 16 include the last name but no first name information. Again, I add combinations of the driver's license number, SSN4, birth date, ZIP code, and house number so that fields 13 to 16 are very nearly unique identifiers.

In some cases there may be problems with both the first and last name that cannot be successfully resolved by matching on composite match fields 5 to 16. For this reason, I have also included three composite match fields that do not use any first name or last name information. These are match fields 17 to 19. As seen in Table 2 these fields make use of various combinations of driver's license number, SSN4, and birth date.

Table 3: Matching Field Characteristics in Voter File

Matching Field	Unique Records	Total Non-Missing	% Unique	% Missing
1	5422860	5422960	100.00%	16.89%
2	5557147	5563478	99.89%	14.74%
3	6509567	6515506	99.91%	0.15%
4	6474824	6525119	99.23%	0.00%
5	5422789	5422960	100.00%	16.89%
6	5562647	5563471	99.99%	14.74%
7	5563176	5563478	99.99%	14.74%
8	6513575	6515506	99.97%	0.15%
9	5422678	5422960	99.99%	16.89%
10	5562431	5563471	99.98%	14.74%
11	5563210	5563478	100.00%	14.74%
12	6511858	6515506	99.94%	0.15%
13	5422650	5422982	99.99%	16.89%
14	5562217	5563493	99.98%	14.74%
15	5562955	5563500	99.99%	14.74%
16	6505425	6515560	99.84%	0.15%
17	5421432	5422975	99.97%	16.89%
18	5421410	5422982	99.97%	16.89%
19	5492896	5563493	98.73%	14.74%
101	6091022	6093022	99.97%	6.62%
102	5562940	5563471	99.99%	14.74%

NOTE: Total number of voter file records is 6,525,173, which includes deceased voters. Because these matching criteria (1-102) were used in matching with the DHHS death file, data from full voter file (including deceased individuals) are included here. The total number of non-deceased voter file records is 6,486,046. Matching field values are coded as missing if any of their constituent pieces is missing. Percent unique is calculated as $\frac{\text{unique records}}{\text{total non-missing records}}$. Percent missing is calculated as $\frac{\text{total non-missing records}}{6{,}525{,}173}$

Having constructed these composite matching fields we can examine the extent to which they create unique identifiers in the North Carolina voter file. Table 3 presents the results of that analysis. The total number of voter file records is 6,525,173, which includes deceased voters. Because these matching criteria (1-102) were used in matching with the DHHS death file, data from full voter file (including deceased individuals) are included here. The total number of non-deceased

voter file records is 6,486,046. The first column gives the number of the composite matching field being examined. The second column gives the number of voter file records that have a unique value in the composite match field. Records with missing values are excluded. Matching field values are coded as missing if any of their constituent pieces is missing. The third column gives the percentage of the non-missing records that have unique match field values. Percent unique is calculated as $\frac{\text{unique records}}{\text{total non-missing records}}$. The last column gives the percentage of observations that have missing data values. Percent missing is calculated as $\frac{\text{total non-missing records}}{6{,}525{,}173}$,

Table 3 shows that the match strings that I have constructed have created record identifiers that are very nearly unique. All but 4 of the 19 composite fields are more than 99.90% unique. Of these 4, 3 are more than 99.00% unique. Even the field that has the smallest percentage of unique values (field 19) is over 98.70% unique. This provides strong reason to believe that use of these matching fields will result in relatively few false positives.

Each of these 19 composite match fields were constructed for both the voter registration file and the driver's license file. Matching an individual in the voter file to a record in the DMV file involves searching the DMV file to find a record (if it exists) that has the same value of the composite matching field as the voter record in question. The next subsection unpacks this logic a bit more.

5.3.2 The Matching Procedure

In this subsection I provide a high-level description of the matching procedure that I used to match North Carolina voter records to DMV records.

In essence, the matching process is relatively straightforward. We begin with composite match field 1 (first name, last name, North Carolina driver's license number). For each individual in the voter file we check to see whether that voter's value of match field 1 appears in match field 1 in the the DMV file. If it does appear in the DMV file, we record a match for this record. If it does not appear we do not record a match on composite match field 1. We do this for all voters in the voter

file.

We then repeat the same procedure for match field 2 (first name, last name, SSN4), match field 3 (first name, last name, birth date), etc. If a match was recorded for a given voter on any of the 19 matching fields, we say that that voter matched to the DMV file, i.e. he or she has an unexpired form of DMV photo ID. If no matches were recorded for a given voter across the 19 composite match fields, we say that the voter in question was not matched to the DMV file, i.e. he or she does not have an unexpired form of DMV photo ID.

In implementing this matching procedure I only look for potential matches for voters who have a complete and well-formed value in the composite match field being used for matching. For instance, a voter whose voter record does not include a North Carolina driver's license number cannot be matched to the DMV file using composite match field 1 (first name, last name, North Carolina driver's license number) because one of the pieces of the match criterion (driver's license number) is missing.

As I discussed above, and as Table 3 shows, the 19 composite match fields that I used are very nearly unique identifiers of individuals in the voter file. This is important for limiting the potential for finding false positives. Nonetheless, the 19 composite match fields are not *perfectly* unique identifiers. There are a small fraction of voter records—typically less than one-tenth of a percent—that share a value of the match field with another voter record. This is a potential source of false positives.

For instance, suppose that we are matching on match field 2 (first name, last name, and SSN4). Further suppose that there are two records in the voter file with values of the match field equal to "JOHNSMITH1234" (first name: John, last name: Smith, SSN4: 1234). If there was only one record in the DMV file with match field 2 equal to "JOHNSMITH1234" the matching procedure used here would match both of the voters to this single DMV record. At least one of these two matches is a false positive.

Some potential for false positives is endemic to record matching problems without a true unique

identifier. The fact that my 19 composite match criteria are very nearly unique identifiers gives me reason to believe that large numbers of false positives are unlikely to result from use of match fields 1 to 19. In Subsection 6.5 I present additional evidence that false positives are not likely to occur when using match fields 1 to 19.

6 Results

In this section I report the results of the matching procedure described above. In Subsection 6.1, I present the results for all North Carolina voters and for voters of various racial groups. I then examine ID possession rates among voters who are likely to attempt to vote in future elections. In Subsections 6.3 and 6.4, I look at how these results are (or are not) affected by the various data analysis choices I have made. Finally, in Subsection 6.5, I report results from a manual validation of a random sample of matched voter records.

6.1 Primary Results

Table 4 displays the overall results from matching voter file records to: a) the North Carolina driver's license file, b) the U.S. passport file, c) the U.S. military ID file, and d) the Veteran's ID file. The results in this table can be interpreted as follows. I begin with the 6,486,046 non-deceased voters in the voter file. Matching those voters with records in the driver's license file produces 5,920,647 matches. Matching the voter records to records in the passport file produces 2,157,490 matches, 158,683 of which are new matches. Matching the voter records to the military ID file produces 317,937 matches. 18,597 of these matches are new matches. Finally, matching the voter records to the Veteran's ID file yields 152,214 matches—only 6,925 of which are new. After this matching process, 381,194 registered North Carolina voters (5.87% of all registered North Carolina voters) were not matched to these four major forms of photo ID. In other words, ***almost 5.9% of registered North Carolina voters do not possess any one of four major forms of photo ID that are needed to vote under HB 589.***

Table 4: Results of Matching NC Voter File with Identification Databases

Begin with Voter File of 6,486,046 Voters (6,525,173 original, 39,127 deceased removed)					
	Match List			No Match	
Match NC Voter File with:	N	% Voter File	N New Matches	N	% Voter File
NC Drivers' license file	5920647	91.28%	–	565399	8.72%
Add U.S. Passport File	2157490	33.26%	158683	406716	6.27%
Add U.S. Military File	317937	4.90%	18597	388119	5.98%
Add Veteran's ID File	152214	2.35%	6925	381194	5.87%

I next examine the self-identified race of voters who did not match to any of these four forms of photo ID. Table 5 reports the total number of registered North Carolina voters in each of seven racial categories along with the number and fraction of each group that were not matched to a form of photo ID. Here we see that African Americans make up 36.67% of the no match list despite being only 22.45% of the registered voters in North Carolina. White voters, on the other hand, make up 70.90% of the registered voters and yet are only 53.85% of the unmatched voters.

In Subsection 5.2.3, I noted that I did not have access to data on tribal ID possession. The information in Table 5 allows me to assess the impact of this on the matching results. From Table 5, we see that 4,636 American Indians are not matched to photo ID records. If we conservatively assume that all 4,636 of these individuals actually do have an acceptable form of photo ID then the number of registered voters without photo ID drops from 381,194 to 376,558 and the percentage of registered voters without ID drops from 5.87% to 5.81%. Even under these extreme assumptions, the basic matching results are not affected in an appreciable way.

Table 5: Racial Composition of Voters on No-Match List.

	All voters		No Match	
Race	N	%	N	%
Asian	61926	0.95%	2369	0.62%
Black	1455913	22.45%	139775	36.67%
American Indian	53065	0.82%	4636	1.22%
Mixed	36983	0.57%	3781	0.99%
Other	135377	2.09%	10178	2.67%
Unknown	144024	2.22%	15194	3.99%
White	4598758	70.90%	205261	53.85%
Total	6486046	100.00%	381194	100.01%

Table 6 looks at the relationship between race and the no-match list from a different perspective. Rather than looking at the racial composition of the no-match list as in Table 5, Table 6 displays the percentage of each racial group that finds itself on the no-match list. One way to think about the percentages in Table 6 is that they give the relative likelihood that a randomly chosen registered voter from a particular racial group will be on the no-match list, i.e., will not have appropriate photo ID. More concretely, we see that 9.60% of registered black voters are without photo ID. This implies that if 1000 black voters were randomly selected, we should expect that 96 would be without photo ID. On the other hand, 4.46% of registered white voters are without photo ID. A sample of 1000 white voters would, in expectation, yield 45 without photo ID.

The ratios of these percentages provide a measure of the impact of HB 589 on black voters relative to white voters. The ratio of 9.60 to 4.46 is 2.15. Put simply, ***African American voters are over 2 times more likely to lack appropriate photo ID than are white voters.***

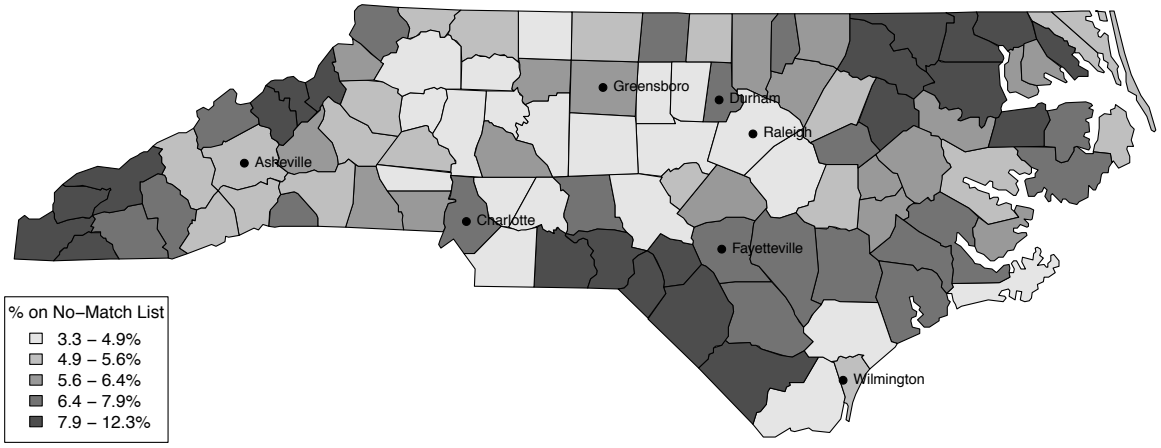
Table 6: Percentage of Racial Groups on the No-Match List

Race	% on No-Match List	N on No-Match List	Number of Registered Voters
Asian	3.83%	2369	61926
Black	9.60%	139775	1455913
American Indian	8.74%	4636	53065
Mixed	10.22%	3781	36983
Other	7.52%	10178	135377
Unknown	10.55%	15194	144024
White	4.46%	205261	4598758
Total	5.88%	381194	6486046

Figure 1 maps the no-match percentage for all registered voters by county. Counties with darker shading have high no-match percentages. The areas of North Carolina with the lowest no-match rates tend to be suburban and exurban[23] counties around metropolitan areas such as those near Charlotte, Winston-Salem, Greensboro, Raleigh-Durham, and Wilmington. The areas with the highest no-match rates tend to be the rural counties of the east and the mountain counties of the west.

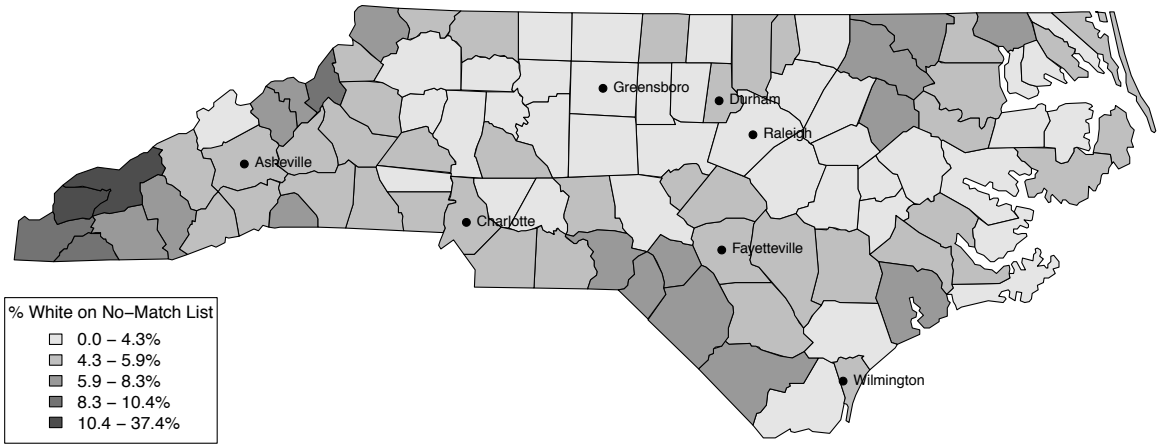
[23]The Merriam-Webster Dictionary defines an exurb as, "a region or settlement that lies outside a city and usually beyond its suburbs and that often is inhabited chiefly by well-to-do families".

Figure 1: Percentage of Voters on No-Match List by County.



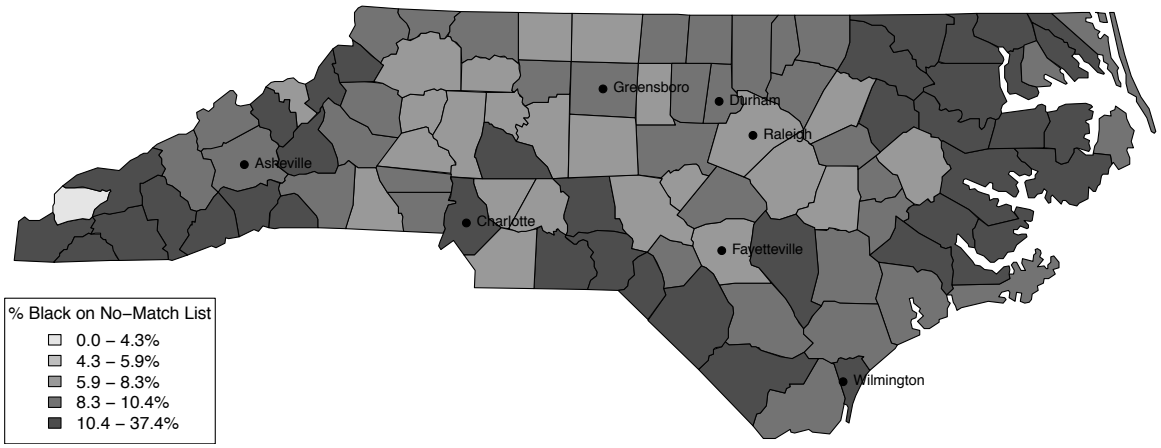
NOTE: Shading bins correspond to quintiles of the distribution of percentages.

Figure 2: Percentage of White Voters on No-Match List by County



NOTE: Shading bins correspond to quintiles of the distribution of percentages for the distribution of black and white voters.

Figure 3: Percentage of Black Voters on No-Match List by County



NOTE: Shading bins correspond to quintiles of the distribution of percentages for the distribution of black and white voters.

Figures 2 and 3 map the percentage of white and black voters on the no-match list. The patterns are striking. The percentage of whites on the no-match list is lower than the black percentage everywhere except for a handful of counties in the mountain west—an area with few black and

relatively large numbers of whites living in poverty.

6.2 Results for Likely Voters vs. Unlikely Voters

I have been asked to form an expert opinion on the degree to which the implementation of the photo ID requirement of HB 589 will affect North Carolina voters. While the results discussed above are an important part of this assessment, one could reasonably argue that the practical effects of HB 589 will be most severe for voters who are likely to attempt to vote in the future. For this reason, I now look at no-match rates for likely voters. More specifically, I look at two indicators of likely turnout: a) the status of the voter's registration record (active voters being more likely to turnout than inactive voters), and b) recent turnout (recent voters being more likely to vote in the future than those who have not voted recently). I find that racial disparities in ID position rates are larger for likely voters than for unlikely voters.

6.2.1 Active vs. Inactive Voters

The North Carolina State Board of Elections website states:

> Voters are removed from the voter rolls due to a biennial list maintenance process that is mandated by federal and state law. If a county board of elections has not had any contact with a voter for a period of two federal election cycles, then the voter will be sent a non-forwardable no-contact mailing. If the mailing is not returned as undeliverable by the postal system, then the voter will remain an active voter. If the mailing is returned as undeliverable by the postal system, then the voter will be sent a forwardable address confirmation mailing. The voter will be required to return the confirmation mailing within 30 days of the mailing. If the confirmation mailing is not returned by the voter within that time, or the mailing is returned by the postal system as undeliverable, then the voters record will be marked inactive in the voter registration database. [24]

Table 7 reports the racial breakdown of a) active voters, b) active voters who are not matched to a form of photo ID, c) inactive voters, and d) inactive voters who are not matched to a form of photo ID. African Americans make up 39.90% of the active voter no match list despite being only 22.06% of active voters. White voters, on the other hand, comprise 71.54% of active voters and 50.27% of the active voter no-match list. Black and white active voters contribute disproportionately to

[24] https://www.ncsbe.gov/ncsbe/Voter-Information/VR-FAQ (visited May 16, 2014).

the active voter no-match list—with blacks being overrepresented on the no-match list and whites being underrepresentd on the no-match list.

These racial disparites are muted among inactive voters. Here blacks make up 29.95% of the inactive voter no match list and 25.46% of inactive voters. White voters make up 65.91% of the inactive voters and 61.28% of the inactive voter no-match list.

Table 7: Racial composition of voters on no-match list, by Active/Inactive status

ACTIVE VOTERS	All Active Voters		No Match Active Voters	
Race	N	%	N	%
Asian	54373	0.95%	1599	0.62%
Black	1269222	22.06%	102657	39.90%
American Indian	47446	0.82%	3602	1.40%
Mixed	30147	0.52%	2515	0.98%
Other	114196	1.99%	6806	2.65%
Unknown	121954	2.12%	10773	4.19%
White	4115575	71.54%	129325	50.27%
Total	5752913	100.00%	257277	100.01%

INACTIVE VOTERS	All Inactive Voters		No Match Inactive Voters	
Race	N	%	N	%
Asian	7553	1.03%	770	0.62%
Black	186691	25.46%	37118	29.95%
American Indian	5619	0.77%	1034	0.83%
Mixed	6836	0.93%	1266	1.02%
Other	21181	2.89%	3372	2.72%
Unknown	22070	3.01%	4421	3.57%
White	483183	65.91%	75936	61.28%
Total	733133	100.00%	123917	99.99%

Another way to view the relationship between race, active/inactive status, and ID possession is to report the percentage of each racial group that is on the no-match list given a particular voter status (active or inactive). Table 8 reports those results.

One way to think about the percentages in the top portion of Table 8 is that they give the relative likelihood that a randomly chosen active voter from a particular racial group will be on the no-match list, i.e. will not have appropriate photo ID. More concretely, we see that 8.09% of active

black voters are without photo ID. This implies that if 1000 active black voters were randomly selected, we should expect that 81 would be without photo ID. On the other hand, 3.14% of active white voters are without photo ID. A sample of 1000 white voters would, in expectation, yield 31 without photo ID.

The ratios of these percentages provide a measure of the impact of HB 589 on active black voters relative to active white voters. The ratio of 8.09 to 3.14 is 2.58. Put simply, ***Active African American voters are over two-and-a-half times more likely to lack appropriate photo ID than are active white voters.*** This is larger than the ratio of 2.15 that was reported above in Subsection 6.1 for all registered black voters relative to all registered white votes.

Table 8: Percentage of Each Racial Group on No-Match List by Active/Inactive Status

ACTIVE VOTERS

Race	% Active on No-Match List	No Match N Active Voters	All Active Voters N
Asian	2.94%	1599	54373
Black	8.09%	102657	1269222
American Indian	7.59%	3602	47446
Mixed	8.34%	2515	30147
Other	5.96%	6806	114196
Unknown	8.83%	10773	121954
White	3.14%	129325	4115575
Total	4.47%	257277	5752913

INACTIVE VOTERS

Race	% Inactive on No-Match List	No Match N Inactive Voters	All Inactive Voters N
Asian	10.19%	770	7553
Black	19.88%	37118	186691
American Indian	18.40%	1034	5619
Mixed	18.52%	1266	6836
Other	15.92%	3372	21181
Unknown	20.03%	4421	22070
White	15.72%	75936	483183
Total	16.90%	123917	733133

6.2.2 Recent Voters vs. Non-Voters

Another predictor of an individual's future propensity to vote is the extent to which s/he has voted in the recent past. Table 9 reports the percentage of each racial group that is on the no-match list within 2012 voters, 2012 non-voters, 2014 voters, and 2014 non-voters.

Table 9: Percentage of Each Racial Group on the No-Match List by Voters and Non-Voters in 2012 and 2014

	Percent on No-Match List, 2012		Percent on No-Match List, 2014	
Race	Voters	Non-Voters	Voters	Non-Voters
Asian	1.40%	6.89%	0.84%	4.87%%
Black	4.54%	21.32%	3.14%	14.30%
American Indian	3.74%	13.77%	3.10%	11.01%
Mixed	4.58%	17.89%	2.69%	12.55%
Other	2.28%	12.33%	1.36%	9.35%
Unknown	4.58%	19.29%	2.87%	13.57%
White	1.19%	11.35%	0.82%	7.59%
Total	2.09%	13.69%	1.37%	9.41%

Table 9 reports that 4.54% of black 2012 voters are on the no match list. Compare this to the 1.19% of white 2012 voters on the no-match list. The ratio of these two percentages is 3.82—***African Americans who voted in 2012 are over 3.8 times more likely to be on the no-match list than are white 2012 voters***.

Looking at the data for 2014 voters, we see that 3.14% of blacks and 0.82% of whites are on the no-match list. The ratio of these two percentages is 3.83. Once again, ***African Americans who voted in 2014 are over 3.8 times more likely to be on the no-match list than are white 2014 voters***.

6.3 Surrendered, Suspended, and Inactive Licenses

It is unclear whether driver's licenses that are listed in the North Carolina driver's license database as being "suspended", "inactive", or "surrendered" should be considered valid identification for the purposes of the matching process in this report. The results in Subsections 6.1 and 6.2 do allow voter records to match licenses with these three status codes. This is a conservative choice that serves to increase match rates and decreased non-match rates.

Nevertheless, it is reasonable to ask what the non-match rates would be under alternative decisions to exclude licenses with these statuses from the matching procedure. The results from such a process are reported in Table 10.

The "Original No Match" column in this table provides the same information as in Table 6

above. The next column to the right (labeled "Remove Surrendered") reports that no-match rates that result after one removes surrendered licenses from the DMV file. The next column (labeled "Remove Surrendered & Suspended") reports non-match rates after removing both surrendered and suspended licenses from the match process. Similarly, the column labeled "Remove Surrendered & Inactive" reports non-match rates after surrendered and inactive licenses have been removed. Finally, the column on the far right of the table reports the non-match rates after removing surrendered, suspended, and inactive licenses.

As can be seen from Table 10, the removal of these three types of licenses increases non-match rates. Indeed, when all three types of licenses are exluded the overall non-match rates increases from 5.88% to 12.51%.

It is also the case that the black-white disparity in non-match rates remains large and in most cases increases as surrendered, suspended, and inactive licenses are no longer allowed to form matches. Recall that the original black-white non-match ratio[25] is 2.15. When surrendered licenses are removed, this ratio becomes[26] 1.85. When surrendered and suspended licenses are removed, the ratio becomes[27] 2.45. When surrendered and inactive licenses are removed, the ratio becomes[28] 2.48. Finally, when surrendered, suspended, and inactive licenses are removed, the ratio becomes[29] 2.89.

6.4 Sensitivity Analyses

A large database matching process, such as that undertaken for this report, inevitably requires the data analyst to make certain analysis decisions. In some cases, these decisions can have an appreciable impact on the reported results. In this section I undertake a series of analyses designed to assess the extent to which the results reported above are sensitive to various data analysis decisons

[25] Calculated as 9.60/4.46.
[26] Calculated as 10.70/5.79.
[27] Calculated as 17.45/7.13.
[28] Calculated as 17.59/7.08.
[29] Calculated as 24.39/8.43.

Table 10: Racial Distribution of No-Match List with the Removal of Surrendered, Suspended, and Inactive Licenses

Race	N Registered Voter	Original No Match	Remove Surrendered	Remove Surrendered & Suspended	Remove Surrendered & Inactive	Remove Surrendered, Suspended, & Inactive
Asian	61926	3.83%	4.64%	5.30%	5.49%	6.15%
Black	1455913	9.60%	10.70%	17.45%	17.59%	24.39%
American Indian	53065	8.74%	9.57%	16.80%	12.61%	19.85%
Mixed	36983	10.22%	11.73%	16.26%	16.73%	21.30%
Other	135377	7.52%	8.92%	10.96%	12.10%	14.16%
Unknown	144024	10.55%	11.71%	15.26%	15.35%	18.92%
White	4598758	4.46%	5.79%	7.13%	7.08%	8.43%
Total	6486046	5.88%	7.14%	9.82%	9.81%	12.51%

that I have made. I find that the results reported above remain qualitatively similar under these alternative analyses.

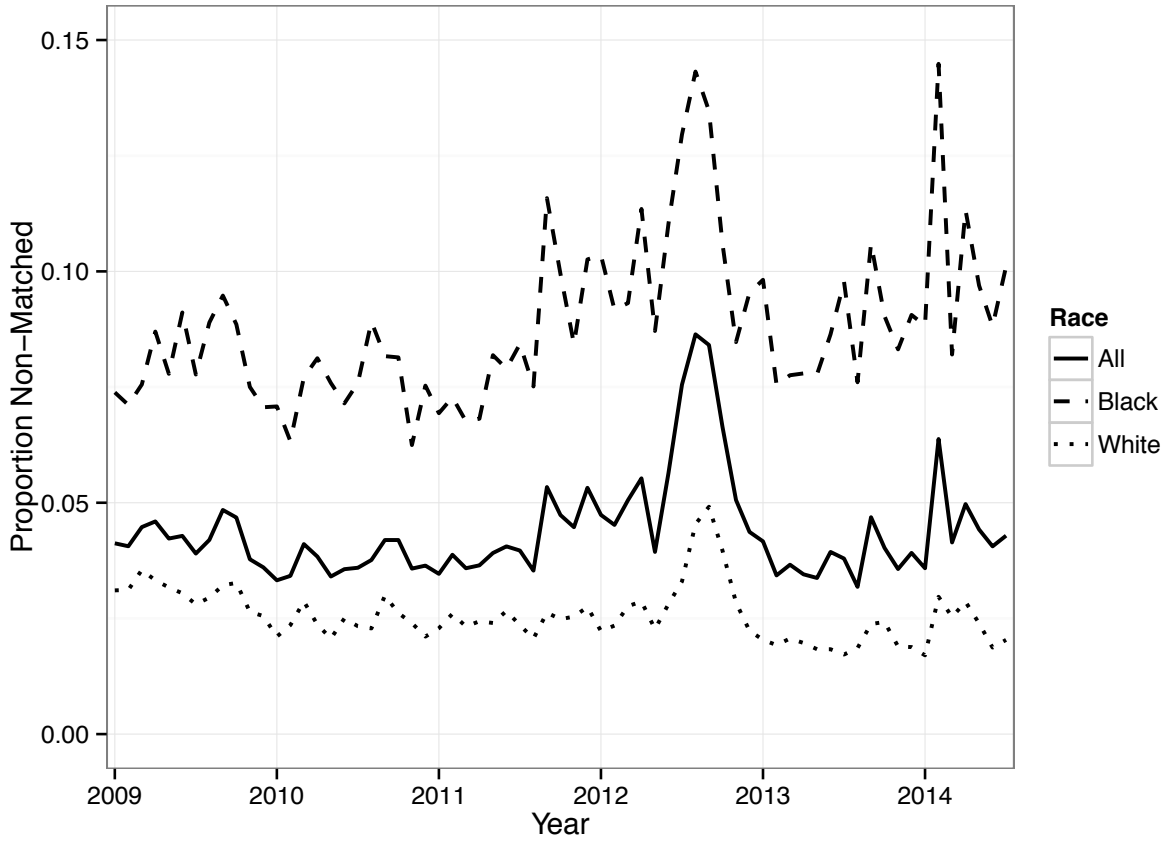
6.4.1 Timing of Voter Registration Snapshot

The voter registration file that I have used for the matching analysis was dated July 17, 2014. Voter registration patterns vary over the course of the election cycle. It is thus important to evaluate whether the date of the voter registration (the use of data from July), rather than from some other point in time, has affected the matching results.

One way to evaluate the substantive impact of this choice to use data from July 2014 is to plot the proportion of registrants from a particular month and year who appear on the no-match list. Figure 4 displays this relationship. The middle solid line in this figure displays the relationship between registration date and probability of being on the no-match list for all registrants. This line is under 0.05 until recent years when it begins to move above and below 0.05, with a notable spike up prior to the 2012 general election.

The lower dotted line reports the probality that a white registrant with a particular date of registration will be on the no-match list. The upper dashed line reports the probability that a black registrant with a particular date of registration will be on the no-match list. Here we see that the probability that white registrants are on the no-match list is consistently below 0.05. If anything,

Figure 4: Percentage of New Registrants on No-Match List by Month of Voter Registration, January 1, 2009 - July 17, 2014.

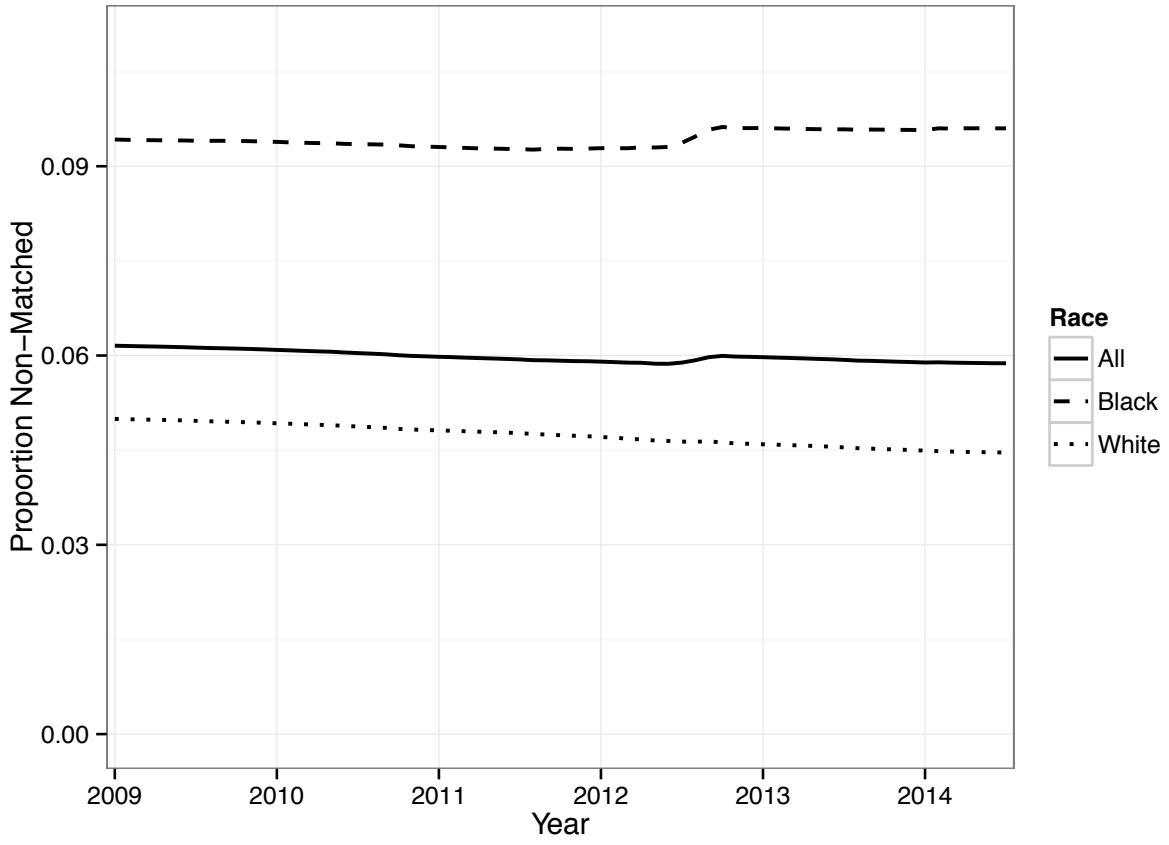


there is a slight downward trend to the white no-match probabilities. The probability that a black registrant will be on the no-match list is much higher regardless of the date of registration. Prior to the middle of 2011, the black no-match probabilities hover around 0.075. After that time, the black no-match probabilities increase to near 0.10—and in two months approach 0.15.

Figure 4 provides evidence that the black-white disparity in no-match rates is not an artifact of relying on the July 2014 voter file. As shown in the figure, black no-match rates are consistently higher than white no-match rates over a 5 year period.

Still another way to get a sense of the impact of the use of the July 2014 voter file is to roll back the voter file and then look at no-match rates for voters in the rolled back voter file. More specifically, the idea behind this roll-back process is the following. In order to approximate the

Figure 5: Composition of no-match list with voter file rolled back at one-month increments to January 2009.



results of the matching analysis done using a June 2014 voter file snapshot, one can remove all July 2014 registration records from the July 2014 voter file and then examine the racial composition of the existing no-match list for the remaining voters. Removing the June 2014 as well as the July 2014 registrants provides an approximation for a May 2014 matching analysis, etc.[30]

Figure 5 plots the results of this approximate roll-back exercise. The solid middle line displays the proportion of all registrants on the no-match list at a given point in time. The lower dotted line displays the proportion of white registrants on the no-match list at a particular time, and the

[30]It is important to note that this roll-back procedure is only an approximation to a true roll-back procedure. A true roll-back procedure would need to simultaneously attend to the status of the voter file as well as the ID databases at the various roll-back dates. Such a true roll-back process is not feasible given time constraints. What this approximate roll-back procedure illustrates is the slowly changing nature of the no-match list over a 5 year period.

upper dashed line displays the proportion of black registrants on the no-match list. As can be seen from Figure 5 the disparity between blacks and whites is remarkably stable over time. Indeed, if anything, the black-white gap has grown following the increase in black registration leading up to the 2012 general election.

6.4.2 Requiring Multiple String Matches for a Successful Record Match

As noted in Subsection 5.3, if the various match fields used in the analysis are not unique identifiers (or very nearly so), then the number of false positives can increase as one searches for matches across increasing numbers of composite match fields. The reason this can happen is that it only takes a match on one of the 19 match strings in order for a match to be recorded.

One method of assessing the degree to which this affects the conclusions reached above is to require more than one of the 19 match strings to match across the voter file and DMV file in order for a match to be recorded. The results of such an exercise are reported in Table 11. Here I vary the number of strings that a record must match on to be counted as a true match from 1 (the original analysis reported above) to 2, 3, 4, 5, 10, and 19 strings (all of the match strings).[31]

As expected, increasing the match threshold from 1 to 19 strings increases the overall non-match percentage (5.88% for 1 string, 8.69% for 2 strings, 9.20% for 3 strings, 10.03% for 4 strings, 10.05% for 5 strings, 15.36% for 10 strings, and 25.12% for 19 strings). The black-white non-match disparity, as measured by the ratio of the black non-match percentage over the white non-match percentage, is consistently above 1.9 except for the 10 and 19 match thresholds. Even at these thresholds (which would imply that between 21% and 37% of registered black voters do not have acceptable photo ID) the black-white ratio is 1.68 and 1.79.

Put more plainly, when one attempts to minimize false positives by increasing the match thresh-

[31] It is not possible for me to vary the matching threshold in this way for matches to the federal ID databases. The reason for this is that I only have access to the match results that were based on the 1 match threshold. The numbers and percentages in Table 11 are calculated assuming that the threshold for matching to the federal databases is fixed at 1 match across all the match strings. The changes in the matching threshold only impact the matches from the voter file to the DMV file.

old, registered African American voters remain about 2 times more likely than registered white voters to lack DMV-issued photo ID. Under extreme thresholds (10 out 19 and 19 out of 19 string matches required for record match) these black-white ratios are closer to 1.7 and 1.8, but these thresholds also imply that very large numbers of black voters do not possess HB 589 approved ID.

Table 11: No-Match List by Race and Number of Required Matching Strings for Voter to DMV File (The Number of Strings a Record Must Match to be Counted as a Match Is In Parentheses - Out of 19 Total)

Race	% No-Match (1)	N No-Match (1)	% No-Match (2)	N No-Match (2)
American Indian	8.74%	4636	15.84%	8408
Asian	3.83%	2369	4.83%	2989
Black	9.60%	139775	13.77%	200411
Mixed	10.22%	3781	13.38%	4949
Other	7.52%	10178	9.50%	12859
Unknown	10.55%	15194	14.80%	21321
White	4.46%	205261	6.80%	312702
Total	5.88%	381194	8.69%	563639

Race	% No-Match (3)	N No-Match (3)	% No-Match (4)	N No-Match (4)
American Indian	17.08%	9064	18.72%	9934
Asian	5.15%	3192	5.58%	3456
Black	14.46%	210549	15.45%	224869
Mixed	13.74%	5083	15.13%	5597
Other	9.75%	13204	10.98%	14870
Unknown	15.41%	22191	16.56%	23848
White	7.24%	333124	8.00%	368024
Total	9.20%	596407	10.03%	650598

Race	% No-Match (5)	N No-Match (5)	% No-Match (10)	N No-Match (10)
American Indian	18.75%	9948	28.79%	15275
Asian	5.59%	3459	7.59%	4701
Black	15.48%	225339	21.90%	318774
Mixed	15.17%	5609	19.40%	7175
Other	11.01%	14905	14.11%	19108
Unknown	16.61%	23926	22.91%	32993
White	8.01%	368474	13.01%	598279
Total	10.05%	651660	15.36%	996305

Race	% No-Match (19)	N No-Match (19)
American Indian	42.64%	22629
Asian	12.46%	7718
Black	37.41%	544659
Mixed	36.43%	13473
Other	22.05%	29853
Unknown	34.76%	50068
White	20.90%	961157
Total	25.12%	1629557

6.4.3 Addition of North Carolina Composite Matching Fields

In the associated federal case, the state of North Carolina requested that a number of additional composite matching fields be used to match the voter file to the federal ID databases. Table 12 provides a visual depiction of the component parts of these strings in a manner similar to Table 2 above.

Inspection of Table 12 reveals that 6 of the 14 matching strings are logically redundant. For instance, any record that matches on string A21 (SSN4, ZIP code, house number) *must* logically also match on string A22 (SSN4, house number). I have used a gray font color to distinguish these redundant strings from the non-redundant strings in Table 12. Because these redundant strings contribute no matches other than what would have been achieved through the non-redundant strings, I focuse my attention on the non-redundant North Carolina strings (those with black font color).

Table 12: Constituent Parts of Composite Matching Fields Proposed by State of North Carolina

Composite Matching Field Number	First Name	First Initial	Last Name	Soundex First Name	Soundex Last Name	Middle Initial	N.C. D.L. #	SSN4	Birth Date	ZIP Code	House #
A2			✓	✓				✓			
A3	✓				✓			✓			
A11								✓	✓	✓	✓
A12								✓	✓		✓
A13	✓		✓						✓	✓	✓
A14			✓	✓					✓	✓	✓
A15	✓		✓						✓	✓	
A16			✓	✓					✓	✓	
A17			✓	✓					✓		
A18			✓						✓	✓	
A19					✓				✓	✓	
A20								✓	✓	✓	
A21								✓		✓	✓
A22								✓			✓

As noted above in Subsection 5.3.1 and reported Table 3 it is important to assess the degree to which composite match fields are unique identifiers. Table 13 adds the 8 non-redundant North Carolina match strings to the information in Table 3. These 8 North Carolina match strings appear on the bottom rows of the table and are labeled A2, A3, A15, A17, A18, A19, A20, and A22. Note

that only 86.36% of the voter records with a non-missing value of A22 (SSN4 and house number) have a unique value of string A22. Put another way, almost 14% of the voter records available for matching on string A22 share their value of string A22 with at least one other voter record. This creates the potential for a large number of false positives when using A22 as a match string. I empirically assess this question of false positives in Subsection 6.5.

Table 13: Matching Field Characteristics in Voter File

Matching Field	Unique Records	Total Non-Missing	% Unique	% Missing
1	5422860	5422960	100.00%	16.89%
2	5557147	5563478	99.89%	14.74%
3	6509567	6515506	99.91%	0.15%
4	6474824	6525119	99.23%	0.00%
5	5422789	5422960	100.00%	16.89%
6	5562647	5563471	99.99%	14.74%
7	5563176	5563478	99.99%	14.74%
8	6513575	6515506	99.97%	0.15%
9	5422678	5422960	99.99%	16.89%
10	5562431	5563471	99.98%	14.74%
11	5563210	5563478	100.00%	14.74%
12	6511858	6515506	99.94%	0.15%
13	5422650	5422982	99.99%	16.89%
14	5562217	5563493	99.98%	14.74%
15	5562955	5563500	99.99%	14.74%
16	6505425	6515560	99.84%	0.15%
17	5421432	5422975	99.97%	16.89%
18	5421410	5422982	99.97%	16.89%
19	5492896	5563493	98.73%	14.74%
101	6091022	6093022	99.97%	6.62%
102	5562940	5563471	99.99%	14.74%
A2	5552297	5563478	99.80%	14.74%
A3	5551321	5563478	99.78%	14.74%
A15	6514873	6515506	99.99%	0.15%
A17	6502511	6515506	99.80%	0.15%
A18	6497304	6515560	99.72%	0.15%
A19	6491567	6515560	99.63%	0.15%
A20	5561632	5563493	99.97%	14.74%
A22	4804396	5563500	86.36%	14.74%

NOTE: Total number of voter file records is 6,525,173, which includes deceased voters. Because these matching criteria (1-102) were used in matching with the DHHS death file, data from full voter file (including deceased individuals) are included here. The total number of non-deceased voter file records is 6,486,046. Matching field values are coded as missing if any of their constituent pieces is missing. Percent unique is calculated as $\frac{\text{unique records}}{\text{total non-missing records}}$. Percent missing is calculated as $\frac{\text{total non-missing records}}{6{,}525{,}173}$

Putting aside this concern about the increased potential for false positives when using the North Carolina matching criteria, I next examine the extent to which my primary matching results would change if I used the North Carolina strings in addition to my matching strings.

Table 14 reports the cumulative number of matches between the North Carolina voter file and the DMV file.[32] The infomation in this table can be understood in the following way. Start with match field 1. This string matches 4,991,832 voter records to DMV records. Next use match field 2 to find matches between the unmatched voter records and the DMV file. This produces 54,840 new matches, for a cumulative total of 5,046,672 matches. Continue to proceed down the list of match strings in this fashion for string 3, 4, etc. down to North Carolina string A22.

What we see is that most of the North Carolina match strings contribute very few (less than 7,500) new matches. The exception is string A22 which brings in 103,509 new matches. As discussed above, string A22 is not even approximately a unique identifier for voter records. This creates a large potential for false positives. I empirically confirm this below in Subsection 6.5.

Does the use of the North Carolina match strings appreciably affect the primary results of this report? In Table 15 I report the percentage of each racial group that finds itself on the no-match list constructed using three distinct sets of composite match fields—those based on the 19 criteria used for my primary results, those that are just proposed by North Carolina, and a combination of these two sets of match strings. The column labeled "Quinn Matching Criteria" is identical to the same column in Table 6. The overall non-match percentage drops from 5.88% to 5.80% when using the North Carolina match strings in place of my 19 match strings. When both sets of match strings are used to find matches the non-match percentage goes to 4.78%. As I noted above, and go on to show in Subsection 6.5 there is strong reason to believe that these decreases in the non-match rate are the result of a substantial number of false positives introduced by the North Carolina match strings—particularly string A22.

[32] Because I did not have access to the underlying federal ID databases I could not examine the extent to which the match criteria incrementally created new matches between the voter file and the federal ID databases.

Table 14: Cumulative Impact of DMV Matching Criteria (NC Alternatives with A Prefix)

Matching String	Matches	Cumulative Matches	New Matches
1	4991832	4991832	4991832
2	5045787	5046672	54840
3	5626799	5642125	595453
4	4692228	5703205	61080
5	4999071	5710375	7170
6	5038665	5711450	1075
7	4167205	5711479	29
8	4619805	5717040	5561
9	5023891	5748865	31825
10	5066441	5753063	4198
11	4188913	5753164	101
12	4676214	5792925	39761
13	5032516	5801473	8548
14	5075589	5802051	578
15	4196895	5802096	45
16	4701611	5818408	16312
17	5114643	5901317	82909
18	5123416	5901487	170
19	5187123	5920647	19160
A2	5067929	5921434	787
A3	5055279	5922331	897
A15	4925133	5922331	0
A17	5675556	5929635	7304
A18	5029233	5933433	3798
A19	5045099	5935850	2417
A20	4519282	5935850	0
A22	4661759	6039359	103509

While the overall non-match percentage does decrease when using the North Carolina match strings, the racial disparity between blacks and whites is not affected in an appreciable way. The ratio of the black non-match percentage to the white non-match percentage from my original analysis is 2.15. This ratio becomes 2.05 and 2.11 under the two matching procedures that use the North Carolina match fields. In other words, ***even when using North Carolina's preferred match strings, African Americans are still found to be more than twice as likely as whites to be without HB 589 approved photo ID.***

Table 15: Percent No-Match by Race and Matching Criteria Used

Race	Quinn Matching Criteria	NC Matching Criteria	Both Matching Criteria
Asian	3.83%	3.52%	3.14%
Black	9.60%	9.23%	7.70%
American Indian	8.74%	9.20%	7.17%
Mixed	10.22%	9.17%	8.12%
Other	7.52%	6.93%	6.31%
Unknown	10.55%	9.99%	8.85%
White	4.46%	4.51%	3.65%
Total	5.88%	5.80%	4.78%

6.5 Manual Validation of Record Matching Procedure

When matching records across databases without a true unique identifier, it is important to assess the extent to which one's matching criteria are likely to generate false positives—recorded matches that in fact do not represent the same individual. This is something that can be empirically evaluated.

I used the following validation procedure. For each of my 19 match strings and each of the 8 non-redundant North Carolina match strings I randomly sampled 100 records from the voter file that matched the DMV file on the string in question. Over the 27 match strings this gave me a total sample size of 2,700 voter records. I then instructed two research assistants[33] to manually inspect the sampled voter records next to the DMV records that matched on the match string in question and to determine if a false positive had occurred. The research assistants conducted this manual evaluation independently. The rate of agreement on the coding of false positives by the two research assistants was extremely good. These two coders disagreed on only 2 records out of 2,700 total.[34] The two records on which the coders initially disagreed were subsequently examined and in each case it was clear what the appropriate coding should have been.

Table 16 reports the results of this validation exercise. In two of my 19 match strings one false

[33]These two research assistants are Doug Ahler, PhD Candidate, Department of Political Science, UC Berkeley; and Stephen Goggin, PhD Candidate, Department of Political Science, UC Berkeley.

[34]This translates to value of Cohen's kappa of 0.916. This is well above the level of reliability that social scientists find acceptable. The null hypothesis that this level of agreement occurred by chance can be rejected at $p < 0.0001$.

Table 16: Validation of Matching Strings for False Positives

Match String	Sample Size	% False Positive	95% Confidence Interval	95% Credible Interval
1	100	0%	(0%, 3.6%)	(0%, 2.5%)
2	100	0%	(0%, 3.6%)	(0%, 2.5%)
3	100	0%	(0%, 3.6%)	(0%, 2.5%)
4	100	1%	(0.03%, 5.4%)	(0.1%, 4.6%)
5	100	0%	(0%, 3.6%)	(0%, 2.5%)
6	100	0%	(0%, 3.6%)	(0%, 2.5%)
7	100	0%	(0%, 3.6%)	(0%, 2.5%)
8	100	0%	(0%, 3.6%)	(0%, 2.5%)
9	100	0%	(0%, 3.6%)	(0%, 2.5%)
10	100	0%	(0%, 3.6%)	(0%, 2.5%)
11	100	0%	(0%, 3.6%)	(0%, 2.5%)
12	100	0%	(0%, 3.6%)	(0%, 2.5%)
13	100	0%	(0%, 3.6%)	(0%, 2.5%)
14	100	0%	(0%, 3.6%)	(0%, 2.5%)
15	100	0%	(0%, 3.6%)	(0%, 2.5%)
16	100	0%	(0%, 3.6%)	(0%, 2.5%)
17	100	0%	(0%, 3.6%)	(0%, 2.5%)
18	100	0%	(0%, 3.6%)	(0%, 2.5%)
19	100	1%	(0.03%, 5.4%)	(0.1%, 4.6%)
A2	100	0%	(0%, 3.6%)	(0%, 2.5%)
A3	100	0%	(0%, 3.6%)	(0%, 2.5%)
A15	100	0%	(0%, 3.6%)	(0%, 2.5%)
A17	100	0%	(0%, 3.6%)	(0%, 2.5%)
A18	100	0%	(0%, 3.6%)	(0%, 2.5%)
A19	100	0%	(0%, 3.6%)	(0%, 2.5%)
A20	100	0%	(0%, 3.6%)	(0%, 2.5%)
A22	100	11%	(5.6%, 18.8%)	(6.0%, 18.2%)

NOTE: Random samples of 100 matched voters for each matching string were taken from the non-deceased voter file. The 95% confidence interval is a Clopper Pearson interval (see C. J. Clopper & E.S. Pearson. 1934. "The use of confidence or fiducial limits illustrated in the case of the binomial". Biometrika, 26, pp. 404413). The 95% credible interval is a Jeffreys interval, which is a Bayesian credible from a binomial model with a Jeffreys prior.

positive was found for estimated false positive rates of 1%. No false positives were found among the matches on the 17 of my match strings for estimated false positive rates of 0%.

No false positives were found in 7 of the 8 North Carolina strings which translates to estimated false positive rates of 0%. However, for string A22 11 false positives were discovered in the sample of 100 voter records. The corresponds to an estimated false positive rate of 11% with a 95% confidence interval of (5.6%, 18.8%).

The takeaway from this validation exercise is that false positives do not appear to be a major problem with the 19 match strings used in my primary analysis, but that false positives are likely to incorrectly deflate the non-match rate of analyses that make use of North Carolina's A22 match string. The presence of false positives likely underestimates the number of North Carolina registrants lacking HB 589 ID.

7 Conclusions

To reiterate, my conclusions are the following.

1. At least 5.9% of registered North Carolina voters lack identification required to vote under HB 589. This number could be as high as 12.5%.

2. African Americans are more than twice as likely as whites to lack identification required to vote under HB 589. A conservative analysis reveals that 9.6% of black registered voters lack acceptable ID, whereas 4.5% of white registered voters lack acceptable ID under HB 589. An alternative analysis shows that 24.4% of African Americans and 8.4% of whites lack acceptable ID under HB 589.

3. The black-white disparity in ID possession is larger among likely voters than among likely non-voters. For instance, African Americans who voted in recent elections are 3.8 times more likely to not have acceptable ID under HB 589 than are whites who voted in the same elections. African Americans who did not vote in recent elections are 1.9 times more likely to lack acceptable ID than are whites who did not vote in the same elections.

Appendix A Data Files Relied Upon

1. The NC State Board of Elections

   (a) `VOTER_REG_20140716 HIGHLY CONFIDENTIAL.txt` (5.24GB the main voter registration file)

   (b) `VOTER_HISTORY 201401104.txt` (7.27GB a database containing information on who and how cast ballots in elections used to find who voted in 2014 and 2012)

   (c) `LK_VH_ELECTION.txt` (2.4MB a dataset indicating what the election IDs were for all elections by county used to locate the 2014 and 2012 elections in the Voter History file).

2. The North Carolina DMV

   (a) `DMV_DL_LIST_20140720 HIGHLY CONFIDENTIAL.txt` (2.18GB the main DMV file matched to the voter file to determine who has DMV-issued ID)

   (b) `DMV_DL_LIST_20140721_expired HIGHLY CONFIDENTIAL.txt` (3.53GB matched to the above DMV file, as the above file did not contain the expiration dates for DMV-issued ID)

   (c) `DOT.MVD.SP.P00.MVDD1000.MVDS104.DT110414` (6KB a data table indicating the fixed-width column layout for the file containing information on whether a DMV-issued ID had been surrendered to the state)

   (d) `DOT.MVD.UN.P00.MVDD1000.MVDS104.DT110414` (1.67GB a fixed-width data file described by the above data table containing information on whether a DMV-issued ID had been surrendered to the state)

3. DHHS Death Data

(a) DHHS_DEATH HIGHLY CONFIDENTIAL.txt (94MB matched to the voter file to remove deceased voters)

4. Charles Stewart III's Replication File

(a) individual_match_results_summary.dta (97.9MB contains voter registration numbers, county, and race information for voters, as well as whether they matched with the DMV, Passport, DOD, VA, Death files in Stewarts analysis. This was used to incorporate those that matched to the Passport, DOD, and VA files.)]

Appendix B Data Cleaning and Preparation

Inspection of the original voter file revealed that a number of carriage return characters had been inserted into the file, causing single records to break across multiple lines and to appear as more than one record. I wrote a python script to remove these excess carriage returns so that the file could be read correctly by other pieces of software.

To check the quality of the data, I cross-checked the number of active and inactive voters in each county with online data from the NCSBE website for July 15, 2014.[35] Table 17 reports this comparison. The numbers are extremely similar, giving me confidence that the voter file is an accurate record of registered voters.

The voter registration file included a number of variables that I did not need for the analysis in this report. I therefore extracted the subset of variables to be used in the construction of the composite match fields. In addition, I extracted a few other variables that would be used in the analysis such as county and race.

A number of data cleaning steps were taken to standardize the values in the data fields used to construct the composite match strings. For example, names were converted to all upper case characters, non-alphabetic characters and blank spaces were removed.

[35] http://www.ncsbe.gov/webapps/voter_stats/results.aspx?date=07-15-2014

The death certificate file and the driver's license database were similarly cleaned.

Table 17: Comparison of Voter Registration in State-Provided Voter File and SBOE Website

County	N In Voter File	N on NCSBE Website	Difference	Difference %
Alamance	93689	93695	6	0.01%
Alexander	24083	24083	0	0.00%
Alleghany	7135	7135	0	0.00%
Anson	17150	17151	1	0.01%
Ashe	18437	18437	0	0.00%
Avery	12045	12045	0	0.00%
Beaufort	32380	32382	2	0.01%
Bertie	14425	14422	-3	-0.02%
Bladen	22511	22511	0	0.00%
Brunswick	84926	84930	4	0.01%
Buncombe	185454	185379	-75	-0.04%
Burke	57507	57507	0	0.00%
Cabarrus	120799	120810	11	0.01%
Caldwell	53219	53220	1	0.00%
Camden	7367	7369	2	0.03%
Carteret	50655	50628	-27	-0.05%
Caswell	15409	15409	0	0.00%
Catawba	101373	101390	17	0.02%
Chatham	46694	46704	10	0.02%
Cherokee	21771	21771	0	0.00%
Chowan	10584	10578	-6	-0.06%
Clay	8890	8891	1	0.01%
Cleveland	61780	61507	-273	-0.44%
Columbus	37074	37071	-3	-0.01%
Craven	69577	69573	-4	-0.01%
Cumberland	202648	202680	32	0.02%
Currituck	17551	17551	0	0.00%
Dare	27759	27758	-1	0.00%
Davidson	103907	103938	31	0.03%
Davie	28214	28214	0	0.00%
Duplin	29293	29293	0	0.00%
Durham	202407	202449	42	0.02%
Edgecombe	38837	38838	1	0.00%
Forsyth	240472	240483	11	0.01%
Franklin	40439	40438	-1	0.00%
Gaston	133118	133180	62	0.05%
Gates	8312	8312	0	0.00%
Graham	6634	6634	0	0.00%

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Table17 – *Continued from previous page*

County	N In Voter File	N on NCSBE Website	Difference	Difference
Granville	36521	36524	3	0.01%
Greene	11248	11249	1	0.01%
Guilford	348438	348455	17	0.01%
Halifax	37926	37926	0	0.00%
Harnett	69245	69233	-12	-0.02%
Haywood	42164	42162	-2	-0.01%
Henderson	77260	77263	3	0.00%
Hertford	15031	15027	-4	-0.03%
Hoke	30307	30306	-1	0.00%
Hyde	3492	3493	1	0.03%
Iredell	109684	109687	3	0.00%
Jackson	26220	26250	30	0.11%
Johnston	110227	110228	1	0.00%
Jones	7458	7459	1	0.01%
Lee	34431	34429	-2	-0.01%
Lenoir	39022	39002	-20	-0.05%
Lincoln	52215	52215	0	0.00%
Macon	25031	25031	0	0.00%
Madison	16331	16337	6	0.04%
Martin	17453	17454	1	0.01%
Mcdowell	28376	28377	1	0.00%
Mecklenburg	667086	667147	61	0.01%
Mitchell	11625	11625	0	0.00%
Montgomery	16038	16037	-1	-0.01%
Moore	63631	63630	-1	0.00%
Nash	66913	66915	2	0.00%
New Hanover	156109	156071	-38	-0.02%
Northampton	15306	15305	-1	-0.01%
Onslow	95797	95821	24	0.03%
Orange	105468	105473	5	0.01%
Pamlico	9437	9437	0	0.00%
Pasquotank	28358	28350	-8	-0.03%
Pender	36813	36830	17	0.05%
Perquimans	9866	9868	2	0.02%
Person	25642	25643	1	0.00%
Pitt	115836	115820	-16	-0.01%
Polk	15439	15439	0	0.00%
Randolph	89353	89354	1	0.00%
Richmond	30532	30533	1	0.00%
Robeson	74528	74529	1	0.00%
Rockingham	59003	59009	6	0.01%
Rowan	91363	91365	2	0.00%

Continued on next page

Table17 – *Continued from previous page*

County	N In Voter File	N on NCSBE Website	Difference	Difference
Rutherford	43388	43395	7	0.02%
Sampson	37527	37528	1	0.00%
Scotland	22301	22301	0	0.00%
Stanly	39865	39862	-3	-0.01%
Stokes	30384	30386	2	0.01%
Surry	43667	43667	0	0.00%
Swain	10425	10427	2	0.02%
Transylvania	24364	24363	-1	0.00%
Tyrrell	2490	2490	0	0.00%
Union	139671	139688	17	0.01%
Vance	29900	29906	6	0.02%
Wake	650851	650904	53	0.01%
Warren	13513	13513	0	0.00%
Washington	8917	8917	0	0.00%
Watauga	43560	43575	15	0.03%
Wayne	73238	73230	-8	-0.01%
Wilkes	41422	41422	0	0.00%
Wilson	54930	54935	5	0.01%
Yadkin	23804	23804	0	0.00%
Yancey	14208	14208	0	0.00%
Total	6525173	6525195	22	0.00%

Appendix C Soundex Encoding Rules

Soundex is an algorithm that encodes the phonetic information in a name so that names that similar sounding names receive the same coding. Soundex is useful for matching because it helps to correct for data entry errors or misspellings.[36]

The following description of the Soundex algorithm is taken verbatim from: `http://www.archives.gov/research/census/soundex.html`

[36]See Thomas N. Herzog, Fritz J. Scheuren, and William E. Winkler, 2007. *Data Quality and Record Linkage Techniques*. Springer. p. 115; Donald E. Knuth. 1998. *The Art of Computer Programming*, Vol. 3. Addison Wesley. pp. 394-395.

To use the census soundex to locate information about a person, you must know his or her full name and the state or territory in which he or she lived at the time of the census. It is also helpful to know the full name of the head of the household in which the person lived because census takers recorded information under that name.

The soundex is a coded surname (last name) index based on the way a surname sounds rather than the way it is spelled. Surnames that sound the same, but are spelled differently, like SMITH and SMYTH, have the same code and are filed together. The soundex coding system was developed so that you can find a surname even though it may have been recorded under various spellings.

To search for a particular surname, you must first work out its code.

Basic Soundex Coding Rule

Every soundex code consists of a letter and three numbers, such as W-252. The letter is always the first letter of the surname. The numbers are assigned to the remaining letters of the surname according to the soundex guide shown below. Zeroes are added at the end if necessary to produce a four-character code. Additional letters are disregarded. Examples:

Washington is coded W-252 (W, 2 for the S, 5 for the N, 2 for the G, remaining letters disregarded).

Lee is coded L-000 (L, 000 added).

Soundex Coding Guide

Number	Represents the Letters
1	B, F, P, V
2	C, G, J, K, Q, S, X, Z
3	D, T
4	L
5	M, N
6	R

Disregard the letters A, E, I, O, U, H, W, and Y.

Additional Soundex Coding Rules

1. **Names with Double Letters**

   If the surname has any double letters, they should be treated as one letter. For example:

   - **Gutierrez** is coded G-362 (G, 3 for the T, 6 for the first R, second R ignored, 2 for the Z).

2. **Names with Letters Side-by-Side that have the Same Soundex Code Number**

   If the surname has different letters side-by-side that have the same number in the soundex coding guide, they should be treated as one letter. Examples:

   - **Pfister** is coded as P-236 (P, F ignored, 2 for the S, 3 for the T, 6 for the R).
   - **Jackson** is coded as J-250 (J, 2 for the C, K ignored, S ignored, 5 for the N, 0 added).
   - **Tymczak** is coded as T-522 (T, 5 for the M, 2 for the C, Z ignored, 2 for the K). Since the vowel "A" separates the Z and K, the K is coded.

3. **Names with Prefixes** If a surname has a prefix, such as Van, Con, De, Di, La, or Le, code both with and without the prefix because the surname might be listed under either code. Note, however, that Mc and Mac are **not** considered prefixes.

   For example, **VanDeusen** might be coded two ways:

   V-532 (V, 5 for N, 3 for D, 2 for S)

   or

   D-250 (D, 2 for the S, 5 for the N, 0 added).

4. **Consonant Separators** If a vowel (A, E, I, O, U) separates two consonants that have the same soundex code, the consonant to the right of the vowel is coded. Example:

Tymczak is coded as T-522 (T, 5 for the M, 2 for the C, Z ignored (see "Side-by-Side" rule above), 2 for the K). Since the vowel "A" separates the Z and K, the K is coded.

If "H" or "W" separate two consonants that have the same soundex code, the consonant to the right of the vowel is not coded. Example:

Ashcraft is coded A-261 (A, 2 for the S, C ignored, 6 for the R, 1 for the F). It is not coded A-226.

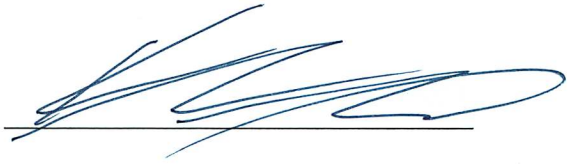
Appendix D Surrendered, Suspended, and Inactive Licenses

Table 18 reports the status of unexpired driver's licenses in the driver's license database.

Table 18: DMV Unexpired Licenses by Driver Status & Surrendered

driver_status_cd	Description	Total Licenses	Surrendered	% Surrendered
A	ELIG FOR REINSTATE	62229	7476	12.01%
B	DECEASED	688928	14962	2.17%
D	MED CANCELLATION	49609	5330	10.74%
E	INACTIVE	780707	262761	33.66%
1	ACTIVE	6960690	58531	0.84%
4	CANCELLED	2774	255	9.19%
7	SUSPENDED	380162	16327	4.29%
9	90 DAY RENEW DENIED	435	8	1.84%
	Missing	9706	0	0.00%
	Total	8935240	365650	4.09%

I declare under penalty of perjury that the foregoing is true and correct. Executed this 18th day of May, 2015.



Kevin M. Quinn

STATE OF NORTH CAROLINA COUNTY OF WAKE	IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION
JABARI HOLMES, FRED CULP, DANIEL E. SMITH, BRENDON JADEN PEAY, SHAKOYA CARRIE BROWN, and PAUL KEARNEY, SR., *Plaintiffs,* v. TIMOTHY K. MOORE *in his official capacity as Speaker of the North Carolina House of Representatives;* PHILLIP E. BERGER *in his official capacity as President Pro Tempore of the North Carolina Senate;* DAVID R. LEWIS, *in his official capacity as Chairman of the House Select Committee on Elections for the 2018 Third Extra Session;* RALPH E. HISE, *in his official capacity as Chairman of the Senate Select Committee on Election for the 2018 Third Extra Session*; THE STATE OF NORTH CAROLINA; *and* THE NORTH CAROLINA STATE BOARD OF ELECTIONS, *Defendants.*	Civil Action No. 18 CVS 15292

AFFIDAVIT OF CHRISTOPHER DALTON KETCHIE

I, Christopher Dalton Ketchie, declare as follows:

1. I am over 18 years of age, legally competent to give this Affidavit, and have personal knowledge of the facts set forth in this Affidavit.

2. I am a graduate of North Carolina State University with a master's degree in Forestry and Environmental Resources with a concentration in Geographic Information Systems (GIS). Additionally, I have over 9 years of professional GIS experience.

3. I am employed by the Southern Coalition for Social Justice in Durham, North Carolina as a Demographer and Data Analyst, which includes the frequent use of GIS. My full CV is attached as Appendix A.

OBJECTIVES OF AFFIDAVIT

4. I have been asked to calculate both the average and the maximum distance that North Carolina registered voters would have to travel in order to obtain a voter photo ID from the local board of elections office within their county for all 100 counties of North Carolina, and to assess disparities in distance based on county, race, and poverty status.

5. Further, I have also been asked to analyze the racial demographics for provisional ballots cast during the March 15th, 2016 Primary for three specific ballot categories. These ballot categories were defined in a presentation[1] given by NC State Board of Elections (NCSBE) Executive Director Kim Strach on November 26th, 2018. The underlying data used for this presentation was not provided by the NCSBE until May 6, 2019. In lieu of this data, publicly available provisional ballot data from the NCSBE's FTP site was used instead. I reserve the right to amend this affidavit after I've had time to analyze the data produced by the NCSBE. The provisional ballot categories are as follows:

a. Voters who completed a Declaration of Reasonable Impediment indicating that a "reasonable impediment" prevented them from obtaining acceptable identification.

[1] https://s3.amazonaws.com/dl.ncsbe.gov/Requests/11262018_JntElect_Westbrook_Strach_Presentation.pdf (last accessed Feb. 19, 2019).

b. Voters who satisfy the criteria listed above and whose ballots were ultimately counted.

c. Voters who did not present acceptable photo identification, or execute a Declaration of Reasonable Impediment, or return to the county office by the deadline after election night, thereby having their votes not counted.

I. Voter Distance from County Boards of Election

DATA SOURCES

6. The primary data source used to determine the distance that North Carolina registered voters would have to travel in order to obtain a voter photo ID from the local board of elections office within their county comes from publicly available data provided by the NC State Board of Elections. The NCSBE makes publicly available a Voter Registration File containing the non-confidential residential address information for all registered voters in the state, as well as the demographic data and partisan affiliation associated with each voter.[2] Additionally, the NCSBE makes publicly available a tab delimited text file containing the geocoded coordinates for all recognized addresses in the state ("SBOE Address File"),[3] as well as the boundaries for each county (NC County Shapefile").[4] The address of each county board of elections was also obtained from the NCSBE's County BOE Information page.[5]

7. Supplemental data used in determining the distance that North Carolina registered voters would have to travel in order to obtain a voter photo ID from the local board of elections office within their county include the following:

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[2] https://s3.amazonaws.com/dl.ncsbe.gov/data/ncvoter_Statewide.zip (last accessed Feb. 2, 2019).
[3] https://s3.amazonaws.com/dl.ncsbe.gov/ShapeFiles/address_points_sboe.zip (last accessed Feb. 2, 2019).
[4] https://s3.amazonaws.com/dl.ncsbe.gov/ShapeFiles/CountyBoundary/NC_State_County_Boundary_NCGS_2017.zip (last accessed Feb. 2, 2019).
[5] https://vt.ncsbe.gov/BOEInfo/PrintableVersion/ (last accessed Feb. 2, 2019).

a. NC Master Address Dataset 2014; Source – NC OneMap[6]

b. Tiger/Line 2018 shapefiles; Source – United States Census Bureau[7]

8. Supplemental data indicating rate of poverty in each of North Carolina's 100 counties was obtained from the 2017 5-year estimates of the United States Census Bureau's American Community Survey.[8]

METHODOLOGY

9. The Voter Registration File and SBOE Address File were first imported into ArcGIS software. The Voter Registration File was then prepared for analysis. The first step in preparing the data was to select only voter records categorized as "ACTIVE" and "INACTIVE," and not flagged as "CONFIDENTIAL." This process yielded 6,570,905 out of a total of 7,449,896 records. Next, unnecessary fields were deleted in order to speed up data processing. The address field was then cleaned by removing extra spaces, street number suffixes, and apartment numbers that would prevent legitimate matches between the Voter Registration File and the SBOE Address File.

10. A primary unique ID field ("join") was created for both the Voter Registration File and SBOE Address File using a combination of county code, street address, city, and zip code. An inner join was performed on all voter records using the primary unique ID field, and successfully matched 6,409,775 voter records with their corresponding geographic coordinates from the SBOE Address File.

11. A secondary unique ID field ("join2") was created for both the Voter Registration File and SBOE Address file using a combination of street address and zip code. An inner join was performed on the remaining, unmatched voter records using the secondary unique ID field and

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[6] http://data.nconemap.gov/downloads/vector/mastadd14.zip (last accessed Feb. 2, 2019).
[7] https://www2.census.gov/geo/tiger/TIGER2018/ADDRFEAT/ (last accessed Feb 2, 2019).
[8] https://data.census.gov/cedsci/table?q=S1701&table=S1701&tid=ACSST5Y2017.S1701&g=0400000US37.050000 (last accessed Feb 2, 2019)

successfully matched 18,182 additional voter records with their corresponding geographic coordinates from the SBOE Address File. Of these additional matches, nine of them matched with duplicate "join2" fields in the SBOE Address File, indicating two instances of the same street address within the same zip code. These records were manually verified in ArcGIS using streets and aerial imagery basemaps to verify their accuracy.

12. In order to geocode as many of the remaining unmatched voter records as possible, a composite address locator was created in ArcGIS using the NC OneMap Master Address Dataset and Tiger/Line 2018 shapefiles. The Composite Address Locator provides a score to indicate the accuracy of any match produced, which ranges from 0 to 100. Only records with a matched or tied score of 88 or higher were assigned geographic coordinates from the results of the composite address locator, which yielded an additional 71,351 geocoded voter records.

13. This compiled list of geocoded voters was then spatially joined to the NC County shapefile in ArcGIS to ensure that all of the geocoded addresses fell within state lines. Seventy-four geocoded addresses fell outside of state lines, and these records were discarded.

14. The total number of voters whose addresses were successfully geocoded was 6,499,234 for an overall success rate of 98.9%.

15. Next, each county board of elections office address was geocoded in ArcGIS using the NC OneMap Master Address Dataset 2014 as an address locator. Any address that did not return a match score of 100 was manually geocoded in ArcGIS using streets and aerial imagery basemaps.

16. The geocoded voter record inputs and county board of elections inputs were split by county to ensure that the distance analysis was county specific. A "near analysis" was run in ArcGIS to determine line distance between each address and its corresponding county board, which was reported in miles.

17. Finally, the resulting dataset was used to create a map of average distance by county, as well as summary statistics statewide and by county and race.

18. It is important to note that these distances were calculated by straight lines, or "as the crow flies," and do not take road networks into account, thereby making the results underestimates of the actual distance needed to travel.

RESULTS

19. The summary statistics demonstrate that based on the statewide figure of 6,499,234 matched voters, North Carolina voters live a mean distance of 7.79 miles from their county board of elections office. The greatest distance between a voter address and county board of elections found was 46.93 miles (occurring in Dare County).

20. As depicted in Table 1 and Figure 1 on the following pages, summary statistics by county indicate that, in 38 of North Carolina's 100 counties, the mean distance a voter must travel to their county board of elections office exceeds the statewide mean of 7.79 miles.[9] These 38 counties contain 3,252,137, or 50.03% of registered voters analyzed. Further, in 18 of these 38 Counties, the mean distance a voter must travel to their county board of elections office exceeds 10 miles. These 18 counties contain 874,789, or 13.46% of registered voters analyzed. The greatest countywide mean distance between voter address and county board of elections occurs in Hyde County, at 15.73 miles.

[9] The full statistical summary for all 100 counties is attached as Appendix B.

County	Total Voters	Mean Distance (mi)	Maximum Distance (mi)	Standard Deviation
HYDE	2939	15.73	30.27	9.16
BRUNSWICK	97481	14.08	28.16	5.93
PENDER	38590	13.46	23.69	6.06
DARE	27143	12.79	46.93	11.47
CARTERET	49273	12.33	29.35	7.83
NORTHAMPTON	12710	11.94	27.13	5.64
COLUMBUS	33437	11.78	31.07	7.41
SAMPSON	34174	11.52	27.72	7.17
HALIFAX	34977	11.44	24.74	4.54
DUPLIN	27808	11.21	22.67	4.24
HARNETT	70406	10.75	24.58	4.47
MOORE	64942	10.62	22.98	3.67
JOHNSTON	119319	10.50	21.14	4.02
CHATHAM	49007	10.42	26.00	5.32
IREDELL	113449	10.36	21.13	5.65
CURRITUCK	18256	10.20	29.13	7.13
ROBESON	68512	10.12	25.52	6.14
BERTIE	12366	10.08	22.57	6.01
GRANVILLE	35986	9.94	19.95	5.79
BLADEN	21098	9.73	26.60	5.83
STOKES	28667	9.54	16.48	2.99
RANDOLPH	84907	9.40	20.22	5.24
FRANKLIN	39722	9.39	18.69	3.85
WAKE	704023	9.20	21.56	4.41
SURRY	42405	9.13	18.09	3.37
EDGECOMBE	33532	9.05	19.51	5.45
UNION	144886	9.01	20.93	3.73
ORANGE	105067	8.93	15.73	3.48
JONES	6896	8.89	22.92	5.10
LINCOLN	53814	8.79	17.69	5.29
DAVIDSON	100668	8.59	24.07	4.03
ONSLOW	94801	8.58	21.15	5.18
ROCKINGHAM	56309	8.47	18.36	3.46
CRAVEN	65217	8.39	26.54	6.45
BEAUFORT	30604	8.18	31.25	7.53
MECKLENBURG	699309	8.16	20.70	4.28
CASWELL	14224	8.11	14.93	3.39
MONTGOMERY	15213	8.11	19.69	4.45

Table 1: North Carolina Counties with Mean Straight Line Voter Distance to County Board of Elections Office Exceeding Statewide Mean. Counties highlighted in red have a mean Straight Line distance in excess of 10 miles.

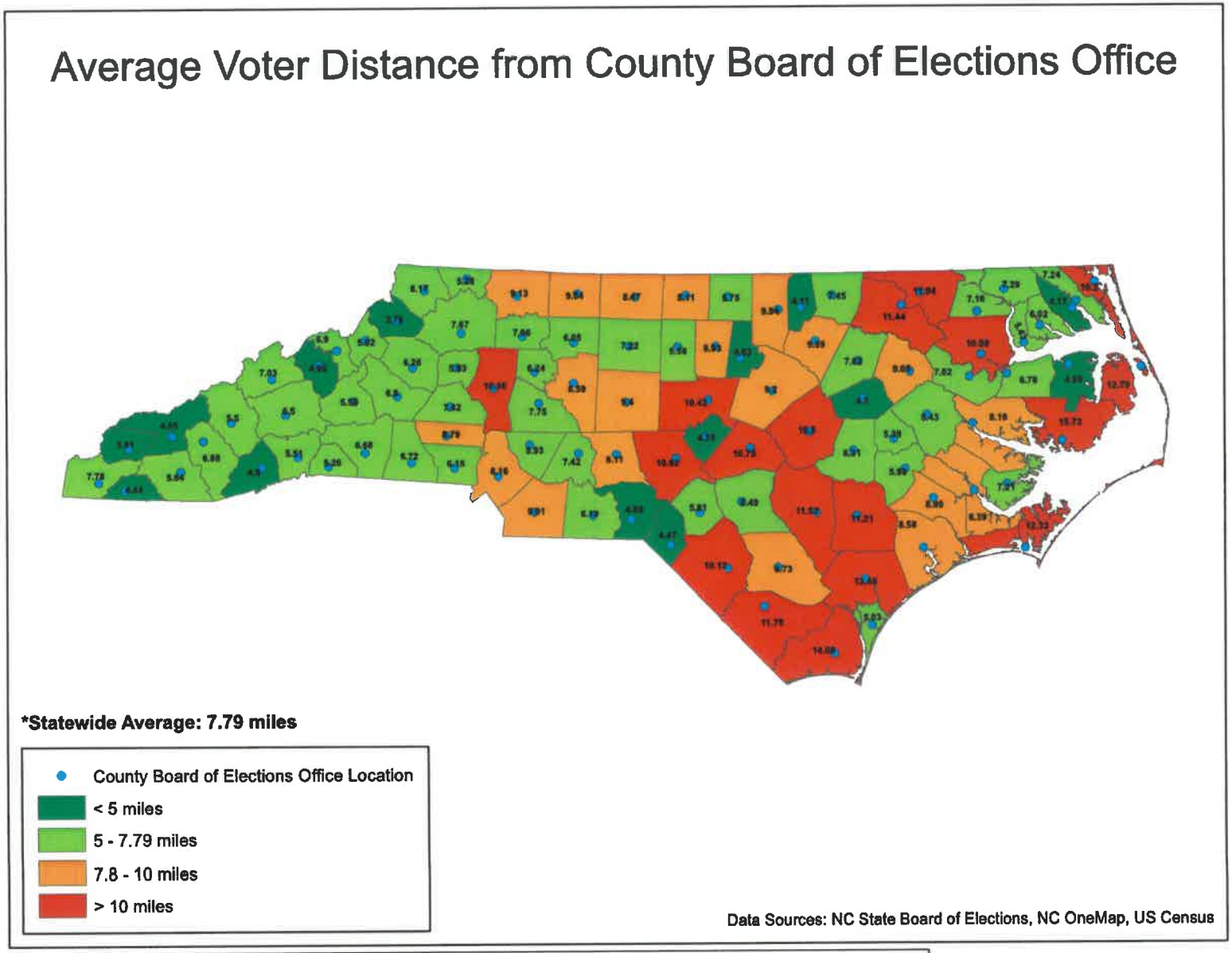


Figure 1: Average Straight Line Voter Distance from County Board of Elections Office

ANALYSIS

21. Of the 38 counties in which voters must travel a distance in excess of the statewide mean of 7.79 miles in order to obtain a voter photo ID from their county board of elections, 16 counties have an African-American voter registration rate that exceeds the statewide rate of 21.86%, including four of the seven counties in North Carolina in which the majority of registered voters are African-American. These counties are represented in Table 2 below.

County	African-American % of VR	Mean Distance (mi)	Maximum Distance (mi)
EDGECOMBE	60.75%	9.05	19.51
BERTIE	59.61%	10.08	22.57
NORTHAMPTON	57.93%	11.94	27.13
HALIFAX	53.56%	11.44	24.74
BLADEN	36.61%	9.73	26.60
CASWELL	33.37%	8.11	14.93
JONES	32.87%	8.89	22.92
MECKLENBURG	32.54%	8.16	20.70
GRANVILLE	32.15%	9.94	19.95
COLUMBUS	30.99%	11.78	31.07
SAMPSON	29.81%	11.52	27.72
DUPLIN	29.30%	11.21	22.67
ROBESON	28.70%	10.12	25.52
FRANKLIN	26.23%	9.39	18.69
BEAUFORT	24.11%	8.18	31.25
HARNETT	22.12%	10.75	24.58

Table 2: North Carolina Counties with Mean Straight Line Voter Distance to County Board of Elections Office Exceeding Statewide Mean and African-American Voter Registration Rate Exceeding Statewide Rate. Counties highlighted in red are counties in which the majority of registered voters are African-American.

22. Further, there are 5 counties in which voters must travel a distance in excess of the statewide mean of 7.79 miles that have American-Indian voter registration in excess of the statewide rate of .77%. These counties are represented in Table 3 below.

County	American-Indian % of VR	Mean Distance (mi)	Maximum Distance (mi)
ROBESON	34.99%	10.12	25.52
HALIFAX	2.92%	11.44	24.74
COLUMBUS	2.71%	11.78	31.07
BLADEN	1.70%	9.73	26.60
SAMPSON	1.47%	11.52	27.72

Table 3: North Carolina Counties with Mean Straight Line Voter Distance to County Board of Elections Office Exceeding Statewide Mean and American-Indian Voter Registration Rate Exceeding Statewide Rate.

23. According to the 2017 5-year estimates of the United States Census Bureau American Community Survey, 16.15% of all North Carolinians live below the federal poverty line. Of the 38 counties in which voters must travel a distance in excess of the statewide mean of 7.79 miles in order to obtain a voter photo ID from their county board of elections, 19 counties suffer from a higher rate of poverty than does the state as a whole. These counties are represented in Table 4 on the following page.

County	% Population Below FPL	Mean Distance (mi)	Maximum Distance (mi)
ROBESON	29.21	10.12	25.52
HALIFAX	26.75	11.44	24.74
JONES	26.39	8.89	22.92
DUPLIN	26.27	11.21	22.67
NORTHAMPTON	25.40	11.94	27.13
EDGECOMBE	24.59	9.05	19.51
BLADEN	24.53	9.73	26.60
SAMPSON	24.31	11.52	27.72
COLUMBUS	23.62	11.78	31.07
BERTIE	22.02	10.08	22.57
CASWELL	21.34	8.11	14.93
MONTGOMERY	20.94	8.11	19.69
HYDE	20.31	15.73	30.27
BEAUFORT	19.13	8.18	31.25
ROCKINGHAM	18.49	8.47	18.36
HARNETT	17.99	10.75	24.58
SURRY	17.58	9.13	18.09
RANDOLPH	16.68	9.40	20.22
FRANKLIN	16.39	9.39	18.69

Table 4: North Carolina Counties with Mean Straight Line Voter Distance to County Board of Elections Office Exceeding Statewide Mean and Poverty Rate Exceeding Statewide Rate

24. Of the 38 counties in which voters must travel a distance in excess of the statewide mean of 7.79 miles in order to obtain a voter photo ID from their county board of elections, five counties also lack a DMV office. Those counties are Bertie,[10] Currituck,[11] Hyde,[12] Jones,[13] and Northampton.[14] Additionally, two counties, Caswell[15] and Stokes,[16] have very limited DMV office hours.

25. Additionally, there are several counties that face multiple risk factors simultaneously. 13 of the 38 counties with a higher than average voter distance from their county board of elections office face a simultaneously higher than average minority population and a higher than average poverty rate. Of the 13 counties with both of these additional risk factors, 4 also lack a DMV office or have very limited DMV office hours. These categories are illustrated in Figure 2 Below:

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[10] https://www.ncdot.gov/dmv/offices-services/locate-dmv-office/Pages/dmv-offices.aspx?term=Bertie+County&type=license&lat=36.09964&lon=-76.987604&field=county (last accessed May 13, 2019).

[11] https://www.ncdot.gov/dmv/offices-services/locate-dmv-office/Pages/dmv-offices.aspx?term=currituck+County&type=license (last accessed May 13, 2019).

[12] https://www.ncdot.gov/dmv/offices-services/locate-dmv-office/Pages/dmv-offices.aspx?term=Hyde+County&type=license&lat=35.5087&lon=-76.215859&field=county (last accessed May 13, 2019)

[13] https://www.ncdot.gov/dmv/offices-services/locate-dmv-office/Pages/dmv-offices.aspx?term=Jones+County&type=license&lat=35.03901&lon=-77.378926&field=county (last accessed May 13, 2019).

[14] https://www.ncdot.gov/dmv/offices-services/locate-dmv-office/Pages/dmv-offices.aspx?term=Northampton+County&type=license&lat=36.44131&lon=-77.469673&field=county (last accessed May 13, 2019).

[15] The Caswell County DMV office is open on the first Wednesday of every month from 9am-12pm and 1pm-4pm. https://www.ncdot.gov/dmv/offices-services/locate-dmv-office/Pages/dmv-offices.aspx?term=caswell+County&type=license&lat=36.40641&lon=-79.320014&field=county (last accessed May 13, 2019).

[16] The Stokes County DMV office is open one day a week on Tuesdays from 9am to 4pm. https://www.ncdot.gov/dmv/offices-services/locate-dmv-office/Pages/dmv-offices.aspx?term=Stokes+County&type=license&lat=36.37194&lon=-80.266907&field=county (last accessed May 13, 2019).

At Risk Counties with Above Average Voter Distance from County Board of Elections Office

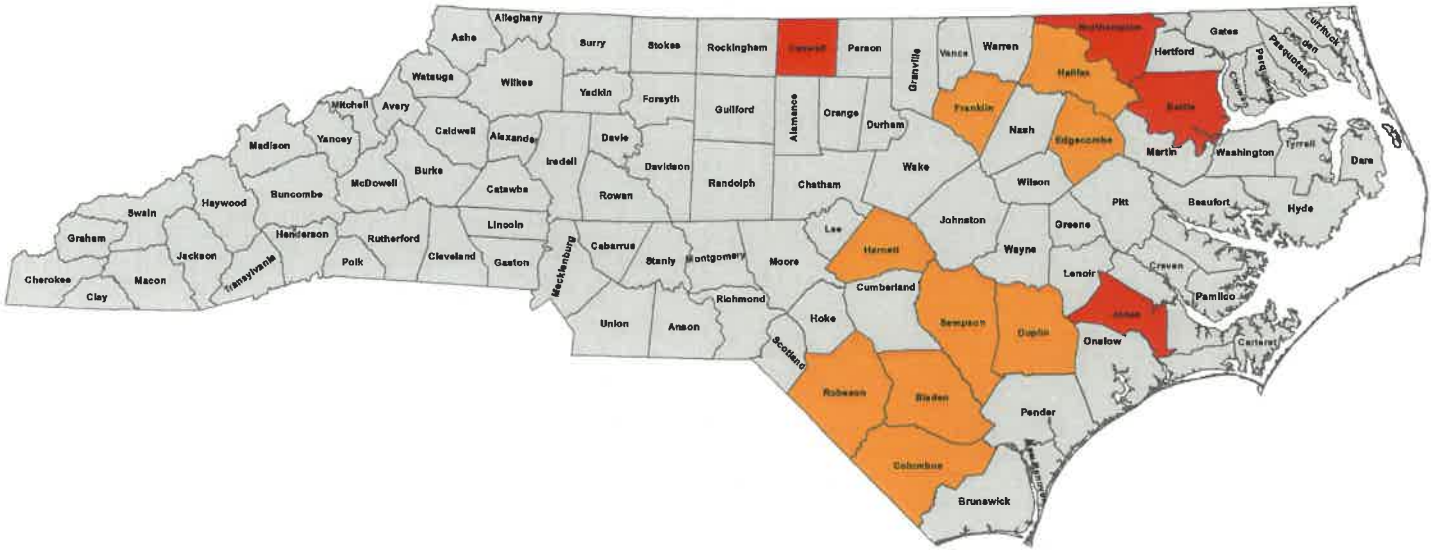


Figure 2. At Risk Counties with Above Average Voter Distance from County Board of Elections Office

II. Racial Demographics of 2016 Provisional Voters

DATA SOURCES

26. Statewide voter demographics[17] from March 15th, 2016 were taken from the SBE website.

27. The provisional ballot file[18] for the March 15th, 2016 Primary was downloaded from the SBE FTP site.

28. A voter registration data snapshot[19] from March 15th, 2016 was downloaded from the SBE FTP site to help fill in missing racial demographic information from the provisional ballot file.

29. Individual voter searches were also performed using the SBE voter lookup tool[20] to further fill in missing racial demographic information that was not found using the voter registration snapshot.

30. The voter counts for each of the three ballot categories were not an exact match between Kim Strach's presentation and the provisional ballot file as the underlying provisional ballot data for Kim Strach's November 26th, 2018 presentation was not provided by the NCSBE until May 6th 2019. I will update this affidavit when I am able to analyze the recently obtained data. The differences between the voter counts are shown in Table 5 on the following page.

[17] https://vt.ncsbe.gov/RegStat/Results/?date=03%2F15%2F2016
[18] https://s3.amazonaws.com/dl.ncsbe.gov/ENRS/2016_03_15/provisional_20160315.txt
[19] https://s3.amazonaws.com/dl.ncsbe.gov/data/Snapshots/VR_Snapshot_20160315.zip
[20] https://vt.ncsbe.gov/RegLkup/

	Kim Strach's Presentation Voter Count	Provisional Ballot File Voter Count
Reasonable Impediment	1,048	1,049
Reasonable Impediment Ballot Counted (Full or Partial)	864	778
No Acceptable ID No Reasonable Impediment Ballot Not Counted	1,248	1,188

Table 5: Differences Between Strach Presentation and March 15, 2016 Provisional Ballot File

METHODOLOGY

31. The provisional ballot file and voter registration snapshot were imported into an ArcGIS file geodatabase, and unique IDs were created for both files using county code and voter registration number. The provisional ballot file does not include a voter registration number for all records, so a unique ID was only created for those records that had them. These unique IDs were then used to join the two files, and for records where the provisional ballot file did not already include a specific race code, the one from the voter registration snapshot was used.

32. The remaining records in the provisional ballot file still lacking race codes were then researched individually using the voter lookup tool on the SBE website. Records that were not found using this method were assigned "UNDESIGNATED," which is one of the seven race codes used by the SBE. The final count of race codes for each step in the methodology described above is shown in Table 6 on the following page.

	Provisional Ballot File Race Code Count	Provisional Ballot File with VR Snapshot Race Code Count	Provisional Ballot File with VR Snapshot and Researched Race Code Count	Provisional Ballot File Voter Count
Reasonable Impediment	807	1,010	1,045	1,049
Reasonable Impediment Ballot Counted (Full or Partial)	598	771	778	778
No Acceptable ID No Reasonable Impediment Ballot Not Counted	928	1,144	1,183	1,188

Table 6: Provisional Ballot File Race Code Matching Results

RESULTS

33. A racial summary count with percentages were calculated from the modified provisional ballot file as well as statewide voter registration numbers from March 15th, 2016, which were used as a comparison. The results are shown in Table 7 on the following page.

Reasonable Impediment		
race	count	percentage
ASIAN	27	2.57%
BLACK or AFRICAN AMERICAN	304	28.98%
AMERICAN INDIAN or ALASKA NATIVE	5	0.48%
TWO or MORE RACES	13	1.24%
OTHER	25	2.38%
UNDESIGNATED	70	6.67%
WHITE	605	57.67%
TOTAL	1,049	

Reasonable Impediment **Ballot Counted (Full or Partial)**		
race	count	percentage
ASIAN	17	2.19%
BLACK or AFRICAN AMERICAN	229	29.43%
AMERICAN INDIAN or ALASKA NATIVE	3	0.39%
TWO or MORE RACES	7	0.90%
OTHER	20	2.57%
UNDESIGNATED	40	5.14%
WHITE	462	59.38%
TOTAL	778	

No Acceptable ID / No Reasonable Impediment **Ballot Not Counted**		
race	count	percentage
ASIAN	26	2.19%
BLACK or AFRICAN AMERICAN	414	34.85%
AMERICAN INDIAN or ALASKA NATIVE	19	1.60%
TWO or MORE RACES	34	2.86%
OTHER	15	1.26%
UNDESIGNATED	70	5.89%
WHITE	610	51.35%
Total	1,188	

Statewide Voter Demographics **3/15/2016**		
race	count	percentage
AMERICAN INDIAN or ALASKA NATIVE	53,439	0.82%
BLACK or AFRICAN AMERICAN	1,456,352	22.35%
OTHER	416,116	6.39%
WHITE	4,589,597	70.44%
TOTAL	6,515,504	

Table 7: Racial Demographics by Provisional Ballot Category and Registered Voters for March 15th, 2016 Primary.

ANALYSIS

34. African Americans represented 22.35% of registered voters during the March 15th, 2016 primary, but were disproportionately represented in all three provisional ballot categories:

a. 28.98% of voters that completed a Declaration of Reasonable Impediment.

b. 29.43% of voters that completed a Declaration of Reasonable Impediment and had their ballot fully or partially counted.

c. 34.85% of voters that had no acceptable ID, did not complete a Declaration of Reasonable Impediment, and did not have their ballot counted.

This the 15 day of MAY, 2019.

Christopher Dalton Ketchie

I, James Ernest Lewis, a Notary Public of the County and State aforesaid, hereby certify that Christopher D. Ketchie, personally known to me to be the affiant in the foregoing affidavit, personally appeared before me this day and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

This the 15 day of MAY, 2019.

(SEAL)

JAMES ERNEST LEWIS
NOTARY PUBLIC
DURHAM COUNTY
STATE OF NORTH CAROLINA

Notary Public

My Commission Expires: 3/7/2021

Appendix A

CHRISTOPHER KETCHIE

chrisketchie@gmail.com 500B Coolidge St, Chapel Hill, NC 27516 919.280.0045

Education

North Carolina State University **May 2010**
Master of Forestry - Concentration in Geographic Information Systems (GIS)

Master's Research: Fuel Mitigation Recommendations in the Wildland Urban Interface (WUI): A 10-year Case study of the North Carolina Sandhills: The goal of this research is to integrate wildland and prescribed fire data with current remote sensing data in a GIS modeling environment to provide North Carolina fire managers with the tools to make informed decisions. A 10-year comprehensive burn history of the North Carolina Sandhills region was compiled from records provided by the North Carolina Division of Forest Resources, The Nature Conservancy, Fort Bragg Military Base, Sandhills Game Land, and Weymouth Woods Sandhills Nature Preserve. These data are weighted against WUI maps from Radeloff et al. (2005), and data acquired from the LANDFIRE Project, to pinpoint areas in greatest need of fuel mitigation and longleaf pine restoration.

U.S. Forest Service Basic Fire School **April 2005**
Classes S-130, S-190, I-100, L-180 and S-212

University of North Carolina at Chapel Hill **Dec 2002**
Bachelor of Arts - Psychology

Professional Experience

Southern Coalition for Social Justice - Demographer / Data Analyst - Durham, NC **Oct 2018 - Present / April 2011 - July 2015**
- Specialize in research, analysis, and spatial visualization of demographic and electoral data to provide an evidence base for advocacy, community organizing, and litigation
- Collect, prepare, and analyze data from a variety of local, state, and federal sources
- Write papers, reports, and research summaries for internal and external audiences
- Collaborate with other non-profits to implement data driven GOTV and voter registration efforts

NC Coastal Land Trust - Stewardship Biologist / GIS Specialist - Wilmington, NC **July 2015 - Oct 2018**
- Oversaw the monitoring and management of the Coastal Land Trust's conservation easement portfolio
- Maintained the Coastal Land Trust's land database and GIS system, and created maps for land acquisition projects, grant applications, and conservation corridor analyses
- Collected and integrated natural heritage, riparian, and land use data for baseline documentation reports
- Prepared preserve management plans and implemented preserve management and restoration activities

Mel Black Law - GIS Consultant - Raleigh, NC **Jan 2011 - Dec 2011**
- Provided the full spectrum of redistricting services for local jurisdictions in North Carolina, following the release of the 2010 Census geographic and demographic data
- Conducted meetings with County Commissions, City Councils, and School Boards to ensure their redistricting objectives complied with state and federal equal representation laws, election law, and the Voting Rights Act
- Analyzed voter registration, voter turnout, and election results data, using GIS and database software, to provide demographic and political profiles for local jurisdictions

Triangle Land Conservancy - Conservation Assessment Intern - Raleigh, NC **May 2010 - Sept 2010**
- Collaborated with multiple conservation partners and land management agencies to design and develop a GIS conservation assessment for the Upper Neuse Clean Water Initiative
- Created production quality maps, posters, and a written report summarizing GIS analysis and results for distribution to conservation partners, land management agencies, and targeted landowners
- Collected baseline documentation data for conservation easements, and collected GPS data locating important wildlife and natural communities

CHRISTOPHER KETCHIE

chrisketchie@gmail.com 500B Coolidge St, Chapel Hill, NC 27516 919.280.0045

Professional Experience

North Carolina State University - Graduate Research Assistant - Raleigh, NC **Aug 2007 - May 2010**

- Coordinated and conducted telephone and in-person interviews with government staff and local residents for research on the public perceptions of wildfire management in Idaho, Montana, Wyoming, and California
- Collected and analyzed fire and policy data from ICS 209 reports, Wildland Fire Situation Analysis reports, Fire Management Plans, and Land Management Plans
- Transcribed 100+ hours of interviews and managed the transcript revision and approval process

North Carolina Division of Forest Resources - Firewise Intern - Raleigh, NC **April 2007 - Aug 2007**

- Conducted hazard assessments and created Community Wildfire Preparedness Plans for communities in western North Carolina as part of the Firewise Communities USA Program
- Assisted with Forest Inventory Analysis data collection for the 2007 report year, including GPS mapping, site selection, and data entry

National Park Service - Parks Intern - Flagstaff, AZ **Jan 2006 - Sept 2006**

- Coordinated and supervised Arizona Conservation Corps crews on multiple projects, including trail maintenance, antelope habitat restoration, and invasive species removal
- Supported daily operations at the Flagstaff area NPS headquarters and three Flagstaff area parks: Walnut Canyon, Sunset Crater, and Wupatki National Monuments

United States Forest Service - Forestry Technician - Nederland, CO **Jan 2005 - Nov 2005**

- Dispatched for initial attack on wildfires in the Arapaho-Roosevelt National Forest, in addition to projects including prescribed fire, aspen rehabilitation, mountain pine beetle spread control, and trail maintenance

Teaching Experience

The School of Architecture, College of Design NCSU - Guest Lecturer - Raleigh, NC **Jan 2011 - Jan 2012**

- Conducted GIS workshops for a graduate seminar on mapping the social, political, economic, and ecological infrastructures sustaining the Triangle Region

Appendix B

Appendix B

Statewide Statistical Summary of Straight Line Voter Distance (Miles) to County Board of Elections Office

County	Total Voters	Mean	Minimum	Maximum	Range	Standard Deviation
ALAMANCE	96531	5.58	0.0256460	17.47	17.44	3.12
ALEXANDER	22832	5.93	0.0366125	11.94	11.91	2.99
ALLEGHANY	6816	5.28	0.0519656	13.84	13.79	3.44
ANSON	15224	6.19	0.0337079	19.59	19.56	4.41
ASHE	17419	6.17	0.0771828	15.66	15.58	3.41
AVERY	10203	5.02	0.0348600	13.51	13.48	2.60
BEAUFORT	30604	8.18	0.0471621	31.25	31.21	7.53
BERTIE	12366	10.08	0.0142577	22.57	22.56	6.01
BLADEN	21098	9.73	0.0221474	26.60	26.58	5.83
BRUNSWICK	97481	14.08	0.2227973	28.16	27.94	5.93
BUNCOMBE	186370	6.50	0.0291263	21.63	21.60	3.73
BURKE	52129	6.80	0.0919390	22.94	22.85	3.95
CABARRUS	127831	5.93	0.0520056	17.03	16.98	3.08
CALDWELL	48234	6.26	0.0246193	18.89	18.87	3.58
CAMDEN	7118	7.24	0.1383353	18.84	18.70	4.47
CARTERET	49273	12.33	0.0112252	29.35	29.34	7.83
CASWELL	14224	8.11	0.0035136	14.93	14.93	3.39
CATAWBA	96958	7.42	0.1778606	17.69	17.51	3.37
CHATHAM	49007	10.42	0.0192776	26.00	25.98	5.32
CHEROKEE	19990	7.78	0.0392943	21.85	21.82	4.67
CHOWAN	9449	5.43	0.0870905	19.57	19.49	4.74
CLAY	8065	4.44	0.0387788	13.72	13.68	2.63
CLEVELAND	59951	6.72	0.0590679	19.50	19.44	4.00
COLUMBUS	33437	11.78	0.0657747	31.07	31.00	7.41
CRAVEN	65217	8.39	0.0464740	26.54	26.49	6.45
CUMBERLAND	195368	6.49	0.0816938	25.36	25.27	3.17
CURRITUCK	18256	10.20	0.0000057	29.13	29.13	7.13
DARE	27143	12.79	0.3519756	46.93	46.58	11.47
DAVIDSON	100668	8.59	0.0913424	24.07	23.97	4.03
DAVIE	27908	6.24	0.0515151	12.47	12.42	3.07
DUPLIN	27808	11.21	0.0278682	22.67	22.64	4.24
DURHAM	209543	4.63	0.0274217	17.32	17.29	2.56
EDGECOMBE	33532	9.05	0.0401911	19.51	19.47	5.45
FORSYTH	237504	6.05	0.0055136	15.84	15.83	3.04
FRANKLIN	39722	9.39	0.1969526	18.69	18.50	3.85
GASTON	132306	6.15	0.0721913	18.32	18.25	3.42
GATES	7447	7.29	0.1055136	14.32	14.22	3.28
GRAHAM	5437	3.91	0.0426548	12.42	12.37	2.83
GRANVILLE	35986	9.94	0.0689908	19.95	19.88	5.79
GREENE	10687	5.39	0.0795146	13.23	13.15	2.96
GUILFORD	339925	7.22	0.0467386	18.57	18.53	4.25
HALIFAX	34977	11.44	0.0495944	24.74	24.69	4.54
HARNETT	70406	10.75	0.0509036	24.58	24.53	4.47
HAYWOOD	40936	5.50	0.0446268	18.68	18.63	3.03
HENDERSON	77685	5.51	0.0447052	14.96	14.91	3.04
HERTFORD	13886	7.16	0.0637027	20.20	20.13	5.06
HOKE	28590	5.81	0.0943172	13.81	13.72	2.97
HYDE	2939	15.73	0.0765528	30.27	30.19	9.16
IREDELL	113449	10.36	0.0294985	21.13	21.10	5.65
JACKSON	25778	6.88	0.0036084	27.00	27.00	5.20
JOHNSTON	119319	10.50	0.0194424	21.14	21.12	4.02

Appendix B

Statewide Statistical Summary of Straight Line Voter Distance (Miles) to County Board of Elections Office

County	Total Voters	Mean	Minimum	Maximum	Range	Standard Deviation
JONES	6896	8.89	0.0396978	22.92	22.88	5.10
LEE	34229	4.35	0.0313287	11.75	11.72	2.68
LENOIR	35528	5.88	0.0560123	18.82	18.77	4.32
LINCOLN	53814	8.79	0.0579849	17.69	17.64	5.29
MACON	24191	5.64	0.0631051	18.54	18.48	4.04
MADISON	15819	7.03	0.0792805	16.35	16.27	3.58
MARTIN	15623	7.02	0.0555957	21.67	21.62	4.85
MCDOWELL	26525	5.58	0.0258698	19.31	19.29	3.66
MECKLENBURG	699309	8.16	0.0538775	20.70	20.65	4.28
MITCHELL	9946	6.90	0.0294159	13.28	13.25	3.37
MONTGOMERY	15213	8.11	0.0781912	19.69	19.61	4.45
MOORE	64942	10.62	0.0804263	22.98	22.90	3.67
NASH	63182	7.62	0.1226629	21.64	21.52	4.19
NEW HANOVER	156666	5.03	0.1123029	18.66	18.55	3.29
NORTHAMPTON	12710	11.94	0.0848909	27.13	27.04	5.64
ONSLOW	94801	8.58	0.1047040	21.15	21.05	5.18
ORANGE	105067	8.93	0.0630057	15.73	15.67	3.48
PAMLICO	8716	7.21	0.0521463	16.97	16.92	3.31
PASQUOTANK	25469	4.17	0.0289076	17.94	17.92	3.51
PENDER	38590	13.46	0.0000072	23.69	23.69	6.06
PERQUIMANS	9077	6.02	0.0237799	16.43	16.41	3.35
PERSON	24852	5.75	0.0481417	15.27	15.22	3.60
PITT	110241	5.43	0.1792374	19.44	19.26	3.72
POLK	14755	5.26	0.0512701	13.57	13.52	3.10
RANDOLPH	84907	9.40	0.0001284	20.22	20.22	5.24
RICHMOND	27102	4.89	0.0000051	20.13	20.13	3.70
ROBESON	68512	10.12	0.0448994	25.52	25.48	6.14
ROCKINGHAM	56309	8.47	0.0000079	18.36	18.36	3.46
ROWAN	85811	7.75	0.0543905	21.77	21.71	4.34
RUTHERFORD	41674	6.68	0.0826752	21.86	21.78	4.26
SAMPSON	34174	11.52	0.1129859	27.72	27.61	7.17
SCOTLAND	20049	4.47	0.0954286	15.41	15.31	3.28
STANLY	38990	7.42	0.1326694	21.38	21.25	5.15
STOKES	28667	9.54	0.1172119	16.48	16.36	2.99
SURRY	42405	9.13	0.1204860	18.09	17.97	3.37
SWAIN	8275	4.55	0.0743898	26.32	26.24	3.48
TRANSYLVANIA	23497	4.80	0.0687858	20.70	20.63	3.72
TYRRELL	2182	4.96	0.0087663	21.05	21.04	4.52
UNION	144886	9.01	0.0379789	20.93	20.89	3.73
VANCE	26670	4.11	0.0234549	15.11	15.09	3.20
WAKE	704023	9.20	0.0000056	21.56	21.56	4.41
WARREN	12726	7.45	0.0399135	17.17	17.13	4.33
WASHINGTON	8022	6.78	0.0249181	21.57	21.55	6.49
WATAUGA	42716	3.78	0.0000077	13.41	13.41	3.04
WAYNE	69522	6.31	0.0182594	18.44	18.42	3.85
WILKES	39477	7.67	0.0127946	21.61	21.60	4.97
WILSON	52137	4.30	0.0231602	15.85	15.82	3.23
YADKIN	22493	7.06	0.0853410	13.72	13.64	3.45
YANCEY	12815	4.96	0.0568710	12.56	12.50	2.83

STATE OF NORTH CAROLINA COUNTY OF WAKE	IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 18 CVS 15292
JABARI HOLMES, FRED CULP, DANIEL E. SMITH, BRENDON JADEN PEAY, SHAKOYA CARRIE BROWN, and PAUL KEARNEY, SR., *Plaintiffs,* v. TIMOTHY K. MOORE *in his official capacity as Speaker of the North Carolina House of Representatives;* PHILLIP E. BERGER *in his official capacity as President Pro Tempore of the North Carolina Senate;* DAVID R. LEWIS, *in his official capacity as Chairman of the House Select Committee on Elections for the 2018 Third Extra Session;* RALPH E. HISE, *in his official capacity as Chairman of the Senate Select Committee on Election for the 2018 Third Extra Session*; THE STATE OF NORTH CAROLINA; *and* THE NORTH CAROLINA STATE BOARD OF ELECTIONS, *Defendants.*	**AFFIDAVIT OF ISELA GUTIÉRREZ**

I, Isela Gutiérrez, declare as follows:

1. I am over the age of 18, legally competent to give this Affidavit, and have personal knowledge of the facts set forth in this Affidavit.

2. I have received my bachelor's degree in History from Scripps College, as well as a master's degree in Social Work from the University of North Carolina at Chapel Hill.

3. Since December 2017, I have served as the Research and Policy Director at Democracy North Carolina, a non-profit organization dedicated to protecting North Carolina's democracy

and promoting citizen ownership of our government. I served as Democracy North Carolina's Associate Research Director for three years prior to becoming Research and Policy Director.

4. In my roles at Democracy North Carolina, I have coordinated the analysis of election-related problems, explore possible solutions, and distribute Democracy North Carolina's findings in order to educate a variety of audiences, including election administrators and the public at large.

5. In these roles, I have also overseen Democracy North Carolina's participation in North Carolina's collaborative statewide Election Protection effort, which protects the rights of voters by providing information about the voting process and addressing voting problems with election officials as they arise.

6. During the 2016 General Election, in conjunction with this statewide Election Protection effort, I oversaw Democracy North Carolina's largest poll monitoring project to date.

7. During the Early Voting period, Democracy North Carolina and its partners fielded 235 lay poll monitors stationed at 63 Early Voting locations in 21 counties.

8. On Election Day, Democracy North Carolina and its partners fielded 1,100 lay poll monitors stationed at 300 precincts in 64 of the state's 100 counties, along with 250 legal field monitors circulating at 420 precincts in 33 counties.

9. Through this field program, Democracy North Carolina collected 415 incident reports, 600 polling place checklists, and 26,500 exit surveys.

10. In addition to this field program, Democracy North Carolina and its partners provided information and assistance to voters and collected data on voter issues through an Election Protection Hotline, which received over 3,800 calls during the 2016 General Election Early-Voting period and on Election Day.

11. The qualitative data collected through this effort was culled and analyzed to inform a report that I authored and that Democracy North Carolina released in January of 2018 entitled "From the Voter's View: Lessons from the 2016 Election."[1]

12. Notably, the 2016 General Election was the first election following the Fourth Circuit's July 2016 invalidation of HB589, which required photo identification ("photo ID") to be presented by voters reporting to vote in person.

13. Although, upon information and belief, the North Carolina State Board of Elections distributed materials to inform voters about the law's repeal and noted the same in training materials to election administrators and poll workers throughout the state, the qualitative data collected during the 2016 General Election demonstrated that poll workers were nonetheless confused about which rules needed to be enforced.

14. The data collected during the 2016 General Election demonstrates that many poll workers still believed that voters were required to show photo ID in order to vote in person, and relayed their misunderstanding to voters at the polls.

15. For example, the 2018 Report details an incident in which a Davidson County voter who attempted to use Same Day Registration and vote on the last day of the Early Voting period was initially denied because he could not provide a photo ID. It was only once this voter requested the poll workers at this location call the Davidson County Board of Elections that the misinformation was corrected and the voter was permitted to register and vote.

16. Though only one example of photo-ID-related poll-worker misinformation was included in the report, this misunderstanding leading to misinformation was not unique to this polling location or to Davidson County.

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[1] Available at https://democracync.org/wp-content/uploads/2018/01/PostElectionReport_DemNC_web.pdf

17. According to the data collected during the 2016 General Election, voters who were not first-time voters in their county and should not have been required to prove their identity in any way in order to vote reported that they were asked to show photo ID before voting in the following additional counties: Chatham, Durham, Gaston, Harnett, Johnston, Mecklenburg, Wayne, and Wake.

18. Based on my research and experience, if Senate Bill 824 is not preliminarily enjoined and the State Board of Elections is allowed to begin disseminating educational messages and materials and conducting poll-worker trainings related to the new photo ID requirements while the courts are deciding the ultimate question of the law's constitutionality, this effort cannot be easily undone.

19. If Senate Bill 824 is ultimately found unconstitutional and enjoined after its implementation, when the message that voter ID will be required has become pervasive and poll-workers have already been trained to enforce the law's requirements, there is a high likelihood that many poll-workers will face the same confusion over which requirements to enforce that poll-workers faced in 2016.

20. A preliminary injunction preventing implementation of Senate Bill 824 during this litigation is necessary to ensure to the greatest extent possible that no voter is discouraged or disenfranchised by the misunderstanding and misinformation of poll-workers.

This the 9th day of May, 2019.

Isela Gutiérrez

I, Stacy Hamilton, a Notary Public of the County and State aforesaid, hereby certify that Isela Gutierrez, personally known to me to be the affiant in the foregoing affidavit, personally appeared before me this day and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

This the 9th day of May, 2019.

(SEAL)

STACY HAMILTON NOTARY PUBLIC WAKE COUNTY, NC My Commission Expires 12-10-22

Notary Public

My Commission Expires: 12/10/22

STATE OF NORTH CAROLINA

COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

JABARI HOLMES, FRED CULP, DANIEL E. SMITH, BRENDON JADEN PEAY, SHAKOYA CARRIE BROWN, and PAUL KEARNEY, SR., *Plaintiffs,* v. TIMOTHY K. MOORE *in his official capacity as Speaker of the North Carolina House of Representatives;* PHILLIP E. BERGER *in his official capacity as President Pro Tempore of the North Carolina Senate;* DAVID R. LEWIS, *in his official capacity as Chairman of the House Select Committee on Elections for the 2018 Third Extra Session;* RALPH E. HISE, *in his official capacity as Chairman of the Senate Select Committee on Election for the 2018 Third Extra Session*; THE STATE OF NORTH CAROLINA; *and* THE NORTH CAROLINA STATE BOARD OF ELECTIONS, *Defendants.*	Civil Action No. 18 CVS 15292

AFFIDAVIT OF KATE FELLMAN

I, Kate Fellman, declare as follows:

1. I am over the age of 18, legally competent to give this Affidavit, and have personal knowledge of the facts set forth in this Affidavit.

2. I received my bachelor's degrees in Social Science and Communication from Metropolitan State University in Minnesota in 2004.

3. I have twenty years of professional experience in organizational effectiveness, including ten years dedicated to organizing around election communications. I worked at General

Mills for seven years and served as Organization Effectiveness Training Coordinator at corporate headquarters. I was an organizer with Durham's People Alliance for almost four years where I oversaw all aspects of fundraising, financial management, and community organizing and communication.

4. I founded You Can Vote in 2014 as its Program Director and now serve as its Executive Director.

5. You Can Vote is a non-profit, non-partisan organization dedicated to developing and mobilizing volunteers to educate, register, and empower voters. You Can Vote develops and uses evidenced-based best practices in training, volunteer management, voter engagement, voter education and voter turnout.

6. As Executive Director of You Can Vote, I serve as the key management leader and am responsible for overseeing administration, programs, and strategic planning for the organization, including fundraisers, communications, and community outreach.

7. With a small staff of four full-time and three part-time organizers, You Can Vote oversees over 2,000 volunteers working in Alamance, Brunswick, Carteret, Chatham, Durham, Forsyth, Guilford, Lenoir, Mecklenburg, New Hanover, Onslow, Orange, Pender, Union, and Wake Counties.

8. During the 2018 election cycle alone, You Can Vote launched volunteer teams in six new counties, held 1,500 voter registration and education events, registered over 8,000 voters, sent 10,000 mailers to recent registrants, fielded 23,000 calls to voters, and educated 150,000 voters via one-on-one conversations.

9. You Can Vote exerted the bulk of its efforts from 2014 to 2016 towards helping 100,000 voters navigate North Carolina's voting rules, with a particular focus on the photo ID requirement that was set to go into effect in 2016. You Can Vote organizers and volunteers had conversations with voters across North Carolina about when the 2016 photo ID requirement would go into effect, what forms of ID would be acceptable, and how to navigate their voting rights. During this outreach, You Can Vote identified 169 eligible voters that did not have proper photo ID.

10. In the two-year lead up to the implementation of photo ID from 2014 through 2016, there was considerable voter confusion about when the photo ID requirement would go into effect. Beginning in 2014 there was a government driven public information campaign about the upcoming photo ID requirement, with everything from billboard advertisements to posters in bus stations, yet many voters still did not understand the law. For instance, many voters did not know there was a grace period in the law and assumed they would not be eligible to vote in the elections leading up to 2016 because they lacked the requisite ID. Even after the photo ID law was struck down, You Can Vote volunteers still found posters prominently displayed in the community informing voters they would need a photo ID in order to vote.

11. There continues to be overwhelming confusion about what is required for a person to be eligible to vote in North Carolina. You Can Vote expends a great deal of time and resources preparing volunteers on how to dispel the myths they will encounter in the field when they interface

with voters. The number one misconception You Can Vote volunteers encounter is the belief that individuals cannot register to vote (let alone cast a ballot) if they do not have an acceptable photo ID or one that matches their current address.

12. Since the passage of the most recent photo ID law, Senate Bill 824, there has not been a mass communication effort to inform voters about the requirement. Other than what You Can Vote volunteers are doing on the ground to educate voters one person at a time about the upcoming requirement, voters lack clear guidelines on when the photo ID requirement will go into effect and what forms of ID will be acceptable.

13. An area of great concern for You Can Vote is the ability of students to vote. As we experienced the last time a photo ID requirement was in place during the 2016 Primary election, students without a North Carolina ID are at great risk of being disenfranchised. In the 2016 Primary, A You Can Vote student volunteer tried to vote on Duke's campus but was turned away and not permitted to cast a ballot due to a lack of an in-state ID.

14. With student ID compliance under Senate Bill 824 still unsettled, You Can Vote has had a difficult time giving firm, straight forward answers to its campus leaders on how to prepare their peers to vote, and we anticipate that many student voters will be disenfranchised in the upcoming municipal and presidential elections.

15. Ordinarily during a municipal election, You Can Vote would be operating with a lighter load in terms of planning, outreach, and simple revisions to training materials leading to 2020 elections and would concentrate its efforts on building electoral literacy around municipal elections. However, with the photo ID requirement in flux, You Can Vote has had to hire and train additional staff and expend significant resources earlier in the election cycle.

16. Thus far this year, You Can Vote has trained 54 captains to lead educational events, trained over 100 volunteers to go out and have conversations with voters, and plans to continue to escalate its public education efforts.

17. You Can Vote receives questions daily from volunteers who are confused about the ID requirement. Volunteers fear telling voters incorrect information, especially as there are still so many unknowns, such whether a photo must look exactly like the person presenting it and who has the authority to decide if it matches.

18. To address this confusion, You Can Vote has doubled the time it spends training staff and volunteers so that they feel secure in relaying the requirements to voters.

19. To adequately answer voter questions about the latest updates regarding photo ID, volunteers spend more time with each voter, which ultimately limits the number of voters volunteers are able to reach. With the added burden of addressing concerns and confusion about photo ID, You Can Vote would need to organize many more volunteers to reach the same number of voters as we have in past elections.

20. You Can Vote has had to print extra materials to send with volunteers to help them convey the most up to date information on photo ID to voters. Ordinarily, volunteers go into the field with one sheet of materials that covers voting questions, but now You Can Vote has had to

divert resources to printing extra materials to help volunteers answer questions about the photo ID requirement.

21. An important resource You Can Vote provides to voters is a "fridge" card, which is a two-sided postcard size piece of cardstock that contains basic voting information. After having already printed 5,000 fridge cards that outline the photo ID requirement following the passage of Senate Bill 824, You Can Vote had to print an entirely new batch of 10,000 fridge cards to address the delayed implementation of the bill.

22. You Can Vote has also diverted a great deal of resources towards statewide travel to community forums. You Can Vote held public forums in Durham, Charlotte, Greensboro, Raleigh, and Supply, North Carolina throughout February and March of 2019 to answer public questions around what the ID requirement is going to look like and to prepare volunteers on how to assist voters.

23. Between the planning stages for the first voter ID public forum held in on February 23, 2019, and the most recent forum on March 16, 2019, You Can Vote had to change the information it shared significantly to account for the shifting requirements of the photo ID law.

24. Notably, the day before the first voter ID public forum in Durham, North Carolina, a Wake County Superior Court Judge ordered that the voter ID constitutional amendment was void. You Can Vote had to make last-minute changes to its educational programming in order to explain the implications of that ruling to voter outreach volunteers.

25. Additionally, attendees at the first several forums were informed that the voter ID requirement would be in effect during the 2019 Municipal Elections, but by the last three forums this was no longer the case because of a bill passed to delay the requirement from going into effect until 2020. Those who attended the initial forums were education with what later became incorrect information, and it will now be necessary to work to get those attendees get the correct information.

26. Through on the ground interactions with voters, You Can Vote volunteers have seen that many voters still think photo ID is required this year. Without one-on-one conversations with individual voters about this requirement, we fear that voters simply will not show up.

27. The ongoing special elections in Congressional Districts 3 and 9 are also of concern. You Can Vote is doing get out the vote organizing in Mecklenburg County ahead of the Congressional District 9 Special Election, and our organizers and volunteers have encountered voters confused as to whether the photo ID requirement will apply to the combined Special Congressional and Municipal election.

28. In short, the more uncertainty there is surrounding voter ID requirements, the more difficult it is for organizations like You Can Vote to help voters.

29. Based on my years of election experience and background in organizational effectiveness and training, I believe that in order to effectively educate and prepare all eligible voters on requirements, there must be several years of ramp up and public education. Every household needs to know what is coming, what will be required, and when it will be required. State and local government, boards of elections and civic engagement groups need to work together to plan a thorough and careful information dissemination process to help North Carolina citizens understand their voting rights. Without extensive planning, voters will be disenfranchised.

30. If Senate Bill 824 were enjoined while the courts decide on its constitutionality, it would provide a certainty that would allow for You Can Vote and its volunteers to dedicate their time and resources to voter literacy, registration and get-out-the-vote efforts ahead of the upcoming presidential election and lessen some of the voter confusion surrounding the photo ID requirement.

Further the affiant sayeth not.

This the 9 day of May, 2019.

Kate Fellman

I, Stacy Hamilton, a Notary Public of the County and State aforesaid, hereby certify that KATHRYN ANN FELLMAN, personally known to me to be the affiant in the foregoing affidavit, personally appeared before me this day and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

This the 9th day of May, 2019.

(SEAL)

STACY HAMILTON NOTARY PUBLIC WAKE COUNTY, NC My Commission Expires 12-10-22

Notary Public

My Commission Expires: 12 / 10 / 22

STATE OF NORTH CAROLINA COUNTY OF WAKE	IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 18 CVS 15292
JABARI HOLMES, FRED CULP, DANIEL E. SMITH, BRENDON JADEN PEAY, SHAKOYA CARRIE BROWN, and PAUL KEARNEY, SR., *Plaintiffs,* v. TIMOTHY K. MOORE *in his official capacity as Speaker of the North Carolina House of Representatives;* PHILLIP E. BERGER *in his official capacity as President Pro Tempore of the North Carolina Senate;* DAVID R. LEWIS, *in his official capacity as Chairman of the House Select Committee on Elections for the 2018 Third Extra Session;* RALPH E. HISE, *in his official capacity as Chairman of the Senate Select Committee on Election for the 2018 Third Extra Session*; THE STATE OF NORTH CAROLINA; *and* THE NORTH CAROLINA STATE BOARD OF ELECTIONS, *Defendants.*	**AFFIDAVIT OF IVY A. JOHNSON**

I, Ivy Johnson, swear that the following information, under the penalty of perjury, is true to the best of my knowledge and state as follows:

1. I am over the age of eighteen years and am competent to give this affidavit.

2. I am employed as a staff attorney at the Southern Coalition for Social Justice in Durham, North Carolina.

3. I was asked by my supervisor, Allison Riggs, lead counsel for Plaintiffs in this case, to gather some publicly available data and court documents for filing with this court in

support of the motion in the above-captioned case. Those data and documents are attached as exhibits to my affidavit.

4. Exhibit A to my affidavit is the November 6, 2018 Election Results – Statewide: Require Photo ID to Vote. It is available at the following link: https://er.ncsbe.gov/?election_dt=11/06/2018&county_id=0&office=REF&contest=1425 (last visited May 13, 2019).

5. Exhibit B to my affidavit is a November 26, 2018 Presentation of Kim Strach, Executive Director of the North Carolina State Board of Elections & Ethics Enforcement, on Prior Education Efforts on Voter Identification Requirements (2014-16). It is available at the following link: https://s3.amazonaws.com/dl.ncsbe.gov/Public_Records_Requests/11262018_JntElect_Westbrook_Strach_Presentation.pdf (last visited May 13, 2019).

6. Exhibit C to my affidavit is the July 25, 2013 Senate Roll Call Vote Transcript – H.B. 589 Third Reading. It is available at the following link: https://www.ncleg.gov/Legislation/Votes/RollCallVoteTranscript/2013/S/882 (last visited May 13, 2019).

7. Exhibt D to my affidavit is the July 25, 2013 House Roll Call Vote Transcript – H.B. 589 Concurrence Vote with Committee Substitute. It is available at the following link: https://www.ncleg.gov/Legislation/Votes/RollCallVoteTranscript/2013/H/1337 (last visted May 13, 2019).

8. Exhibit E to my affidavit is the December 16, 2018 Senate Roll Call Vote Transcript – S.B. 824 Veto Override. It is available at the following link: https://www.ncleg.gov/Legislation/Votes/RollCallVoteTranscript/2017/S/824 (last visited May 13, 2019).

9. Exhibit F to my affidavit is the December 18, 2018 House Roll Call Vote – S.B. 824 Veto Override. It is available at the following link: https://www.ncleg.gov/Legislation/Votes/RollCallVoteTranscript/2017/H/1354 (last visited May 13, 2019).

10. Exhibit G to my affidavit is Selected Characteristics of People at Specified Levels of Poverty in the Past 12 Months 2017 American Community Survey 5-year Estimates. It is available at: https://data.census.gov/cedsci/table?q=S1703&table=S1703&tid=ACSST5Y2017.S1703&hidePreview=true&g=0400000US37 (last visited May 14, 2019).

11. Exhibit H to my affidavit are the hours and locations of different county boards of elections. It is available at: https://vt.ncsbe.gov/BOEInfo/PrintableVersion/ (last visited May 13, 2019).

12. Exhibit I to my affidavit is the North Carolina Board of Elections Student, Employee and Tribal Identification Approvals. It is available at:

https://s3.amazonaws.com/dl.ncsbe.gov/Voter%20ID/Student%2C%20Employee%20and%20Tribal%20ID%20Approvals.pdf (last visited May 13, 2019).

13. Exhibit J to my affidavit is the North Carolina Poverty Statistics provided by the University of North Carolina School of Law. This is available at: http://www.law.unc.edu/centers/poverty/statistics/ (last visited May 13, 2019).

14. Exhibit K to my affidavit is the June 23, 2011 WRAL article by Laura Leslie, *Perdue Vetoes ID*. It is available at: https://www.wral.com/news/state/nccapitol/blogpost/9772426/ (last visited May 13, 2019).

15. Exhibit L to my affidavit is the Senate Bill 824 History. It is available at: https://www.ncleg.gov/BillLookUp/2017/sb%20824

16. Exhibit M to my affidavit is the House Bill 646 History. It is available at: https://www.ncleg.gov/BillLookup/2019/HB%20646 (last visited May 14, 2019).

17. Exhibit N to my affidavit is *Applewhite v. Pennsylvania*, No. 330 M.D. 2012 (Pa. Commw. Aug 16, 2013) (unpublished).

18. On March 19, 2019, counsel for the Plaintiffs in this case served the State Board of Elections and the State of North Carolina ("State Defendants") with a request for production of documents that sought the following:

The subset of the March 2016 primary provisional vote data file . . . that reflects the voters referenced in Executive Director Kim Strach's presentation to the Joint Legislative Elections Oversight Committee on November 26, 2018—specifically:

a. The data from the full and publicly available provisional file representing the 1,048 voters who completed a Declaration of Reasonable Impediment indicating that a "reasonable impediment" prevented them from obtaining acceptable identification, including the notation of which 864 such voters had their provisional ballot counted[.]

19. On May 6, 2019, the State Defendants produced, in response to this request, a spreadsheet containing the data from the provisional voter file along with instructions for how to sort it to identify the 1,048 voters who completed a Declaration of Reasonable Impediment and the 864 voters whose votes were counted. The document provided by the State Defendants was also sorted in order to identify the 184 voters whose votes were not counted. The spreadsheet attached as Exhibit O reflects the data provided by the State Defendants in the fields describing the reasons those provisional ballots were not counted, with certain personal identifying information regarding the voters redacted.

Further the affiant sayeth not.

This 14 day of May, 2019.

IVY A. JOHNSON

STATE OF NORTH CAROLINA

DURHAM COUNTY

Ivy A. Johnson first duly sworn, deposes and says that ~~he~~ she has read the foregoing Affidavit and knows the contents thereof; that the same are true except as to those matters and things stated therein upon information and belief, and as to those ~~he~~ she believes them to be true. DJF

Subscribed and sworn to before me, David J. Fondren DJF

This 14 day of May, 2019.

Official Signature of Notary David J. Fondren

David J. Fondren, Notary Public (SEAL)

Printed/Typed Name

DAVID J. FONDREN NOTARY PUBLIC DURHAM COUNTY, N.C.

My commission expires: June 4, 2023

Exhibit A

11/06/2018 OFFICIAL GENERAL ELECTION RESULTS - STATEWIDE

Precincts Reported: 2706 of 2706

Criteria

Election: 11/06/2018
County: STATE
Office: REFERENDA
Contest: REQUIRE PHOTO ID TO VOT

Display Results | Refresh

NAME ON BALLOT	PARTY	BALLOT COUNT	PERCENT
For		2,049,121	55.49%
Against		1,643,983	44.51%

Statewide Info

Last County Submit:
November 27, 2018 8:55 am

Last County Upload:
November 27, 2018 8:55 am

Precincts Reported:
100.00% (2,706 out of 2,706)
100.00%

Ballots Cast:
52.98% (3,755,778 out of 7,089,657)
52.98%

Display Large Map

Exhibit B

NORTH CAROLINA
State Board of Elections & Ethics Enforcement

Prior Education Efforts on Voter Identification Requirements (2014-16)

Kim Westbrook Strach
Executive Director

Prior Mandate: S.L. 2013-381 § 5.2

- Publicize requirements and how to obtain photo identification.
- Identify voters lacking photo identification by partnering with public agencies, private entities, and nonprofits.
- Assist "any registered voter" in obtaining required photo identification.

Publicize

S.L. 2013-381 § 5.2

NORTH CAROLINA
State Board of Elections & Ethics Enforcement

Publicize requirements and how to obtain photo identification.

- Engaged professional marketing group to develop messaging for statewide campaign.
- Group worked to identify key messages for target communities.



NORTH CAROLINA
State Board of Elections & Ethics Enforcement

Publicize requirements and how to obtain photo identification.

TV, Radio & Online Ads



- Statewide placement in roughly thirty TV stations and more than forty-five radio stations.
- 60 and 30 second ads informed the public that (1) photo ID would be required for most voters beginning in 2016; (2) exceptions exist; (3) assistance in obtaining free ID is available; and (4) voters unable to obtain acceptable ID remain able to present at the polls and ask for assistance or vote by mail.

NORTH CAROLINA
State Board of Elections & Ethics Enforcement

Publicize requirements and how to obtain photo identification.

- VoterID.nc.gov



- Stand-alone website featured photo ID requirements, exceptions, and FAQs in both English and Spanish.
- Online portal allowed organizations and the public to request assistance or printed materials.

Publicize requirements and how to obtain photo identification.

- Billboards



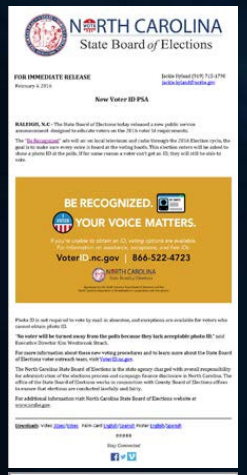


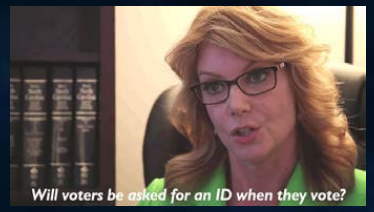
- Digital and print billboards displayed different messages informing voters of key election dates and drove traffic to VoterID.nc.gov.
- Millions of passersby estimated to have viewed the billboards.

NORTH CAROLINA
State Board of Elections & Ethics Enforcement

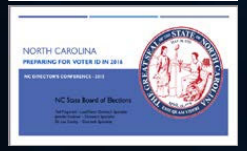
Publicize requirements and how to obtain photo identification.

Earned Media









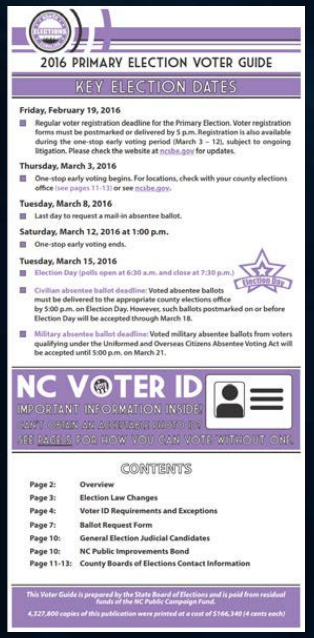


- Press releases and interviews helped position the agency as an impartial source for election administration information throughout implementation period.
- PIO joined agency to coordinate public education efforts.

NORTH CAROLINA
State Board of Elections & Ethics Enforcement

Publicize requirements and how to obtain photo identification.

Voter Guides


2016 PRIMARY ELECTION VOTER GUIDE

KEY ELECTION DATES

Friday, February 19, 2016

- Regular voter registration deadline for the Primary Election. Voter registration forms must be postmarked or delivered by 5 p.m. Registration is also available during the one-stop early voting period (March 3 – 12), subject to ongoing litigation. Please check the website at ncsbe.gov for updates.

Thursday, March 3, 2016

- One-stop early voting begins. For locations, check with your county elections office (see pages 11-13) or see ncsbe.gov.

Tuesday, March 8, 2016

- Last day to request a mail-in absentee ballot.

Saturday, March 12, 2016 at 1:00 p.m.

- One-stop early voting ends.

Tuesday, March 15, 2016

- Election Day (polls open at 6:30 a.m. and close at 7:30 p.m.)
- Civilian absentee ballot deadline: Voted absentee ballots must be delivered to the appropriate county elections office by 5:00 p.m. on Election Day. However, such ballots postmarked on or before Election Day will be accepted through March 18.
- Military absentee ballot deadline: Voted military absentee ballots from voters qualifying under the Uniformed and Overseas Citizens Absentee Voting Act will be accepted until 5:00 p.m. on March 21.

NC VOTER ID

IMPORTANT INFORMATION INSIDE!

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Page 7: Ballot Request Form
Page 10: General Election Judicial Candidates
Page 10: NC Public Improvements Bond
Page 11-13: County Boards of Elections Contact Information

This Voter Guide is prepared by the State Board of Elections and is paid from residual funds of the NC Public Campaign Fund.

4,327,800 copies of this publication were printed at a cost of $166,340 (4 cents each)


Voter ID

Most voters must now show acceptable photo ID at the polls. This guide contains information about voter ID requirements and exceptions outlined in the law (S.L. 2013-381, S.L. 2014-111, and S.L. 2015-103). You may vote with any of the photo IDs listed below. Free photo IDs are available from the Division of Motor Vehicles (DMV). **There are ways to vote, even if you cannot obtain acceptable photo ID before the election (see exceptions on page 5).**

For additional information or assistance, please contact the State Board of Elections Voter Outreach Team at 1-866-522-4723 or VoterOutreach.SBOE@ncsbe.gov.

WHAT TYPES OF PHOTO ID ARE ACCEPTABLE?

NC DRIVERS LICENSE/PERMIT (may be expired up to 4 years)

NC IDENTIFICATION CARD (may be expired up to 4 years)

US PASSPORT/PASSPORT CARD (unexpired)

MILITARY IDENTIFICATION CARD (unexpired, if there is an expiration date)

VETERANS IDENTIFICATION CARD (unexpired, if there is an expiration date)

CERTAIN TRIBAL ENROLLMENT CARDS (* see requirements)

* Cards issued by North Carolina recognized tribes and approved by the State Board of Elections are acceptable for voting if they have an expiration date and are unexpired. Cards issued by federally recognized tribes are acceptable if they have an expiration date and are unexpired, or if they have an issuance date and were issued within eight years.

If you do not have one of the forms of photo ID above, you can get a free ID from the DMV.

NEED HELP GETTING YOUR FREE NC DMV ID CARD?

Step 1: Gather the needed documents and information:

1. Two documents that prove your **age** and **identity** (examples: birth certificate, court documents, or tax forms)
2. One document to prove your **North Carolina residency** (examples: a lease, voter registration card, or utility bill)
3. Your **social security number**

Step 2: Bring these items to any drivers license office or DMV mobile unit, and state that you are there for your free NC Identification Card. DMV locations may be found at **www.VoterID.nc.gov**.

EXCEPTIONS

4

- Roughly 12.7 million guides sent to every residential address between 2014 and 2016 primaries.
- Highlighted assistance options and outlined requirements and exceptions.

NORTH CAROLINA
State Board of Elections & Ethics Enforcement

Publicize requirements and how to obtain photo identification.

Posters & Flyers



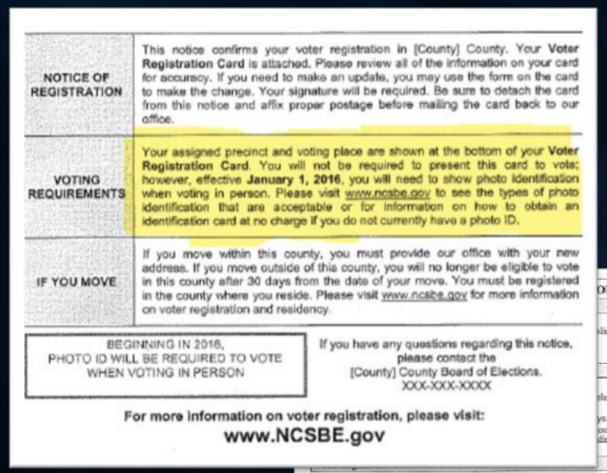




- Roughly 400,000 posters and flyers printed.
- Distributed statewide to churches, advocacy groups, educational institutions, food banks, businesses, polling sites, election offices, libraries, and other community locations in English and Spanish.

Publicize requirements and how to obtain photo identification.

Official Forms/Mailers

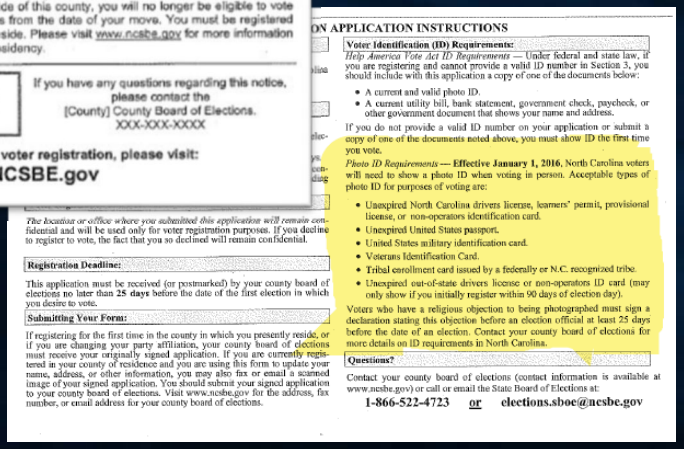


NOTICE OF REGISTRATION	This notice confirms your voter registration in [County] County. Your **Voter Registration Card** is attached. Please review all of the information on your card for accuracy. If you need to make an update, you may use the form on the card to make the change. Your signature will be required. Be sure to detach the card from this notice and affix proper postage before mailing the card back to our office.
VOTING REQUIREMENTS	Your assigned precinct and voting place are shown at the bottom of your **Voter Registration Card**. You will not be required to present this card to vote; however, effective **January 1, 2016**, you will need to show photo identification when voting in person. Please visit www.ncsbe.gov to see the types of photo identification that are acceptable or for information on how to obtain an identification card at no charge if you do not currently have a photo ID.
IF YOU MOVE	If you move within this county, you must provide our office with your new address. If you move outside of this county, you will no longer be eligible to vote in this county after 30 days from the date of your move. You must be registered in the county where you reside. Please visit www.ncsbe.gov for more information on voter registration and residency.

BEGINNING IN 2016,
PHOTO ID WILL BE REQUIRED TO VOTE
WHEN VOTING IN PERSON

If you have any questions regarding this notice, please contact the
[County] County Board of Elections.
XXX-XXX-XXXX

For more information on voter registration, please visit:
www.NCSBE.gov



ON APPLICATION INSTRUCTIONS

Voter Identification (ID) Requirements:

Help America Vote Act ID Requirements — Under federal and state law, if you are registering and cannot provide a valid ID number in Section 3, you should include with this application a copy of one of the documents below:

- A current and valid photo ID.
- A current utility bill, bank statement, government check, paycheck, or other government document that shows your name and address.

If you do not provide a valid ID number on your application or submit a copy of one of the documents noted above, you must show ID the first time you vote.

Photo ID Requirements — **Effective January 1, 2016**, North Carolina voters will need to show a photo ID when voting in person. Acceptable types of photo ID for purposes of voting are:

- Unexpired North Carolina drivers license, learners' permit, provisional license, or non-operators identification card.
- Unexpired United States passport.
- United States military identification card.
- Veterans Identification Card.
- Tribal enrollment card issued by a federally or N.C. recognized tribe.
- Unexpired out-of-state drivers license or non-operators ID card (may only show if you initially register within 90 days of election day).

Voters who have a religious objection to being photographed must sign a declaration stating this objection before an election official at least 25 days before the date of an election. Contact your county board of elections for more details on ID requirements in North Carolina.

The location or office where you submitted this application will remain con-
fidential and will be used only for voter registration purposes. If you decline to register to vote, the fact that you so declined will remain confidential.

Registration Deadline:

This application must be received (or postmarked) by your county board of elections no later than **25 days** before the date of the first election in which you desire to vote.

Submitting Your Form:

If registering for the first time in the county in which you presently reside, or if you are changing your party affiliation, your county board of elections must receive your originally signed application. If you are currently registered in your county of residence and you are using this form to update your name, address, or other information, you may also fax or email a scanned image of your signed application. You should submit your signed application to your county board of elections. Visit www.ncsbe.gov for the address, fax number, or email address for your county board of elections.

Questions?

Contact your county board of elections (contact information is available at www.ncsbe.gov) or call or email the State Board of Elections at:
1-866-522-4723 **or** **elections.sboe@ncsbe.gov**

- **Voter Registration Forms** reprinted to include information about requirements and exceptions.
- **Confirmation Mailers** sent to new registrants repeated information.

NORTH CAROLINA
State Board of Elections & Ethics Enforcement

Publicize requirements and how to obtain photo identification.

Voter Outreach Team







- More than 200 community presentations and events conducted by the Voter Outreach Team enabled advocacy groups, faith communities, political parties, NC Tribes, care facilities, and others groups to provide accurate information to members.

NORTH CAROLINA
State Board of Elections & Ethics Enforcement

Publicize requirements and how to obtain photo identification.

Voter Outreach Team







- Established partnerships with United Way's "2-1-1" information line along with other organizations and churches to promote awareness of new requirements and how to obtain free identification.

NORTH CAROLINA
State Board of Elections & Ethics Enforcement

Identify

S.L. 2013-381 § 5.2

NORTH CAROLINA
State Board of Elections & Ethics Enforcement

Identify voters lacking photo identification.

- The State Board worked to identify voters who lacked identification by utilizing:

1. Voter self-identification

2. Database matching

NORTH CAROLINA
State Board of Elections & Ethics Enforcement

Identify voters lacking photo identification.

Voter self-identification

- S.L. 2013-381 § 6.2 required poll workers to notify voters of the coming requirements and to offer an acknowledgement signed by the voter indicating that she lacked acceptable identification.
- In 2014, 10,743 voters signed the form. In 2015, 823 voters signed the form.

Identify voters lacking photo identification.

Voter self-identification

- Voter Outreach Team sent a mailing to each voter who signed the acknowledgement.
- Of the 2014 voters, 2,353 responded. Of those responders, 95% indicated that they did in fact possess acceptable identification.
- 51 voters requested assistance.

NORTH CAROLINA
State Board of Elections & Ethics Enforcement

Identify voters lacking photo identification.

Database matching

- No-match List generated by comparing DMV and voter roll databases to identify voters who could not be matched with a DMV identification card.
- Final analysis in February 2015 resulted in a list of 254,391 registrations who could not be matched to a DMV identification card.

Identify voters lacking photo identification.

Database matching

- Voter Outreach Team sent a mailing to each unmatched voter.
- 20,580 returned a response card. Of those responders, 91% indicated that they possessed acceptable identification.
- 633 voters requested assistance. Voter Outreach worked each of these and additional cases opened based on calls/emails.

NORTH CAROLINA
State Board of Elections & Ethics Enforcement

Identify voters lacking photo identification.

Database matching

- Plaintiffs' expert in *NAACP v. McCrory*, conducted a separate database analysis. Voter Outreach sent a mailing to 209,253 voters identified by Plaintiff's expert.
- 8,440 returned a marked response card. Of responders, 76% indicated that they possessed acceptable identification.
- 782 voters requested assistance. Voter Outreach worked each of these and additional cases opened based on calls/emails.

NORTH CAROLINA
State Board of Elections & Ethics Enforcement

Assist

S.L. 2013-381 § 5.2

NORTH CAROLINA
State Board of Elections & Ethics Enforcement

Assist "any registered voter" in obtaining required photo identification.

- Voter Outreach Team worked more than 2,700 cases and established agreements with 97 transit systems across the State to provide transportation to and from DMV offices at no cost to the voter.
- Team members helped voters obtain DMV identification. DMV issued 7,841 photo identifications for voting purposes at no cost to the voter (issuance continues as of Nov. 2018).

NORTH CAROLINA
State Board of Elections & Ethics Enforcement

Implementation

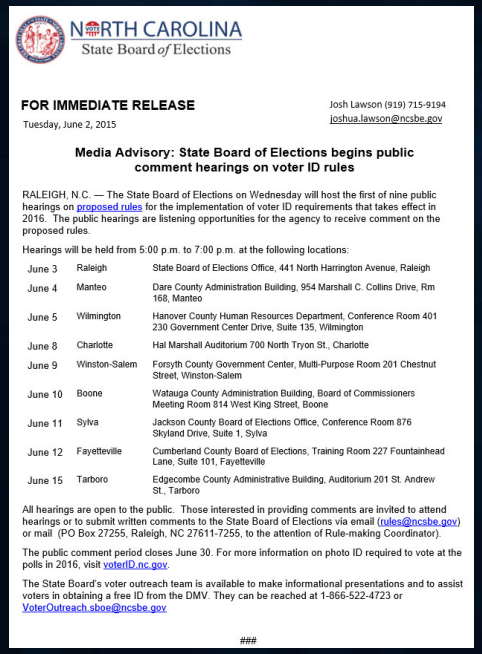
Implementation

- Implementation involved:

1. Administrative rulemaking
2. Standardized training materials
3. Review of 2016 primary (March) data

Implementation

Rulemaking



NORTH CAROLINA
State Board of Elections

FOR IMMEDIATE RELEASE

Tuesday, June 2, 2015

Josh Lawson (919) 715-9194
joshua.lawson@ncsbe.gov

Media Advisory: State Board of Elections begins public comment hearings on voter ID rules

RALEIGH, N.C. — The State Board of Elections on Wednesday will host the first of nine public hearings on proposed rules for the implementation of voter ID requirements that takes effect in 2016. The public hearings are listening opportunities for the agency to receive comment on the proposed rules.

Hearings will be held from 5:00 p.m. to 7:00 p.m. at the following locations:

June 3	Raleigh	State Board of Elections Office, 441 North Harrington Avenue, Raleigh
June 4	Manteo	Dare County Administration Building, 954 Marshall C. Collins Drive, Rm 168, Manteo
June 5	Wilmington	Hanover County Human Resources Department, Conference Room 401 230 Government Center Drive, Suite 135, Wilmington
June 8	Charlotte	Hal Marshall Auditorium 700 North Tryon St., Charlotte
June 9	Winston-Salem	Forsyth County Government Center, Multi-Purpose Room 201 Chestnut Street, Winston-Salem
June 10	Boone	Watauga County Administration Building, Board of Commissioners Meeting Room 814 West King Street, Boone
June 11	Sylva	Jackson County Board of Elections Office, Conference Room 876 Skyland Drive, Suite 1, Sylva
June 12	Fayetteville	Cumberland County Board of Elections, Training Room 227 Fountainhead Lane, Suite 101, Fayetteville
June 15	Tarboro	Edgecombe County Administrative Building, Auditorium 201 St. Andrew St., Tarboro

All hearings are open to the public. Those interested in providing comments are invited to attend hearings or to submit written comments to the State Board of Elections via email (rules@ncsbe.gov) or mail (PO Box 27255, Raleigh, NC 27611-7255, to the attention of Rule-making Coordinator).

The public comment period closes June 30. For more information on photo ID required to vote at the polls in 2016, visit voterID.nc.gov.

The State Board's voter outreach team is available to make informational presentations and to assist voters in obtaining a free ID from the DMV. They can be reached at 1-866-522-4723 or VoterOutreach.sboe@ncsbe.gov

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CHAPTER 17 - PHOTO IDENTIFICATION

08 NCAC 17 .0101 DETERMINATION OF REASONABLE RESEMBLANCE AT CHECK-IN



08 NCAC 17 .0103 IDENTIFICATION REQUIRED OF CURBSIDE VOTERS

08 NCAC 17 .0104 OPPORTUNITY TO UPDATE NAME OR ADDRESS AFTER REASONABLE RESEMBLANCE IS DETERMINED

08 NCAC 17 .0105 DECLARATION OF RELIGIOUS OBJECTION TO PHOTOGRAPH

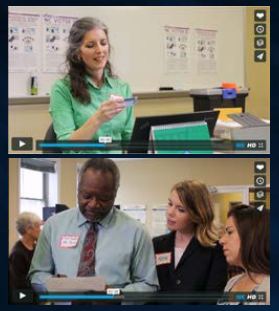
- State Board adopted administrative rules to ensure uniform implementation.
- Staff held public comment hearings in nine cities statewide.
- Rules remain codified in Chapter 17 of Title 8 of the Administrative Code.

NORTH CAROLINA
State Board of Elections & Ethics Enforcement

Implementation

Training Materials

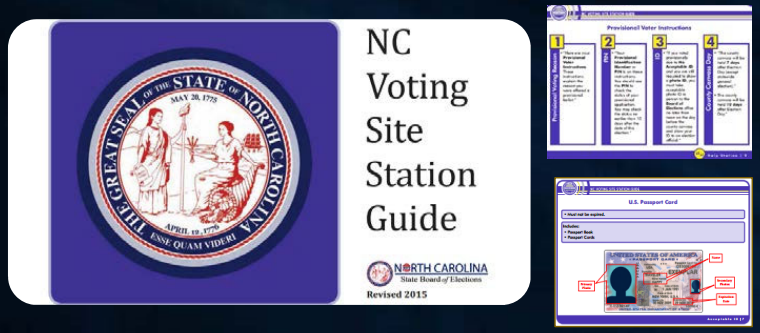




- Video training series professionally produced to educate poll workers about standard procedures regarding photo identification.

Implementation

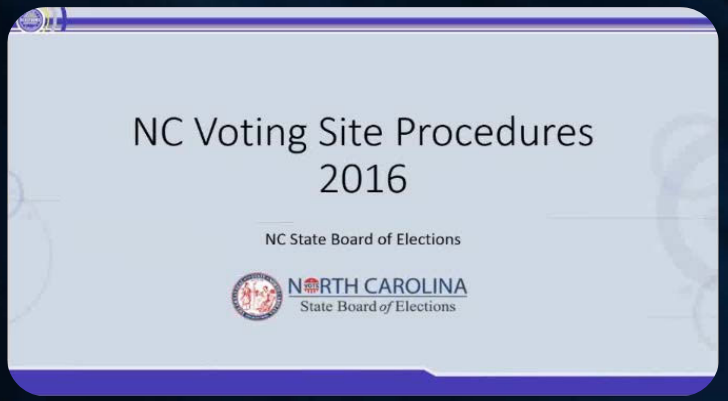
Training Materials



- Tabletop station guide with step-by-step instructions and standard scripts for photo identification and other polling place procedures, printed and distributed for each station in every precinct.

Implementation

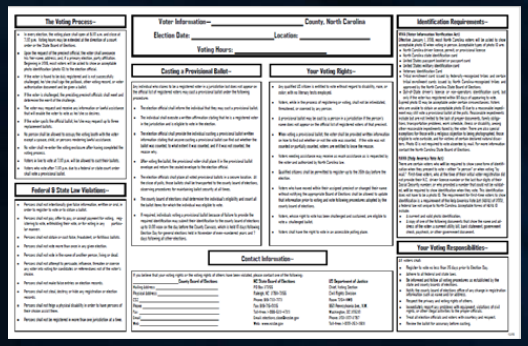
Training Materials

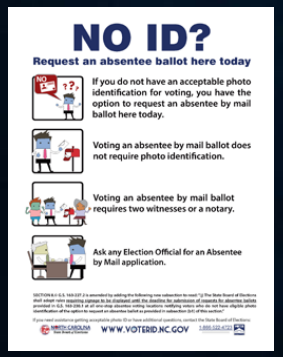


- Train-the-Trainer Presentations and Webinars required of all local election workers who trained precinct officials. Presentations summarized how each polling station handles identification requirements.

Implementation

Training Materials







- Mandatory precinct signage included detailed guidance regarding alternative voting procedures, exceptions, and identification requirements.

Implementation

Review of 2016 primary data

- 1,048 voters completed a Declaration of Reasonable Impediment indicating that a "reasonable impediment" prevented them from obtaining acceptable identification. Of these Reasonable Impediment voters, 864 ultimately counted.

Implementation

Review of 2016 primary data

- 1,248 voters did not present acceptable photo identification, or execute a Declaration of Reasonable Impediment, or return to the county office by the deadline after election night. These votes did not count.
- 2.7 million voters participated in the 2016 Primary.

NORTH CAROLINA
State Board of Elections & Ethics Enforcement

Questions

Exhibit C

SENATE ROLL CALL VOTE TRANSCRIPT FOR ROLL CALL #882

2013-2014 Session

HB 589: VIVA/Election Reform. Vote: Third Reading

Roll Call #882
Outcome: PASS
Sponsor: WARREN
Time: 7/25/2013 5:24 p.m.

Total votes: 47
Noes: 14
Excused Absence: 3

Ayes: 33
Not Voting: 0
Excused Vote: 0

Ayes (Democrat)
None

Ayes (Republican)
Allran; Apodaca (Chair); Barefoot; Barringer; Berger; Bingham; Brock; Brown; Brunstetter; Cook; Curtis; Daniel; Davis, J.; Goolsby; Gunn; Harrington; Hartsell; Hise; Hunt; Jackson; Meredith; Newton; Pate; Rabin; Rabon; Randleman; Rucho; Sanderson; Soucek; Tarte; Tillman; Tucker; Wade

Noes (Democrat)
Blue; Bryant; Clark; Davis, D.; Ford; Graham; Kinnaird; McKissick; McLaurin; Nesbitt; Parmon; Robinson; Stein; Woodard

Noes (Republican)
None

Excused Absence (Democrat)
Clodfelter; Jenkins; Walters

Excused Absence (Republican)
None

Exhibit D

HOUSE ROLL CALL VOTE TRANSCRIPT FOR ROLL CALL #1337

2013-2014 Session

HB 589: VIVA/Election Reform. Vote: M11 Concur

Roll Call #1337
Outcome: PASS
Sponsor: Warren
Time: 7/25/2013 10:39 p.m.

Total votes: 114
Noes: 41
Excused Absence: 6

Ayes: 73
Not Voting: 0
Excused Vote: 0

Ayes (Democrat)
None

Ayes (Republican)
Arp; Avila; Bell, J.; Blackwell; Blust; Boles; Brawley, R.; Brawley, W.; Brody; Brown, B.; Brown, R.; Bryan; Bumgardner; Burr; Catlin; Collins; Conrad; Daughtry; Davis; Dixon; Dollar; Elmore; Faircloth; Ford; Fulghum; Hager; Hardister; Hastings; Hollo; Holloway; Horn; Hurley; Iler; Jeter; Johnson; Jones; Jordan; Langdon; Lewis; Malone; Martin, S; McElraft; McGrady; McNeill; Millis; Moffitt; Moore, T.; Murry; Pittman; Presnell; Ramsey; Riddell; Ross, S.; Saine; Samuelson; Schaffer; Setzer; Shepard; Speciale; Stam; Starnes; Steinburg; Stone; Szoka; Tillis (Speaker); Torbett; Turner; Warren, H.; Wells; West; Whitmire; Younts

Noes (Democrat)
Adams; Alexander; Baskerville; Bell, L.; Brandon; Carney; Cotham; Cunningham; Earle; Farmer-Butterfield; Fisher; Floyd; Foushee; Gill; Glazier; Goodman; Graham, C.; Graham, G.; Hall, D.; Hall, L.; Hamilton; Hanes; Harrison; Holley; Insko; Jackson; Lucas; Luebke; Martin, G; McManus; Michaux; Mobley; Moore, R.; Pierce; Queen; Richardson; Terry; Tine; Tolson; Waddell; Wilkins

Noes (Republican)
None

Excused Absence (Democrat)
Brisson; Wray

Excused Absence (Republican)
Cleveland; Howard; Lambeth; Stevens

Exhibit E

SENATE ROLL CALL VOTE TRANSCRIPT FOR ROLL CALL #824

2017-2018 Session

SB 824: Implementation of Voter ID Const. Amendment. Vote: Motion 11 Veto Override

Roll Call #824
Outcome: PASS
Sponsor: KRAWIEC
Time: 12/18/2018 2:18 p.m.

Total votes: 45
Noes: 12
Excused Absence: 4

Ayes: 33
Not Voting: 1
Excused Vote: 0

Ayes (Democrat)
Ford

Ayes (Republican)
Alexander; Ballard; Barefoot; Barrett; Barringer; Berger (Chair); Bishop; Britt; Brown; Cook; Daniel; J. Davis; Dunn; Edwards; Gunn; Harrington; Hise; Horner; B. Jackson; Krawiec; Lee; McInnis; Meredith; Newton; Rabin; Rabon; Sanderson; Sawyer; Tarte; Tillman; Tucker; Wells

Noes (Democrat)
Chaudhuri; Clark; D. Davis; Fitch; Foushee; J. Jackson; McKissick; Robinson; Smith; Van Duyn; Waddell; Woodard

Noes (Republican)
None

Not Voting (Democrat)
Lowe

Not Voting (Republican)
None

Excused Absence (Democrat)
Blue

Excused Absence (Republican)
Pate; Randleman; Wade

Exhibit F

HOUSE ROLL CALL VOTE TRANSCRIPT FOR ROLL CALL #1354

2017-2018 Session

SB 824: Implementation of Voter ID Constitutional Amendment. Vote: Veto Override

Roll Call #1354
Outcome: PASS
Sponsor: KRAWIEC
Time: 12/19/2018 3:39 p.m.

Total votes: 112
Noes: 40
Excused Absence: 6

Ayes: 72
Not Voting: 2
Excused Vote: 0

Ayes (Democrat)
Duane Hall

Ayes (Republican)
Adams; J. Adcock; Arp; J. Bell; Bert Jones; Blackwell; Blust; Boles; Boswell; Bradford; Brawley; Brenden Jones; Brisson; Brody; Bumgardner; Burr; Clampitt; Cleveland; Collins; Conrad; Corbin; Davis; Destin Hall; Dixon; Dobson; Dollar; Elmore; Faircloth; Ford; Fraley; Grange; K. Hall; Hardister; Hastings; Henson; Horn; Howard; Hurley; Iler; Johnson; Jordan; Lambeth; Lewis; Malone; McElraft; McGrady; McNeill; T. Moore (Speaker); Muller; Murphy; Pittman; Potts; Presnell; Riddell; Rogers; Ross; Saine; Sauls; Setzer; Shepard; Speciale; Steinburg; Stevens; Stone; Strickland; Szoka; R. Turner; Warren; Watford; White; Yarborough

Noes (Democrat)
G. Adcock; Ager; Alexander; Autry; Ball; Beasley; Belk; L. Bell; Black; Brockman; Butler; Carney; Cunningham; Earle; Farmer-Butterfield; Floyd; Garrison; Gill; C. Graham; Harrison; Holley; Hunter; Insko; Jackson; John; Lucas; G. Martin; Meyer; Michaux; Montgomery; R. Moore; Morey; Pierce; Quick; Reives; B. Richardson; W. Richardson; Terry; Willingham; Wray

Noes (Republican)
None

Not Voting (Democrat)
None

Not Voting (Republican)
Dulin; S. Martin

Excused Absence (Democrat)

Excused Absence (Republican)

Exhibit G

SELECTED CHARACTERISTICS OF PEOPLE AT SPECIFIED LEVELS OF POVERTY IN THE PAST 12 MONTHS

Geography: North Carolina CHANGE GEOGRAPHY

Year: 2017 CHANGE YEAR

Estimates: 5 Year

☐ Show Margin Of Error ☐ Transpose Table

VIEW MAP

VIEW CHART

HIDE / FILTER / SORT

DOWNLOAD / PRINT / SHARE

VIEW DATA NOTES

RESTORE TABLE LAYOUT CHANGE TABLE LAYOUT

	North Carolina			
	Total	Less than 50 percent of the poverty level	Less than 100 percent of the poverty level	Less than 125 percent of the poverty level
	Estimate	Estimate	Estimate	Estimate
Population for whom poverty status is determined	9,783,738	7.0%	16.1%	21.4%
SEX				
Male	4,733,269	6.3%	14.7%	19.7%
Female	5,050,469	7.7%	17.5%	23.0%
AGE				
Under 18 years	2,256,186	10.2%	22.9%	29.6%
Related children of householder under 18 ye...	2,245,271	9.8%	22.6%	29.3%
18 to 64 years	6,053,546	7.0%	15.3%	19.9%

	North Carolina			
	Total	Less than 50 percent of the poverty level	Less than 100 percent of the poverty level	Less than 125 percent of the poverty level
	Estimate	Estimate	Estimate	Estimate
18 to 64 years	6,053,546	7.0%	15.3%	19.9%
65 years and over	1,474,006	2.5%	9.4%	15.1%
RACE AND HISPANIC OR LATINO ORIGIN				
One race	9,542,914	7.0%	16.0%	21.2%
White	6,776,691	5.5%	12.5%	16.9%
Black or African American	2,077,559	10.9%	24.9%	32.1%
American Indian and Alaska Native	114,751	12.0%	26.2%	32.8%
Asian	262,596	6.0%	12.7%	16.9%
Native Hawaiian and Other Pacific Islander	5,886	9.3%	18.6%	21.2%
Some other race	305,431	12.7%	32.0%	42.4%
Two or more races	240,824	9.6%	22.9%	28.7%
Hispanic or Latino origin (of any race)	894,810	11.1%	30.1%	40.1%
White alone, not Hispanic or Latino	6,248,560	5.0%	11.1%	15.0%
LIVING ARRANGEMENT				
In family households	8,099,309	5.9%	14.2%	19.0%
In married-couple family	5,808,505	2.2%	7.1%	10.7%

	North Carolina			
	Total	Less than 50 percent of the poverty level	Less than 100 percent of the poverty level	Less than 125 percent of the poverty level
	Estimate	Estimate	Estimate	Estimate
In married-couple family	5,808,505	2.2%	7.1%	10.7%
In Female householder, no husband present ...	1,717,615	16.7%	34.4%	42.5%
In other living arrangements	1,684,429	12.6%	25.7%	33.1%
EDUCATIONAL ATTAINMENT				
Population 25 years and over	6,679,411	5.0%	12.6%	17.2%
Less than high school graduate	859,223	10.7%	29.8%	39.8%
High school graduate (includes equivalency)	1,733,385	6.1%	15.4%	21.4%
Some college or associate's degree	2,070,305	4.7%	11.2%	15.5%
Bachelor's degree or higher	2,016,498	2.1%	4.2%	5.8%
NATIVITY AND CITIZENSHIP STATUS				
Native	9,006,738	6.9%	15.8%	20.8%
Foreign born	777,000	8.1%	20.8%	28.0%
Naturalized citizen	286,009	3.6%	10.9%	15.3%

DISABILITY STATUS				
With any disability	1,338,880	8.3%	22.7%	30.3%
No disability	8,383,659	6.9%	15.2%	20.1%
WORK STATUS				
Population 16 to 64 years	6,309,685	7.1%	15.4%	20.1%
Worked full-time, year-round	3,166,998	0.5%	3.4%	6.3%
Worked less than full-time, year-round	1,591,110	9.9%	22.3%	28.4%
	1,551,577	17.5%	32.8%	39.7%

Send Feedback
edsci.feedback@census.gov

Exhibit H

County	Director	Mailing Address	Physical Address	Phone/Email
ALAMANCE M-F (8:00-5:00)	KATHY HOLLAND	Same as Physical Address	115 SOUTH MAPLE STREET GRAHAM, NC 27253	336-570-6755 336-570-6757 (fax) Alamance.BOElections@alamanc nc.com
ALEXANDER M-F (8:00-5:00)	PATRICK WIKE	PO BOX 326 TAYLORSVILLE, NC 28681	370 1ST AVENUE SW TAYLORSVILLE, NC 28681	828-632-2990 828-632-1381 (fax) elections@alexandercountync.go
ALLEGHANY M-F (8:00-5:00)	SHERRY DAWSON	PO BOX 65 SPARTA, NC 28675	348 S. MAIN ST. LOWER LEVEL 10 SPARTA, NC 28675	336-372-4557 336-372-5435 (fax) alleghanyelections@outlook.com
ANSON M-F (8:30-5:00)	STEVE ADAMS	PO BOX 768 WADESBORO, NC 28170	402 MORVEN ROAD WADESBORO, NC 28170	704-994-3223 704-694-2443 (fax) sadams@co.anson.nc.us
ASHE M-F (8:00-5:00)	JOHN SHEPHERD	Same as Physical Address	150 GOVERNMENT CIRCLE, STE 2100 JEFFERSON, NC 28640	336-846-5570 336-846-5574 (fax) johnshepherd@ashecountygov.cc
AVERY M-F (8:00-4:30)	SHEILA E. OLLIS	PO BOX 145 NEWLAND, NC 28657	200 MONTEZUMA ST, SUITE 307 COURT HOUSE ANNEX NEWLAND, NC 28657	828-733-8282 828-733-8283 (fax) sheila.ollis@averycountync.gov
BEAUFORT M-F (8:00-5:00)	KELLIE HARRIS HOPKINS	PO BOX 1016 WASHINGTON, NC 27889	1308 HIGHLAND DRIVE, SUITE 104 WASHINGTON, NC 27889	252-946-2321 252-974-2962 (fax) BEAUFORT.boe@co.beaufort.nc.
BERTIE M-F (8:30-5:00)	SHEILA HOLLOMAN	PO BOX 312 WINDSOR, NC 27983	210 W. WATSON ST. WINDSOR, NC 27983	252-794-5306 252-794-5368 (fax) elections@bertie.nc.gov
BLADEN M-F (8:30-5:00)	VALERIA PEACOCK-MCKOY	PO BOX 512 ELIZABETHTOWN, NC 28337	301 SOUTH CYPRESS STREET ELIZABETHTOWN, NC 28337	910-862-6951 910-862-7820 (fax) elections@bladenco.org

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County	Director	Mailing Address	Physical Address	Phone/Email
BRUNSWICK M-F (8:30-5:00)	SARA KNOTTS	PO BOX 2 BOLIVIA, NC 28422	75 STAMP ACT DRIVE NE BUILDING H BOLIVIA, NC 28422	910-253-2620 910-253-2618 (fax) elections@brunswickcountync.go
BUNCOMBE M-F (8:00-5:00)	TRENA VELEZ	PO BOX 7468 ASHEVILLE, NC 28802	77 MCDOWELL STREET ASHEVILLE, NC 28801	828-250-4200 828-250-6262 (fax) elections@buncombecounty.org
BURKE M-F (8:00-5:00)	DEBBIE K. MACE	P O BOX 798 MORGANTON, NC 28680	2128 S STERLING ST STE. 100 MORGANTON, NC 28655	828-764-9010 828-764-9011 (fax) BURKE.boe@burkenc.org
CABARRUS M-F (8:00-5:00)	CAROL SOLES	PO BOX 1315 CONCORD, NC 28026	369 CHURCH ST N CONCORD, NC 28025	704-920-2860 704-920-2831 (fax) cabarrus.boe@cabarruscounty.us
CALDWELL M-F (8:00-5:00)	SANDRA RICH	PO BOX 564 LENOIR, NC 28645	905 WEST AVENUE LENOIR, NC 28645	828-757-1326 828-757-1195 (fax) election@caldwellcountync.org
CAMDEN MONDAY - FRIDAY 8:00AM-NOON & 1:00PM-5:00PM	ELAINE P. BEST	PO BOX 206 CAMDEN, NC 27921	117 NC HWY 343 N CAMDEN, NC 27921	252-338-5530 252-338-1271 (fax) ELECTIONS@CAMDENCOUNTY
CARTERET M-F (8:00-5:00)	MARGOT BURKE	Same as Physical Address	1702 LIVE OAK ST, SUITE 200 BEAUFORT, NC 28516	252-728-8460 252-728-8571 (fax) boemail@carteretcountync.gov
CASWELL M-F (8:00-5:00)	ROBERT WEBB	PO BOX 698 YANCEYVILLE, NC 27379	140 MAIN STREET YANCEYVILLE, NC 27379	336-694-4010 ext:2 336-694-9924 (fax) elections@caswellcountync.gov
CATAWBA M-F (8:00-5:00)	AMANDA H. DUNCAN	PO BOX 132 NEWTON, NC 28658	25 GOVERNMENT DRIVE NEWTON, NC 28658	828-464-2424 828-464-9832 (fax) elections@catawbacountync.gov
CHATHAM M-F (8:00-5:00)	PANDORA PASCHAL	PO BOX 111 PITTSBORO, NC 27312	984 THOMPSON ST., STE. D PITTSBORO, NC 27312	919-545-8500 919-542-6430 (fax) elections@chathamnc.org

County	Director	Mailing Address	Physical Address	Phone/Email
CHEROKEE M-F (8:00-5:00)	LEIGHSA JONES	Same as Physical Address	40 PEACHTREE STREET MURPHY, NC 28906	828-837-6670 828-837-7998 (fax) ccboe@cherokeecounty-nc.gov
CHOWAN M-F (8:00-5:00)	TERRENCE S. MEYERS	P O BOX 133 EDENTON, NC 27932	730 N GRANVILLE STREET SUITE "D" EDENTON, NC 27932	252-482-4010 252-482-5920 (fax) chowan.boelections@chowan.nc
CLAY M-F (8:00-5:00)	REBECCA HALL	54 CHURCH ST HAYESVILLE, NC 28904	54 CHURCH STREET HAYESVILLE, NC 28904	828-389-6812 828-389-3757 (fax) elections@claync.org
CLEVELAND M-F (8:00-5:00)	CLIFTON W. PHILBECK	P O BOX 1299 SHELBY, NC 28151	215 PATTON DR. SHELBY, NC 28150	704-484-4858 704-484-4958 (fax) CLEVELAND.boe@clevelandcou
COLUMBUS M-F (8:30-5:00)	CARLA STRICKLAND	P O BOX 37 WHITEVILLE, NC 28472	2322 JAMES B. WHITE HWY. N WHITEVILLE, NC 28472	910-640-6609 910-640-0916 (fax) Columbus.BOE@columbusco.org
CRAVEN M-F (8:00-5:00)	MELONI M. WRAY	Same as Physical Address	406 CRAVEN STREET NEW BERN, NC 28560	252-636-6610 252-636-6687 (fax) cravenboe@cravencountync.gov
CUMBERLAND M-F (8:00-5:00)	TERRI ROBERTSON	Same as Physical Address	227 FOUNTAINHEAD LANE SUITE 101 FAYETTEVILLE, NC 28301	910-678-7733 910-678-7738 (fax) boardofelections@co.cumberlanc
CURRITUCK M-F (8:00-5:00)	SYDNI BANKS	PO BOX 177 CURRITUCK, NC 27929	2811 CARATOKE HIGHWAY CURRITUCK, NC 27929	252-232-2525 252-232-2427 (fax) currituck.boe@currituckcountync.
DARE M-F (8:30-5:00)	MICHELE N BARNES	P.O. BOX 1000 MANTEO, NC 27954	954 MARSHALL COLLINS DRIVE MANTEO, NC 27954	252-475-5631 252-475-1223 (fax) elections@darenc.com
DAVIDSON M-F (8:00-5:00)	RUTH H HUNEYCUTT	P O BOX 1084 LEXINGTON, NC 27293	945 N MAIN ST SUITE A LEXINGTON, NC 27292	336-242-2190 336-242-2199 (fax) DAVIDSON.boe@davidsoncounty

County	Director	Mailing Address	Physical Address	Phone/Email
DAVIE M-F (8:00-5:00)	TABATHA PARRISH	161 POPLAR ST. SUITE 102 MOCKSVILLE, NC 27028	161 POPLAR ST. SUITE 102 MOCKSVILLE, NC 27028	336-753-6072 336-751-0185 (fax) tparrish@daviecountync.gov
DUPLIN M-F (8:00-5:00)	SUSAN R. WILLIAMS	PO BOX 975 KENANSVILLE, NC 28349	160 MALLARD STREET KENANSVILLE, NC 28349	910-296-2170 910-296-2167 (fax) dcboe@duplincountync.com
DURHAM M-F (8:30-5:00)	DEREK L. BOWENS	PO BOX 868 DURHAM, NC 27702	120 E. PARRISH STREET DURHAM, NC 27701	919-560-0700 919-560-0688 (fax) elections@dconc.gov
EDGECOMBE M-F (8:00-5:00)	JERRY W. SPRUELL	PO BOX 10 TARBORO, NC 27886	201 ST ANDREW ST., RM 434 TARBORO, NC 27886	252-641-7852 252-641-1740 (fax) ecboe@edgecombeco.com
FORSYTH M-F (8:00-5:00)	TIM TSUJII	201 N. CHESTNUT STREET WINSTON SALEM, NC 27101	201 N. CHESTNUT STREET WINSTON SALEM, NC 27101	336-703-2800 336-727-2893 (fax) fcvotes@forsyth.cc
FRANKLIN M-F (8:00-5:00)	MICHELLE CHAVIS	PO BOX 180 LOUISBURG, NC 27549	107 INDUSTRIAL DRIVE LOUISBURG, NC 27549	919-496-3898 919-496-7418 (fax) mchavis@franklincountync.us
GASTON M-F (8:30-5:00)	ADAM RAGAN	P O BOX 1396 GASTONIA, NC 28053	410 W. FRANKLIN BLVD., STE. 50 GASTONIA, NC 28052	704-852-6005 704-852-6011 (fax) elections@gastongov.com
GATES MON.-FRI. 8:30AM-5PM	CLYTIA A JOHNSON	PO BOX 621 GATESVILLE, NC 27938	931 MAIN ST GATESVILLE, NC 27938	252-357-1780 252-357-4341 (fax) gatesco.boe@gmail.com
GRAHAM M-F (8:30-5:00)	TERESA C. GARLAND	PO BOX 1239 ROBBINSVILLE, NC 28771	18 COURT STREET ROBBINSVILLE, NC 28771	828-479-7969 828-479-4264 (fax) elections@grahamnc.org
GRANVILLE M-F (8:30-5:00)	TONYA C. BURNETTE	PO BOX 83 OXFORD, NC 27565	208 WALL STREET OXFORD, NC 27565	919-693-2515 919-690-0245 (fax) Granvilleboe@granvillecounty.org

County	Director	Mailing Address	Physical Address	Phone/Email
GREENE M-F (8:00 AM-12:00 NOON, 1:00 PM-5:00PM)	TREY CASH	PO BOX 583 SNOW HILL, NC 28580	110 SE FIRST STREET SNOW HILL, NC 28580	252-747-5921 252-747-2426 (fax) vote@greenecountync.gov
GUILFORD M-F (8:00-5:00)	CHARLIE COLLICUTT	P O BOX 3427 GREENSBORO, NC 27402	301 W. MARKET ST, ROOM 115 GREENSBORO, NC 27401	336-641-3836 336-641-7676 (fax) guilfordelections@guilfordcountyr
HALIFAX M-F (8:30-5:00)	KRISTIN SCOTT	PO BOX 101 HALIFAX, NC 27839	10 N. KING STREET HALIFAX, NC 27839	252-583-4391 252-583-1068 (fax) elections@halifaxnc.com
HARNETT M-F (8:00-5:00)	CLAIRE JONES	PO BOX 356 LILLINGTON, NC 27546	308 W. DUNCAN ST LILLINGTON, NC 27546	910-893-7553 910-893-4655 (fax) harnettboe@harnett.org
HAYWOOD M-F (8:30-5:00)	ROBERT INMAN	Same as Physical Address	63 ELMWOOD WAY SUITE A WAYNESVILLE, NC 28786	828-452-6633 828-452-6750 (fax) elections@haywoodcountync.gov
HENDERSON M-F (8:30-5:00)	BEVERLY W. CUNNINGHAM	PO BOX 2090 HENDERSONVILLE, NC 28793	75 E. CENTRAL ST. HENDERSONVILLE, NC 28792	828-697-4970 828-697-4590 (fax) elections@hendersoncountync.g
HERTFORD M-F (8:30-5:00)	SHEILA PRIVOTT	PO BOX 355 AHOSKIE, NC 27910	418 EVERETT ST SUITE A AHOSKIE, NC 27910	252-358-7812 252-513-8454 (fax) elections@hertfordcountync.gov
HOKE 8:00 AM-5:00 PM	TOWANNA JACKSON	PO BOX 1565 RAEFORD, NC 28376	227 N MAIN ST RAEFORD, NC 28376	910-875-8751 ext:1550 910-875-9084 (fax) elections@hokecounty.org
HYDE M-W-F (8:00-5:00)	VIOLA WILLIAMS	PO BOX 152 SWAN QUARTER, NC 27885	1223 MAIN STREET SWAN QUARTER, NC 27885	252-926-4194 252-926-3707 (fax) elections@hydecountync.gov
IREDELL M-F (8:00-5:00)	BECKY GALLIHER	Same as Physical Address	203 STOCKTON ST. STATESVILLE, NC 28677	704-878-3140 704-832-2312 (fax) bgalliher@co.iredell.nc.us

County	Director	Mailing Address	Physical Address	Phone/Email
JACKSON M-F (8:00-5:00)	LISA LOVEDAHL	Same as Physical Address	876 SKYLAND DRIVE SUITE 1 SYLVA, NC 28779	828-586-7538 828-586-1951 (fax) LisaLovedahl@jacksonnc.org
JOHNSTON M-F (8:00-5:00)	LEIGH ANNE PRICE	PO BOX 1172 SMITHFIELD, NC 27577	205 S. SECOND ST. SMITHFIELD, NC 27577	919-989-5095 919-989-5142 (fax) elections@johnstonnc.com
JONES 8:00AM - 5:00PM	JENNIFER KING	Same as Physical Address	367-B HWY 58-S TRENTON, NC 28585	252-448-3921 252-448-1040 (fax) jking@jonescountync.gov
LEE M-F (8:00-5:00)	PARKER HOLLAND	P O BOX 1443 SANFORD, NC 27331	225 S. STEELE ST. SANFORD, NC 27330	919-718-4646 919-718-4629 (fax) elections@leecountync.gov
LENOIR M-F (8:30-5:00)	DANA W. KING	PO BOX 3503 KINSTON, NC 28502	110-C S HERRITAGE ST KINSTON, NC 28501	252-523-0636 252-523-3472 (fax) dking@co.lenoir.nc.us
LINCOLN M-F (8:00-5:00)	BRADLEY R. PUTNAM	115 W. MAIN ST ROOM 201 LINCOLNTON, NC 28092	115 W MAIN ST, ROOM 201 LINCOLNTON, NC 28092	704-736-8480 704-736-8804 (fax) lincolnboe@lincolncounty.org
MACON M-F (8:00-5:00)	MELANIE D. THIBAULT	5 WEST MAIN ST FLOOR 1 FRANKLIN, NC 28734	5 W MAIN ST FLOOR 1 FRANKLIN, NC 28734	828-349-2034 ext:2035 828-349-2557 (fax) mthibault@maconnc.org
MADISON M-F (8:30-5:00)	KATHY M. RAY	PO BOX 142 MARSHALL, NC 28753	5707 HWY 25-70 RM 16 MARSHALL, NC 28753	828-649-3731 828-649-0187 (fax) MADISON.boe@madisoncountyn
MARTIN M-F (8:00-12:00 & 1:00-5:00)	KRISTY DUPREE MODLIN	PO BOX 801 WILLIAMSTON, NC 27892	305 E MAIN ST, ROOM 120 WILLIAMSTON, NC 27892	252-789-4317 252-789-4319 (fax) vote@martincountyncgov.com
MCDOWELL M-F (8:30-5:00)	KIMBERLY WELBORN	PO BOX 1509 MARION, NC 28752	60 E. COURT ST MARION, NC 28752	828-652-7121 ext:342 828-659-3294 (fax) elections@mcdowellgov.com

County	Director	Mailing Address	Physical Address	Phone/Email
MECKLENBURG M-F (8:00-5:00)	MICHAEL DICKERSON	PO BOX 31788 CHARLOTTE, NC 28231	741 KENILWORTH AVE STE 202 CHARLOTTE, NC 28204	704-336-2133 704-343-0537 (fax) kristin.mavromatis@mecklenburg
MITCHELL M-F (8:00-5:00)	ROYCENE JONES	Same as Physical Address	11 N MITCHELL AVE ROOM 108 BAKERSVILLE, NC 28705	828-688-3101 828-688-1651 (fax) roycene.jones@mitchellcounty.or
MONTGOMERY M-F (8:00-5:00)	RHONDA JOHNSON	PO BOX 607 TROY, NC 27371	327 NORTH MAIN STREET TROY, NC 27371	910-572-2024 910-576-2118 (fax) rhonda.johnson@montgomerycou
MOORE M-F (8:00-5:00)	GLENDA CLENDENIN	POST OFFICE BOX 787 CARTHAGE, NC 28327	700 PINEHURST AVENUE CARTHAGE, NC 28327	910-947-3868 910-947-2389 (fax) elections@moorecountync.gov
NASH M-F (8:00-5:00)	JOHN KEARNEY	PO BOX 305 NASHVILLE, NC 27856	1006 EASTERN AVENUE, RM 109 NASHVILLE, NC 27856	252-459-1350 252-459-1371 (fax) info@nashcountyboe.com
NEW HANOVER M-F (8:00-5:00)	RAE HUNTER-HAVENS	Same as Physical Address	230 GOVERNMENT CENTER DR., SUITE 38 WILMINGTON, NC 28403	910-798-7330 910-798-7295 (fax) newhanover.boe@nhcgov.com
NORTHAMPTON M-F (8:30-12:30 -1:00-5:00)	TANESHIA MANGUM	PO BOX 603 JACKSON, NC 27845	9495 NC HWY 305, JW FAISON ADMIN BLDG JACKSON, NC 27845	252-534-5681 ext:679 252-534-1202 (fax) taneshia.mangum@nhcnc.net
ONSLOW M-F (8:00-5:00)	JEAN ROUSE	Same as Physical Address	246 GEORGETOWN RD. JACKSONVILLE, NC 28540	910-455-4484 910-455-1390 (fax) onslowBOE@onslowcountync.go
ORANGE M-F (8:00-5:00)	RACHEL BOYCE RAPER	PO BOX 220 HILLSBOROUGH, NC 27278	208 S. CAMERON ST HILLSBOROUGH, NC 27278	919-245-2350 919-644-3318 (fax) vote@orangecountync.gov
PAMLICO M-F (8:00-5:00)	LISA BENNETT	PO BOX 464 BAYBORO, NC 28515	202 MAIN STREET BAYBORO, NC 28515	252-745-4821 252-745-4114 (fax) pamlico.boe@pamlicocounty.org

County	Director	Mailing Address	Physical Address	Phone/Email
PASQUOTANK M-F (8:00-5:00)	KELLI PRICE	PO BOX 1797 ELIZABETH CITY, NC 27906	1409 PARKVIEW DR. ELIZABETH CITY, NC 27909	252-335-1739 252-331-2560 (fax) boe@co.pasquotank.nc.us
PENDER M-F (8:00-5:00)	LILLIAN H STAINBACK	PO BOX 1232 BURGAW, NC 28425	807 S. WALKER ST. BURGAW, NC 28425	910-259-1220 910-259-1269 (fax) PenderBOE@pendercountync.go
PERQUIMANS 8:00 A.M.-5:00P.M.	HOLLY HUNTER	PO BOX 336 HERTFORD, NC 27944	601A S EDENTON RD ST HERTFORD, NC 27944	252-426-5598 252-426-5068 (fax) PERQUIMANS.boe@gmail.com
PERSON M-F (8:30-5:00)	GLENNA SHERRY B. HARRIS	331 SOUTH MORGAN STREET ROXBORO, NC 27573	331 SOUTH MORGAN STREET ROXBORO, NC 27573	336-597-1727 336-598-0300 (fax) personboe@personcountync.gov
PITT M-F (8:00-5:00)	DAVID P. DAVIS	PO BOX 56 GREENVILLE, NC 27835	1717 WEST 5TH STREET GREENVILLE, NC 27834	252-902-3300 252-830-1157 (fax) pittelections@pittcountync.gov
POLK 8:30A - 5:00P	CLIFFORD J MARR	PO BOX 253 COLUMBUS, NC 28722	40 COURTHOUSE ST COLUMBUS, NC 28722	828-894-8181 828-894-3565 (fax) polkboe@polknc.org
RANDOLPH M-F (8:00-5:00)	MELISSA T. JOHNSON	Same as Physical Address	158 WORTH STREET SHAW BUILDING ASHEBORO, NC 27203	336-318-6900 336-318-6903 (fax) elections@randolphcountync.gov
RICHMOND M-F (8:00-5:00)	CONNIE H KELLY	PO BOX 1843 ROCKINGHAM, NC 28380	221 S. HANCOCK ST ROCKINGHAM, NC 28379	910-997-8253 910-417-4900 (fax) richmond.boe@richmondnc.com
ROBESON M-F (8:15-5:15)	TINA BLEDSOE (INTERIM)	PO BOX 2159 LUMBERTON, NC 28359	800 N. WALNUT STREET LUMBERTON, NC 28358	910-671-3080 910-671-3089 (fax) robeson.boe@co.robeson.nc.us
ROCKINGHAM M-F (8:00-5:00)	TINA CARDWELL	PO BOX 22 WENTWORTH, NC 27375	240 CHEROKEE CAMP RD. REIDSVILLE, NC 27320	336-342-8107 336-342-8228 (fax) rcboe@co.rockingham.nc.us

County	Director	Mailing Address	Physical Address	Phone/Email
ROWAN M-F (8:00-5:00)	NANCY S. EVANS	Same as Physical Address	1935 JAKE ALEXANDER BLVD W SUITE D10 SALISBURY, NC 28147	704-216-8140 704-216-8145 (fax) rowan.boe@rowancountync.gov
RUTHERFORD M-F (8:30-5:00)	DEBBIE BEDFORD	PO BOX 927 RUTHERFORDTON, NC 28139	298 FAIRGROUND ROAD SPINDALE, NC 28160	828-287-6030 828-287-6140 (fax) elections@rutherfordcountync.go
SAMPSON M-F (8:00-5:00)	ASHLEY PATE TEW	Same as Physical Address	120 COUNTY COMPLEX ROAD SUITE 110 CLINTON, NC 28328	910-592-5796 910-592-3918 (fax) atew@sampsonnc.com
SCOTLAND M-F (8:00-5:00)	DELL M. PARKER	231 EAST CRONLY ST, SUITE 305 LAURINBURG, NC 28352	231 EAST CRONLY ST, SUITE 305 LAURINBURG, NC 28352	910-277-2595 910-277-2928 (fax) Elections@scotlandcounty.org
STANLY M-F (8:30-5:00)	KIMBERLY BLACKWELDER	PO BOX 1309 ALBEMARLE, NC 28002	1000 N FIRST STREET SUITE 16 ALBEMARLE, NC 28001	704-986-3647 704-986-3798 (fax) elections@stanlycountync.gov
STOKES M-F (8:30-5:00)	JASON PERRY	PO BOX 34 DANBURY, NC 27016	1012 MAIN STREET DANBURY, NC 27016	336-593-2409 336-593-4022 (fax) vote@co.stokes.nc.us
SURRY M-F (8:15-5:00)	SUSAN JARRELL	PO BOX 372 DOBSON, NC 27017	915 E. ATKINS STREET DOBSON, NC 27017	336-401-8225 336-401-8228 (fax) elections@co.surry.nc.us
SWAIN M-F (8:00-5:00)	JOAN WEEKS	PO BOX 133 BRYSON CITY, NC 28713	1422 HWY 19 S. BRYSON CITY, NC 28713	828-488-6177 828-488-6463 (fax) swain.boe@gmail.com
TRANSYLVANIA M-F (8:30 AM-5:00 PM)	JEFF STOREY	P O BOX 868 BREVARD, NC 28712	150 SOUTH GASTON STREET SUITE A BREVARD, NC 28712	828-884-3114 828-884-8682 (fax) Transylvania.boe@tconc.org
TYRRELL M-W-F (9:00-5:00)	DEBORAH SWAIN	PO BOX 449 COLUMBIA, NC 27925	403 MAIN STREET COLUMBIA, NC 27925	252-796-0775 252-796-5375 (fax) elections@tyrrellcounty.net

County	Director	Mailing Address	Physical Address	Phone/Email
UNION M-F (8:00-5:00)	KRISTIN JACUMIN	PO BOX 1106 MONROE, NC 28111	316-B EAST WINDSOR ST MONROE, NC 28112	704-283-3809 704-282-1083 (fax) union.boe@unioncountync.gov
VANCE M-F 8:30 AM - 5:00 PM	FAYE M. GILL	300 S. GARNETT ST., STE C HENDERSON, NC 27536	300 S. GARNETT ST, STE C HENDERSON, NC 27536	252-492-3730 252-430-7370 (fax) fgill@vancecounty.org
WAKE M-F (8:30-5:15)	GARY SIMS	P O BOX 695 RALEIGH, NC 27602	337 S SALISBURY STREET RALEIGH, NC 27601	919-856-6240 919-856-5864 (fax) voter@wakegov.com
WARREN 8:30 AM-5:00 PM	DEBBIE S. FORMYDUVAL	PO BOX 803 WARRENTON, NC 27589	309 N MAIN STREET-ANNEX BUILDING WARRENTON, NC 27589	252-257-2114 252-257-5232 (fax) DebbieFormyduval@warrencount
WASHINGTON M-F (8:30-5:00)	DORA BELL	PO BOX 1007 PLYMOUTH, NC 27962	116 ADAMS ST PLYMOUTH, NC 27962	252-793-6017 252-793-5801 (fax) elections@washconc.org
WATAUGA M-F (8:00-5:00)	MATTHEW SNYDER	PO BOX 528 BOONE, NC 28607	842 WEST KING STREET, STE. 6 BOONE, NC 28607	828-265-8061 828-265-8068 (fax) matthew.snyder@watgov.org
WAYNE M-F (8:00-5:00)	DANE BEAVERS	Same as Physical Address	309 E. CHESTNUT ST. GOLDSBORO, NC 27530	919-731-1411 919-731-1409 (fax) elections@waynegov.com
WILKES M-F (8:30-5:00)	KIM CAUDILL	Same as Physical Address	110 NORTH STREET, RM 315 WILKESBORO, NC 28697	336-651-7339 336-651-7560 (fax) elections@wilkescounty.net
WILSON M-F (8:00-5:00)	RENA' C. MORRIS	P O BOX 2121 WILSON, NC 27894	112 DOUGLAS ST. EAST WILSON, NC 27893	252-399-2836 252-399-2838 (fax) elections@wilson-co.com
YADKIN M-F (8:00-5:00)	ELAINE BARNES	PO BOX 877 YADKINVILLE, NC 27055	213 EAST ELM STREET ROOM 100 YADKINVILLE, NC 27055	336-849-7907 336-849-7927 (fax) YCBOE@yadkincountync.gov

County	Director	Mailing Address	Physical Address	Phone/Email
YANCEY M-F (8:30-5:00)	MARY BETH TIPTON	PO BOX 763 BURNSVILLE, NC 28714	30 EAST US HWY 19E BY-PASS SUITE 2 BURNSVILLE, NC 28714	828-682-3950 828-682-2209 (fax) boe@yanceycountync.gov

Exhibit I

NORTH CAROLINA
STATE BOARD OF ELECTIONS

Mailing Address:
P.O. Box 27255,
Raleigh, NC 27611

(919) 814-0700 or
(866) 522-4723

Fax: (919) 715-0135

Pursuant to N.C.G.S. §§ 163A-1145.2(a), 163A-1145.3(a) and 2018 N.C. Sess. Laws 144, sec. 1.2.(f) the following student identification cards, employee identification cards and tribal enrollment cards are **approved** for use as photo identification to vote under N.C.G.S. § 163A-1145.1 for the primaries and general election to be held in 2020:

1. Anderson Creek Academy: Employee
2. Appalachian State University: **Student** and Employee
3. Beaufort County Community College: **Student** and Employee
4. Bennett College: **Student**
5. Brevard Academy: Employee
6. Brevard College: **Student**
7. Burke County: Employee
8. Central Piedmont Community College: **Student** and Employee
9. City of Clinton: Employee
10. City of Elizabeth City: Employee
11. City of Greensboro: Employee
12. Coharie Tribe
13. County of Warren: Employee
14. Davidson College: **Student**
15. Duke University: **Student**
16. Edgecombe Community College: **Student** and Employee
17. Elizabeth City State University: **Student** and Employee
18. Elon University: **Student**
19. Envision Science Academy: Employee
20. Falls Lake Academy: Employee
21. Fayetteville State University: Employee
22. Guilford Preparatory Academy: Employee
23. Halifax Community College: **Student** and Employee
24. Halifax County: Employee
25. Haliwa-Saponi Tribe
26. Healthy Start Academy: Employee
27. Isothermal Community College: **Student** and Employee
28. Johnson C. Smith University: **Student**
29. Kestrel Heights Charter School: Employee
30. Kipp Durham: Employee
31. Lake Norman Charter: Employee
32. Livingstone College: **Student**
33. Lumbee Tribe of North Carolina
34. Meredith College: **Student**
35. NC Central University: **Student** and Employee

36. NC Connections Academy: Employee
37. NC Department of Administration: Employee
38. NC Department of Health and Human Services: Employee
39. NC Department of Information Technology: Employee
40. NC Department of Justice: Employee
41. NC Department of Public Safety: Employee
42. NC Department of Revenue: Employee
43. NC Department of Transportation: Employee
44. NC General Assembly: Employee
45. NC Housing Finance Agency: Employee
46. NC Lottery Education Lottery: Employee
47. NC School of Science and Math: Employee
48. NC State University: **Student** and Employee
49. North East Carolina Preparatory: Employee
50. Onslow County Government: Employee
51. Orange County: Employee
52. Peak Charter Academy: Employee
53. Pender County: Employee
54. Pfeiffer University: **Student**
55. Piedmont Community College: **Student** and Employee
56. Roanoke-Chowan Community College: **Student**
57. Rowan-Cabarrus Community College: **Student** and Employee
58. Sappony Tribe
59. Shaw University: **Student**
60. St. Augustine University: **Student**
61. The Expedition School: Employee
62. Town of Fuquay-Varina: Employee
63. Town of Jamestown: Employee
64. U.N.C. Asheville: **Students** and Employee
65. U.N.C. Wilmington: Employee
66. Vance Charter School: Employee
67. Waccamaw Siouan Tribe
68. Warren Wilson College: **Student**
69. Washington Montessori Public Charter School: Employee
70. Wayne Community College: **Student**
71. Winston-Salem State University: Employee
72. Western Piedmont Council of Governments: Employee

The following student identification cards and employee identification cards are **not approved** for use as photo identification to vote for the primaries and general election to be held in 2020:

1. East Carolina University: Student and Employee
   Nonconformity: G.S. § 163A-1145.2(a)(1)(a)
   G.S. § 163A-1145.3(a)(1)(a)

2. Fayetteville State University: Student
   Nonconformity: G.S. § 163A-1145.2(a)(1)(b)

3. NC A&T State University: Student and Employee
   Nonconformity: G.S. § 163A-1145.2(a)(1)(a)
   G.S. § 163A-1145.2(a)(1)(b)
   G.S. § 163A-1145.3(a)(1)(a)

4. NC School of Science and Math: Student
   Nonconformity: G.S. § 163A-1145.2(a)(1)(a)
   G.S. § 163A-1145.2(a)(1)(b)

5. U.N.C. Chapel Hill: Student and Employee
   Nonconformity: G.S. § 163A-1145.2(a)(1)(a)
   G.S. § 163A-1145.3(a)(1)(a)

6. U.N.C. Charlotte: Student and Employee
   Nonconformity: G.S. § 163A-1145.2(a)(1)(a)
   G.S. § 163A-1145.2(a)(1)(b)
   G.S. § 163A-1145.3(a)(1)(a)

7. U.N.C. Greensboro: Student and Employee
   Nonconformity: G.S. § 163A-1145.2(a)(1)(a)
   G.S. § 163A-1145.2(a)(1)(b)
   G.S. § 163A-1145.3(a)(1)(a)

8. U.N.C. Healthcare: Employee
   Nonconformity: G.S. § 163A-1145.3(a)(1)(a)

9. U.N.C. Pembroke: Student and Employee
   Nonconformity: G.S. § 163A-1145.2(a)(1)(a)
   G.S. § 163A-1145.3(a)(1)(a)

10. U.N.C. School of the Arts: Student and Employee
    Nonconformity: G.S. § 163A-1145.2(a)(1)(a)
    G.S. § 163A-1145.3(a)(1)(a)

11. U.N.C. Wilmington: Student
    Nonconformity: G.S. § 163A-1145.2(a)(1)(a)

12. Winston-Salem State University: Student
    Nonconformity: G.S. § 163A-1145.2(a)(1)(b)

13. Western Carolina University: Student and Employee
    Nonconformity: G.S. § 163A-1145.2(a)(1)(a)
    G.S. § 163A-1145.3(a)(1)(a)

On behalf of the North Carolina State Board of Elections:



March 15, 2019

Kim Westbook Strach
Executive Director
North Carolina State Board of Elections

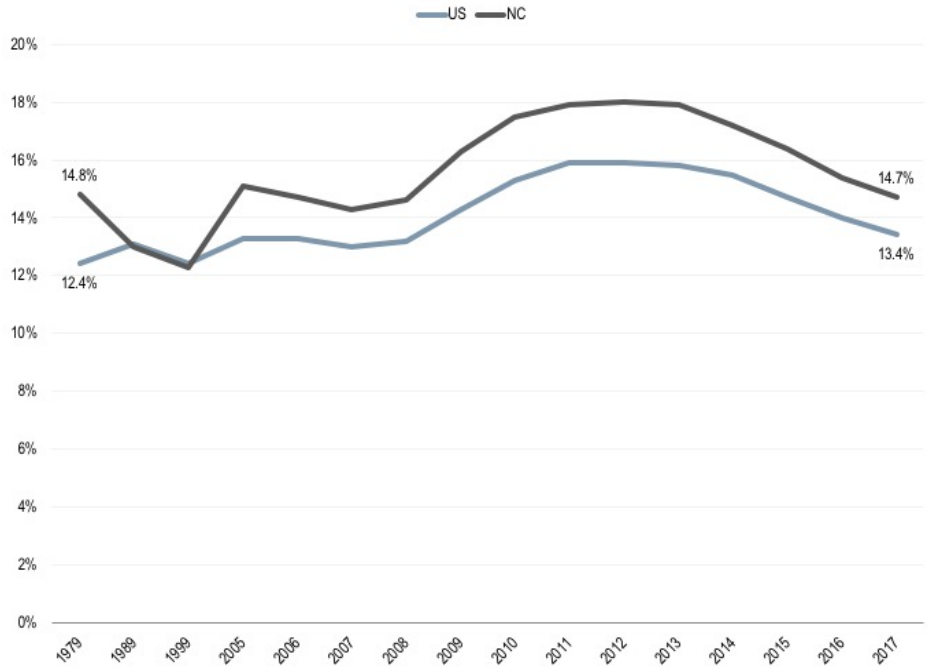
Date

Exhibit J

N.C. Poverty Statistics

The latest census estimates (2017) show a very small decline in the poverty rate compared to the previous year. For North Carolina, the drop is not statistically significant--a real blow considering we're now 7 years out of the recession. This might be as low as it gets.

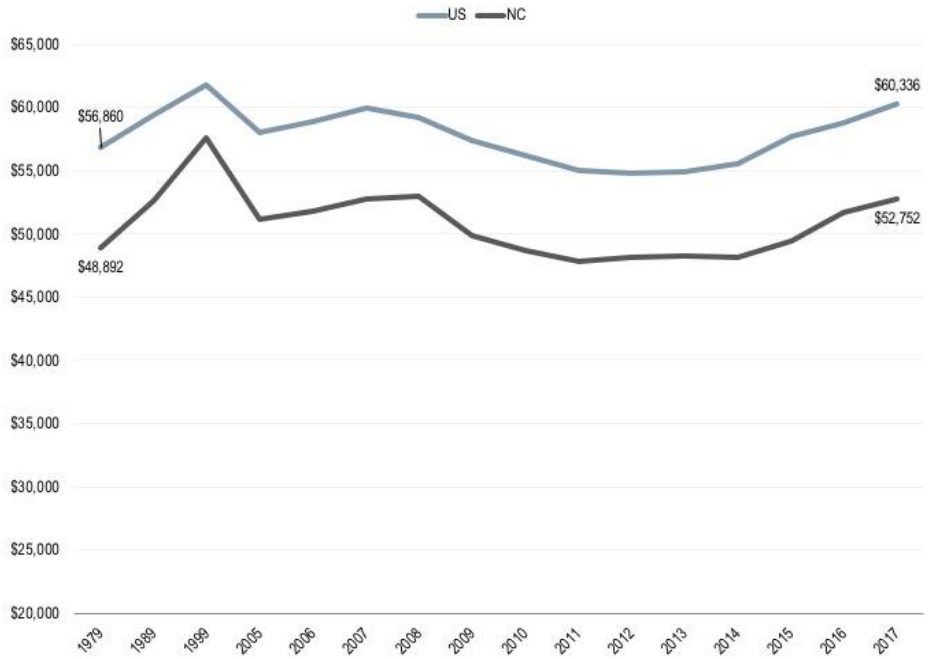
Poverty rate, 1979-2017



Source: Decennial census and ACS 1-Year Estimates

Median household income is finally reaching (NC) or surpassing (US) 2007 pre-recession measures. Neither has recovered its 2000 peak however, which was $61,786 (US) and $57,652 (NC). 2000 was also the year in which NC median household income got closest to the US number, a gap that now stands at about $7,500.

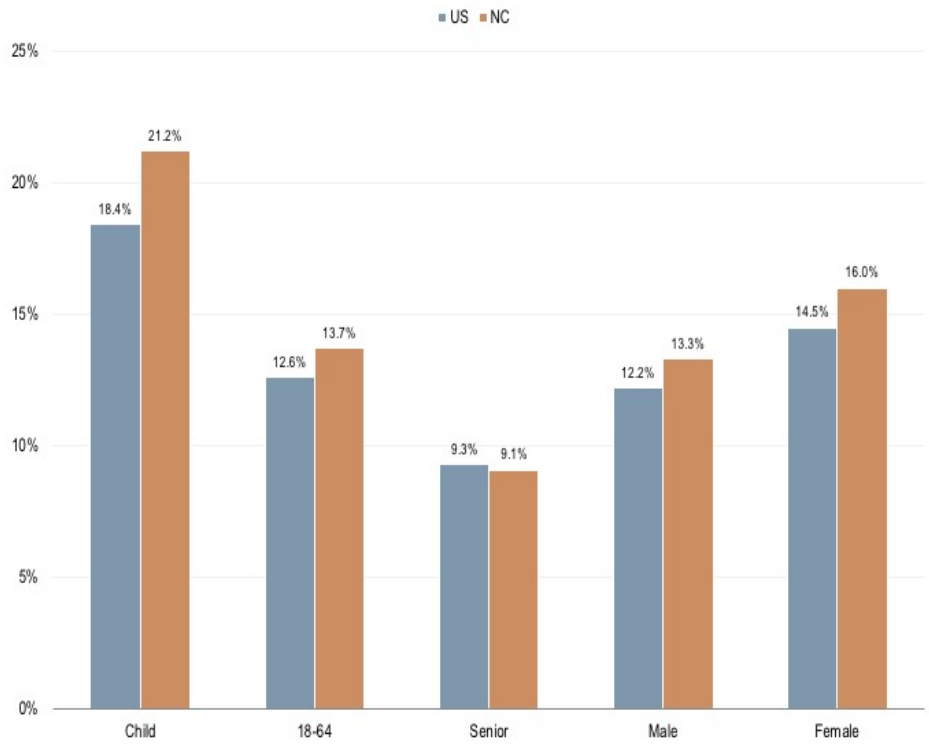
Median household income, 1979-2017



Source: Decennial census and ACS 1-Year Estimates

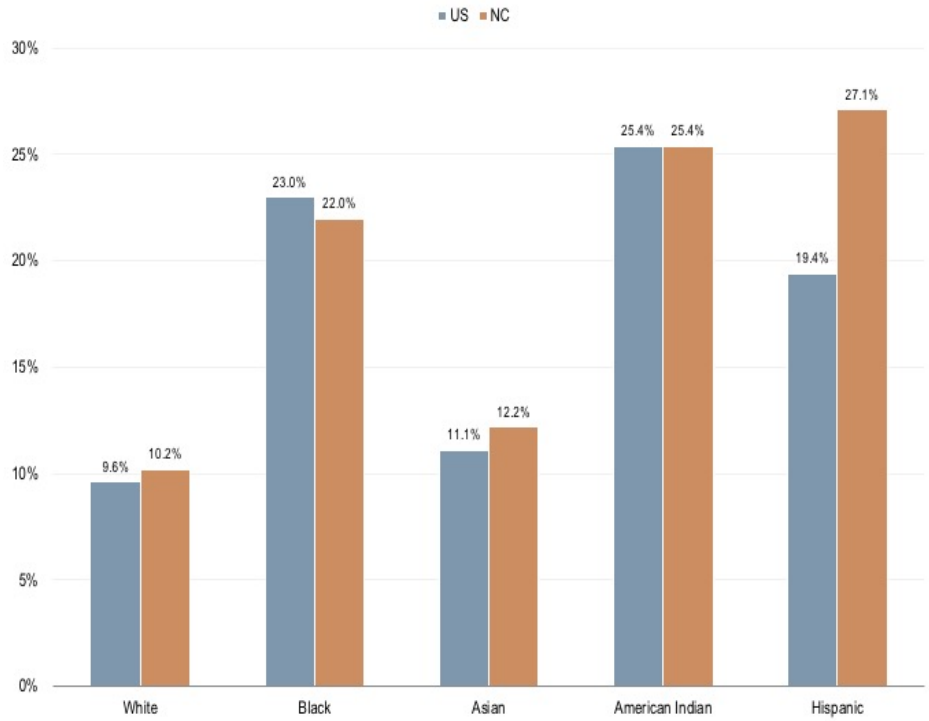
Poverty and income varies widely by who you are. Children and women experience poverty at higher rates. The poverty rate for African Americans, Native Americans and Hispanic residents of NC is more than double that for whites. Median income for African American households is 66% of that for white households.

Poverty rate by age and gender



Source: 2017 ACS 1-Year Estimates

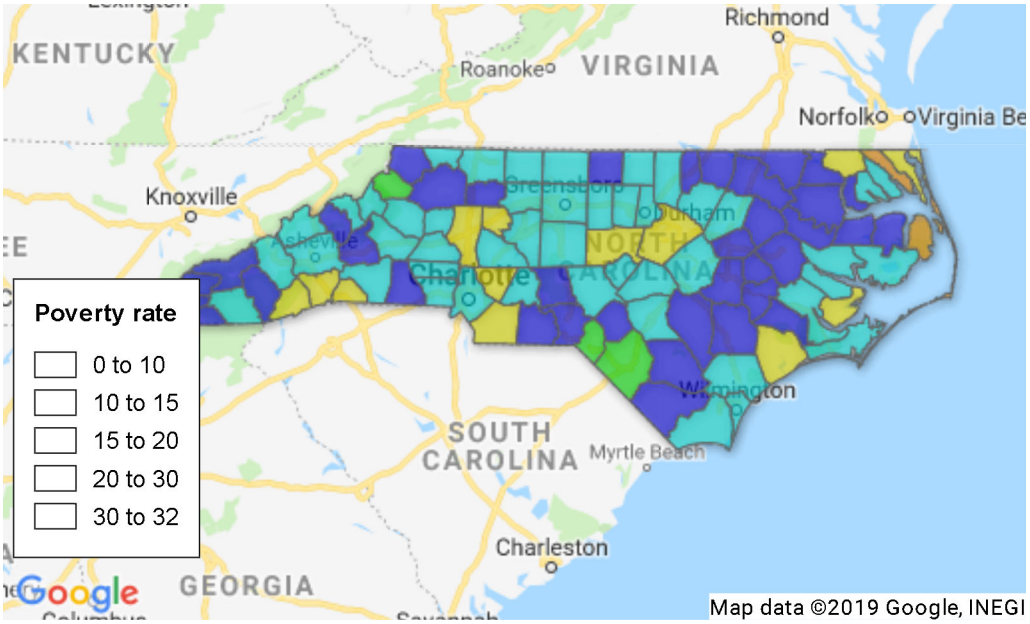
Poverty rate by race and ethnicity



Source: 2017 ACS 1-Year Estimates

Poverty and income in North Carolina also depends on where you live. Camden County's poverty rate is 7.9%; Robeson County's is 31.6%. Forty of North Carolina's 100 counties has a poverty rate over 20%.

Poverty rate by county



Source: 2015 ACS 5-Year Estimates

Exhibit K

Program Alert At 6: Patience and other tips to get the best repairs for Monday's storm damage more »



Perdue vetoes Voter ID

Posted June 23, 2011

By Laura Leslie

Gov. Bev Perdue has vetoed a controversial proposal to require voters to show photo ID at the polls.

Her statement:

> "The right to choose our leaders is among the most precious freedoms we have – both as Americans and North Carolinians. North Carolinians who are eligible to vote have a constitutionally guaranteed right to cast their ballots, and no one should put up obstacles to citizens exercising that right.
>
> "We must always be vigilant in protecting the integrity of our elections. But requiring every voter to present a government-issued photo ID is not the way to do it. This bill, as written, will

> unnecessarily and unfairly disenfranchise many eligible and legitimate voters. The legislature should pass a less extreme bill that allows for other forms of identification, such as those permitted under federal law.
>
> "There was a time in North Carolina history when the right to vote was enjoyed only by some citizens rather than by all. That time is past, and we should not revisit it.
>
> "Therefore, I veto this bill."

Supporters of **House Bill 351** argued it would restore voters' confidence that their vote is secure. But critics pointed out that voter fraud is rarer than being struck by lightning, calling the bill "a solution in search of a problem."

Some have accused the GOP of trying to depress turnout among low-income, elderly, African-American, students, and women voters – the groups most likely to not have a photo ID, many of whom are considered likely to support Obama's re-election effort in 2012.

If it had become law, voting rights advocates say North Carolina's voter ID law would have been among the three strictest in the country.

The Voter ID bill passed both House and Senate along strict party lines, so a veto override seems unlikely.

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Exhibit L

Senate Bill 824 / SL 2018-144

Implementation of Voter ID Const. Amendment.
2017-2018 Session

GOVERNOR'S VETO OF SENATE BILL 824

VIEW BILL DIGEST

VIEW AVAILABLE BILL SUMMARIES

EDITION	FISCAL NOTE
Filed	
Edition 1	Incarceration Incarceration Rev.
Edition 2	Fiscal Note
Edition 3	
Edition 4	
Edition 5	
Ratified	
SL 2018-144	

Last Action:	Ch. SL 2018-144 on 12/19/2018
Sponsors:	Krawiec; Ford; Daniel (Primary)
Attributes:	Public; Contains Appropriations; Contains Local Appropriations; Text has changed; Requests Study
Counties:	No counties specifically cited
Statutes:	130A, 161, 163A, 20 (Chapters); 115D-2, 116-280, 130A-93.1, 161-10, 163A-1133, 163A-1134, 163A-1137, 163A-1140, 163A-1145, 163A-1145.1, 163A-1145.2, 163A-1145.3, 163A-1146, 163A-1147, 163A-1167, 163A-1168, 163A-1298, 163A-1300, 163A-1301, 163A-1303, 163A-1306, 163A-1307, 163A-1308, 163A-1309, 163A-1310, 163A-1315, 163A-1368, 163A-1389, 163A-1411, 163A-1520, 163A-741, 163A-821, 163A-867, 163A-868, 163A-869, 163A-869.1, 163A-913, 20-37.7 (Sections)
Keywords:	APPROPRIATIONS, BOARDS, BUDGETING, COLLEGES & UNIVERSITIES, COMMUNITY COLLEGES, COUNTIES, CRIMES, DMV, DRIVERS LICENSES, EDUCATION, ELECTIONS, ELECTIONS BOARDS, ELECTIONS, STATE BOARD OF, FRAUD, FUNDS & ACCOUNTS, HIGHER EDUCATION, ID SYSTEMS, LICENSES & PERMITS, LOCAL GOVERNMENT, MINORITIES, MOTOR VEHICLES, PHOTOGRAPHY, PRESENTED, PRIVATE SCHOOLS, PUBLIC, RATIFIED, SESSION LAWS, TRIBAL GOVERNMENT, UNC, VETOED, VOTER REGISTRATION,

LATEST 2 VOTES

DATE	SUBJECT	RCS#	AYE	NO	N/V	EXC.ABS.	EXC.VOTE	TOTAL	RESULT
12/19/2018 3:39 p.m.	M4 Previous Question Veto Override	[H]-1353	68	43	3	6	0	111	PASS
12/19/2018 3:39 p.m.	Veto Override	[H]-1354	72	40	2	6	0	112	PASS

HISTORY

DATE	CHAMBER	ACTION	DOCUMENTS	VOTES
12/19/2018		Ch. SL 2018-144		
12/19/2018	House	Veto Overridden		PASS: 72-40
12/18/2018	House	Placed On Cal For 12/19/2018		
12/18/2018	House	Veto Received From Senate		
12/18/2018	Senate	Veto Overridden		PASS: 33-12
12/17/2018	Senate	Placed On Cal For 12/18/2018		
12/14/2018		Vetoed 12/14/2018	Veto Document	
12/6/2018		Pres. To Gov. 12/6/2018		
12/6/2018		Ratified		
12/6/2018	Senate	Ordered Enrolled		
12/6/2018	Senate	Concurred In H Com Sub		PASS: 25-7
12/6/2018	Senate	Motion to Table bill Failed		FAIL: 8-23
12/5/2018	Senate	Placed On Cal For 12/06/2018		
12/5/2018	Senate	Special Message Received For Concurrence in H Com Sub		
12/5/2018	House	Special Message Sent To Senate		
12/5/2018	House	Ordered Engrossed		
12/5/2018	House	Passed 3rd Reading		PASS: 67-40
12/5/2018	House	Passed 2nd Reading		PASS: 67-40

12/5/2018	House	Amend Failed A12	**A12:** Scanned Document	FAIL: 9-95
12/5/2018	House	Amend Failed A13	**A13:** ABK-145-V-2	FAIL: 38-68
12/5/2018	House	Amend Adopted A11	**A11:** AST-182-V-1	PASS: 106-0
12/5/2018	House	Amend Adopted A10	**A10:** ABK-155-V-6	PASS: 105-0
12/5/2018	House	Amendment Withdrawn A8	**A8:** ABK-155-V-5	
12/5/2018	House	Amend Failed A9	**A9:** ABK-151-V-3	FAIL: 17-89
12/5/2018	House	Amend Adopted A7	**A7:** AST-181-V-1	PASS: 68-38
12/5/2018	House	Amend Failed A6	**A6:** ATC-203-V-1	FAIL: 17-89
12/5/2018	House	Amend Adopted A5	**A5:** ATC-204-V-2	PASS: 68-39
12/5/2018	House	Amend Adopted A4	**A4:** ATC-202-V-3	PASS: 106-1
12/5/2018	House	Amend Failed A3	**A3:** ABK-147-V-6	FAIL: 41-66
12/5/2018	House	Amend Adopted A2	**A2:** ABK-133-V-5	PASS: 102-4
12/5/2018	House	Amend Adopted A1	**A1:** Scanned Document	PASS: 86-14
12/4/2018	House	Placed On Cal For 12/05/2018		
12/4/2018	House	Cal Pursuant Rule 36(b)		
12/4/2018	House	Reptd Fav Com Sub 2	**CS:** PCS15340-BKf-54	
12/4/2018	House	Re-ref Com On Rules, Calendar, and Operations of the House		
12/4/2018	House	Reptd Fav Com Substitute	**CS:** PCS15339-BKf-53	
11/29/2018	House	Ref To Com On Elections and Ethics Law		
11/29/2018	House	Passed 1st Reading		
11/29/2018	House	Special Message Received From Senate		
11/29/2018	Senate	Special Message Sent To House		
11/29/2018	Senate	Engrossed		
11/29/2018	Senate	Passed 3rd Reading		PASS: 30-10
11/28/2018	Senate	Passed 2nd Reading		PASS: 32-11
11/28/2018	Senate	Amend Adopted A11	**A11:** AST-165-V-2	PASS: 40-3
11/28/2018	Senate	Amend Adopted A10	**A10:** AST-164-V-1	PASS: 43-0
11/28/2018	Senate	Amend Tabled A9	**A9:** ABK-123-V-2	PASS: 30-12
11/28/2018	Senate	Amend Tabled A8	**A8:** ABK-125-V-1	PASS: 29-14
11/28/2018	Senate	Amend Tabled A7	**A7:** ABK-122-V-1	PASS: 31-12
11/28/2018	Senate	Amend Tabled A6	**A6:** ABK-119-V-6	PASS: 29-13
11/28/2018	Senate	Amendment Withdrawn A5	**A5:** ABK-121-V-2	
11/28/2018	Senate	Motion to Table bill Failed		FAIL: 13-30
11/28/2018	Senate	Amend Adopted A4	**A4:** Scanned Document	PASS: 43-0
11/28/2018	Senate	Amend Adopted A3	**A3:** ABK-118-V-3	PASS: 43-0
11/28/2018	Senate	Amend Adopted A2	**A2:** ABK-126-V-3	PASS: 43-0
11/28/2018	Senate	Amend Adopted A1	**A1:** ABK-120-V-1	PASS: 43-0
11/28/2018	Senate	Placed on Today's Calendar		
11/28/2018	Senate	Reptd Fav		
11/27/2018	Senate	Re-ref Com On Rules and Operations of the Senate		
11/27/2018	Senate	Reptd Fav		
11/27/2018	Senate	Ref to Select Committee on Elections. If fav, re-ref to Rules and Operations of the Senate		

11/27/2018	Senate	Passed 1st Reading	
11/27/2018	Senate	Filed	**DRAFT:** DRS15330-BKf-25

Exhibit M

H645

House Bill 646

H647

ID Approval/Flex Muni One-Stop.
2019-2020 Session

VIEW BILL DIGEST

VIEW AVAILABLE BILL SUMMARIES

EDITION	FISCAL NOTE
Filed	
Edition 1	
Edition 2	
Edition 3	

Last Action:	Re-ref to Redistricting and Elections. If fav, re-ref to Rules and Operations of the Senate on 5/13/2019
Sponsors:	Lewis; Hawkins; Hardister; Russell (Primary) Brockman; Carter; Dahle; Harrison; Humphrey; Kidwell; Majeed; McGrady; Montgomery
Attributes:	Public; Text has changed
Counties:	No counties specifically cited
Statutes:	163A (Chapters); 115D-2, 116-280, 163A-1145.1, 163A-1145.2, 163A-1145.3, 163A-1303 (Sections)
Keywords:	BOARDS, COLLEGES & UNIVERSITIES, EDUCATION, ELECTIONS, ELECTIONS, STATE BOARD OF, HIGHER EDUCATION, ID SYSTEMS, LOCAL GOVERNMENT, PERSONNEL, PUBLIC, PUBLIC OFFICIALS, SESSION LAWS, STATE EMPLOYEES, STUDENTS, UNC, GOVERNMENT EMPLOYEES, LOCAL GOVERNMENT EMPLOYEES

ALL VOTES

DATE	SUBJECT	RCS#	AYE	NO	N/V	EXC.ABS.	EXC.VOTE	TOTAL	RESULT
4/11/2019 12:37 p.m.	Second Reading	[H]-156	100	9	1	10	0	109	PASS
4/11/2019 12:36 p.m.	A1 Lewis Second Reading	[H]-155	108	0	2	10	0	108	PASS

HISTORY

DATE	CHAMBER	ACTION	DOCUMENTS	VOTES
5/13/2019	Senate	Re-ref to Redistricting and Elections. If fav, re-ref to Rules and Operations of the Senate		
5/13/2019	Senate	Withdrawn From Com		
4/15/2019	Senate	Ref To Com On Rules and Operations of the Senate		
4/15/2019	Senate	Passed 1st Reading		
4/15/2019	Senate	Regular Message Received From House		
4/12/2019	House	Regular Message Sent To Senate		
4/11/2019	House	Ordered Engrossed		
4/11/2019	House	Passed 3rd Reading		
4/11/2019	House	Passed 2nd Reading		PASS: 100-9
4/11/2019	House	Amend Adopted A1	A1: Scanned Document	PASS: 108-0
4/10/2019	House	Placed On Cal For 04/11/2019		
4/10/2019	House	Cal Pursuant Rule 36(b)		
4/10/2019	House	Reptd Fav Com Substitute	CS: PCS30321-ST-8	
4/10/2019	House	Re-ref Com On Rules, Calendar, and Operations of the House		
4/10/2019	House	Reptd Fav		
4/9/2019	House	Ref to the Com on Elections and Ethics Law, if favorable, Rules, Calendar, and Operations of the House		
4/9/2019	House	Passed 1st Reading		
4/9/2019	House	Rules Suspended		

Exhibit N

COMMONWEALTH COURT OF PENNSYLVANIA

Fax:

330 MD 2012 13 *Pages*

To: Wiltold Walczak, Esq. (412) 681-8707

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Dawn Yamane Hewett, Esq., Bassel Korker, Esq., John Freedman, Esq.
Whitney Moore, Esq., and Rosemary F. Smith, Esq., Rachel L. Frankel,
Esq., Dorian L. Hurley, Esq. & Dana E. Peterson, Esq.

Kevin Patrick Schmidt, Esq. (717) 787-1788

Benjamin Geffen, Esq. & Jennifer Clarke, Esq. (215) 627-3183

Patrick Cawley, Esq., Calvin Koons, Esq. & Timothy Keating, Esq. (717) 772-4526

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Karen Buck, Esq. (215) 988-1243

Elise Michelle Bruhl, Esq. (215) 683-5296

Howard Langer, Esq., John Grogan, Esq. & Peter Leckman, Esq. (215) 320-5703

Nora Winkelman, Esq. & David Vitale, Esq. (717) 772-3630

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Kevin Mincey, Esq. (215) 587-0628

Dennis Baylor Sent via e-mail

601 Commonwealth Avenue, Suite 2100, P.O. Box 69185, Harrisburg, PA 17105-9185
Marie Murak Phone: (717) 255-1659

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Viviette Applewhite; Wilola Shinholster Lee; Grover Freeland; Gloria Cuttino; Nadine Marsh; Dorothy Barksdale; Bea Bookler; Joyce Block; Henrietta Kay Dickerson; Devra Mirel ("Asher") Schor; the League of Women Voters of Pennsylvania; National Association for the Advancement of Colored People, Pennsylvania State Conference; Homeless Advocacy Project, Petitioners	:	
v.	:	No. 330 M.D. 2012
The Commonwealth of Pennsylvania; Thomas W. Corbett, in his capacity as Governor; Carole Aichele, in her capacity as Secretary of the Commonwealth, Respondents	:	HEARD: July 15, 2013

BEFORE: HONORABLE BERNARD McGINLEY, Judge

OPINION NOT REPORTED

MEMORANDUM OPINION
BY JUDGE McGINLEY **FILED:** August 16, 2013

DETERMINATION on RENEWED APPLICATION for PRELIMINARY INJUNCTION

Before the Court is Petitioners' renewed application for a preliminary injunction to enjoin enforcement of certain provisions of the Act of March 14, 2012, P.L. 195, No. 18 (Act 18), commonly known as the "Voter ID Law." Upon reviewing the evidence on the preliminary injunction, hearing argument and considering the submissions of both parties, which represent their respective best interests, I conclude a preliminary injunction is warranted.

Procedural Context

A preliminary injunction enjoining certain identification aspects of the Voter ID Law has been in place through all elections held since its enactment. Initially, after remand from our Supreme Court, on October 2, 2012, the Honorable Robert E. Simpson issued a preliminary injunction as to the November 2012 Presidential election. Significantly, he enjoined implementation and enforcement of the voter identification requirements, enabling qualified electors to cast a regular ballot without showing qualifying photo identification at the polls.[1] At that time, when the trial on the merits had not yet been scheduled, a preliminary injunction limited to that single election seemed appropriate.

Then, as the trial on the merits could not be held prior to the primary election in May 2013, the parties agreed to continue the preliminary injunction on the same terms as Judge Simpson previously ordered and stipulated to its extension through the May primary. This Court approved the stipulation by order issued on February 19, 2013. Respondents thus conceded to the "soft rollout" of the Voter ID Law for that third election.[2]

[1] Judge Simpson's October order also enjoined Respondents from requiring registered electors to apply for a Pennsylvania Department of Transportation (PennDOT) ID before seeking issuance of a free Department of State (DOS) ID. PennDOT and DOS have since abandoned this "exhaustion requirement," obviating any need to enjoin that process.

[2] The "soft rollouts" were written into Act 18 to provide a transition, from January 1, 2012, through September 17, 2012, encompassing the May 2012 primary, permitting qualified electors to adjust to its mandate to show compliant photo ID before casting a regular ballot.

Under the preliminary injunction in effect for each election to date, poll workers were permitted to request photo identification, but qualified electors were not required to show it. Complicating the matter, poll workers were required to "inform the elector that he or she will be required to comply with that [proof of identification requirement, necessitating compliant photo ID] when voting at future elections ... unless an exemption applies." Section 10(2) of Act 18, 25 P.S. §3050 (Historical and Statutory Notes). However, as the May 2013 primary elections reflect, the information the poll workers were responsible for relaying was not accurate, and its inaccuracy could not be foreseen at the time of its communication.

The trial on the permanent injunction commenced in July 2013, pursuant to this Court's scheduling order. However, the trial exceeded the projected timeframes, and the Court finds itself in much the same position as last summer, facing the limitations presented by an upcoming "Election Day" in November.

Recognizing the circumstances and time constraints which accompany the November 2013 election, both Respondents and Petitioners have agreed to a preliminary injunction for the next election. Indeed, Respondents here request the continuation of a preliminary injunction on the same terms as originally issued last October, as a fourth "soft rollout." The differences in the relief sought surround the mechanism of the injunction and its duration. In light of the agreement of the parties to the imposition of a preliminary injunction in some form, it is unnecessary to analyze each of the elements of proof for a preliminary injunction. The Court will focus instead upon the parties' respective arguments regarding duration and form of the injunction.

Purpose of Preliminary Injunction

The sole object of a preliminary injunction is to preserve the existing status until the merits of the controversy may be fully determined. Mahanoy Twp. Auth. v. Deaper, 356 Pa. 573, 52 A.2d 653 (1947). In deciding a preliminary injunction, it is neither necessary nor proper to decide the case as on final hearing. Crestwood Sch. Dist. v. Topito, 463 A.2d 1247 (Pa. Cmwlth. 1983). In contrast to a permanent injunction, a preliminary injunction does not judge the merits since, by definition, it is a *temporary* remedy granted until the dispute is satisfactorily resolved. Appeal of Little Britain Twp., 651 A.2d 606 (Pa. Cmwlth. 1994).

Both parties represent in their most recent briefs that nothing has changed since Judge Simpson issued the initial preliminary injunction. See Petitioners' Br. at 2 ("nothing has changed since last fall to justify lifting the preliminary injunction"); Respondents' Br. at 7 ("the testimony at the hearing does not show changed circumstances"). This Court must disagree.

Although the evidentiary record has not changed, the prior injunctions did not stop time. Through the passage of time, two elections have been held with another fast approaching. During the repeated "soft rollouts," elections officials informed electors who were registered and qualified to vote that compliant photo ID would be required at the next election. Thus, active voters have been told repeatedly that they could not vote without compliant photo ID. Heeding the warning offered by philosopher George Santayana, that those who do not learn from the past are condemned to repeat it, this Court modifies the prior injunction.

Duration

In October 2012, this Court was not in a position to foresee the shortfall of the initial preliminary injunction's duration, necessitating repeated extension. The "transition period" that the General Assembly designed to expire seven months after passage of the Voter ID Law, is now cued, by party agreement, to extend at least 20 months. What it drafted as temporary has gained permanence. At some point, this "transition" must end.

While it is this Court's intention to finally determine the merits of the permanent injunction before any subsequently scheduled elections, this Court does not control such matters. Although the parties may be amenable to extending a preliminary injunction at a later date, the Court is unable to rely on their willingness to agree to such terms should another election occur before this stage is completed. Certainly, it is preferable for all involved to devote our collective attention to the primary case on the merits and resolve the preliminary injunction issue with some finality. In an abundance of caution, the Court takes this opportunity to save all participants from expending additional resources caused by addressing this issue on an election-by-election basis.

Imposing a preliminary injunction until a final decision is rendered on the permanent injunction, as is traditional, makes sense now that the trial on the merits is completed. This will allow the parties and this Court to address the permanent injunction without distraction or distress from impending elections. Further, this injunction accounts, as best it can, for unplanned exigencies.

Therefore, this preliminary injunction shall continue in full force and effect until this Court concludes proceedings on the merits of the permanent injunction.[3]

Form of Injunction

Our Supreme Court recognized in its decision on appeal, after this Court initially denied preliminary injunctive relief that: "the right to vote in Pennsylvania, as vested in eligible, qualified voters, is a fundamental one." Applewhite v. Commonwealth, __ Pa. __, __, 54 A.3d 1, 3 (2012) (per curiam). Judge Simpson's order was eminently reasonable at the time issued in its implicit assumption that an extended soft rollout would relay accurate information and not impair this right.

As explained in the Supplemental Determination, Act 18 is severable. See Applewhite v. Commonwealth, Dep't of State, (Pa. Cmwlth., No. 330 M.D. 2012, filed Oct. 2, 2012), slip op. at 10-11 (citing Section 103(a) of the Election Code, 25 P.S. §2603(a)). Accordingly, this Court may enjoin those provisions that may result in disenfranchisement and, in effect, mislead eligible, qualified voters.

I adopt Judge Simpson's thoughtful approach and language, with slight modification, narrowly tailored to prevent further inaccuracies at the polls. John G. Bryant Co., Inc. v. Sling Testing & Repair, Inc., 471 Pa. 1, 369 A.2d 1164 (1977) (preliminary injunction must be narrowly tailored to abate the wrong).

[3] Although Petitioners requested relief until all appeals are exhausted to the Supreme Court, the Court declines to enter such a sweeping edict. In the event that one of the parties seeks to stay the final decision on the merits of the permanent injunction, that party may seek a stay on the basis provided in PUC v. Process Gas Consumers Group, 502 Pa. 545, 467 A.2d 805 (1983).

The Court agrees with Respondents that merely *asking* an elector to produce compliant photo ID does not cause disenfranchisement, and election officials are not asked to discontinue that practice here. Yet, the Court cannot (in good conscience) ignore the fact that the information conveyed to electors, if relayed at all, at the last two regularly scheduled elections, was inaccurate. Through two preliminary injunctions, and three "soft rollouts," poll workers were to inform qualified electors that they would not be able to vote at the next election unless they had a compliant photo ID. Each time, this statement, although well-intentioned and hoped to be correct when made, turned out to be wrong. That is because, as our highest court reminded us, this Court is not able to predict the future.

Again, just as this Court cannot predict the actions of government officials, the Court cannot divine the future so as to ensure the statement that: "elector[s] ... will be required to comply with [the proof of identification, *i.e.*, compliant photo ID] requirement when voting at future elections" will be consistently accurate.

There is no value in inaccurate information, and the Court does not deem inaccurate information "educational." It is not a matter of confusion— it is a matter of accuracy. This Court and election officials have a duty to provide correct information at the polls to qualified electors who exercise their vested right to vote. Regardless of whether a request for photo ID causes confusion, telling a qualified elector that he or she will not have the right to vote in future elections if he or she does not obtain compliant photo ID, when that information has been erroneous at

best, deceptive at worst, will not be continued. Not when this Court has witnessed two prior injunctions where the information, in effect, misled qualified electors.

This preliminary injunction does not mandate Respondents to take any action or promote any particular message. Greater Nanticoke Educ. Ass'n v. Greater Nanticoke Area Sch. Dist., 938 A.2d 1177 (Pa. Cmwlth. 2007). Rather, they are ordered to refrain from implementing discrete parts of the Voter ID Law. This preliminary injunction will not define the content of any forecasts.[4] Having learned from past patterns, this limited modification in form of the preliminary injunction is compelled to prevent repeated inaccuracies. The Court will not continue or facilitate the possibility of disseminating misinformation.

Conclusion and Directive

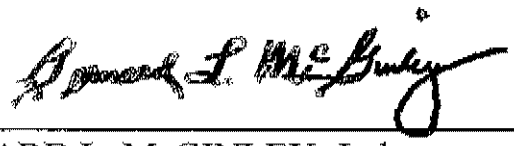
After a full trial, a preliminary injunction is entered until this Court issues a final appealable determination on the merits of the permanent injunction. This is preferable to contending with each election, and potential special election, as it comes.

The terms of the prior preliminary injunctions are modified to enjoin poll workers from informing qualified electors that compliant photo ID is required at future elections. This preliminary injunction will have the effect of extending the majority of the express transition provisions of Act 18 through our final appealable decision on the merits. Specifically, the Court enjoins the requirement

[4] Following Judge Simpson's lead, I leave the education provisions in Section 206(a) of the Election Code, 25 P.S. §2626(a), intact and education at the polls may continue.

in Section 10(2) of Act 18, which states "the election official that requested the proof of identification... [shall] inform the elector that he or she will be required to comply with that requirement when voting at future elections...."

For the foregoing reasons, I enter the following order.



BERNARD L. McGINLEY, Judge

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Viviette Applewhite; Wilola Shinholster Lee; Grover Freeland; Gloria Cuttino; Nadine Marsh; Dorothy Barksdale; Bea Bookler; Joyce Block; Henrietta Kay Dickerson; Devra Mirel ("Asher") Schor; the League of Women Voters of Pennsylvania; National Association for the Advancement of Colored People, Pennsylvania State Conference; Homeless Advocacy Project, Petitioners	:	
v.	:	No. 330 M.D. 2012
The Commonwealth of Pennsylvania; Thomas W. Corbett, in his capacity as Governor; Carole Aichele, in her capacity as Secretary of the Commonwealth, Respondents	:	

ORDER

AND NOW, this 16th day of August, 2013, after a full trial and upon consideration of the oral and written arguments of counsel regarding the modification and/or continuation of a preliminary injunction, and in recognition that both parties are amenable to continuing a preliminary injunction in some form, it is **ORDERED** and **DECREED** as follows:

Petitioners' preliminary injunction previously granted by this Court's order dated October 2, 2012, shall continue in effect **AS MODIFIED** as follows.

Based on the foregoing Determination on Renewed Application for Preliminary Injunction, the Respondents and their agents, servants and officers are hereby **PRELIMINARILY ENJOINED** from:

Implementing or enforcing that part of Act 18 which amends Section 1210(a.2) of the Election Code, 25 P.S. §3050(a.2), and Section 1210(a.4)(5)(ii) of the Election Code, 25 P.S. §3050(a.4), until this Court enters a final appealable decision on the merits of the permanent injunction, and thus affects the election on November 5, 2013, and any subsequent elections until such time. It is the intent of this Preliminary Injunction to extend the transition procedures described in **Section 10(1)** of Act 18 until proceedings before this Court have concluded.

As to **Section 10(2)** of Act 18, implementing or enforcing the following transition procedure(s): "the election official that requested the proof of identification shall ... inform the elector that he or she will be required to comply with that requirement when voting at future elections." It is the intent of this Preliminary Injunction to enjoin verbally informing electors about the necessity of proofs of identification for future elections. Because this Preliminary Injunction shall continue until this Court renders a final appealable decision on the permanent injunction, such information would not be accurate in the event the decision does not become final before any future regularly scheduled or special elections.

Nothing in this Preliminary Injunction shall preclude the Commonwealth from following transition procedures described in Section 10(2) of Act 18, as they relate to providing written information only. All other provisions of Act 18 remain in effect.

As this is the third order imposing a preliminary injunction, with no party requesting or posting a bond to date, and the parties having stipulated to continuing a preliminary injunction previously, the Court finds that no bond is necessary to support continuation of a preliminary injunction in the form set forth herein.

The Court resolves to act on the permanent injunction expeditiously.

Bernard L. McGinley

BERNARD McGINLEY, Judge

Certified from the Record

AUG 16 2013

and Order Exit

Exhibit O

pv_id	county_desc	pv_vote_reason_desc	voter_reg_num	id_provided	id_provided_lbl	comments	vote_counted	reason_not_counted_id	reason_not_counted_desc	other_reason	is_reasonable_impediment	reasonable_impediment_reason_desc	reasonable_impediment_other_reason
33963	WAKE	NO ACCEPTABLE ID	000100451597	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	voter has not applied yet
22105	DURHAM	NO ACCEPTABLE ID	000030218235	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	No impediment provided
22109	DURHAM	NO ACCEPTABLE ID	000030219387	FALSE			N	3	ID NOT PROVIDED	NO INFO IN RI FORM TO ID PERSON	TRUE	WORK SCHEDULE	
22130	DURHAM	NO ACCEPTABLE ID	000030244790	TRUE	PHI		N	3	ID NOT PROVIDED	SSN AND DOB MATCH RECORD	TRUE	OTHER REASONABLE IMPEDIMENT	Leaving something at home is not a reasonable impediment to aquiring it.
2456	WATAUGA	NO ACCEPTABLE ID		FALSE			N	3	ID NOT PROVIDED	VOTER SAID HE WOULD BRING ID TO CBE OFFICE AND NEVER DID.	TRUE	OTHER REASONABLE IMPEDIMENT	DIDN'T KNOW I NEEDED PROOF OF CURRENT RESIDENCE.
17983	MECKLENBURG	NO ACCEPTABLE ID	000001325898	FALSE			N	3	ID NOT PROVIDED	VOTER CLAIMED REASONABLE IMPEDIMENT BUT DID NOT PROVIDE SSN OR OTHER DOCUMENT	TRUE	LOST OR STOLEN PHOTO ID	
17984	MECKLENBURG	NO ACCEPTABLE ID	001000262543	FALSE			N	3	ID NOT PROVIDED	VOTER CLAIMED REASONABLE IMPEDIMENT BUT DID NOT PROVIDE SSN OR OTHER DOCUMENTS.	TRUE	LOST OR STOLEN PHOTO ID	
32701	WAKE	NO ACCEPTABLE ID	000100457646	FALSE			N	3	ID NOT PROVIDED		TRUE	PHOTO ID NOT YET RECEIVED	
32702	WAKE	NO ACCEPTABLE ID	000100172138	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	NO PHOTO ID
9209	BUNCOMBE	NO ACCEPTABLE ID	000000413974	FALSE			N	3	ID NOT PROVIDED	ID WAS LOST - WILL BRING BY BOE THIS WEEK	TRUE	LOST OR STOLEN PHOTO ID	
9215	BUNCOMBE	NO ACCEPTABLE ID	000000272114	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	Voter did not provide any alternative identification document or information.
9254	BUNCOMBE	NO ACCEPTABLE ID	000000393817	FALSE			N	3	ID NOT PROVIDED	DID NOT PROVIDE ALTERNATIVE ID	TRUE	LOST OR STOLEN PHOTO ID	
9889	BUNCOMBE	NO ACCEPTABLE ID		FALSE			N	3	ID NOT PROVIDED	NO ID. NOTE: IN REVIEW. RECIEVED BY STATE BOARD ON 18FEB2016.	TRUE	OTHER REASONABLE IMPEDIMENT	No comments
9989	BUNCOMBE	NO ACCEPTABLE ID	000000151308	TRUE	DL		N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	no reason given
10110	BUNCOMBE	INCORRECT PRECINCT	000000150163	TRUE	DL		N	3	ID NOT PROVIDED	CORRECT BALLOT STYLE	TRUE	OTHER REASONABLE IMPEDIMENT	No comment
1796	LINCOLN	NO RECORD OF REGISTRATION		FALSE	DL		N	3	ID NOT PROVIDED	PROVIDED LAST 4 OF SOCIAL	TRUE	LOST OR STOLEN PHOTO ID	
4920	ROCKINGHAM	NO ACCEPTABLE ID	000000021105	FALSE			N	3	ID NOT PROVIDED		TRUE	DISABILITY OR ILLNESS	
2328	DUPLIN	NO ACCEPTABLE ID	000030015516	FALSE			N	3	ID NOT PROVIDED	NONE COUNTED	TRUE	DISABILITY OR ILLNESS	
3054	BRUNSWICK	NO ACCEPTABLE ID	000600060522	FALSE			N	3	ID NOT PROVIDED	FIRST TIME VOTER WAS REQUIRED TO SHOW ID OR HAVA DOCUMENT	TRUE	LACK OF TRANSPORTATION	
990	HENDERSON	NO ACCEPTABLE ID	000000007196	FALSE		2016 Primary - Reasonable Impediment- Lost or Stolen Photo Id - Other ID not provided by 3/21/16 - NOT APPROVED	N	3	ID NOT PROVIDED	OTHER ID NOT PROVIDED BY 3/21/2016	TRUE	LOST OR STOLEN PHOTO ID	
3404	CHATHAM	NO ACCEPTABLE ID	000000092129	TRUE	PHI		N	3	ID NOT PROVIDED	NO ACCEPTABLE ID	TRUE	PHOTO ID NOT YET RECEIVED	
10092	NEW HANOVER	NO ACCEPTABLE ID	000000141839	FALSE			N	3	ID NOT PROVIDED	DECLARED A REASONABLE IMPEDIMENT BUT DID NOT PROVIDE ACCEPTABLE ID TO THE BOE BEFORE DEADLINE	TRUE	OTHER REASONABLE IMPEDIMENT	Completed a reasonable impediment form, but indicated that she left ID at home. Board decision as to whether it qualifies as a reasonable impediment under the law.
10111	NEW HANOVER	NO ACCEPTABLE ID	000000006354	FALSE		entry in SSN box does not match her records--took me a while to realize it was her zip code!	N	3	ID NOT PROVIDED	DID NOT MEET REASONABLE IMPEDIMENT REQUIREMENTS. PROVIDED ZIP CODE INSTEAD OF SS#. JLD. HAS UNTIL NOON TO PRESENT.VOTER DID NOT PROVIDE ALTERNATIVE ID.	TRUE	WORK SCHEDULE	
10374	NEW HANOVER	NO ACCEPTABLE ID	000000365373	FALSE	NID		N	3	ID NOT PROVIDED	PRESENTED WITH THEIR VOTER REGISTRATION CARD. NO REASON FOR RID. CALLED, LEFT MESSAGE SEEKING FURTHER INFO 3/20/16. CT	TRUE	OTHER REASONABLE IMPEDIMENT	Voter did not provided a reason for the impediment.

pv_id	county_desc	pv_vote_reason_desc	voter_reg_num	id_provided	id_provided_lbl	comments	vote_counted	reason_not_counted_id	reason_not_counted_desc	other_reason	is_reasonable_impediment	reasonable_impediment_reason_desc	reasonable_impediment_other_reason
21808	DURHAM	NO ACCEPTABLE ID		FALSE			N	3	ID NOT PROVIDED	NO ID PROVIDED	TRUE	OTHER REASONABLE IMPEDIMENT	no reason give and id provided
21810	DURHAM	NO ACCEPTABLE ID	000030250931	FALSE			N	3	ID NOT PROVIDED	NO ID	TRUE	OTHER REASONABLE IMPEDIMENT	voter provided no reason for impediment
633	BLADEN	NO ACCEPTABLE ID	000000035825	TRUE	OGD		N	3	ID NOT PROVIDED	DID NOT PROVIDE ID BY DEADLINE	TRUE	OTHER REASONABLE IMPEDIMENT	Miss Amanda said he really did not give a reason, Just did not have I.D. gpw
21906	DURHAM	NO ACCEPTABLE ID	000030244802	TRUE	PHI		N	3	ID NOT PROVIDED	NO ID SS AND DOB MATCH RECORDS	TRUE	OTHER REASONABLE IMPEDIMENT	NO Impediment provided
21871	DURHAM	NO ACCEPTABLE ID	000030265451	FALSE			N	3	ID NOT PROVIDED	HIGH SCHOOL ID WAS ONLY PROVIDED SECOND REVIEW - MOVED TO PENDING	TRUE	OTHER REASONABLE IMPEDIMENT	ONLY PROVIDED HIGH SCHOOL ID NO SIGNATURE OR ALT ID
21857	DURHAM	NO ACCEPTABLE ID	000030186638	FALSE			N	3	ID NOT PROVIDED	ID NOT PROVIDED	TRUE	OTHER REASONABLE IMPEDIMENT	SUSPENDED LICENSE
21870	DURHAM	NO ACCEPTABLE ID	000030265861	FALSE			N	3	ID NOT PROVIDED	NO ID 2ND REVIEW - MOVED TO PENDING	TRUE	OTHER REASONABLE IMPEDIMENT	high school student, no ID NO ALT ID PROVIDED
21845	DURHAM	NO ACCEPTABLE ID		TRUE	PHI		N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	No Impediment provided
21852	DURHAM	NO ACCEPTABLE ID	000030259953	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	No Impediment reason provided
21853	DURHAM	NO ACCEPTABLE ID	000030244117	TRUE	PHI		N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	No Impediment provided
2419	WATAUGA	NO ACCEPTABLE ID		TRUE	PHI		N	3	ID NOT PROVIDED	SHE FILLED OUT THE REASONABLE IMPEDIMENT, BUT NEVER BROUGHT PROOF OF RESIDENCE TO THE CBE.	TRUE	WORK SCHEDULE	
4847	CRAVEN	NO ACCEPTABLE ID	000000145783	FALSE			N	3	ID NOT PROVIDED	VOTER COULD NOT STATE BDATE,SSN. WHERE HE LIVED, ETC	TRUE	LACK BIRTH CERTIF/AGE & ID DOC	
2439	STANLY	NO ACCEPTABLE ID	000000070112	FALSE			N	3	ID NOT PROVIDED	NO ALTERNATIVE ID	TRUE	OTHER REASONABLE IMPEDIMENT	Could not get an appointment with DMV until April 1
3130	CHATHAM	NO ACCEPTABLE ID	000000126504	FALSE			N	3	ID NOT PROVIDED	SSN PROVIDED DOES MATCH THE ONE WE HAVE IN HER RECORDS. WE HAVE TRIED TO CONTACT VOTER ON SEVERAL DIFFERENT OCCASSIONS TO VERIFY, AND SHE HAS NOT RETURNED OUR CALLS.	TRUE	DISABILITY OR ILLNESS	
21874	DURHAM	NO ACCEPTABLE ID	000030267046	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	HIGH SCHOOL STUDENT, NO ID NO ALT ID PROVIDED
2111	BERTIE	NO ACCEPTABLE ID	000000002104	FALSE			N	3	ID NOT PROVIDED		TRUE	LOST OR STOLEN PHOTO ID	
21895	DURHAM	NO ACCEPTABLE ID	000030244800	TRUE	PHI		N	3	ID NOT PROVIDED	NEEDS PHOTO ID BOTTOM OF RI FORM NOT FILLED OUT	TRUE	PHOTO ID NOT YET RECEIVED	
21897	DURHAM	NO ACCEPTABLE ID	000030257833	TRUE	PHI		N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	NO impediment given
21899	DURHAM	NO ACCEPTABLE ID	000030203349	TRUE	PHI		N	3	ID NOT PROVIDED	SSN MATCHES OUR RECORDS	TRUE	OTHER REASONABLE IMPEDIMENT	nothing marked no acceotabe id
21900	DURHAM	NO ACCEPTABLE ID	000030240562	TRUE	PHI		N	3	ID NOT PROVIDED	NO ID SS AND DOB MATCH RECORDS CHANGED ADDRESS	TRUE	OTHER REASONABLE IMPEDIMENT	None provided
21901	DURHAM	NO ACCEPTABLE ID	000030208608	TRUE	PHI		N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	no reason checked
21904	DURHAM	NO ACCEPTABLE ID	000030246021	TRUE	PHI		N	3	ID NOT PROVIDED	NO ID DOB MATCHED RECORD NO SS IN RECORD OR ON FORM	TRUE	OTHER REASONABLE IMPEDIMENT	NO Impediment reason provided
21905	DURHAM	NO ACCEPTABLE ID	000030245943	TRUE	PHI		N	3	ID NOT PROVIDED	NO ID SS AND DOB MATCH RECORDS	TRUE	OTHER REASONABLE IMPEDIMENT	NO RI Reason provided
21907	DURHAM	NO ACCEPTABLE ID	000030244801	TRUE	PHI		N	3	ID NOT PROVIDED	NO ACCEPTABLE ID, NO SIGNATURE ON RID	TRUE	LACK BIRTH CERTIF/AGE & ID DOC	
21908	DURHAM	NO ACCEPTABLE ID	000030239999	TRUE	PHI		N	3	ID NOT PROVIDED	SSN MATCHES OUR RECORDS	TRUE	OTHER REASONABLE IMPEDIMENT	nothing checked
21909	DURHAM	NO ACCEPTABLE ID	000030247438	TRUE	PHI		N	3	ID NOT PROVIDED	SSN MATCHES OUR RECORDS	TRUE	OTHER REASONABLE IMPEDIMENT	no reason checked
21910	DURHAM	NO ACCEPTABLE ID	000030205317	TRUE	PHI		N	3	ID NOT PROVIDED	SSN MATCHES OUR RECORDS	TRUE	OTHER REASONABLE IMPEDIMENT	nothing marked
21911	DURHAM	NO ACCEPTABLE ID	000030206581	TRUE	PHI		N	3	ID NOT PROVIDED	NO ID SS AND DOB MATCH	TRUE	OTHER REASONABLE IMPEDIMENT	NO Impediment Reason given

pv_id	county_desc	pv_vote_reason_desc	voter_reg_num	id_provided	id_provided_lbl	comments	vote_counted	reason_not_counted_id	reason_not_counted_desc	other_reason	is_reasonable_impediment	reasonable_impediment_reason_desc	reasonable_impediment_other_reason
21912	DURHAM	NO ACCEPTABLE ID	000030203152	TRUE	PHI		N	3	ID NOT PROVIDED	NO ID SS AND DOB MATCH RECORDS	TRUE	OTHER REASONABLE IMPEDIMENT	NO IMPEDIMENT DECLARED
21913	DURHAM	NO ACCEPTABLE ID	000030244023	TRUE	PHI		N	3	ID NOT PROVIDED	SSN MATCHES OUR RECORDS	TRUE	OTHER REASONABLE IMPEDIMENT	nothing checked
21914	DURHAM	NO ACCEPTABLE ID	000030209672	TRUE	PHI		N	3	ID NOT PROVIDED	SSN MATCHES OUR RECORDS	TRUE	OTHER REASONABLE IMPEDIMENT	nothing checked
21915	DURHAM	NO ACCEPTABLE ID	000030262309	TRUE	PHI		N	3	ID NOT PROVIDED	NO ID SS AND DOB MATCH RECORDS	TRUE	OTHER REASONABLE IMPEDIMENT	No Reasonable Impediment given.
21916	DURHAM	NO ACCEPTABLE ID	000030257845	TRUE	PHI		N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	no acceptable id ssn provided and matched our records NO REASONABLE IMPEDIMENT PROVIDED
21917	DURHAM	NO ACCEPTABLE ID	000030248230	TRUE	PHI		N	3	ID NOT PROVIDED	NO SSN TO MATCH	TRUE	OTHER REASONABLE IMPEDIMENT	nothing noted
21918	DURHAM	NO ACCEPTABLE ID	000030203172	TRUE	PHI		N	3	ID NOT PROVIDED	NO ACCEPTABLE ID	TRUE	OTHER REASONABLE IMPEDIMENT	NO ACCEPTABLE ID
21919	DURHAM	NO ACCEPTABLE ID	000030240144	TRUE	PHI		N	3	ID NOT PROVIDED	VOTER REQUIRED TO PROVIDE ID NO SSN TO MATCH IN VOTER REC	TRUE	OTHER REASONABLE IMPEDIMENT	No Impediment provided
21920	DURHAM	NO ACCEPTABLE ID	000030244107	TRUE	PHI		N	3	ID NOT PROVIDED	SSN MATCHES OU RECORDS	TRUE	OTHER REASONABLE IMPEDIMENT	No Impediment provided
21921	DURHAM	NO ACCEPTABLE ID	000030206825	TRUE	PHI		N	3	ID NOT PROVIDED	NO ID ADDED SS# DOB MATCHED RECORD	TRUE	OTHER REASONABLE IMPEDIMENT	NO ID - NO REASON LISTED
21922	DURHAM	NO ACCEPTABLE ID	000030240574	FALSE	PHI		N	3	ID NOT PROVIDED	VOTER NEEDS TO PROVIDE ID	TRUE	OTHER REASONABLE IMPEDIMENT	No impediment marked
21925	DURHAM	NO ACCEPTABLE ID	000030262367	TRUE	PHI		N	3	ID NOT PROVIDED	RI FORM NOT FILLED OUT CORRECTLY. NO RI REASON. BUT SSN AND DOB MATCH RECORD.	TRUE	OTHER REASONABLE IMPEDIMENT	not listed
21926	DURHAM	NO ACCEPTABLE ID	000030262291	TRUE	PHI		N	3	ID NOT PROVIDED	SSN MATCHES OUR RECORDS	TRUE	OTHER REASONABLE IMPEDIMENT	no ri marked on form
21937	DURHAM	NO ACCEPTABLE ID	000030204797	TRUE	PHI		N	3	ID NOT PROVIDED	SSI AND DOB MATCH RECORD, BUT FORM IS NOT SIGNED	TRUE	WORK SCHEDULE	
21944	DURHAM	NO ACCEPTABLE ID	000030247955	TRUE	PHI		N	3	ID NOT PROVIDED	NO ID SS AND DOB MATCH RECORDS NO SIGNATURE ON RI	TRUE	WORK SCHEDULE	
34605	WAKE	NO ACCEPTABLE ID	000010272019	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	Principle
4977	GUILFORD	NO ACCEPTABLE ID	000009946222	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	ID expired
5038	GUILFORD	NO ACCEPTABLE ID	000010077408	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	No State ID
5051	GUILFORD	NO ACCEPTABLE ID	000010148805	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	other state ID
35241	WAKE	NO ACCEPTABLE ID	000100216232	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	FORGOT IT AND NO TIME TO GET
35244	WAKE	NO ACCEPTABLE ID	000100178330	FALSE			N	3	ID NOT PROVIDED		TRUE	LOST OR STOLEN PHOTO ID	
35339	WAKE	NO ACCEPTABLE ID	000100390209	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	Out of state drivers license
35545	WAKE	NO ACCEPTABLE ID	000100402700	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	passport at home in PA
35826	WAKE	NO ACCEPTABLE ID	000100288685	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	out of state student
38717	WAKE	NO ACCEPTABLE ID	000100268691	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	moved to DC for school; had to change id card to dc for parking purposes
5061	GUILFORD	NO ACCEPTABLE ID	000010076685	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	no comment
5115	GUILFORD	NO ACCEPTABLE ID	000010088837	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	NO NC ID
5124	GUILFORD	NO ACCEPTABLE ID	000010094697	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	No reason checked
5128	GUILFORD	NO ACCEPTABLE ID	000010146674	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	no reason listed on prov ballot

pv_id	county_desc	pv_vote_reason_desc	voter_reg_num	id_provided	id_provided_lbl	comments	vote_counted	reason_not_counted_id	reason_not_counted_desc	other_reason	is_reasonable_impediment	reasonable_impediment_reason_desc	reasonable_impediment_other_reason
1126	CURRITUCK	NO ACCEPTABLE ID	000000034946	FALSE			N	3	ID NOT PROVIDED	DIRECTOR CALLED VOTER TO DETERMINE REASONABLE IMPEDIMENT. VOTER SAID SHE DID NOT HAVE ONE AND UNDERSTOOD HER BALLOT MAY NOT BE APPROVED BY BOARD.	TRUE	OTHER REASONABLE IMPEDIMENT	Her VA DL had not yet expired so she hasn't gotten her NC DL. She told me she had no reasonable impediment preventing her form obtaining a valid photo ID.
38379	WAKE	NO ACCEPTABLE ID	000100058292	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	FORGOT IT
21948	DURHAM	NO ACCEPTABLE ID	000030257848	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	NO ACCEPTABLE ID
21959	DURHAM	NO ACCEPTABLE ID	000030203048	FALSE			N	3	ID NOT PROVIDED	RI FORM NOT FILLED OUT	TRUE	OTHER REASONABLE IMPEDIMENT	RI form not filled out
21962	DURHAM	NO ACCEPTABLE ID	000030193389	FALSE			N	3	ID NOT PROVIDED	NO REASONABLE IMPEDIMENT FORM INCLUDED	TRUE	LOST OR STOLEN PHOTO ID	
21970	DURHAM	NO ACCEPTABLE ID	000030245314	FALSE			N	3	ID NOT PROVIDED	BOTTOM PART OF RI NOT COMPLETED	TRUE	WORK SCHEDULE	
21972	DURHAM	NO ACCEPTABLE ID	000030244731	FALSE			N	3	ID NOT PROVIDED	RI FORM NOT COMPLETED--NO SSN OR DOB PROVIDED	TRUE	LACK OF TRANSPORTATION	
21976	DURHAM	NO ACCEPTABLE ID	000030203328	FALSE			N	3	ID NOT PROVIDED	RI FORM NOT MARKED	TRUE	OTHER REASONABLE IMPEDIMENT	nothing marked on form
21982	DURHAM	NO ACCEPTABLE ID	000030213411	FALSE			N	3	ID NOT PROVIDED	RI NOT FILLED OUT--NO SSN OR DOB	TRUE	OTHER REASONABLE IMPEDIMENT	not stated
21983	DURHAM	NO ACCEPTABLE ID	000030203254	FALSE			N	3	ID NOT PROVIDED	PROVISIONAL FORM NOT SIGNED	TRUE	OTHER REASONABLE IMPEDIMENT	nothing marked on form
21987	DURHAM	NO ACCEPTABLE ID	000030204687	TRUE	PHI		N	3	ID NOT PROVIDED		TRUE	WORK SCHEDULE	
21993	DURHAM	NO ACCEPTABLE ID	000030205883	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	no acceptable id presented ssn matches NO REASONABLE IMPEDIMENT PROVIDED
32546	WAKE	NO ACCEPTABLE ID	000010351157	FALSE			N	3	ID NOT PROVIDED		TRUE	LACK OF TRANSPORTATION	
984	HENDERSON	NO ACCEPTABLE ID		FALSE		2016 Primary - Not Approved - NOT REGISTERED	N	3	ID NOT PROVIDED	NOT REGISTERED	TRUE	OTHER REASONABLE IMPEDIMENT	Called Union Cty - was told that she could vote here even though they were told just moved here - didn't offer absentee ballot choice
22011	DURHAM	NO ACCEPTABLE ID	000030218288	TRUE	PHI		N	3	ID NOT PROVIDED	NO ID WRONG PARTY SS AND DOB NOT PROVIDED	TRUE	OTHER REASONABLE IMPEDIMENT	NO ID
22021	DURHAM	NO ACCEPTABLE ID	000030265470	FALSE			N	3	ID NOT PROVIDED	STUDENT, NO ID	TRUE	OTHER REASONABLE IMPEDIMENT	STUDENT, NO ID NO ALT ID PROVIDED
695	BLADEN	NO ACCEPTABLE ID	000000053662	FALSE			N	3	ID NOT PROVIDED	NO PHOTO ID PROVIDED BY CUT-OFF TIME-IS ACTIVE VOTER	TRUE	PHOTO ID NOT YET RECEIVED	
22046	DURHAM	NO ACCEPTABLE ID	000030240145	TRUE	OGD		N	3	ID NOT PROVIDED	NO ID SS AND DOB NOT PROVIDED	TRUE	OTHER REASONABLE IMPEDIMENT	NO ID
22051	DURHAM	NO ACCEPTABLE ID	000030260022	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	NO ACCEPTABLE ID
22054	DURHAM	NO ACCEPTABLE ID	000030259678	FALSE			N	3	ID NOT PROVIDED	SSN AND DOB MATCH RECORD	TRUE	OTHER REASONABLE IMPEDIMENT	NO IMPEDIMENT GIVEN
22068	DURHAM	NO ACCEPTABLE ID	000030239282	FALSE			N	3	ID NOT PROVIDED	CHECKED, BUT NO COMMENT, UNKNOWN PROBLEM	TRUE	OTHER REASONABLE IMPEDIMENT	checked, but unknown problem
22069	DURHAM	NO ACCEPTABLE ID	000030248280	FALSE			N	3	ID NOT PROVIDED	VOTER DID NOT SIGN REASONABLE IMPEDIMENT	TRUE	DISABILITY OR ILLNESS	
22073	DURHAM	NO ACCEPTABLE ID	000030207474	TRUE	PHI		N	3	ID NOT PROVIDED	NO SS OR DOB ON RI	TRUE	OTHER REASONABLE IMPEDIMENT	PASSPORT IN HOME STATE (VT)
2144	HOKE	NO ACCEPTABLE ID	000000055104	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	Wrong ID
22077	DURHAM	NO ACCEPTABLE ID	000030259611	TRUE	PHI		N	3	ID NOT PROVIDED	SSN AND DOB MATCH RECORD, BUT RI FORM IS NOT SIGNED BY VOTER	TRUE	LACK OF TRANSPORTATION	
22078	DURHAM	NO ACCEPTABLE ID	000030240095	TRUE	PHI		N	3	ID NOT PROVIDED	RI--FORM NOT SIGNED	TRUE	OTHER REASONABLE IMPEDIMENT	passport out of state
22079	DURHAM	NO ACCEPTABLE ID	000030260023	TRUE	PHI		N	3	ID NOT PROVIDED	RI--SSN MATCHES BUT DOB DOES NOT.	TRUE	OTHER REASONABLE IMPEDIMENT	"out of state" is not an impediment
22080	DURHAM	NO ACCEPTABLE ID	000030246504	TRUE	PHI		N	3	ID NOT PROVIDED	SSN ON RI FORM MATCHES RECORD, BUT DOB NOT ON RI FORM	TRUE	LACK OF TRANSPORTATION	

pv_id	county_desc	pv_vote_reason_desc	voter_reg_num	id_provided	id_provided_lbl	comments	vote_counted	reason_not_counted_id	reason_not_counted_desc	other_reason	is_reasonable_impediment	reasonable_impediment_reason_desc	reasonable_impediment_other_reason
22081	DURHAM	NO ACCEPTABLE ID	000030217974	TRUE	PHI		N	3	ID NOT PROVIDED	SSN IN TOP PART OF RI FORM MATCHES RECORD, BUT BOTTOM PART OF RI FORM IS NOT FILLED OUT.	TRUE	LACK OF TRANSPORTATION	
22085	DURHAM	NO ACCEPTABLE ID		TRUE	UTB		N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	Did not understand the ID Law
22087	DURHAM	NO ACCEPTABLE ID	000030240829	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	None provided
22093	DURHAM	NO ACCEPTABLE ID	000030206090	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	None provided
985	HENDERSON	NO ACCEPTABLE ID		TRUE	UTB	2016 Primary - No Acceptable ID - No Registered - NOT APPROVED	N	3	ID NOT PROVIDED	NOT REGISTERED	TRUE	WORK SCHEDULE	
22099	DURHAM	NO ACCEPTABLE ID	000030262245	TRUE	PHI		N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	document in home state,- CALIFORNIA
17970	MECKLENBURG	NO ACCEPTABLE ID	000000213911	FALSE			N	3	ID NOT PROVIDED	REASONABLE IMPEDIMENT. DID NOT PROVIDE SSN OR ANOTHER DOCUMENT.	TRUE	LOST OR STOLEN PHOTO ID	
17973	MECKLENBURG	NO ACCEPTABLE ID	000001342641	FALSE			N	3	ID NOT PROVIDED	REASONABLE IMPEDIMENT GIVEN. NO VALID SOCIAL SECURITY OR HAVA ID PROVIDED. NO COUNT.	TRUE	LOST OR STOLEN PHOTO ID	
2307	HOKE	NO ACCEPTABLE ID	000000005056	FALSE			N	3	ID NOT PROVIDED		TRUE	LOST OR STOLEN PHOTO ID	
2304	WILKES	NO ACCEPTABLE ID		FALSE			N	3	ID NOT PROVIDED		TRUE	LOST OR STOLEN PHOTO ID	
13653	ROBESON	NO ACCEPTABLE ID	000000390319	FALSE			N	3	ID NOT PROVIDED	NOT APPROVED UNTIL COPY OF PHOTO ID IS RECEIVED IN OFFICE	TRUE	LOST OR STOLEN PHOTO ID	
13664	ROBESON	NO ACCEPTABLE ID	000000390418	FALSE	DL		N	3	ID NOT PROVIDED	NOT APPROVED UNTIL A PHOTO ID IS PROVIDED TO THE OFFICE	TRUE	LOST OR STOLEN PHOTO ID	
1198	MONTGOMERY	NO ACCEPTABLE ID	000000006194	TRUE	NID		N	3	ID NOT PROVIDED	NO ID PROVIDED. REASONABLE IMPEDIMENT DECLARATION COMPLETED. VOTER DID NOT PROVIDE ALTERNATIVE IDENTIFICATION.	TRUE	DISABILITY OR ILLNESS	
3623	LEE	NO ACCEPTABLE ID	000030001065	FALSE	DL	Applied for license - not yet received. Did not bring ID to the office and did not provide any at the precinct.	N	3	ID NOT PROVIDED		TRUE	PHOTO ID NOT YET RECEIVED	
2486	STANLY	NO ACCEPTABLE ID	000000011511	FALSE			N	3	ID NOT PROVIDED	NO ALTERNATIVE ID	TRUE	MULTIPLE	Disability or Illness Lack of Transportation
2593	STANLY	NO ACCEPTABLE ID	000000050591	FALSE			N	3	ID NOT PROVIDED	DID NOT BRING ID	TRUE	OTHER REASONABLE IMPEDIMENT	none listed
18228	MECKLENBURG	NO ACCEPTABLE ID	000099869013	FALSE			N	3	ID NOT PROVIDED	NO PHOTO ID PROVIDED. VALID REASONABLE IMPEDIMENT BUT NO HAVA ID OR SOCIAL SECURITY NUMBER PROVIDED.	TRUE	LOST OR STOLEN PHOTO ID	
18271	MECKLENBURG	NO ACCEPTABLE ID	001000223187	FALSE			N	3	ID NOT PROVIDED	NO PHOTO ID PROVIDED. VALID REASONABLE IMPEDIMENT BUT NO HAVA ID OR SOCIAL SECURITY NUMBER PROVIDED.	TRUE	LOST OR STOLEN PHOTO ID	
18288	MECKLENBURG	NO ACCEPTABLE ID	001000206322	FALSE			N	3	ID NOT PROVIDED	NO HAVA ID OR SOCIAL SECURITY NUMBER PROVIDED FOR REASONABLE IMPEDIMENT. ADDITIONALLY, MISSING SIGNATURE FOR REASONABLE IMPEDIMENT REASON.	TRUE	LOST OR STOLEN PHOTO ID	
18322	MECKLENBURG	NO ACCEPTABLE ID	001000118433	FALSE			N	3	ID NOT PROVIDED	NO PHOTO ID. INVALID REASONABLE IMPEDIMENT GIVEN: COLLEGE STUDENT/COLLEGE SCHEDULE. VALID SOCIAL SECURITY NUMBER/HAVA ID PROVIDED. NOT APPROVED. .	TRUE	OTHER REASONABLE IMPEDIMENT	college student/college schedule

pv_id	county_desc	pv_vote_reason_desc	voter_reg_num	id_provided	id_provided_lbl	comments	vote_counted	reason_not_counted_id	reason_not_counted_desc	other_reason	is_reasonable_impediment	reasonable_impediment_reason_desc	reasonable_impediment_other_reason
18391	MECKLENBURG	NO ACCEPTABLE ID	000001238667	FALSE			N	3	ID NOT PROVIDED	NO HAVA ID OR SOCIAL SECURITY NUMBER PROVIDED FOR REASONABLE IMPEDIMENT. ADDITIONALLY, MISSING SIGNATURE FOR REASONABLE IMPEDIMENT REASON.	TRUE	LOST OR STOLEN PHOTO ID	
18618	MECKLENBURG	NO ACCEPTABLE ID	000000584409	FALSE			N	3	ID NOT PROVIDED	NO PHOTO ID PROVIDED. VALID REASONABLE IMPEDIMENT BUT NO HAVA ID OR SOCIAL SECURITY NUMBER PROVIDED.	TRUE	DISABILITY OR ILLNESS	
18633	MECKLENBURG	NO ACCEPTABLE ID	001000012140	FALSE			N	3	ID NOT PROVIDED	NO HAVA ID OR SOCIAL SECURITY NUMBER PROVIDED FOR REASONABLE IMPEDIMENT. ADDITIONALLY, MISSING SIGNATURE FOR REASONABLE IMPEDIMENT REASON.	TRUE	LOST OR STOLEN PHOTO ID	
18649	MECKLENBURG	NO ACCEPTABLE ID	001000222758	FALSE			N	3	ID NOT PROVIDED	NO PHOTO ID PROVIDED. VALID REASONABLE IMPEDIMENT BUT INVALID SOCIAL SECURITY NUMBER PROVIDED.	TRUE	OTHER REASONABLE IMPEDIMENT	college student/college schedule per Davidson College address
18652	MECKLENBURG	NO ACCEPTABLE ID	000999919815	FALSE			N	3	ID NOT PROVIDED	NO PHOTO ID PROVIDED. VALID REASONABLE IMPEDIMENT BUT NO HAVA ID OR SOCIAL SECURITY NUMBER PROVIDED.	TRUE	LOST OR STOLEN PHOTO ID	
18654	MECKLENBURG	NO ACCEPTABLE ID	001000113717	FALSE			N	3	ID NOT PROVIDED	NO PHOTO ID. INVALID REASONABLE IMPEDIMENT GIVEN: COLLEGE STUDENT/COLLEGE SCHEDULE. NO COUNT	TRUE	OTHER REASONABLE IMPEDIMENT	Colelge student/college schedule
18655	MECKLENBURG	NO ACCEPTABLE ID	000001305667	FALSE			N	3	ID NOT PROVIDED	NO HAVA ID OR SOCIAL SECURITY NUMBER PROVIDED FOR REASONABLE IMPEDIMENT. ADDITIONALLY, MISSING SIGNATURE FOR REASONABLE IMPEDIMENT REASON.	TRUE	LOST OR STOLEN PHOTO ID	
18660	MECKLENBURG	NO ACCEPTABLE ID	000000555322	FALSE			N	3	ID NOT PROVIDED	NO HAVA ID OR SOCIAL SECURITY NUMBER PROVIDED FOR REASONABLE IMPEDIMENT. ADDITIONALLY, MISSING SIGNATURE FOR REASONABLE IMPEDIMENT REASON.	TRUE	DISABILITY OR ILLNESS	
18667	MECKLENBURG	NO ACCEPTABLE ID	001000266167	FALSE			N	3	ID NOT PROVIDED	NO PHOTO ID. INVALID REASONABLE IMPEDIMENT GIVEN: COLLEGE STUDENT/COLLEGE SCHEDULE (PER DAVIDSON COLLEGE ADDRESS). VALID SOCIAL SECURITY NUMBER/HAVA ID PROVIDED. NOT APPROVED.	TRUE	OTHER REASONABLE IMPEDIMENT	College student/College schedule
18699	MECKLENBURG	NO ACCEPTABLE ID	001000116452	FALSE			N	3	ID NOT PROVIDED	NO PHOTO ID. INVALID REASONABLE IMPEDIMENT GIVEN: COLLEGE STUDENT/COLLEGE SCHEDULE	TRUE	OTHER REASONABLE IMPEDIMENT	College student/College schedule
18733	MECKLENBURG	NO ACCEPTABLE ID	000000895878	FALSE			N	3	ID NOT PROVIDED	NO PHOTO ID PROVIDED. VALID REASONABLE IMPEDIMENT BUT NO HAVA ID OR SOCIAL SECURITY NUMBER PROVIDED.	TRUE	LOST OR STOLEN PHOTO ID	
18843	MECKLENBURG	NO ACCEPTABLE ID	001000116762	FALSE			N	3	ID NOT PROVIDED	NO PHOTO ID PROVIDED. VALID REASONABLE IMPEDIMENT BUT NO HAVA ID OR SOCIAL SECURITY NUMBER PROVIDED.	TRUE	LOST OR STOLEN PHOTO ID	
18938	MECKLENBURG	NO ACCEPTABLE ID	001000091055	FALSE			N	3	ID NOT PROVIDED	NO PHOTO ID PROVIDED. VALID REASONABLE IMPEDIMENT BUT NO HAVA ID OR SOCIAL SECURITY NUMBER PROVIDED.	TRUE	DISABILITY OR ILLNESS	
18981	MECKLENBURG	NO ACCEPTABLE ID	001000225356	FALSE			N	3	ID NOT PROVIDED	NO PHOTO ID. INVALID REASONABLE IMPEDIMENT GIVEN: COLLEGE STUDENT/COLLEGE SCHEDULE (PER DAVIDSON COLLEGE ADDRESS). VALID SOCIAL SECURITY NUMBER/HAVA ID PROVIDED. NOT COUNTED AS PER BOARD DECISION.	TRUE	OTHER REASONABLE IMPEDIMENT	College student/College schedule

pv_id	county_desc	pv_vote_reason_desc	voter_reg_num	id_provided	id_provided_lbl	comments	vote_counted	reason_not_counted_id	reason_not_counted_desc	other_reason	is_reasonable_impediment	reasonable_impediment_reason_desc	reasonable_impediment_other_reason
18992	MECKLENBURG	NO ACCEPTABLE ID	000999919802	FALSE			N	3	ID NOT PROVIDED	NO HAVA ID OR SOCIAL SECURITY NUMBER PROVIDED FOR REASONABLE IMPEDIMENT. ADDITIONALLY, MISSING SIGNATURE FOR REASONABLE IMPEDIMENT REASON.	TRUE	FAMILY RESPONSIBILITIES	
18995	MECKLENBURG	NO ACCEPTABLE ID	000001153844	FALSE			N	3	ID NOT PROVIDED	NO PHOTO ID PROVIDED. VALID REASONABLE IMPEDIMENT BUT NO HAVA ID OR SOCIAL SECURITY NUMBER PROVIDED.	TRUE	LOST OR STOLEN PHOTO ID	
19040	MECKLENBURG	NO ACCEPTABLE ID	001000106513	FALSE			N	3	ID NOT PROVIDED	NO PHOTO ID PROVIDED. VALID REASONABLE IMPEDIMENT BUT NO HAVA ID OR SOCIAL SECURITY NUMBER PROVIDED.	TRUE	LOST OR STOLEN PHOTO ID	
19073	MECKLENBURG	NO ACCEPTABLE ID	001000184115	FALSE			N	3	ID NOT PROVIDED	NO PHOTO ID PROVIDED. VALID REASONABLE IMPEDIMENT BUT NO HAVA ID OR SOCIAL SECURITY NUMBER PROVIDED.	TRUE	WORK SCHEDULE	
19103	MECKLENBURG	NO ACCEPTABLE ID	000999951260	FALSE			N	3	ID NOT PROVIDED	NO PHOTO ID PROVIDED. VALID REASONABLE IMPEDIMENT BUT NO HAVA ID OR SOCIAL SECURITY NUMBER PROVIDED.	TRUE	LOST OR STOLEN PHOTO ID	
19139	MECKLENBURG	NO ACCEPTABLE ID	000001015101	FALSE			N	3	ID NOT PROVIDED	NO PHOTO ID PROVIDED. VALID REASONABLE IMPEDIMENT BUT NO HAVA ID OR SOCIAL SECURITY NUMBER PROVIDED.	TRUE	LOST OR STOLEN PHOTO ID	
19160	MECKLENBURG	NO ACCEPTABLE ID	001000220040	FALSE			N	3	ID NOT PROVIDED	NO PHOTO ID. INVALID REASONABLE IMPEDIMENT GIVEN: COLLEGE STUDENT/COLLEGE SCHEDULE. NO COUNT	TRUE	OTHER REASONABLE IMPEDIMENT	College student/College schedule
19233	MECKLENBURG	NO ACCEPTABLE ID	001000286324	FALSE			N	3	ID NOT PROVIDED	NO PHOTO ID PROVIDED. VALID REASONABLE IMPEDIMENT BUT NO HAVA ID OR SOCIAL SECURITY NUMBER PROVIDED.	TRUE	PHOTO ID NOT YET RECEIVED	
5097	ROCKINGHAM	NO ACCEPTABLE ID	000000048413	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	Left id at work in High Point.
33201	WAKE	NO ACCEPTABLE ID	000100295470	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	OUT OF STATE LICENSE (OVER 70)
33224	WAKE	NO ACCEPTABLE ID	000100266632	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	OUT OF STATE DL
4677	ALAMANCE	NO ACCEPTABLE ID	000009027124	FALSE			N	3	ID NOT PROVIDED		TRUE	LOST OR STOLEN PHOTO ID	
3102	BRUNSWICK	NO ACCEPTABLE ID	000001454218	FALSE			N	3	ID NOT PROVIDED	VOTER DID NOT INDICATE REASON ON DECLARATION FORM AND DID NOT PROVIDE ALTERNATE PROOF OF IDENTITY	TRUE	OTHER REASONABLE IMPEDIMENT	voter signed, but did not indicate reason
3103	BRUNSWICK	NO ACCEPTABLE ID	000600054295	FALSE			N	3	ID NOT PROVIDED	VOTER SIGNED REASONABLE IMPEDIMENT, BUT DID NOT SELECT A REASON. ATTEMPT TO CONTACT VOTER UNSUCCESSFUL.	TRUE	OTHER REASONABLE IMPEDIMENT	voter signed, but did not indicate a reason
3217	BRUNSWICK	NO ACCEPTABLE ID	000600055910	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	voter signed, but did not indicate reason
3259	BRUNSWICK	NO ACCEPTABLE ID	000000046448	FALSE			N	3	ID NOT PROVIDED	VOTER SIGNED REASONABLE IMPEDIMENT, BUT DID NOT SELECT A REASON. ATTEMPT TO CONTACT VOTER UNSUCCESSFUL.	TRUE	OTHER REASONABLE IMPEDIMENT	voter signed, but did not indicate a reason
3362	BRUNSWICK	NO ACCEPTABLE ID	000000008147	FALSE			N	3	ID NOT PROVIDED	VOTER SIGNED REASONABLE IMPEDIMENT, BUT DID NOT SELECT A REASON. ATTEMPT TO CONTACT VOTER UNSUCCESSFUL.	TRUE	OTHER REASONABLE IMPEDIMENT	voter signed, but did not indicate reason on form
3410	BRUNSWICK	NO ACCEPTABLE ID	000600060364	FALSE			N	3	ID NOT PROVIDED	FIRST TIME VOTER, ID REQUIRED STATUS, DID NOT PROVIDE PHOTO ID OR HAVA DOCUMENT	TRUE	PHOTO ID NOT YET RECEIVED	
3590	BRUNSWICK	NO ACCEPTABLE ID	000600029832	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	voter signed, but did not indicate reason
3684	BRUNSWICK	NO ACCEPTABLE ID	000001463682	FALSE			N	3	ID NOT PROVIDED	VOTER SIGNED REASONABLE IMPEDIMENT, BUT DID NOT SELECT A REASON. ATTEMPT TO CONTACT VOTER UNSUCCESSFUL.	TRUE	OTHER REASONABLE IMPEDIMENT	voter signed, but did not mark reason
33525	WAKE	NO ACCEPTABLE ID	000100299932	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	DUAL RESIDENCY

pv_id	county_desc	pv_vote_reason_desc	voter_reg_num	id_provided	id_provided_lbl	comments	vote_counted	reason_not_counted_id	reason_not_counted_desc	other_reason	is_reasonable_impediment	reasonable_impediment_reason_desc	reasonable_impediment_other_reason
3712	PENDER	INCORRECT PRECINCT	000000006735	TRUE	DL		N	3	ID NOT PROVIDED	NO ID	TRUE	PHOTO ID NOT YET RECEIVED	
22489	DURHAM	NO ACCEPTABLE ID	000030262241	FALSE			N	3	ID NOT PROVIDED	ID NOT PROVIDED	TRUE	OTHER REASONABLE IMPEDIMENT	No Reasonable Impediment provided
23020	DURHAM	NO ACCEPTABLE ID	000030178744	FALSE			N	3	ID NOT PROVIDED	NO ID PROVIDED. RI FORM REASON LISTED AS THE LAW IS WRONG.	TRUE	OTHER REASONABLE IMPEDIMENT	THE LAW IS WRONG.
2492	DUPLIN	NO ACCEPTABLE ID	000030026355	FALSE		VOTER HAS NOT RECEIVED HER DRIVERS LICENSE THAT WAS APPLIED FOR THRU DMV-- VOTER ALSO REGISTERED AT DMV ON SAME DATE OF 03/10/2016 AFTER THE REGISTRATION DEADLINE. NOT REGISTERED IN DUPLIN COUNTY	N	3	ID NOT PROVIDED	DID NOT BRING PROPER ID TO BOARD OFFICE BEFORE THE DEADLINE FOR CANVASS (03/21/2016 AT 12 NOON)	TRUE	PHOTO ID NOT YET RECEIVED	
3028	BURKE	NO ACCEPTABLE ID	000000018889	FALSE			N	3	ID NOT PROVIDED	NO ID WITH HER-BRING BEFORE CANVASS NEVER CAME BY OFFICE WITH ID.	TRUE	OTHER REASONABLE IMPEDIMENT	left id at home
5041	CLEVELAND	NO ACCEPTABLE ID	000000019671	FALSE			N	3	ID NOT PROVIDED	REASONABLE IMPEDIMENT REASON INVALID	TRUE	OTHER REASONABLE IMPEDIMENT	id in auto @ home
5091	CLEVELAND	NO ACCEPTABLE ID	000000066529	FALSE			N	3	ID NOT PROVIDED	REASONABLE IMPEDIMENT REASON INVALID	TRUE	OTHER REASONABLE IMPEDIMENT	forgot to bring id
40335	WAKE	NO ACCEPTABLE ID	000100294110	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	has valid florida license and hasn't switched to NC
4606	GUILFORD	NO ACCEPTABLE ID	000000064860	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	No photo Id
2517	FRANKLIN	NO ACCEPTABLE ID	000000059039	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	REASON FOR REASONABLE IMPEDIMENT NOT CHECKED
2519	FRANKLIN	NO ACCEPTABLE ID	000000050269	FALSE			N	3	ID NOT PROVIDED		TRUE	LACK BIRTH CERTIF/AGE & ID DOC	
4284	HALIFAX	NO ACCEPTABLE ID	000000092078	FALSE			N	3	ID NOT PROVIDED	ATTEMPTED TO CONTACT VOTER. UNABLE TO LEAVE MESSAGE AND CALL NOT RETURNED. ALSO DID NOT COMPLETE ANY PORTION OF DECLARATION.	TRUE	OTHER REASONABLE IMPEDIMENT	Trying to contact voter for signature and reason.
4289	HALIFAX	NO ACCEPTABLE ID	000000032732	FALSE			N	3	ID NOT PROVIDED	ATTEMPTED TO CONTACT VOTER. INDICATED NO ID ON PROV, BUT NO DECLARATION COMPLETED.	TRUE	OTHER REASONABLE IMPEDIMENT	Reason not provided.
4657	GUILFORD	NO ACCEPTABLE ID	000000125564	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	Photo ID is from Virginia
4659	GUILFORD	NO ACCEPTABLE ID	000010155229	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	has not needed photo ID
702	YANCEY	NO ACCEPTABLE ID	000000002583	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	voter did not check anything to explain
1175	VANCE	NO ACCEPTABLE ID	000000120555	FALSE			N	3	ID NOT PROVIDED		TRUE	OTHER REASONABLE IMPEDIMENT	Destroyed
2178	BERTIE	NO ACCEPTABLE ID	000000017573	TRUE	NID		N	3	ID NOT PROVIDED		TRUE	LACK OF TRANSPORTATION	
4486	HALIFAX	NO ACCEPTABLE ID	000000075452	FALSE			N	3	ID NOT PROVIDED	NO ID OR HAVA DOC PROVIDED FOR FIRST TIME VOTER ID	TRUE	LOST OR STOLEN PHOTO ID	
4495	HALIFAX	UNRECOGNIZED ADDRESS (GEOCODE ISSUE)	000000062580	FALSE			N	3	ID NOT PROVIDED	ATEMPTED TO CONTACT VOTER AND CHIEF JUDGE. DECLARATION IS INCOMPLETE.	TRUE	OTHER REASONABLE IMPEDIMENT	Reason not provided.