

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

\_\_\_\_\_)  
NORTH CAROLINA STATE CONFERENCE OF )  
THE NAACP, EMMANUEL BAPTIST CHURCH, )  
NEW OXLEY HILL BAPTIST CHURCH, )  
BETHEL A. BAPTIST CHURCH, COVENANT )  
PRESBYTERIAN CHURCH, CLINTON )  
TABERNACLE AME ZION CHURCH, )  
BARBEE'S CHAPEL MISSIONARY BAPTIST )  
CHURCH, INC., ROSANELL EATON, )  
ARMENTA EATON, CAROLYN COLEMAN, )  
BAHEEYAH MADANY, JOCELYN FERGUSON- )  
KELLY, FAITH JACKSON, MARY PERRY, and )  
MARIA TERESA UNGER PALMER )

Plaintiffs,

v.

PATRICK LLOYD MCCRORY, in his official )  
capacity as the Governor of North Carolina, KIM )  
WESTBROOK STRACH, in her official capacity as )  
Executive Director of the North Carolina State )  
Board of Elections, JOSHUA B. HOWARD, in his )  
official capacity as Chairman of the North Carolina )  
State Board of Elections, RHONDA K. AMOROSO, )  
in her official capacity as Secretary of the North )  
Carolina State Board of Elections, JOSHUA D. )  
MALCOLM, in his official capacity as a member of )  
the North Carolina State Board of Elections, PAUL )  
J. FOLEY, in his official capacity as a member of )  
the North Carolina State Board of Elections and )  
MAJA KRICKER, in her official capacity as a )  
member of the North Carolina State Board of )  
Elections, )

Defendants.

\_\_\_\_\_)

**DECLARATION OF**

**SARAH BUFKIN**

**Case No.: 1:13-CV-658**

LEAGUE OF WOMEN VOTERS OF  
NORTH CAROLINA, A. PHILIP  
RANDOLPH INSTITUTE, UNIFOUR  
ONESTOP COLLABORATIVE,  
COMMON CAUSE NORTH CAROLINA,  
GOLDIE WELLS, KAY BRANDON,  
OCTAVIA RAINEY, SARA STOHLER,  
and HUGH STOHLER,

Plaintiffs,

v.

THE STATE OF NORTH CAROLINA, JOSHUA  
B. HOWARD in his official capacity as a member of  
the State Board of Elections, RHONDA K.  
AMOROSO in her official capacity as a member of  
the State Board of Elections, JOSHUA D.  
MALCOLM in his official capacity as a member of  
the State Board of Elections, PAUL J. FOLEY in his  
official capacity as a member of the State Board of  
Elections, MAJA KRICKER in her official capacity  
as a member of the State Board of Elections, and  
PATRICK LLOYD MCCRORY, in his official  
capacity as the Governor of North Carolina,

Defendants.

UNITED STATES OF AMERICA,

Plaintiffs,

v.

THE STATE OF NORTH CAROLINA; THE  
NORTH CAROLINA STATE BOARD OF  
ELECTIONS; and KIM W. STRACH, in her official  
capacity as Executive Director of the North Carolina  
State Board of Elections,

Defendants.

Case No.: 1:13-CV-660

Case No.: 1:13-CV-861

**Declaration of Sarah Bufkin**

I, Sarah Bufkin, hereby declare as follows:

1. I am a United States citizen, a resident of Durham County, North Carolina and a registered voter. I am a 23 year-old Caucasian woman.
2. I was born and raised in Atlanta, Georgia and moved to North Carolina to attend college at the University of North Carolina at Chapel Hill ("UNC Chapel Hill") in August 2009.
3. I attended UNC Chapel Hill as a recipient of the Morehead-Cain scholarship.
4. For the past 4.5 years, I have lived, studied, and worked in North Carolina. I am now employed as the Media Coordinator at the North Carolina State Conference of the National Association for the Advancement of Colored People ("NC NAACP").
5. Having felt a real sense of community here in North Carolina, I registered to vote for the first time in Chapel Hill. I registered and cast my ballot during the early-voting period through same-day registration (SDR) at the Morehead Planetarium early-voting site.
6. I subsequently voted in primary and general elections a total of six times. As a college student, I frequently relocated, changing dormitories each year and then eventually moving off the school campus. Each year that I relocated, I used SDR to update my address with the Orange County Board of Elections.
7. Given my transient, college lifestyle, SDR allowed me to vote without having to change my address and registration information 25 days ahead of Election Day, as is the case under House Bill 589 (2013) ("H.B. 589). Updating my address information each time I moved, and weeks before the actual election, would have been a burdensome requirement and potentially one that would have prevented me from casting ballots in elections that meant a lot to me.

8. I graduated from UNC Chapel Hill in December 2013 and one month later, moved just nine miles from my prior location in Chapel Hill to Durham, NC. With the stresses of looking for a permanent job, then working one full-time and two part-time positions, I neglected to change my voter registration when I moved from Chapel Hill in Orange County to Durham in Durham County before the registration deadline.

9. Unlike in past years, SDR was unavailable to me as a North Carolina voter during the May 2014 primary.

10. Because H.B. 589 eliminated SDR, I was unable to vote in the May 6 primary election, which was a crucial election for many races. For instance, in the Durham Board of Education – District 1 race there is no November election and so the primary election decided these important county school board positions. Additionally, in Durham, no Republican candidates filed for the District Attorney and Sheriff primary races, so the 2014 Democratic primary determined these political positions.

11. SDR was a pivotal way for students like me to participate in the electoral process in the communities where we lived without having to update our registration information weeks before the election. Without SDR, many young voters like me will be inhibited from staying engaged in elections that matter to us.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 15, 2014.

  
Sarah Bufkin