

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

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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. )

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**DECLARATION OF**  
**BESSIE CARRINGTON**  
**Case No.: 1:13-CV-658**

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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.

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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.

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**Case No.: 1:13-CV-660**

**Case No.: 1:13-CV-861**

**DECLARATION OF BESSIE CARRINGTON**

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

1. I live at [REDACTED] Durham, North Carolina 27705.
2. I have a Master's Degree in library science and spent most of my professional career as an academic librarian. I retired in 1995 from Duke University.
3. I first became involved with League of Women Voters of North Carolina ("LWVNC") in 1997, when I joined the Orange/Durham/Chatham County League of Women Voters ("ODC League"). LWVNC is comprised of 17 local leagues, together totaling over 1100 members as of January 31, 2014. Members join a local league as opposed to the state league, and it is through their local league that they participate in the state and national League of Women Voters. My local league, the ODC League, is one of the largest and most active local leagues in the state. As of January 31, 2014, we have 153 members in the ODC League. Only the Charlotte, Triad, and perhaps the Wake County leagues are bigger, and we are certainly one of the most active leagues in the state.
4. I am currently part of the leadership team for LWVNC. My first position with the LWV was as the newsletter editor for ODC League. I later became Treasurer and Membership Chair for the ODC League. Within the ODC League, each county has a "unit." I am now the Chair of the Durham Unit of the ODC League. I am also the Convener of the Leadership Team of the Board of Directors for the League of Women Voters of North Carolina and webmaster for LWVNC.org.

5. The statewide league currently only has 2 elected officer positions filled—Secretary and Treasurer. Our president, Jo Nicholas, resigned earlier this year because of family health issues, and as dictated by our by-laws, we cannot elect a new president until our convention in 2015. This vacancy has not affected L WVNC’s work because we have an active and engaged Board of Directors and because our voting rights protection and voter registration services work has always been performed by the local leagues. We are an organization that is driven from the bottom up—consensus on issues/positions is decided by the local leagues and drives the statewide League’s position on state issues.
6. Members of L WVNC volunteer on some basis in support of the League’s eight areas of emphasis: voting rights protections and voter services; campaign finance reform; immigration; environment; health care; public education; ratification of the ERA in NC; and redistricting. Speaking for my local ODC league, we spend about 75% of our time and efforts on voter services, with voter registration efforts comprising the bulk of that work. Our local league and others in the state have received small grants from the national L WV to engage in these voter registration efforts.
7. The ODC League has a board meeting once a month, and that meeting is open to the public and all members. In the ODC League, in addition to our voter registration events (described below) and League board meetings, most of the county units meet formally once a year. Additionally, we meet approximately 4-7 times a year in two different venues: evening presentations concerning our current issues for emphasis and lunch meetings. Both the issues for emphasis presentations and the lunch meetings are publicized and non-members are invited. The issues for emphasis presentations are sometimes co-sponsored with other organizations, while the lunch meetings are usually just League-sponsored. Voting rights is a frequent topic for both the presentations and the lunch meetings.

8. As indicated by the name, the LWV-ODC covers three counties. We send members to observe the Durham County Board of Elections and the Orange County Board of Elections meetings. This activity gives us insight into issues facing voters and how the county boards of elections are implementing the election laws in North Carolina.
9. Just recently, we received a grant from our national league to educate and register younger voters, and have used those resources to conduct voter events at community colleges in Durham, Pittsboro and Siler City, North Carolina. We inform young voters about the changes in the law, how to get registered, and why it is important to register and to vote. When 16- and 17-year olds could pre-register to vote, we focused substantial energy on conducting high school civic engagement events, and found those to be very rewarding and encouraging for high school students to prepare them to vote when they become eligible. Now that pre-registration has been repealed, we have had to shift our efforts, and are now focusing on the community college events described above.
10. The ODC League holds other regular voter registration events each year. In addition to at least 6 formal voter registration events last year, we also hold ad hoc events, provide voter registration opportunities at other organizations' events, and encouraged our members to carry voter registration cards in their pocketbooks at all times. One example of a voter registration event we did was running a voter registration booth at Centerfest in Durham. Centerfest is a September outdoor event, where artists display their work and bands play. We registered over 75 people in the 3 days of Centerfest,- more than any of the political parties that were also doing voter registration there. And we talked to many more than that about the importance and benefits of registering and exercising their right to vote. In my discussion with attendees, I found that many people had moved and had not yet changed

their registration. Most of the people I talked to, registered and not registered, were very surprised to realize that they could no longer register to vote during early voting.

11. At Sunshine Day at Elon University on March 17, 2014, in talking to folks there, I was again surprised that a large number of them did not know that same day registration was no longer an option. Sunshine Day attracted many well-educated attendees, which made this even more surprising.
12. Every time I attend an event to register voters and promote election participation, I meet and talk to eligible voters who do not know about the changes to North Carolina's election laws, including the repeal of same day registration. Everywhere that I go, I ask people if they are registered and if their registration is up-to-date, which allows me to talk to a lot of potential North Carolina voters on a daily or weekly basis. I am deeply concerned that voters are not adequately educated about the many voting law changes.
13. In order to address that concern, and to address the increased demand for voter education events, I am certain that the ODC League will do more registration events this year than we did last year and in previous years. When ODC League members talk to potential voters, we now take a two-pronged approach: we ask the voter if he or she is registered, then we hand them a wallet card, produced by Democracy North Carolina, which describes the changes in voting laws. Even if the potential voter is already registered, or just says that he or she is, that wallet card often provokes questions and discussion. Thus, we are able to educate voters, even if we do not end up helping them register.
14. The ODC League does not, as a group, focus on get-out-the vote (GOTV) efforts, although our members, including myself, do such work on an individual basis. I have participated in GOTV efforts by doing phone banking, driving to polls voters who did not have transportation, and handed out literature about judges.

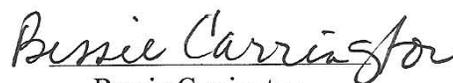
15. Based on my work with LWVNC, the ODC League, and my individual GOTV work, I can see that the voters who will be hurt the most by the changes to the voting laws are those who are busy and those who are unaware of the changes. Neither of those groups deserves to lose their right to vote.
16. I am also aware that the new reduction in early voting mandates that county boards offer the same number of early voting hours in 2014 as they did in 2010. Based on my observations of the Durham County Board of Elections, this will not do much, if anything, to ease the burden that the new law will place on voters. With 7 fewer days of early voting, the Durham County Board of Elections had to open additional early voting sites for the May 2014 primary when compared with 2010 in order to meet the aggregate hours requirement (which it did). Unfortunately, there are problems with the additional the early voting sites it opened in Durham. The two additional sites are in public libraries that have overcrowded parking lots. Parking in general around the libraries is abysmal. The locations of both libraries are not convenient for large numbers of voters because they are not near any of the main residential areas. Because there are two new sites, the early voting sites do not have to offer significantly expanded daily hours. So Durham County voters will have the same total number of hours for early voting, but they will have 7 fewer days in which to early vote, and additional locations, which will not be convenient for voters. This is going to be burdensome on Durham voters, and for some prohibit them from casting their vote.
17. Additionally, I think that the changes to the voting laws just add to the confusion that voters were already feeling because of the redistricting plans enacted by the state in 2011. For example, the county of Durham is now represented by four different Congressional Districts. The ODC League conducts forums for candidates, so that the public can make educated decisions when voting. The convoluted splitting of Durham County into Congressional and

state legislative districts has made it a nightmare for us to conduct candidate forums, and voters seem very confused even when we do. This redistricting confusion will only exacerbate the confusion caused by the changes to the voting laws. I am incensed that the legislature cares so little about the needs of the voter, and enacts laws that make it harder for voters to stay engaged and educated.

18. All of the facts and information contained within this declaration are within my personal knowledge and are true and correct.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 25 day of April, 2014.

  
Bessie Carrington