

**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  
MASAC DORLOUIS**  
**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.

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

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-861**

## DECLARATION OF MASAC DORLOUIS

My name is Masac Dorlouis 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] Raleigh, North Carolina, 27606.
2. I was born in Fort Pierce, Florida, in 1989.
3. I moved to North Carolina in 2007 to attend St. Augustine's College. I graduated in 2011 from St. Augustine's College in Raleigh, North Carolina, with a Bachelor of Arts degree in Communication Studies. After graduating in May 2011, I moved to Savannah, Georgia for nine months and returned to North Carolina in February 2012.
4. I was very active in the Student Government Association (SGA) at St. Augustine's College, serving as Vice President during the 2009-2010 academic year and President for the 2010-2011 academic year. During those two years, SGA and Common Cause organized several voter registration drives and coordinated several GOTV canvassing efforts in Southeast Raleigh, a predominantly African-American and low-income community.
5. I am currently the statewide Campus Organizer for Common Cause North Carolina. In that capacity, I work to promote civic engagement on Historically Black College and University campuses across North Carolina. At the moment, Common Cause is active on four campuses in North Carolina: Shaw University and St. Augustine's College in Raleigh, Fayetteville State University in Fayetteville, and North Carolina Agricultural and Technical University (NC A&T) in Greensboro. Additionally, I supervise the work of our student interns. An intern's primary responsibilities are to serve as a Common Cause ambassador on the target campus, plan voter education and voter engagement activities, coordinate voter registration drives, research candidates for student-led candidate forums and mobilize students for an annual non-

partisan, issue-based lobby day. Currently, all of our interns are undergraduate students at North Carolina State University in Raleigh.

6. I also facilitate partnerships between students from the four HBCUs and students from neighboring predominantly white universities. Common Cause facilitates these partnerships to promote diversity and inclusion in civic engagement work. The students engaged in the partnership routinely comment that the experience provides their first opportunity for cross-campus and cross-racial collaboration. The facilitated partnerships include trainings on basic GOTV canvassing, effective communication skills and presenting non-partisan information to diverse audiences. At the moment, Shaw and St. Augustine's College students are partnering with students at North Carolina State University in Raleigh, Fayetteville State students are partnering with students at Methodist College in Fayetteville, and NC A&T students are partnering with students at the University of North Carolina at Greensboro.
7. Common Cause's GOTV work on college campuses is designed to identify, educate and register eligible incoming freshmen and first-time voters. We have a Democracy Fellow program, in which students at some HBCUs can receive college credit for the civic engagement work they do with us. Through our Democracy Fellows and interns, we annually host 3 non-partisan voter registration drives at the beginning of the Fall semester to ensure every eligible voter is registered to vote in the coming election.
8. The voter education prong of Common Cause's campus organizing provides students with all relevant information for participating in the electoral process. Specifically, campus residents are informed as to the annual election calendar, their respective polling location and the procedures for participating in the respective election. A critical piece of this process is also informing voters on updating their voter registration information, if necessary.

9. In addition to providing students with general information concerning registration and election administration, I work through our Democracy Fellows to coordinate at least 2 non-partisan voter engagement programs on our target campuses per academic year. These programs inform students of all candidates running in their local elections and other issues (bonds, annexation, etc.) to be informed of on the ballot. During the 2013 election cycle, Common Cause partnered with St. Augustine's College to host a voter registration deadline party so students would remember to get registered and a local candidates forum immediately before the general election so students would remember to vote.
10. Transportation is a major hurdle students face when attempting to vote in elections. Students are not allowed to have vehicles on many campuses. This makes managing their academic and work schedules and getting to an off-campus location to register on one day and getting to another off-campus location to vote on a different day challenging. On many HBCU campuses, students do not have on-campus parking so they are less likely to have a car. Additionally, a significant segment of the HBCU student population is from outside North Carolina. This means they are less likely to have friends, neighbors, parents or relatives close by who can give them a ride to the polls. Even for North Carolina A&T, a public HBCU, this will be a huge problem. North Carolina A&T is the only public university in North Carolina that recruits over 18% of their student body from out of state. As such, A&T has the highest percentage of out of state students on a UNC system campus. Because of this, students on A&T's campus will be harmed even more than the average students by the restrictions on voting, including the cuts to early voting, and the ending of same day registration and out of precinct voting.
11. Students in rural areas face greater hurdles to voting and participating in the electoral process because of decreased connectivity and access to transportation. First, students who never get to meet who they are voting for or see elected government in action are less motivated to

participate. This hurts rural students more. For example, students in Raleigh are minutes away from state and local candidates and officials. If those students are interested in meeting candidates, they can take public transportation to the location or schedule an event on their campus. Students in rural areas are very much removed physically from both state and local officials. It is very common for rural college students to be dozens of miles from their elected officials. Second, these students in rural areas have far less access to public transportation resources like their urban counterparts, which makes registering and voting even harder. Both of these factors make it harder to engage rural students, and these new laws are only going to make that worse.

12. Same Day Registration was a huge mobilization tool and created more opportunities for young voters to participate. Half of the people who took advantage of Same Day Registration were between the ages of 18-25. Its importance on college campuses was enormous. Typically, students move into their dorms in mid-August. The voter registration deadlines are usually less than 60 days away, in mid October. Between mid-August and mid-October, students, and especially incoming freshmen, are bombarded with all types of deadlines and academic life adjustments. They have left home and are trying to navigate in an entirely new universe. Some students are very overwhelmed during this time. This is not a period where we want to be adding one more bit of paperwork on their pile. Same Day Registration allowed us to engage the students after they were all settled for the academic year, and it allowed the students to efficiently register and vote in one trip, minimizing the interruptions in their academic schedules and minimizing the burdens in a challenging period of their life.


13. Common Cause heavily pushed Early Voting. We would engage in GOTV work on the traditional Tuesday election day sometimes, but a large early voting period allowed us to reach many more students than we could on just one day. Students on campuses all across North

Carolina, particularly North Carolina Central University and Elizabeth City State University organized several marches and programs during the early voting period designed to encourage participation in the upcoming election. These students, who have been so energized and empowered by early voting, are going to be hurt by the significant cut to it.

14. Common Cause found early voting on the weekends to be very helpful not only for students to vote, but as an opportunity for students to get engaged in their communities. This was a time when students could responsibly connect with the local community and participate in civic engagement activities. Our student volunteers would canvass a community during the early part of a Saturday and vote in the afternoon. Weekend voting was easier because students did not have classes and other academic responsibilities to attend. So we saw the benefits of more time when students could vote without missing classes, but we also saw a chance to encourage students to volunteer in a positive way. Losing a weekend of early voting will undo both benefits.
15. Out of Precinct voting was heavily used by students. Many students would move to off-campus housing and not realize they had to change their voter registration, or would forget to do so. Out of Precinct voting allowed these students to vote in the races for which they were eligible to cast a ballot and prevented them from being completely disenfranchised. Under the new law, many of them will end up being disenfranchised.
16. I am troubled that lawmakers would pass legislation making it more difficult to vote, especially students. The new law presents several challenges to students and functions as a deterrent to voting, and some will end up disenfranchised. There is no explanation for passing laws that burden students so heavily.
17. 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 28<sup>th</sup> day of April 2014.

  
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Masac Dorlouis