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 an
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.
MALCOM, 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
RENEE MICHAUX

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 RAINLEY, 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 MCCROPY, 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
DECLARATION OF RENEE MICHAUX

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


2. I have a Bachelor's Degree in Business Administration with a concentration in management from Almeda College in Boise, Idaho in 2006. I am currently enrolled at South University in High Point, North Carolina, pursuing a Bachelor's Degree in Criminal Justice and expect to complete the program and graduate in May of 2015.

3. From June 2001 until January 2006, I worked for Goodwill Industries of North Carolina as a Vocational Rehabilitation Program Employment Specialist Manager. From June 2007 until July 2009, I worked at the Q Foundation as Director of Programs. Since 2009, I have served as the Deputy Director of Unifour One (formerly Unifour OneStop Collaborative).

4. Unifour One is a non-partisan 501(c)(3) grassroots organization, headquartered in Greensboro, NC, whose mission is to build political and electoral power in African American and other historically disenfranchised and underrepresented communities. We promote educational achievement, social equality and economic self-sufficiency to underserved populations all across the state.

5. As Deputy Director, I manage the daily functions of the organization, write grants, assist with proposing legislative policy, create and manage issue-based programs and supervise all staff. Additionally, I write the grants for our general support and programmatic work and serve as the point of contact between grant makers and Unifour. I regularly meet with state and federal legislators for the purpose of advancing Unifour One's mission.

6. Civic engagement is one of our primary areas of focus—approximately 80% of our organization's efforts are directed toward this work, which includes registration, get-out-the-
vote (GOTV) work, and voter education. We have built civic engagement programs in Alamance, Alexander, Avery, Buncombe, Burke, Caldwell, Cumberland, Durham, Forsyth, Gaston, Guilford, Iredell, Lincoln, McDowell, Mecklenburg, Orange, Robeson, Rutherford, McDowell, Pasquotank, Pitt and Wake Counties in NC. These programs consist of non-partisan voter registration, GOTV and voter education and issue-based public education campaigns. Historically, we have focused on environmental and economic development issues.

7. We are not a membership organization—we relied on a small paid staff and a sizable network of volunteers to do our civic engagement work.

8. In 2012, we helped to register to vote over 8,300 North Carolina residents. We dedicated a substantial amount of time to a high school voter registration effort, where we were able to register and pre-register 1,100 high school students in 12 counties.

9. In September of 2012, we conducted the 1000 Black Men March and Movement in Greensboro, where we educated community members on voting rights issues including: ex-felon voter registration, address changes, last name changes, and other issues that affect African American voters.

10. From 2010 to 2013, we made nearly 15,000 voter contacts during voter registration work, organized more than 50 canvassers, mailed 23,000 nonpartisan voter education pieces, made over 63,000 phone calls, knocked on 36,000 doors, and distributed 12,800 door hangers and 25,000 voter guides.

11. In 2012, we conducted at least one voter registration drive on the campus of each one of North Carolina’s Historically Black Colleges and Universities, including NC A&T University, Livingstone College, Winston-Salem State University, Johnson C. Smith
University, NC Central University, Elizabeth City State University, Fayetteville State University, Shaw University and St. Augustine University.

12. The loss of a whole week of early voting will be very harmful to African American voters, among others. Unifour’s constituency is low-income African Americans and other people of color, college students and single mothers—folks for whom getting to the polling site is not always easy. These are citizens who want to participate in the political process but are forced to balance several additional necessary competing interests. And it is not only the constituents I work with—I’m also a good example of how the cuts to early voting hurt voters. I have been voting early for the past 10 years because of my work schedule. As a single parent, it was not always convenient to cast my vote in precinct on Election Day. I cannot afford to be held up in long lines or have questions arise on Election Day that may prevent my vote from being counted. I now have significantly less flexibility in doing that.

13. In all of the bad things that the new voting laws do, one thing that is common is that they destroy the sense of community that has been built around voting, especially in African-American communities. Two weekends of early voting allowed so many people to come together under the non-partisan, faith-based coordinated polling site shuttle, commonly known as ‘All Souls 2 The Polls’. Cutting this in half by removing one weekend hurts that sense of community.

14. Groups like Unifour are significantly less effective with the shortened early voting schedule. From a grassroots organizing perspective it is imperative that we have at least two weeks of early voting in order to serve all the constituents who need our help. The constituency that we serve often relies on our staff, members and/or volunteers for transportation to the polls. During early voting, one staff person can take several people who need transportation to one
common polling site. We simply cannot help as many people on Election Day. That is why we need a long early voting period.

15. Even during early voting, our resources can be stretched, and shortening the period would make that worse. For example, in 2010, a 22-year-old African American man in Greensboro who is a quadriplegic was phone-banked by Unifour One staff and asked would he like to vote. This young man was ecstatic as no one had ever contacted him and asked if he would like to vote. Unifour One’s young canvassers called around the city to inquire about getting this young man to the polls so that he could One Stop Early Vote. The canvassers located a man with a truck, went to the young man’s house, assisted him with getting dressed, lifted the young man’s wheel chair onto the back of a pickup truck, tied the wheelchair down, and strapped the young man into the cab of the truck and rode with this young man to the polls. This was exciting to this young man; this was literally the first time that he was able to vote because he didn’t know he could vote absentee. This is the grassroots organizing that Unifour One does to ensure that each and every person, no matter what their current condition is has access to the polls. Unifour needs time to make this happen, though, and cutting early voting undermines that.

16. For minority communities, cutting the first week of early voting will likely make an already strained situation much worse. For example, these communities already suffer from various economic and social disparities. Increasing the barriers to political participation is the last thing these communities need. There are also things happening at the local level that make these state-level changes hurt even more. One example of this was the Forsyth County Board of Election’s decision to move a polling site off campus at Winston Salem State University, a historically black university. The students and community members reported to us that they felt this action was a blatant attempt to silence the voice of WSSU students and
surrounding community members. This is not a unique experience—HBCU college
organizers we work with often tell me that they feel like these state laws and local decisions
are put into place to disenfranchise college students on the campuses of Historically Black
Colleges and Universities. The effect on African-American voters of cutting early voting
needs to be understood in this context.

17. HBCU Students are not alone in feeling that these laws are directed at African-American
voters. Unifour conducted a door-to-door and phone-banking polling from October 2012
through March 2013. The constituency we polled believes that this is a blatant attempt to
disenfranchise African-American voters.

18. As an African-American woman my personal feelings are that the North Carolina Governor
and General Assembly do not have the backs of eligible minority voters. These citizens
already suffer the perils of a failing economy and now will have to endure a resurgent Jim
Crow era law. Access to voting is being taken away from the people that we just told to
boldly amplify their voices by casting their votes. Now that the new law has been passed, so
many people feel their participation is not wanted and that this is just another attempt to
silence them.

19. The repeal of same day registration is also harmful to African-American voters. Same day
registration was an important tool for Unifour One and individual voters because it affords
voters the opportunity to register to vote and then immediately vote at the polling place. It
was a provision that allowed groups like Unifour to mobilize and engage traditionally non-
participating citizens, and it was a positive experience for them. In our experience, the
students who took advantage of Same Day Registration were more likely to vote early and
convince their peers to register and vote in a like manner. This is another example of how
the new laws destroy the civic sense of community—we will not get to see excited young folks like that interacting with and encouraging their peers to do the same.

20. Pre-registering 16 and 17 year olds has been a main part of the work Unifour One has done in the last few years. We have performed voter registration drives in over 30 high schools in North Carolina, in more than 19 counties in North Carolina that included Alamance, Alexander, Burke, Buncombe, Caldwell, Catawba, Cleveland, Durham, Gaston, Guilford, Forsyth, Iredell, Lincoln, McDowell, Mecklenburg, Pasquotank, Robeson, Rutherford and Wake Counties. When we hold high school voter registration drives, we hold assemblies in high schools and educate students on the importance of civic engagement. High school voter registration drives give students the opportunity to feel included and it gives them a sense of accomplishment. Not many groups are talking to young adults about voting and what voting means to them and their communities and their country.

21. Losing preregistration diminishes the enthusiasm of young high school students eager to participate in the electoral process. Watching these young people participate in our preregistration drives is encouraging and motivating to our staff and volunteers. You can’t help but to feel proud and hopeful. Preregistration provided an opportunity to see democracy at work. I witnessed students that were already 18 years old coordinate rides to the polls. I had the opportunity to speak with hundreds of students that stated that they could not wait to be able to vote when they turned 18 years old because the seed had been planted. By losing pre-registration we as mentors are losing our mentees. By losing pre-registration we are losing that common ground between adults and our youth. As an organization, as a result of losing pre-registration, we have lost 20% of our funding.

22. 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 25th day of April 2014.

[Signature]
Renee Michaux