

**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
GOLDIE FRINKS WELLS
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 GOLDIE FRINKS WELLS

My name is Goldie Frinks Wells 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] Greensboro, NC 27405.
2. I was born in 1942 in Edenton, North Carolina. I have lived in Greensboro since 1968.
3. I attended Hampton Institute (now Hampton University) and graduated in 1964 with a Bachelor of Science in Elementary Education. I later earned two Masters Degrees from North Carolina Agricultural and Technical University, one in Elementary Education and another in Education Administration. I also earned a Doctorate in Administration and Supervision from the University of North Carolina at Chapel Hill.
4. I started work in 1964 at Fuller Elementary in Raleigh, North Carolina. In 1967, I began working for Greensboro City Schools until 1985 when I transferred to Iredell-Statesville Schools until retirement in 1994. After retirement, I worked in Lexington, Mississippi, at a Church School called Saints Academy. I currently work as an Adjunct Professor at Gardner-Webb and Guilford College in Greensboro. During the 1970s and 80s, I was a contract consultant for Educator Training Center in Long Beach, California
5. My history of political involvement began in 1998, when the Winn Dixie closed in Northeast Greensboro, a predominantly African-American part of the city. While there are some middle-class neighborhoods in the area, there are a large number of elderly residents and low-income residents. There were no other options for residents of the community to access fresh foods. The group Concerned Citizens of Northeast Greensboro (CCNEG) was born around the issue, and I was the first leader of the group. CCNEG is actually comprised of 10 neighborhood groups.

6. My work with CCNEG inspired me to run for Greensboro City Council. I served two terms on the city council, from 2005 until 2009.
7. When the Greensboro City Council considered re-opening the White Street Landfill in Northeast Greensboro in 2011, I started the group Citizens for Economic and Environmental Justice (CEEJ) to fight back on that issue. The CEEJ organization realized to win on the landfill fight, we were going to have to vote people out of the city council. Educating voters on the issues and importance of voting in local elections, as well as voter registration and get-out-the-vote (GOTV) work, became primary focuses of the group. We were successful in that goal—we elected two city council representatives who pledged to keep the landfill closed.
8. After that success, I believed that model of voter education and outreach should be applied city-wide, on issues even beyond environmental and economic justice. So I started the Greensboro Voter Alliance (GVA) in 2012. GVA's goals are to promote voter registration and turnout, and to support candidates who will be responsive to the needs of the voters.
9. In addition to my own campaigns, I have worked on numerous political campaigns over the years, for local government and state legislative races.
10. GVA has volunteers that do on the spot Voter Registration at retail stores and other public locations. Specific activities include passing out literature, hosting voter registration education meetings and partnering with other organizations to facilitate candidate forums.
11. GVA is a diverse volunteer organization, made up of black and white residents from all across Greensboro. Most meetings are held in east Greensboro, but there are several members from the west. The group came together, primarily, around the recent landfill advocacy.

12. Same Day Registration is about efficiency, for voters and for running elections, and providing eligible voters every opportunity to participate in the electoral process. That provision makes it easier for people who have forgotten to register or find it routinely difficult to accommodate the traditional deadline to register and vote because of other demands in life--more than one job, family responsibilities, or academic commitments..
13. Losing Same Day Registration means voters will lose the efficient option that is Same Day Registration, but it also means that some eligible voters will be completely disenfranchised. The resulting consequence is the community casts fewer votes and, as a result, has less political voice. I have heard several conservatives argue that Same Day Registration is about laziness, and I think there are racial overtones to that suggestion. I completely disagree. There are numerous reasons for missing the traditional deadline that have nothing to do with laziness, apathy or an unwillingness to participate in the political process. Many people in minority communities face unique logistical and financial constraints. For example, in these communities, in which I volunteer frequently, it is very common for families to have one car or no car at all. Having to coordinate the normal family activities alone is difficult for them. When faced with this limitation, it becomes even harder to coordinate voting and other civic responsibilities with regular family demands, and if something has to give way, it cannot be picking a child up from daycare. Additionally, it is very common for these same individuals to work several low-wage jobs. These are the people—people balancing those often-competing schedules on a very modest income—who are going to be hurt most by the loss of Same Day Registration.
14. The loss of a weekend of early voting will harm minority communities because it will harm “All Souls to the Polls” efforts. Area churches use non-partisan coordinated rides to Early Voting sites after church on Sunday, often referred to as “All Souls to the Polls”, to ensure

their parishioners vote in every possible election. The program has been very successful and works well during the Early Voting process because churches have two Sundays on which to participate and to coordinate the rides. Voters can be encouraged to vote and be taken to the poll on the same day. Cutting in half the opportunity for Souls to the Polls to be used is very hurtful. In the African American community, dating back to slavery, the church and the community have historically been strongly linked. The African American church is the clearinghouse of information in the community, serves as the meeting place for most, if not all, community members and is the trusted source for collective strength and power in the community. Having two weekends to encourage and coordinate eligible voters in the African American community to go to the polls is critical because gives our community two opportunities to meet the needs of its members.

15. I believe cutting the first week of early voting was intended to weaken the voice of African Americans and minorities. Losing a week of Early Voting will certainly mean fewer votes from minority communities. We know, historically, that young people and minorities heavily used the first week of early voting. Losing that time will mean a sharp reduction in participation from those groups. The legislators who passed this law knew that.
16. No longer counting out of precinct ballots will really interfere with the right to vote. I see no reason why a registered voter's entire ballot should be discarded because he or she happened to vote at the neighboring precinct. What really should matter is counting the votes the voter is eligible to cast, not necessarily where he or she mistakenly cast them. With the records and technology we have now, I know we are able to keep up with people and the votes they are eligible to cast, especially if they are in the same city or county.
17. Confusion is going to be a huge problem with this new law. Implementing a Voter ID provision is going to be confusing for voters. Simply put, everyone will not know they need

an ID and the folks who do know they need an ID will likely be confused about what type of ID they will need. I have yet to see any adequate governmental education efforts to avoid this confusion. In fact, we have already experienced the confusion in many places because the phase-in process is not being implemented correctly already. Our biggest task as grassroots organizers is now and will be to educate the eligible voters because the new law is unnecessarily cumbersome and confusing. For people to understand, we really have to get out there and help them understand all the changes.

18. I understand the new law eliminates straight party voting. Based on my work with voters, I can say that seniors commonly vote straight ticket. Not being able to vote straight ticket will be confusing, particularly for the elderly, because that population is accustomed to having that ability. It is simply another provision designed to confuse voters and reduce the participation of eligible voters.

19. All of these changes to voting laws will be a burden on candidates running for office and a disincentive for voters to run for office, which is their constitutional right. As a former elected official, I know it will become even more critical for each political candidate to educate the voters on North Carolina election law. Currently, political candidates participate in forums, give their stump speeches and are constantly selling themselves to the public. Now, they will have to do all those things and will also have to educate persons on all the new logistics of voting. Candidates will repeatedly have to tell voters to be sure to have the right precinct, be sure to have their ID, be sure to be there on-time and be sure to vote in all the races. As a result, running for political office will require more financial resources for election related materials and more time to convey both your personal message and the requirements of the new law. This will be an additional constraint for a seasoned political

candidate, and for a person who has never run for political office, the additional responsibility will likely be a deterrent.

20. 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 28th day of April, 2014.


Goldie Frinks Wells