

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

NORTH CAROLINA STATE CONFERENCE
OF THE NAACP, et al.,

Plaintiffs,

v.

PATRICK LLOYD MCCRORY, in his official
capacity as the Governor of North Carolina, et
al.,

Defendants.

**DECLARATION OF
LOUIS M. DUKE**

Case No.: 1:13-CV-658

LEAGUE OF WOMEN VOTERS OF
NORTH CAROLINA, et al.,

Plaintiffs,

v.

THE STATE OF NORTH CAROLINA, et al.,

Defendants.

Case No.: 1:13-CV-660

UNITED STATES OF AMERICA,

Plaintiffs,

v.

THE STATE OF NORTH CAROLINA, et al.,

Defendants.

Case No.: 1:13-CV-861

Pursuant to 20 U.S.C. § 1746, I, Louis M. Duke, hereby declare:

1. My name is Louis M. Duke. I am a U.S. citizen, and am otherwise eligible to vote in North Carolina.
2. I am a Plaintiff-Intervenor in the *League of Women Voters of North Carolina, et al. v. North Carolina, et al.*, Case No. 1:13-CV-660, currently pending in this Court.
3. I am currently 21 years old and reside in Harnett County, North Carolina, where I am a rising senior at Campbell University.
4. I originally registered to vote in Rockingham County, which is where I lived with my family before moving to Harnett County.
5. When I moved to campus in the Fall of 2012, I submitted a new voter registration form updating my residence to my on-campus address.
6. I had no reason to believe that my new registration was not effective, but when I attempted to utilize early voting in the 2012 election, I was told by local election officials that I was not registered and would have to use same day registration to update my registration and cast my ballot.
7. Without same day registration, I would not have been able to vote in the 2012 election.
8. My experience is not unique. I have heard many stories from other students whose voter registration was not effective for some reason or another, and had to rely on same day registration to vote.

9. That these problems are commonplace is not surprising, given that many young (and often first time) voters move in the late summer or early Fall every year consistent with the academic calendar, and as a result are subject to a significantly shortened period in which they may register to vote in advance of a November election.
10. The repeal of same day registration makes it substantially more difficult for young voters to register within this time period and many are likely to be completely disenfranchised, whether because, when they go to vote, they discover -- as I did -- that their registration was not effective, because between their busy schedules and lack of access to transportation find it too difficult to search out other means to register within that time period, or because they become discouraged by a legal regime that is hostile to their attempts to participate in the electoral process.
11. As noted, in 2012, I utilized early voting (also known as “one stop” voting).
Given my busy school schedule and extracurricular activities, as well as the fact that I regularly travel home to visit my family, I have found that early voting helps to ensure that I am able to get to the polls to cast my ballot.
12. There has never been an early voting site on the campus of my school while I have been in college. Instead, I have had to travel to the next town over to the county board of elections to participate in early voting. The 17-day early voting period

ensured that I had time to arrange transportation and vote as permitted by my schedule.

13. I believe that voting is one of our most sacred rights as Americans and have been a vocal advocate for student voting rights. As part of my ongoing efforts in this area, I have participated in non-partisan efforts to register other young voters every year since I began college, and I intend to continue to do so in the future.

14. Before the General Assembly repealed pre-registration, I helped all North Carolinians who were interested in registering to fill out registration forms through non-partisan voter drives on campus; those completed forms were then forwarded to the State Board of Elections or relevant County Board of Elections.

15. I understood that, if a young person who filled out the form was not yet of the age of majority, the State would hold those forms and those voters would then automatically be registered when they reached the age of majority, without any further effort on their part.

16. The repeal of pre-registration has complicated and hindered these efforts; not only will I no longer be able to help young North Carolinians secure their future voting rights before they reach the age of majority, I will have to advise young voters who will be 18 by the next general election that, under North Carolina's laws establishing a certain window in which such voters may register (and which may

be different in different counties, depending on their municipal election schedules), I may or may not be able to help them register.

17. This inserts unnecessary and unjustified confusion into the process and is likely to result in young voters who are eligible to register, but whose registration forms are submitted outside of the relatively narrow window provided for under North Carolina law and are rejected, become discouraged and ultimately fail to register.
18. Young people both register and vote at substantially lower rates than other members of the electorate here in North Carolina; the pre-registration program was an important tool in my efforts to encourage young people to register, and went far to encourage all young voters -- even those that had already aged out of the pre-registration program -- to participate in the electoral process.
19. Together with the repeal and/or modification of several provisions of North Carolina's election laws that I -- like many other young voters -- relied upon and that gave me confidence that my registration would be effectuated and my votes counted (including, but not limited to early voting, same day registration, and pre-registration), I no longer have confidence in North Carolina's election system. Together, these provisions are discouraging and have made me and other young voters like me feel like our participation in elections in this State is unwelcome and our ballots are much less likely to be counted.

July 10, 2014



Louis M. Duke