

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

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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.

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

Plaintiffs,

v.

THE STATE OF NORTH CAROLINA, et al.,

Defendants.

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UNITED STATES OF AMERICA,

Plaintiffs,

v.

THE STATE OF NORTH CAROLINA, et al.,

Defendants.

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**DECLARATION OF  
JOSUE BERDUO**

**Case No.: 1:13-CV-658**

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

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

Pursuant to 20 U.S.C. § 1746, I, Josue Berduo, hereby declare:

1. My name is Josue Berduo. 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 20 years old and reside in Wake County, North Carolina, where I am a rising junior at North Carolina State University. I am currently registered to vote in Wake County.
4. I pre-registered to vote in Buncombe County when I was 17 years old. I lived with my family in Buncombe County at that time.
5. I have used and would like to continue to use early voting.
6. I am very active in civic engagement and have previously engaged in extensive voter registration and voter education activities, including at my high school. I have also made phone calls to voters to assist with a get-out-the-vote effort.
7. This Fall, I will be supervising a non-partisan effort to register voters on my campus. We will be registering students all over campus. We will also be trying to maximize voter participation on campus, despite the vote of the Wake County Board of Elections not to have a polling location on campus this year.
8. If pre-registration had not been repealed, that voter registration drive would have also included pre-registration efforts for anyone on campus who would not be 18

by the 2014 general election. Because of the repeal of pre-registration, I will have to expend efforts registering young people who would already have been registered if pre-registration had not been repealed. That is effort I otherwise could and would have used to help other voters register.

9. I am a strong supporter of Senator Kay Hagan and plan to vote for her in the 2014 general election. I voted for Senator Hagan in the May 2014 primary.

10. I plan on making phone calls on behalf of Senator Hagan's campaign in the fall to help her campaign get out the vote. I will mostly focus on get out the vote efforts as we near Election Day.

11. I have made financial contributions to the Hagan campaign in connection with fundraisers that I attended.

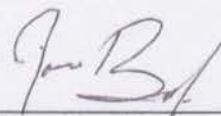
12. The Hagan campaign launched their Students for Kay chapter earlier this year in order to reach out to young voters on campus. They will try to persuade students to register to vote and support the senator. The Students for Kay effort is led by college students throughout North Carolina. They will try to organize on many college campuses throughout the state. I plan to be involved with these efforts. I also plan to help organize a North Carolina State University team of students that will volunteer for the Hagan campaign.

13. The repeal of pre-registration will not only hinder my efforts to make registration and voting accessible to all young North Carolinians, but the fact that it became

effective in September of last year, together with the State Board of Election's implementation of it -- that is, by directing the Department of Motor Vehicles not to register anyone under 18 -- is very likely to harm the reelection efforts of Sen. Hagan, who has historically had very strong support among North Carolina's youngest voters.

14. Because of the repeal of pre-registration and the repeal and/or modification of several other provisions of North Carolina's election laws (including, but not limited to, early voting, same-day registration, and out-of-precinct voting) that I -- like many other young voters -- relied upon and that gave me confidence that my registration would be effectuated and my votes counted, I no longer have confidence in North Carolina's election system. Together, these provisions are discouraging and have made me and other young voters feel like our participation in elections in this State is unwelcome.

July 10, 2014

  
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Josue Berduo