No. COA25-181 TENTH DISTRICT

NORTH CAROLINA COURT OF APPEALS

JEFFERSON GRIFFIN,

Petitioner-Appellant,

v.

NORTH CAROLINA STATE BOARD OF ELECTIONS,

Respondent-Appellee,

and

ALLISON RIGGS,

Intervenor-Respondent-Appellee From Wake County

BRIEF OF RALIM ALLSTON, CINDY OATES ANTHONY, RACHEL ARNOLD, DANIELLE BROWN, AMY BRYANT, DENISE CARMAN, JEAN CARY, LOUANNE CASPAR, ALEXIA CHAVIS, CARRIE CONLEY, JOSE BENITO DEL PLIEGO, SOFIA DIB-GOMEZ, MARY KAY HELING, WESLEY HOGAN-PHILIPSEN, ELIZABETH HUNTER KESLING, KEVIN HUNTER KESLING, LESLEY-ANNE LEONARD, GAYNELLE LITTLE, JENNA MARROCCO, AUDREY MEIGS, BRUKLYN MILLER, DIRK PHILIPSEN, LARRY REPANES, ANNA RICHARDS, LILA RICHARDSON, LYSE ROCHLEDER, KEMEKA SIDBURY, SOPHIA "FELIX" SOTO, ALEXA ADAMO VALVERDE, DIANE WYNNE, PHOEBE ZERWICK, NORTH CAROLINA STATE CONFERENCE OF THE NAACP, NORTH CAROLINA BLACK ALLIANCE, COMMON CAUSE EDUCATION FUND, DEMOCRACY NORTH CAROLINA, EL PUEBLO, NORTH CAROLINA ASIAN AMERICANS TOGETHER, AND NORTH CAROLINA POOR PEOPLE'S CAMPAIGNAS AMICI CURIAE SUPPORTING RESPONDENT

TABLE OF CONTENTS

			Page
INTR	RODUC	TION	2
INTE	EREST	OF AMICI CURIAE	4
ISSU	ES AD	DRESSED	7
ARG	UMEN'	Γ	7
I.	AFFI]	TH CAROLINA'S ELECTION PROTEST SCHEME REQUIRES RMATIVE PROOF OF VOTER INELIGIBILITY TO SHOW AN COME-DETERMINATIVE VIOLATION OF ELECTION LAW	7
II.	JUDO STAT	COMPLETE LACK OF INDIVIDUALIZED ALLEGATIONS IN SE GRIFFIN'S PROTESTS FAILS TO CARRY THE UTORILY REQUIRED BURDEN AND CANNOT JUSTIFY NTING HIS REQUESTED RELIEF	8
	a.	The Protests Do Not Allege, Much Less Show, Actual Voter Ineligibility, as Required By State Law.	9
	b.	Even if Griffin's Erroneous Interpretations of Law Were Correct He Could Not Show an Outcome-Determinative Irregularity Occurred	•
	c.	Even if Judge Griffin's Legal Theories Were Valid, His Requested Remedy is Not Available Without an Evidentiary Record.	12
III.		CHALLENGED VOTERS ARE ELIGIBLE TO VOTE IN NORTH	
CON	CLUSI	ON	15
CER	ΓΙFΙCΑ	TE OF COMPLIANCE	18
CER	ΓΙFICA	TE OF SERVICE	19
APPI	ENDIX		App i

TABLE OF AUTHORITIES

Page(s)

Cases Bouvier v. Porter, In re Consideration of Certain Legal Questions Affecting the Authentication of the 2016 General Election, In re HAVA Complaint of Carol Snow, James v. Bartlett, N.C. State Conf. of NAACP v. Bipartisan Bd. of Elections & Ethics Enf't, Overton v. Mayor & City Comm'rs of Hendersonville, People ex rel. Boyer v. Teague, Woodall v. W. Wake Highway Comm'n, Statutes & Rules

Other Authorities

Doug Bock Clark, They Followed North Carolina Election Rules When	
They Cast Their Ballots. Now Their Votes Could Be Tossed Anyway,	
ProPublica (Jan. 27, 2025),	
https://www.propublica.org/article/north-carolina-voters-jefferson-	
griffin-supreme-court-challenge	15
Joe Bruno, Voter whose ballot is being challenged provided SSN during	
registration, YahooNews (Jan. 8, 2025),	
https://www.yahoo.com/news/voter-whose-ballot-being-challenged-	
215500041.html?guccounter=1	15
Chris Cooper, An Analysis of Challenged Voters in the 2024 NC	
Supreme Court Justice Election, Old North State Politics (Jan. 12,	
2025), https://www.oldnorthstatepolitics.com/2025/01/an-analysis-	
of-challenged-voters-in.html	6
Kyle Ingram, Black NC Voters Twice as Likely to Have Ballots	
Challenged in Griffin Election Protests, News & Observer (Jan. 7,	
2025), https://www.newsobserver.com/news/politics-	0
government/election/article296693744.html	б
Military and Overseas Voting, North Carolina State Board of Elections,	
https://www.ncsbe.gov/voting/military-and-overseas-voting (last	
visited Feb. 3, 2025)	13
N.C. State Bd. of Elections, Voter Challenge Procedures Guide, (last	
updated Dec. 18, 2023)	8. 9
Patrick Marley, To gain a court seat, Republicans seek to throw out	
thousands of votes, Wash. Post (Jan. 23, 2025),	
https://www.washingtonpost.com/politics/2025/01/23/north-carolina-	
supreme-court-griffin-riggs/	15

No. COA25-181 TENTH DISTRICT

NORTH CAROLINA COURT OF APPEALS

JEFFERSON GRIFFIN,

Petitioner-Appellant,

v.

NORTH CAROLINA STATE BOARD OF ELECTIONS,

Respondent-Appellee,

and

ALLISON RIGGS,

Intervenor-Respondent-Appellee From Wake County

BRIEF OF RALIM ALLSTON, CINDY OATES ANTHONY, RACHEL ARNOLD, DANIELLE BROWN, AMY BRYANT, DENISE CARMAN, JEAN CARY, LOUANNE CASPAR, ALEXIA CHAVIS, CARRIE CONLEY, JOSE BENITO DEL PLIEGO, SOFIA DIB-GOMEZ, MARY KAY HELING, WESLEY HOGAN-PHILIPSEN, ELIZABETH HUNTER KESLING, KEVIN HUNTER KESLING, LESLEY-ANNE LEONARD, GAYNELLE LITTLE, JENNA MARROCCO, AUDREY MEIGS, BRUKLYN MILLER, DIRK PHILIPSEN, LARRY REPANES, ANNA RICHARDS, LILA RICHARDSON, LYSE ROCHLEDER, KEMEKA SIDBURY, SOPHIA "FELIX" SOTO, ALEXA ADAMO VALVERDE, DIANE WYNNE, PHOEBE ZERWICK, NORTH CAROLINA STATE CONFERENCE OF THE NAACP, NORTH CAROLINA BLACK ALLIANCE, COMMON CAUSE EDUCATION FUND, DEMOCRACY NORTH CAROLINA, EL PUEBLO, NORTH CAROLINA ASIAN AMERICANS TOGETHER, AND NORTH CAROLINA POOR PEOPLE'S CAMPAIGNAS AMICI CURIAE SUPPORTING RESPONDENT

Amici Ralim Allston, Cindy Oates Anthony, Rachel Arnold, Danielle Brown, Amy Bryant, Denise Carman, Jean Cary, Louanne Caspar, Alexia Chavis, Carrie Conley, Jose Benito del Pliego, Sofia Dib-Gomez, Mary Kay Heling, Wesley Hogan-Philipsen, Elizabeth Hunter Kesling, Kevin Hunter Kesling, Lesley-Anne Leonard, Gaynelle Little, Jenna Marrocco, Audrey Meigs, Bruklyn Miller, Dirk Philipsen, Larry Repanes, Anna Richards, Lila Richardson, Lyse Rochleder, Kemeka Sidbury, Sophia "Felix" Soto, Alexa Adamo Valverde, Diane Wynne, and Phoebe Zerwick (together, the "Impacted Voters"), together with the North Carolina State Conference of the NAACP, North Carolina Black Alliance, Common Cause Education Fund, Democracy North Carolina, El Pueblo, North Carolina Asian Americans Together, and North Carolina Poor People's Campaign (the "Organizational Amici," together with the Impacted Voters, the "Amici"), respectfully submit this brief to aid the Court in considering the election protests filed by Judge Griffin (the "Election Protests" or "Protests") and ensure that the statutory scheme is properly applied, the protester is held to the correct burden of proof, and the constitutional rights of the challenged North Carolina voters are protected.¹

INTRODUCTION

Judge Jefferson Griffin challenges the ballots of more than 60,000 voters in his Election Protests. Their transgression? Voting exactly how the State Board of

_

¹ Pursuant to Rule 28.1(b)(3)(c) of the North Carolina Rules of Appellate Procedure, no person or entity other than amici curiae, its members and its counsel, helped to write the brief or contributed money for its preparation.

Elections told them to, in accordance with longstanding election law and practices used for numerous election cycles before this one.

And who, exactly, are the challenged voters? A list of over 60,000 North Carolinians, composed of disproportionately Black, Latino, and Asian American and Pacific Islander ("AAPI") voters in a state with a long, tragic history of suppressing votes from these communities. The challenge list includes voters from all walks of life, all of whom voted pursuant to, and in reliance on, the rules promulgated by the State Board of Elections.

Through all of the legal wrangling and procedural maneuvering amongst the parties to date, the voices of the challenged voters themselves have been glaringly absent. These voters deserve not just to be heard, but to be centered in this proceeding. Amici, themselves a small subset of the challenged voters directly impacted by this proceeding, as well as non-partisan organizations who work with impacted voters across the state, respectfully submit this brief to ensure that the Court hears the voices and perspective of those voters at risk of being disenfranchised for nothing more than following the rules.

Judge Griffin's Protests seek retroactive disenfranchisement of these voters, and more than 60,000 like them, based on legal theories that have been rejected by both federal and state courts. Stunningly, Judge Griffin fails to allege any evidence that even a single one of these voters is actually ineligible to vote in North Carolina—only that they should have anticipated his challenges and followed an alternative,

hypothetical set of rules when casting their ballot. State law requires that election protests make this showing by *substantial* evidence. Yet the Protests offer *none*.

The Protests also request sweeping, unprecedented remedies that would permanently destabilize the post-election period and deny voters any assurance their ballots will be counted, despite having met North Carolina's voting requirements in precisely the way that was required of them. The sought-after relief is without basis in state law and dubious in the eyes of bedrock constitutional principles and fundamental fairness. If the Protests are successful, no election will ever have finality in North Carolina again.

Put simply, Judge Griffin asks for extraordinary relief with an extraordinary lack of evidence. The consequences of granting his relief cannot be overstated. It will create distrust in the democratic process amongst all North Carolinians, and shake North Carolina elections to the core. To avoid precisely that outcome, in accordance with North Carolina law, Amici respectfully request that this Court reject Judge Griffin's Protests in their entirety.

INTEREST OF AMICI CURIAE

The Impacted Voters are all U.S. citizens and eligible voters qualified to cast a ballot in North Carolina. *See generally* Exs. 1-26, 28-32. At the time of voting in the 2024 General Election, they lawfully voted under the laws and regulations that existed during the voting process. However, they are now threatened with disenfranchisement by Judge Griffin's Election Protests, which challenge voters for purportedly lacking a Social Security Number ("SSN") or driver's license number in

their voter registration (the "Incomplete" Protests) or not presenting voter ID when voting overseas ("Overseas ID" Protests).²

The Impacted Voters come from across the state, from Pasquotank County in the east (Allston, Ex. 1), Brunswick County in the south (Sidbury, Ex. 31), Jackson and Buncombe Counties in the west (Anthony, Ex. 2, Richardson, Ex. 22), and all manner of areas in between. They include young voters casting their very first ballot in a general election (Dib-Gomez, Ex. 9, Soto, Ex. 23), to seasoned North Carolina voters with decades of demonstrated commitment to ensuring their voices are heard (Zerwick, Ex. 26). They come from diverse racial, economic, political, and occupational backgrounds, and are united in their commitment to voting.

As expressed in the appended affidavits, the Impacted Voters all felt shock, confusion, and disappointment at having their votes challenged. Those with allegedly incomplete registrations utilized the lawful registration procedures at the time. Many in fact provided the purportedly missing information when registering (Exs. 2, 6, 8, 11, 14, 19, 20, 25, 30), including through the DMV ((Valverde, Ex. 24), and many also showed their DMV license when presenting to vote (Exs. 1-3, 6, 8, 11-23, 25-26, 29, 31). And those who voted from abroad were instructed not to provide a photo of their ID with their ballot, but could have done so if asked. (Exs. 23, 26, 28, 32).

The Organizational Amici are non-partisan, non-profit North Carolina-based organizations that engage in year-round voter outreach, voter education, and election

² While Amici do not specifically address the "Overseas Non-Resident" category of election protest here, those number less than the margin of victory and thus would not alone cause an outcome-determinative impact on the election.

protection activities across the state. They include organizations that engage individuals to exercise their right to vote as part of efforts to eliminate discrimination (North Carolina NAACP), advocate for voting rights (NC Poor People's Campaign), and promote systemic policy change to assist marginalized communities, including Black voters (N.C. Black Alliance), AAPI voters (NCAAT), and those in the Latin American community (El Pueblo), who are all disproportionately targeted by the Protests. These and other Organizational Amici have members whose votes have been challenged (Common Cause Education Fund) and work to educate those affected as part of their efforts to ensure all voters can access the ballot (Democracy NC).

Each of the Impacted Voters thus has an interest in the outcome of this matter. The Protests also disproportionately impact the Black and brown constituents and members of the Organizational Amici, which provides a unique and particularly strong interest in the case for those organizations.³

The Impacted Voters and Organizational Amici are not advocating for or against any specific candidate for office. Rather, they seek to protect the fundamental

in.html.

³ Analysis by the News & Observer found that "Black registered voters were twice as likely to have their votes challenged [by Judge Griffin] as white voters." Kyle Ingram, Black NC Voters Twice as Likely to Have Ballots Challenged in Griffin Election Protests, News & Observer (Jan. 7, 2025), https://www.newsobserver.com/news/politicsgovernment/election/article296693744.html. Professor Chris Cooper from Western Carolina University also found that the challenged voters are "much less likely to be white than the pool of voters in 2024," and that they are more likely to be either Black, Hispanic, or Asian. An Analysis of Challenged Voters in the 2024 NC Supreme Court Justice Election. Old North State **Politics** (Jan. 12. 2025), https://www.oldnorthstatepolitics.com/2025/01/an-analysis-of-challenged-voters-

right to vote of eligible North Carolina voters whose valid votes in the 2024 General Election have been baselessly called into question by these Protests.

ISSUES ADDRESSED

Whether Petitioner's requested relief will lead to the disenfranchisement of eligible North Carolina voters.

Whether Petitioner has met his statutory burden of proof for an election protest.

Whether Petitioner's requested relief is available given his failure to provide any affirmative, individualized allegations or evidence of voter ineligibility.

ARGUMENT

I. North Carolina's Election Protest Scheme Requires Affirmative Proof of Voter Ineligibility to Show an Outcome-Determinative Violation of Election Law.

To be successful, an election protest must demonstrate "substantial evidence of any violation, irregularity, or misconduct sufficient to cast doubt on the results of the election." N.C.G.S. § 163-182.10(d)(2). Election protests challenging specific voters should be dismissed unless they allege that ineligible voters participated "in numbers sufficient to change the outcome of the election." *In re Consideration of Certain Legal Questions Affecting the Authentication of the 2016 General Election*, N.C. State Bd. of Elections, at 1-2 (Nov. 28, 2016); *see also Bouvier v. Porter*, 386 N.C. 1, 4, 900 S.E.2d 838, 843 (2024).

North Carolina election law has an unambiguous presumption of eligibility for a voter whose eligibility to vote is challenged. "No challenge shall be sustained unless the challenge is substantiated by affirmative proof. In the absence of such proof, the presumption shall be that the voter is properly registered or affiliated." N.C.G.S. § 163-90.1(b). In addition, "[c]hallenges shall not be made indiscriminately and may only be made if the challenger knows, suspects or reasonably believes such a person not to be qualified and entitled to vote," N.C.G.S. § 163-90.1(a), requiring evidence specific to each individual voter being challenged. See North Carolina State Board of Elections, Voter Challenge Procedures Guide, at 6 (last updated Dec. 18, 2023).4 "[I]nformation pulled from a public website or database that conveys no information specific to the circumstances of the voter" does not qualify as individualized evidence and cannot be grounds for a voter challenge. Id.; see also N.C. State Conf. of NAACP v. Bipartisan Bd. of Elections & Ethics Enf't, No. 1:16-CV-01274, 2018 WL 3748172, at *7 (M.D.N.C. Aug. 7, 2018).

Faithful adherence to the statutory scheme requires that Judge Griffin be held to the statutorily mandated burden of proof. Even if he articulates plausible legal theories of voter ineligibility (a legal conclusion that Amici do <u>not</u> concede), he must also allege and then prove via affirmative, individualized evidence that these voters are actually ineligible. As set forth below, Judge Griffin has failed to meet this burden.

II. The Complete Lack of Individualized Allegations in Judge Griffin's Protests Fails to Carry the Statutorily Required Burden and Cannot Justify Granting His Requested Relief.

 $^{^4\} https://s3.amazonaws.com/dl.ncsbe.gov/Legal/Voter\%20Challenge\%20Guide.pdf.$

a. The Protests Do Not Allege, Much Less Show, Actual Voter Ineligibility, as Required By State Law.

Judge Griffin's Protests suffer a fundamental, and fatal, oversight requiring dismissal: He has not offered (or even alleged) *any* evidence—let alone substantial evidence—that *any* Incomplete or Overseas ID challenged voter is ineligible to vote, as required to prevail under state law.

As an initial matter, Judge Griffin does not dispute that each challenged voter cast a ballot pursuant to their registration on the state's official list of valid registrants at the time of the election. There are no allegations of fraud, or that these voters lack the requisite age, residency, or citizenship to cast a ballot in the state. Nor does Judge Griffin offer any investigation into the specific circumstances of any voter he challenges. Instead, the lists of voters whose registrations are purportedly incomplete rely upon the kind of systematized data query that does not meet a protester's burden to challenge voter ineligibility. See Voter Challenge Procedures Guide at 6 (citing Bipartisan Bd. of Elections & Ethics Enf't, 2018 WL 3748172, at *7). This kind of mass challenge is expressly forbidden by the North Carolina election code.

The Protests also fail to account for any of the readily available alternative explanations that do not bear on voter eligibility for the voters who appear in his Incomplete protests, including, for example, voters that provided a driver's license or SSN at the time of registration that was either not entered or was somehow removed from their voter registration file. *See, e.g.*, Exs. 2, 6-15, 17, 19-21, 25 (Impacted Voters who remember providing identifying information, including some who confirmed this

with their county board of elections). The State Board recognized that such information might be omitted in a voter's file due to an information mismatch with the DMV or Social Security Administration databases, for reasons unrelated to eligibility (such as inadvertent typos, misspelling, or reasonable variation in names). See NCSBE Decision and Order at 16 (Dec. 13, 2024).

Judge Griffin also ignores that voters may have provided a driver's license or SSN after registering, such as when they requested a mail-in ballot or when they presented a driver's license to satisfy North Carolina's voter ID requirement. *See, e.g.*, Exs. 1-3, 6, 8, 10-22, 24, 25, 29, 31 (Impacted Voters who provided their driver's license when they voted). Other voters might not possess a driver's license or SSN but are still North Carolina citizens who are eligible to register and vote, a scenario contemplated by state and federal law.

But whether any one of these reasons, or yet another reason, specifically describes any individual voter's circumstance is beside the point. It is the protester's burden under state law to affirmatively prove that the voters they claim are ineligible are, in fact, ineligible to vote. Judge Griffin's Incomplete challenges have not attempted to, much less met this burden.

Likewise, Griffin's Overseas ID protests seek to disenfranchise voters he admits *followed* the State Board's instructions when voting, pursuant to a lawful rule in place well before the election, 8 N.C. Admin. Code § 17.0109, without making any showing that these voters were not eligible to cast their ballots. He never alleges even one vote cast by this group of challenged voters was fraudulent. Rather, had it

actually been required of them, many (or even all) of these voters would have provided a copy of their ID or availed themselves of the reasonable impediment exception. *See, e.g.*, Exs. 23, 26, 28, 32. For the same reasons, then, his Overseas ID protests are insufficient as a matter of state law and must be dismissed.

b. Even if Griffin's Erroneous Interpretations of Law Were Correct, He Could Not Show an Outcome-Determinative Irregularity Occurred.

Even were the Court to assume the existence of an irregularity or violation of law during the 2024 General Election, Judge Griffin still has not satisfied his burden of demonstrating that any such alleged irregularity was outcome-determinative. This is because he cannot show that, had his preferred interpretation of the law been in place all along, any of the challenged voters could not have satisfied these requirements and still cast a ballot. As the appended affidavits show, many did or would have.

This is relevant because Judge Griffin is not arguing that the law as established by lawful authorities at the time of the election was violated or misapplied. He is rather arguing that those lawful bodies erred in their interpretations and that, instead, his preferred construction should have been adopted during that time. If the Court finds this untimely theory plausible, both state law and fundamental fairness demand that Judge Griffin then show voters could not have satisfied those alternative requirements had they instead been the law at the time of the election, which he does not do here.

This provides an alternative ground for the Court to affirm dismissal.

c. Even if Judge Griffin's Legal Theories Were Valid, His Requested Remedy is Not Available Without an Evidentiary Record.

Even if this Court were inclined to overlook these facial defects in Judge Griffin's Protests and consider the protest theories on their merits, it would not be able to grant his requested relief without an evidentiary record. The statutory election protest scheme requires an evidentiary record before consideration of granting any substantive relief. See N.C.G.S. § 163-182.10(d)(2) (requiring "substantial evidence of any violation, irregularity, or misconduct sufficient to cast doubt on the results of the election" (emphasis added)). The lack of evidentiary record in this case necessarily prevents the Protests from establishing anything by substantial evidence, let alone a violation of state election law.

James v. Bartlett, 359 N.C. 260, 607 S.E.2d 638 (2005) does not counsel any differently. In James, the North Carolina Supreme Court ruled that when the State Board counted out-of-precinct provisional ballots, it was a violation of state election law. 359 N.C. at 271. However, the evidentiary record in James was clear: there was no factual dispute that the challenged voters voted out-of-precinct. Id. at 263. Instead, the case turned entirely on whether voting out of precinct was legal under the state law in place for the election. Id. There is no such evidentiary record in this case, and there is significant dispute about whether the technical deficiencies identified by Judge Griffin actually occurred or are the result of administrative errors. If the Protests are to be considered on their merits, such disputes must be resolved through adducing and testing an evidentiary record, which does not exist here.

Further, there was no argument in *James* that voters detrimentally relied on the State Board's guidance, as the State Board had shifted its interpretation of the relevant North Carolina statutes in *James* for the very first time that election cycle, and had not informed voters or candidates of the shift in policy. *Id.* at 265 (noting the "absence of any clear statutory or regulatory directive" that out-of-precinct ballots would be counted in 2004). The opposite is true here, where the State Board prominently announced rules governing each of Griffin's Protests well in advance of the 2024 election, operated in compliance with those rules throughout the election, and where each category of challenged voters cast their ballots in accordance with those announced rules and procedures.

Judge Griffin's prior contention that "this is not an instance in which an election official affirmatively instructed a voter" to take a specific course of action (Griffin Brief, Case No. 622-910, at 37), which he seemingly has abandoned on appeal, is wholly inaccurate. Each of the challenged voters, in all three of Griffin's categories, voted specifically pursuant to rules laid out by the State Board. In the case of the Overseas ID voters, as well as the Never Resident voters, this is self-evident. See Military and Overseas Voting, North Carolina State Board of Elections,

-

⁵ Judge Griffin's insistence that the 2004 general election was not the first time outof-precinct ballots were counted, and thus voters developed reliance interests that the North Carolina Supreme Court held were insufficient to defeat the protests, is inaccurate. The relevant reliance interest is that of the voters who voted pursuant to the rule. In *James*, voters were not expressly told that out-of-precinct ballots would be counted ahead of time. 359 N.C. at 265. No out-of-precinct voter relied on guidance from the State Board to cast their ballot in 2004, because no such guidance existed. That is very different from the present case.

https://www.ncsbe.gov/voting/military-and-overseas-voting (last visited Feb. 3, 2025);

FAQ: Voter ID, North Carolina State Board of Elections,

https://www.ncsbe.gov/voting/voter-id/faq-voter-

id#IsphotoIDrequiredformilitaryandoverseasvotersakaUOCAVAvoters-2274 (last visited Feb. 26, 2025). In the case of the Incomplete voters, the State Board announced a year in advance of the 2024 election that it would not require additional information from anyone already registered to vote. See In re HAVA Complaint of Carol Snow, N.C. State Bd. of Elections, at 4 (Dec. 6, 2023). These are prominent, unambiguous announcements made well in advance of the election. Voters were entitled to rely on these affirmative instructions about how to vote.⁶

III. The Challenged Voters Are Eligible to Vote in North Carolina.

Not only did Griffin fail to allege or attempt to prove actual ineligibility, he would not be able to do so. What evidence has been adduced, both by Amici and in the public record, all supports the presumption that the more than 60,000 voters Judge Griffin challenges are bona fide eligible voters who have followed all rules provided by the State to exercise their fundamental right to vote. In addition to Amici, there are numerous public accounts of voters who retrieved copies of their voter registration

⁶ For over a century, the North Carolina Supreme Court has recognized that otherwise eligible and registered voters should not have their votes disqualified due to administrative errors. See People ex rel. Boyer v. Teague, 106 N.C. 576, 11 S.E. 665, 670 (1890) (rejecting effort to disqualify vote based on an alleged failure to register where "the voter procure[d] the proper certificate and duly register[ed] thereunder[,]" since where "the registrar made a mistake, without the fault or complicity of the voter . . . the vote is legal and should not be disturbed"); see also Woodall v. W. Wake Highway Comm'n, 176 N.C. 377, 388-91, 97 S.E. 226, 231-32 (1918); Overton v. Mayor & City Comm'rs of Hendersonville, 253 N.C. 306, 315-16, 116 S.E.2d 808, 815 (1960).

forms to confirm they included purportedly missing information.⁷ This should give the Court extreme pause before granting any of Griffin's requested relief.

These eligible voters followed the law. To retroactively attempt to disqualify their ballots on the basis of newfound disagreement with the rules they voted under – after federal and state courts had already rejected similar efforts to challenge these rules prior to the election – violates fundamental precepts of due process, democracy, and basic fairness.

CONCLUSION

For the reasons stated above, Amici respectfully request that the Court affirm the lower court decision and further hold that, in addition to the reasons stated by the NCSBE Decision and Order, Griffin's Protests also fail as a matter of law for failure to allege or prove the challenged voters are actually ineligible to vote in North Carolina, as required by N.C.G.S. § 163-90.1.

⁷ See, e.g., Patrick Marley, To gain a court seat, Republicans seek to throw out thousands of votes, Wash. Post (Jan. 23, 2025),

^{23,} 2025), https://www.washingtonpost.com/politics/2025/01/23/north-carolina-supreme-courtgriffin-riggs/; Joe Bruno, Voter whose ballot is being challenged provided SSN during registration, YahooNews (Jan. 8, 2025), https://www.yahoo.com/news/voter-whoseballot-being-challenged-215500041.html?guccounter=1; see also Doug Bock Clark, They Followed North Carolina Election Rules When They Cast Their Ballots. Now Votes Could BeTossedAnyway, ProPublica 27. https://www.propublica.org/article/north-carolina-voters-jefferson-griffin-supremecourt-challenge.

Respectfully submitted, this the 27th day of February, 2025.

SOUTHERN COALITION FOR SOCIAL JUSTICE

/s/ Jeffrey Loperfido
N.C. Bar No. 52939
PO Box 51280
Durham, NC 27707
(919) 794-4213
jeffloperfido@scsj.org

N.C. R. App. P. 33(b) Certification: I certify that all of the attorneys listed below have authorized me to list their names on this document as if they had personally signed it.

Hilary Harris Klein N.C. Bar No. 53711 Christopher Shenton N.C. Bar No. 60442 Mitchell Brown N.C. Bar No. 56122

hilaryhklein@scsj.org chrisshenton@scsj.org mitchellbrown@scsj.org

FORWARD JUSTICE

/s/Caitlin A. Swain
Caitlin A. Swain
N.C. Bar No. 57042
Kathleen Roblez
N.C. State Bar No. 57039
Ashley Mitchell
N.C. State Bar No. 56889
P.O. Box 1932
Durham, NC 27702

(919) 907-8586 cswain@forwardjustice.org kroblez@forwardjustice.org amitchell@forwardjustice.org

Irving Joyner
N.C. State Bar No. 7830
P.O. Box 374
Cary, NC 27512
(919) 319-8353
ijoyner@nccu.edu

- 18 -

CERTIFICATE OF COMPLIANCE

Pursuant to Rule 28(j) of the North Carolina Rules of Appellate Procedure, the

undersigned counsel certifies that the foregoing brief, which is prepared using a

proportional font, contains fewer than 3,750 words (excluding cover, index, table of

authorities, caption, signature blocks, certificate of service, and this certificate of

compliance) as reported by the word-processing software.

This the 27th day of February 2025.

/s/ Jeffrey Loperfido

Jeffrey Loperfido

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was e-filed and served upon the parties listed below via e-mail, addressed as follows:

Troy Shelton – <u>tshelton@dowlingfirm.com</u>
Craig D. Schauer – <u>cschauer@dowlingfirm.com</u>
W. Michael Dowling – <u>mike@dowlingfirm.com</u>
Phillip R. Thomas – <u>pthomas@chalmersadams.com</u>

Attorneys for Petitioner-Appellant Jefferson Griffin

Mary Carla Babb — <u>mcbabb@ncdoj.gov</u> Terence Steed — <u>tsteed@ncdoj.gov</u>

Attorneys for Respondent-Appellee North Carolina State Board of Elections

Raymond M. Bennett – <u>ray.bennett@wbd-us.com</u> Samuel B. Hartzell – sam.hartzell@wbd-us.com

Attorneys for Intervenor-Respondent-Appellee Allison Riggs

This the 27th day of February, 2025.

/s/ Jeffrey Loperfido

NORTH CAROLINA COURT OF APPEALS

JEFFERSON GRIFFIN,

Petitioner-Appellant,

v.

NORTH CAROLINA STATE BOARD OF ELECTIONS.

From Wake County

Respondent-Appellee,

and

ALLISON RIGGS,

 $Intervenor\hbox{-}Respondent\hbox{-}Appellee$

APPENDIX TO BRIEF OF RALIM ALLSTON, CINDY OATES ANTHONY, RACHEL ARNOLD, DANIELLE BROWN, AMY BRYANT, DENISE CARMAN, JEAN CARY, LOUANNE CASPAR, ALEXIA CHAVIS, CARRIE CONLEY, JOSE BENITO DEL PLIEGO, SOFIA DIB-GOMEZ, MARY KAY HELING, WESLEY HOGAN-PHILIPSEN, ELIZABETH HUNTER KESLING, KEVIN HUNTER KESLING, LESLEY-ANNE LEONARD, GAYNELLE LITTLE, JENNA MARROCCO, AUDREY MEIGS, BRUKLYN MILLER, DIRK PHILIPSEN, LARRY REPANES, ANNA RICHARDS, LILA RICHARDSON, LYSE ROCHLEDER, KEMEKA SIDBURY, SOPHIA "FELIX" SOTO, ALEXA ADAMO VALVERDE, DIANE WYNNE, PHOEBE ZERWICK, NORTH CAROLINA STATE CONFERENCE OF THE NAACP, NORTH CAROLINA BLACK ALLIANCE, COMMON CAUSE EDUCATION FUND, DEMOCRACY NORTH CAROLINA, EL PUEBLO, NORTH CAROLINA ASIAN AMERICANS TOGETHER, AND NORTH CAROLINA POOR PEOPLE'S CAMPAIGN AS AMICI CURIAE SUPPORTING RESPONDENT

CONTENTS OF APPENDIX

EXHIBIT 1: Affidavit of Ralim Allston	App. 1
EXHIBIT 2: Affidavit of Cindy Oates Anthony	App. 4
EXHIBIT 3: Affidavit of Rachel Suzanne Arnold	App. 7
EXHIBIT 4: Affidavit of Amy Grace Bryant	App. 10
EXHIBIT 5: Affidavit of Denise Bradley Carman	App. 13
EXHIBIT 6: Affidavit of Louanne Flanagan Caspar	App. 16
EXHIBIT 7: Affidavit of Alexia Chavis	App. 19
EXHIBIT 8: Affidavit of J. Benito del Pliego	App. 22
EXHIBIT 9: Affidavit of Sofia Dib-Gomez	App. 26
EXHIBIT 10: Affidavit of Mary Kay Heling	App. 29
EXHIBIT 11: Affidavit of Wesley Hogan-Philipsen	App. 32
EXHIBIT 12: Affidavit of Elizabeth Hunter Kesling	App. 36
EXHIBIT 13: Affidavit of Kevin Hunter Kesling	App. 39
EXHIBIT 14: Affidavit of Lesley-Anne Leonard	App. 43
EXHIBIT 15: Affidavit of Gaynelle Little	App. 47
EXHIBIT 16: Affidavit of Jenna Marie Marrocco	App. 50
EXHIBIT 17: Affidavit of Audrey Meigs	App. 53
EXHIBIT 18: Affidavit of Bruklyn Miller	App. 56
EXHIBIT 19: Affidavit of Dirk Philipsen	App. 59
EXHIBIT 20: Affidavit of Larry Repanes	App. 63
EXHIBIT 21: Affidavit of Anna Louise Richards	App. 67

EXHIBIT 22: Affidavit of Lila Richardson
EXHIBIT 23: Affidavit of Sophia "Felix" Angelita Soto App. 73
EXHIBIT 24: Affidavit of Alexa Adamo Valverde App. 77
EXHIBIT 25: Affidavit of Diane Wynne
EXHIBIT 26: Affidavit of Phoebe Zerwick App. 84
EXHIBIT 27: Common Cause Impacted Voters List App. 88
EXHIBIT 28: Affidavit of Carrie ConleyApp. 94
EXHIBIT 29: Affidavit of Danielle Brown App. 97
EXHIBIT 30: Affidavit of Jean CaryApp. 100
EXHIBIT 31: Affidavit of Kemeka SidburyApp. 102
EXHIBIT 32: Affidavit of Lyse RochlederApp. 105

STATE OF NORTH CAROLINA WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION Nos. 24CV040619-910, 24CV040620-910, 24CV040622-910

JEFFERSON GRIFFIN,		-
Plaintiff,	AFFIDAVIT OF	
ν.		
NORTH CAROLINA STATE BOARD OF ELECTIONS,	RALIM ALLSTON	
•		
Defendants.		

I, Ralim Allston, hereby declare as follows:

- I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- I am a 35-year-old Black man who is a current resident of Elizabeth City, North Carolina, in Pasquotank County. I have lived at my current residence since 2002.
 - 3. I am a citizen of the United States.
- 4. I am not disqualified from voting due to a felony conviction, and I otherwise meet the qualifications for eligibility to register and vote in North Carolina.
- 5. I have been a registered voter in this state since 2008, and I registered to vote at my current address on September 15, 2008.
- 6. Voting is important because people fought and sacrificed their lives for me and Black people like me to have this right. It is my duty to use this opportunity to contribute to our society. It is my right to voice my opinion on what goes on in our state and country through my vote.

- 7. I cast a ballot in the November 5, 2024, election by going to the only early voting site in my county on October 31, 2025. When voting, I was required to show a photo ID so I provided my state issued identification card obtained from the NC DMV. Because I have been a registered voter in my county since 2008, I did not utilize Same-Day registration.
- 8. Shortly after the election, I learned that my name was on a list of voters challenged by Judge Griffin. I did not receive any notice of any issues with my registration. Prior to the election, I checked the State Board of Election's website to make sure I was registered and able to vote before the election and there was no indication that something was wrong with my registration. When I went to vote, poll workers did not inform me that something was wrong with my registration. I found out my name was on the list from my older sister. She called me on January 16, 2025, and told me I was on the list and my vote may be thrown out.
- 9. I am aware that my vote has been included on Judge Griffin's challenge list because my voter registration record is allegedly missing either a Social Security Number or a driver's license number according to Judge Griffin. I do not recall receiving a postcard from Judge Griffin's campaign about my name being on this list.
- 10. I believe I provided my driver's license number at the time I registered to vote. I do have my driver's license number and social security number and could provide that information to my County Board of Elections if it were required.
- 11. I was never offered an opportunity to fix any supposed problems with my registration/absentee ballot, neither before nor after Election Day.
- 12. If my ballot is retroactively discarded under Judge Griffin's protest, I will feel angry and discouraged because I thought this was a democracy. I thought voting was supposed to be fair. It is my right to vote, and this challenge is stripping me of my right.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on January 31, 2025.

Ralim Allston



STATE OF NORTH CAROLINA WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 24CV040619-910; 24CV040620-910; 24CV040622-910

JEFFERSON GRIFFIN,	
Plaintiff,	AFFIDAVIT OF
ν .	AFFIDAVIIOF
NORTH CAROLINA STATE BOARD OF ELECTIONS,	CINDY OATES ANTHONY
,	
Defendants.	

- I, Cindy Oates Anthony, hereby declare as follows:
- 1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I was born in Gaston County, North Carolina. I later lived in Buncombe County, and am currently a resident of Jackson County. I have lived at my current residence since 2008.
 - 3. I am a citizen of the United States.
- 4. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- 5. I have been a registered voter in this state since at least 1992, and I registered to vote at my current address shortly after moving residences in 2008.
- 6. I believe that as citizens of the United States it is our right and responsibility to vote and to participate in our system of government. I believe everyone who is eligible to vote should be able to cast a ballot and have that vote counted.

- 7. I cast a ballot in the November 5, 2024, election going to an early voting site in my county.

 I showed a copy of my driver's license when I presented to vote.
- 8. I learned that my name was on a list of voters challenged by Judge Griffin when a member of my church notified me that my name was on the list on Friday, January 10th. I do not recall getting a post card about this challenge. If I did, I might have thrown it out as I frequently get junk mail in that format.
- 9. I am aware that my vote has been included on Judge Griffin's challenge list because my voter registration record is allegedly missing either a Social Security Number or a driver's license number. After I was notified by my friend from church, I reached out to my county board of elections in Jackson County and talked with an elections specialist. He told me I had included my driver's license number when I updated my registration for Jackson County in October of 2008, and he was not sure why that information was not included in my voter registration file. I have since received a copy of my registration form and confirmed it does show that I filled out my driver's license number.
- 10. I was never offered an opportunity to fix any supposed problems with my registration before Election Day. If I had been notified of any such issue, I would have done whatever I could to make sure my ballot would count.
- 11. If my ballot is retroactively discarded under Judge Griffin's protest, I would feel wronged, and like a fundamental right of mine had been taken away. I would wonder why all the other votes I cast that day could count, and this wouldn't. I would also wonder whether this means we need to go back and question the results of all elections that have occurred.

I declare under penalty of perjury under the	laws of North Carolina that the foregoing is true and
correct. Executed on <u>Januar 31</u>	_, 2025. Cindy Oates Anthony
Sworn to (or affirmed) and subscribed before	re me this the 31 day of JANUARY, 2025.
A Commission III G	Dianal A Suscere of Notary
NOTARI DE SILING	DIGNNE J LIN DGREW, Notary Public
COUNTRIBLE	My Commission Expires: 11/14/2026

3

STATE OF NORTH CAROLINA WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION Nos. 24CV040619-910, 24CV040620-910, 24CV040622-910

JEFFERSON GRIFFIN,	
Plaintiff,	
v.	AFFIDAVIT OF
NORTH CAROLINA STATE BOARD OF	Dealed Commune Associa
ELECTIONS,	Rachel Suzanne Arnold
,	
Defendants.	

I, Rachel Suzanne Arnold, hereby declare as follows:

- 1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I am a 51-year-old white female resident of the state of North Carolina. I was born in Ypsilanti, Michigan. I became a resident of Guilford County, North Carolina in 2009. I have lived at my current residence since June 2009.
- 3. I am a senior vice president in a government affairs firm.
- 4. I am a citizen of the United States.
- 5. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.

- 6. I registered to vote in North Carolina in 2009. I registered to vote at the North Carolina Department of Motor Vehicles. I am currently registered to vote at my current address.
- 7. As my voting record demonstrates, I am an active voter. I have participated in primary and general elections held in North Carolina since 2009. I have never had any issue with voting.
- 8. For me voting is a form of expression and a statement of values. I believe that it is imperative to participate in a representative democracy.
- 9. I participated in the early voting during the 2024 General Election.
- 10. I voted at the Craft Recreational Center on October 24, 2024. Prior to receiving a ballot, a poll worker requested a copy of my driver's license. I complied by presenting my "Real ID". I was given a ballot, and I voted.
- 11. There was nothing out of the ordinary about my voting experience.
- 12. Shortly after the election, I received a generic postcard from the North Carolina Republican Party. It was addressed to "Rachel Arnold or current resident". Initially I thought the mailer was a scare tactic, so I called the North Carolina Republican Party and left a voicemail. No one returned my call.
- 13. Then, in December, I stumbled upon the challenge list on social media. I searched the list and I was floored to discover that my vote was being challenged.
- 14. I emailed the State Board of Elections on December 13, 2024, to inquire if I needed to do anything to rectify the issue. I was told "In terms of when or whether you would need to provide information, the State Board first must decide whether the protest makes legally valid arguments before the protest would move toward a hearing on the evidence as to the

specific voter's eligibility. If the State Board determines that this will go to a hearing, you

and any other affected voter will be contacted in writing, either by the State Board or you

county board of elections."

15. To date, I have never received any follow up information from the State Board of

Elections.

16. I am an upstanding United States citizen who always adheres to the voting laws and

check my voting status before an election. I have never had any issues until now.

17. Up until this point, I have walked through life without problems. However, this

process has shown me how easy a miscarriage of justice can happen in our democratic

society, and how important it is for those of us who can, to stand up and make our voices

heard for ourselves and others.

18. I strongly believe it is hypocritical that a candidate for the North Carolina Supreme

Court aims to take a seat on the highest court by disenfranchising over 60,000 North

Carolina citizens. If Griffin's Campaign is allowed to reverse a decisive election, it would

not only be a travesty, but it would make it impossible for me to trust any ruling coming

from the Judicial system, particularly any ruling in which he is a part.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and

correct. Executed on February 2, 2025.

aceuf and

Rachel Suzanne Arnold

9

STATE OF NORTH CAROLINA WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION Nos. 24CV040619-910, 24CV040620-910, 24CV040622-910

JEFFERSON GRIFFIN,	
Plaintiff,	
ν.	AFFIDAVIT OF
NORTH CAROLINA STATE BOARD OF ELECTIONS,	Amy Grace Bryant
,	
Defendants.	

I, Amy Grace Bryant, hereby declare as follows:

- 1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I am a 52-year-old female resident of the state of North Carolina. I was born in Baltimore County, Maryland. I am a resident of Durham, North Carolina. I have lived at my current residence since July 2011.
 - 3. I am a wife and mother of two school age children.
- 4. I am a physician who spends my days ensuring that my patients have access to high-quality healthcare and resources. I am also an educator who helps train the next generation of healthcare providers.
 - 5. I am active in the Durham County community.
 - 6. I am a citizen of the United States.
- 7. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.

- 8. I initially registered to vote in North Carolina in summer of 2011. I registered to vote at the Department of Motor Vehicles. I am currently registered to vote at my current address.
- 9. As my voting record demonstrates, I am an active voter. I have participated in every election in my district since 2011. I have never had any issue with voting.
- 10. Voting is important to me because I believe strongly that it is imperative to participate in a representative democracy. I understand clearly how being an engaged citizen can lead to improved policies and outcomes for our society, and conversely, that not being engaged can result in systems and policies that cause harm. Everyone deserves to have their voices heard. I also view voting as a way to model civic engagement for my children and community.
- 11. During the 2024 early voting period, I presented to the Durham Main Library on October 22, 2024 to cast my vote. Prior to receiving a ballot, a poll worker requested a copy of my driver's license. I complied with the request and as a result, I was given a ballot, and I voted.
 - 12. There was nothing out of the ordinary about my voting experience.
- 13. Shortly after the election, I received a generic postcard. It was addressed to "Amy Bryant or current resident". The mailer indicated that my vote may be affected by one or more protests filed in relation to the 2024 general election.
- 14. I scanned the QR code contained on the mailer which directed me to a site ran by the North Carolina Republican Party. This website contained links to challenges organized by county.
- 15. After searching, I eventually found my name in the incomplete voter registration file. I observed no details or evidence explaining why my vote was challenged.
- 16. I contacted the State Board of Election and I was told to contact the Griffin Campaign for more details.

17. I contacted the Griffin Campaign on November 27, 2024, December 6, 2024, and

January 6 2025. I received no response from the Griffin Campaign.

18. As an upstanding United States citizen, who spends my working hours caring for

patients and educating medical trainees, it is sickening that I now have to fight to save my lawfully

cast vote.

19. This unfair process has caused me to have a range of emotions which include

disbelief, confusion, anger, powerlessness, and disappointment.

20. I have always complied with the rules. To witness a candidate for the North

Carolina Supreme Court file a lawsuit to disenfranchise my vote, along with 59,000 other citizens

without any proof feels like a blow to our democracy.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and

correct. Executed on February 1, 2025.

Any By I

Dr. Amy Grace Bryant

STATE OF NORTH CAROLINA WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 24CV040619-910; 24CV040620-910; 24CV040622-910

JEFFERSON GRIFFIN,

Plaintiff,

V.

NORTH CAROLINA STATE BOARD OF ELECTIONS,

Defendants.

Defendants.

I, Denise Bradley Carman, hereby declare as follows:

- 1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I was born in Florida. I moved to North Carolina in late 2003 and have lived here ever since. I first lived in Chatham County, then in Alamance County, and since 2020 have lived in my current residence back in Chatham County.
 - 3. I am white, 59 years old, and a woman.
 - 4. I am a citizen of the United States.
- 5. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- 6. I have been a registered voter in this state since at least 2004, and I registered to vote at my current address in June of 2020 after moving to my current residence.
- 7. Voting has always been very important to me. I registered to vote as soon as I could when I turned 18. When I moved to North Carolina, I was asked to consider working for our

elections, and agreed because I thought I could contribute to a process that is important to me in a non-partisan way. I have grown to love that work and helping people understand and engage in the voting process. For the past 18 months, I have served as an Election Judge for the Goldston precinct in Chatham County. I am proud that we were able to provide a successful election experience for our voters in 2024. I feel strongly that everyone who is eligible to vote should have the opportunity to do so, and I like playing a part in making that happen for others in addition to exercising that right for myself.

- 8. I cast a ballot in the November 5, 2024 election by going to an early voting site in my county. I showed my passport as identification when I went to vote.
- 9. I learned that my name was on a list of voters challenged by Judge Griffin while I was visiting my mother in Florida in January 2025 and a friend of mine who worked the election texted me. To the best of my knowledge, I have not received any notifications or postcards about the election protests in the mail.
- 10. I have since learned that my vote has been included on Judge Griffin's challenge list because my voter registration record is missing either a Social Security Number or a driver's license number. I am frustrated that voters have been called out for issues like this because neither of those numbers is a legal requirement to be a qualified voter, and voters are being asked to show proof of identity when they vote. I have almost always shown my passport to prove my identity, which I consider to be better indicator of eligibility to vote since it requires proof of citizenship to even obtain.
- 11. When I learned I was on Judge Griffin's challenge list, I contacted the Chatham County Board of Elections to see if there was anything I needed to do and they recommended I submit a new voter registration application with my driver's license number or last four of my

social security number to fix the issue going forward, but they did not have any advice for what I could do about the challenge.

- 12. I was never offered an opportunity to fix any supposed problems with my registration before Election Day. If I had been notified of any such issue, I would have done whatever I could to make sure my ballot would count.
- 13. If my ballot is retroactively discarded under Judge Griffin's protest, I will feel angry because I know that I am eligible to vote in Chatham County, North Carolina, in all elections, and I am committed to voting as is my legal right as a citizen. My concern is also for the people who don't understand the process as well as I do. I am worried that this will be a deterrent for them to vote again. Deep down I cannot help but think that might be a motivation for the current challenges that are happening. This kind of action makes me feel that we are trying to discourage our citizens from voting.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on Tengan 1, 2025.

State of North Carolina County of Wake

I, Amber Line, a Notary Public for said County and State, do hereby certify that Denise Bradley Carman personally appeared before methis day and acknowledged the due execution of the

foregoing instrument.

Witness my hand and official seal,

this the day of F

day of February, 2075

signature of notary public

My commission expires $\frac{08/03}{\text{month}}$, $\frac{207}{\text{vear}}$

Denise Bradley Carman

OTARY OUBLING THE

STATE OF NORTH CAROLINA WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION No. 24CV040619-910, 24CV040620-910, 24CV040622-910

JEFFERSON GRIFFIN,

Plaintiff,

17

NORTH CAROLINA STATE BOARD OF ELECTIONS,

Defendants.

AFFIDAVIT OF

LOUANNE FLANAGAN CASPAR

I, Louanne Flanagan Caspar, hereby declare as follows:

- I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- I am a 52 year old White woman and resident of North Carolina. I was born in Michigan and am currently a resident of Apex, North Carolina, in Wake County. I have lived at my current residence since July, 2015.
- 3. I am a citizen of the United States.
- 4. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- I have been a registered voter in this state since April 2014 and I registered to vote at my current address on October 29, 2015.
- Voting is extremely important to me. I have participated in 17 elections since I
 moved to North Carolina. Before moving to North Carolina, I regularly participated since

registering to vote at the age of 18. I also volunteer regularly at the polls as a precinct official.

- 7. I cast a ballot in the November 5, 2024, election by early voting at the John Brown Community Center during early voting site in Wake County. To satisfy the photo ID requirement, I showed my North Carolina driver's license issued by the North Carolina Department of Motor Vehicles ("DMV"). I did not utilize Same Day Registration because I was already registered to vote.
- 8. Shortly after the election, I learned that my name was on a list of voters challenged by Judge Griffin. I learned of this because a friend texted me about it. I do not recall receiving a postcard or any other mail from Judge Griffin's campaign.
- 9. I am aware that my vote has been included on Judge Griffin's challenge list because my voter registration record is allegedly missing either a Social Security Number or a driver's license number according to Judge Griffin. I do not understand how this information could be missing because I provided the last four digits of my social security number on my registration form.
- 10. When I learned I was on Judge Griffin's list of voters whose registrations lacked these identification numbers in my voter file, I contacted the Wake Board of Elections to request a copy of my submitted voter registration form. When that copy was provided to me, it showed that my voter registration application did include my social security number. I am not sure why it was not entered into my voter registration record.
- 11. I was never offered an opportunity to fix any supposed problems with my registration either before or after Election Day. If I had been notified of any such issue, I would have done whatever I could to ensure that my ballot would count.

12. If my ballot is retroactively discarded under Judge Griffin's protest, I will feel disenfranchised. I have never once had my ballot questioned, and if there should have been an opportunity to cure this discrepancy if there were a problem. It is fundamentally unfair to discount my vote for something I had no control over and no opportunity to fix.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on February 2, 2025.

dovanne Flanagan Caspar
Affiant

Wake County, North Carolina

I certify that the following person appeared person ally before me this day, February 2, 2025, and acknowledged that she signed the foregoing document: Louanne Flanagan Caspar.

Date: February 2, 2025

Jacqueline S. Jones, Notary Public My commission expires April 23, 2025

JACQUELINE S. JONES Notery Public, North Carolina Wake County My Commission Expires April 23, 2025

EXHIBIT

7

STATE OF NORTH CAROLINA WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION No. 24CV040619-910, 24CV040620-910, 24CV040622-910

JEFFERSON GRIFFIN,	
Plaintiff,	
V.	AFFIDAVIT OF
NORTH CAROLINA STATE BOARD OF ELECTIONS,	ALEXIA CHAVIS
,	
Defendants.	

I, ALEXIA CHAVIS, hereby declare as follows:

- 1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I was born in Wake County and am currently a resident of Greensboro, North Carolina, in Guilford County. I have lived at my current residence since August 2024.
 - 3. I am a citizen of the United States.
- 4. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- 5. I have been a registered voter in this state, using pre-registration in 2020 in Wake County, and I registered to vote in Guilford County on September 26, 2023. I updated my voter registration in September 2024 to vote at my current address.
- 6. Voting is very important to me. I currently serve as the Vice President for North Carolina Agricultural and Technical State University's chapter of Black Girls Vote and help to lead and support various student voter education and mobilization efforts on my campus. In 2024, I

was a friendtern in Democracy North Carolina's Democracy Summer internship program that further instilled in me the importance of voting rights advocacy especially for young Black people, like myself, where our vote is targeted and barriers to the ballot box are created, like trying to remove the early voting site on campus.

- 7. I cast a ballot in the November 5, 2024, election by going to an early voting site in my county and showed my student ID.
- 8. Shortly after the election, I learned that my name was on a list of voters challenged by Judge Griffin because I was notified by Democracy North Carolina. I never received a post-card from Griffin's Campaign.
- 9. I am aware that my vote has been included on Judge Griffin's challenge list because my voter registration record is allegedly missing either a Social Security Number or a driver's license number according to Judge Griffin. I do not understand how this information could be missing because I vividly remember listing my NC Driver's License number on my registration form in September; especially because when I registered to vote in 2023, I remember being told I did not need to provide my NC Driver's License number. Before I went to early vote in the 2024 General Election, I waited until I saw the State Board of Elections updated my residential address on the Voter Search tool.
- 10. If my ballot is retroactively discarded under Judge Griffin's protest, I will feel dishearten, frustrated, and disappointed. We should not have to deal with voter suppression from people that we elect to protest us and who will make important legal decisions on our behalf. When I first learned about my vote being challenged, I was initially very confused because I consider myself someone that is very civically engaged and knowledgeable about the election process. To not receive any notice to inform me my vote was being challenged and why, and that I had to go

out of my way to check and figure out what to do; it is not a good feeling for me. It should not be on the voters, when as citizens, we were not the ones that did anything wrong.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on February 3, 2025.

Alexia Chavis

STATE OF NORTH CAROLINA WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 24CV040619-910; 24CV040620-910; 24CV040622-910

JEFFERSON GRIFFIN,

Plaintiff,

v.

NORTH CAROLINA STATE BOARD OF ELECTIONS.

Defendants.

AFFIDAVIT OF J. BENITO DEL PLIEGO

I. J. Benito Del Pliego, hereby declare as follows:

- I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I was born in Madrid, Spain, and moved to the United States in 1997. I became a naturalized U.S. citizen in the mid-2000s. I have been living in North Carolina since 2002, when I accepted a job with Appalachian State University. I moved to Chapel Hill in about 2014 and registered to vote in Orange County that year. I have been voting regularly since then.
 - 3. I am 54 years old, male, and identify as Latino.
 - 4. I am a citizen of the United States.
- I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- 6. I vote regularly because I think voting and participating is one of the basic principles of our democracy. It is also fundamental as a citizen of the United States that I exercise my right to vote.

- 1 cast a ballot in the November 5, 2024, election by going to an early voting site in
 my county. I showed my driver's license when I voted.
- 8. I learned that my name was on a list of voters challenged by Judge Griffin in January of 2025 when a friend of mine told me he saw it when he was checking the list of challenged voters from online. I was baffled when I saw this. I had no idea why my name was included on this list. I do not remember getting a postcard or other notification regarding the election protests in the mail.
- 9. I have since learned that my vote has been included on Judge Griffin's challenge list because my voter registration record is allegedly missing either a Social Security Number or a driver's license number according to Judge Griffin. I have since contacted the Orange County Board of Elections to request a copy of my submitted voter registration form. When that copy was provided to me, it showed that my voter registration application did include the last four digits of my Social Security Number. The election official from Orange County told me it may have been a difficulty with reconciling my last name in my voter registration with my social security file since my last name has two words. They told me there wasn't anything for me to do to fix it.
- 10. If I had been notified there were any issue with my voter registration before the election, I would have done whatever I could to make sure my ballot would count.
- 11. I cannot believe my vote can be challenged after I have been registered and voted in North Carolina and Orange County for nearly 10 years. If my ballot is retroactively discarded under Judge Griffin's protest, I will feel that the basics of our democracy are being challenged without reason. This feels to me like a malicious effort to suppress my vote.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

J. Benito Del Pliego

G.S. § 10B-43 NOTARIAL CERTIFICATE FOR AN OATH OR AFFIRMATION

Orange (ounty, North Carolina
Signed and sworn to	before me this day by Jose Benito Delphego Name of principal
Date: 01/31/2	015
(Official Section of DIAZ	Official Signature of Notary Flor Disz Notary Public Notary's printed or typed name My commission expires: 03 22 2027
	OPTIONAL
This certificate is a	ttached to a, signed by
on	, and includes pages.

EXHIBIT

9

STATE OF NORTH CAROLINA WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION Nos. 24CV040619-910, 24CV040620-910, 24CV040622-910

JEFFERSON GRIFFIN,

Plaintiff,

v.

NORTH CAROLINA STATE BOARD OF ELECTIONS,

Defendants.

AFFIDAVIT OF

SOFIA DIB-GOMEZ

I, Sofia Dib-Gomez, hereby declare as follows:

- I am at least eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I am an 18-year-old Hispanic female resident of North Carolina. I was born in New York City and am currently a resident of Durham, North Carolina, in Durham County. I have lived at my current residence since August 2024. I am a citizen of the United States.
- I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- 4. I have been a registered voter in this state since 2024, and I registered to vote at my current address on August 29, 2024.
- 5. I am currently a student at Duke University. I am also a member of the Student Voting Rights Lab at Duke and North Carolina Central University, and a first-year fellow for Duke Votes, a non-partisant student group at Duke which works to educate, register, and mobilize the Duke community to vote.

- Ouke Votes, I served as a voter engagement recourse for all first-years, planned voter engagement activities, and spent at least two hours per week registering students to vote in the first-year dining hall and around the Duke campus. Through my fellowship, I mastered the intricacies of voter registration and instructed hundreds of Duke community members on how to fill out their voter registration form, always checking it over and ensuring that it was filled out correctly. I feel that my work reveals how important voter rights and mobilization are to me, regardless of party affiliation, and that I was equipped with accurate knowledge on voter registration validity.
- 7. I cast a ballot in the November 5, 2024, election by voting early in person at an early voting site in Durham County on October 29, 2024. To satisfy the photo voter ID requirement, I brought two forms of ID, my US passport and physical Duke Student ID, to ensure that my vote would count. I did not utilize Same-Day Registration because I was already registered to vote.
- 8. Shortly after the election, I learned that my name was on a list of voters challenged by Judge Griffin. I learned this through the work that I did with the Voting Rights Lab, who ultimately identified hundreds of Duke students who appeared on Griffin's list. I do not recall receiving a postcard from Judge Griffin's campaign about my name being on this list.
- 9. I am aware that my vote has been included on Judge Griffin's challenge list because my voter registration record is allegedly missing either a Social Security Number or a driver's license number according to Judge Griffin. I do not understand how this information could be missing because I provided my Social Security number when I registered.
- 10. When I learned that I was on Judge Griffin's list of voters whose registration lacked these identification numbers in my voter file, I contacted the Durham County Board of Elections

to request a copy of my submitted voter registration form. When that copy was provided to me, it showed that my voter registration application did include my Social Security number. The Durham County Board of Elections also confirmed this in an email to me and stated that no further action was necessary on my part.

11. I was never offered an opportunity to fix any supposed problems with my registration, either before or after Election Day. If I had been notified of any such issue, I would have done whatever I could to ensure that my ballot would count.

12. If my ballot is retroactively discarded under Judge Griffin's protest, I will feel very frustrated to not have my vote counted in the very first election that I was eligible to vote in. I know that students are being unfairly targeted in these election challenges, and I am incredibly concerned about the threat that this challenge poses to the future of voter rights in North Carolina, particularly for youth voters. The harm to the State of North Carolina is greater and more long lasting because these young North Carolinians citizens are the future of our state. The harm extends beyond one judicial election and one election cycle to the future of democracy itself.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on February 3, 2025.

Sofia Dip-Gomez

2/3/2025

DURHAM, NC USA

FEBRUARY 03rd, 200

NOTARY: SAM SAWAYA

Commission Expines or:

07/29/2029

EXHIBIT 10

STATE OF NORTH CAROLINA

WAKE COUNTY

JEFFERSON GRIFFIN.

Plaintiff,

I, Mary Kay Heling, hereby declare as follows:
IN THE GENERAL COURT OF
JUSTICE SUPERIOR COURT DIVISION
Nos. 24CV040619-910, 24CV040620-910,
24CV040622-910

v

NORTH CAROLINA STATE BOARD OF ELECTIONS,

Defendants.

AFFIDAVIT OF

MARY KAY HELING

- 1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect. 2. I was born in Wisconsin and am currently a resident of Raleigh, North Carolina, in Wake County. I have lived at my current residence since January 2016.
 - 3. I am a citizen of the United States.
- 4. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina. 5. I have been a registered voter in this state since 2016. I registered to vote at my current address on February 19, 2016.
- 6. Voting is important to me because it is not just a right, voting is a civic duty because we choose who makes the government run both statewide and locally. Voting was always a requirement of my family. It wasn't just a privilege or right, it was responsibility.

7. I cast a ballot in the November 5, 2024, election by early voting at the Chavis Park early voting site in Wake County. To satisfy the photo voter ID requirement, I showed my North

1

Carolina driver's license issued by the North Carolina Department of Motor Vehicles ("DMV"). I did not utilize Same-Day Registration because I was already registered to vote. 8. Shortly after the election, I learned that my name was on a list of voters challenged by Judge Griffin. I received a letter in the mail from the Jefferson Griffin campaign and tried to look up my name on the website link shared on the postcard. It was really hard to navigate the link because of how many people were on the list. I spent tons of time trying to find my name, and when I could not locate it, eventually assumed it was a mistake. I then looked on the web tool and found my name. I was surprised to see my name on the list. My husband registered at the same time and did not receive a letter. I have voted for the last 9 years without an issue. 9. I am aware that my vote has been included on Judge Griffin's challenge list because my voter registration record is allegedly missing either a Social Security Number or a driver's license number according to Judge Griffin. I do not understand how this information could be missing because I provided the last 4 digits of my Social Security Number on my registration form. 10. When I went to vote in the 2024 General Election, I showed my NC DMV issued driver's license.

- 11. When I learned I was on Judge Griffin's list of voters whose registrations lacked these identification numbers in my voter file, I contacted the Wake Board of Elections to request a copy of my submitted voter registration form. When that copy was provided to me, it showed that my voter registration application did include my Social Security Number. I am not sure why it was not entered into my voter registration record.
- 12. I was never offered an opportunity to fix any supposed problems with my registration/absentee ballot, either before or after Election Day. If I had been notified of any such

issue, I would have done whatever I could to ensure that my ballot would count.

2

13. If my ballot is retroactively discarded under Judge Griffin's protest, I will feel frustrated and angry. I am frustrated because I know I provided my Social Security Number and presented my driver's license. My right is being stripped away though I did everything I needed to do.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on January 31, 2025.

Mary Kay Heling

State of NC County of Usec

The foregoing instrument was acknowledged before me
this 2s day of February 2555

by Mary Kay Helins

My Commission Expires 61/3/18

ALEXANDER THOMAS HENSON NOTARY PUBLIC WAKE COUNTY, N.C. My Commission Expires 6/3/28 11

STATE OF NORTH CAROLINA WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 24CV040619-910; 24CV040620-910; 24CV040622-910

JEFFERSON GRIFFIN,

Plaintiff,

v.

NORTH CAROLINA STATE BOARD OF ELECTIONS,

Defendants.

AFFIDAVIT OF

WESLEY HOGAN-PHILIPSEN

I, WESLEY HOGAN-PHILIPSEN, hereby declare as follows:

- 1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- I was born in Pennsylvania and am currently a resident of Durham, North Carolina,
 in Durham County. I have lived at my current residence since 2013.
 - 3. I am 54 years old, white, and female.
 - 4. I am a citizen of the United States.
- 5. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- 6. I have been a registered voter in this state since 2013, and I registered to vote at my current address on October 8, 2013.
- 7. I believe without the ability to vote, there is no way I can secure other political rights guaranteed under state and federal constitutions. Without the protection of one person, one vote, all other rights are meaningless.

- 8. I cast a ballot in the November 5, 2024, election by going to an early voting site in my county. I was registered to vote already, and I showed my North Carolina driver's license to vote.
- 9. Shortly after the election, I learned that my name was on a list of voters challenged by Judge Griffin. I am a history professor, and one of my colleagues told me my husband and I were on the list. When I looked at the list, I saw my name. I did not receive a postcard from the Griffin Campaign alleging my vote was being challenged.
- 10. I am aware that my vote has been included on Judge Griffin's challenge list because my voter registration record is allegedly missing either a Social Security Number or a driver's license number according to Judge Griffin. I remember providing both my Social Security Number and driver's license when I registered to vote, and I voted without incident until now. When I saw my name on the list, I felt enraged and frustrated that such a challenge could be taken seriously by any officials. Fair minded people in both parties should not allow these kinds of challenges to go forward.
- 11. When I learned I was on Judge Griffin's challenge list, I contacted the Durham County Board of Elections to see if there was anything I needed to do to make sure my ballot counted. Staff told me my registration previously had my Social Security Number and driver's license number, but because I had requested an absentee ballot overseas in 2022, the information was depopulated to meet a 48-hour ballot counting deadline required by federal law. Staff subsequently reprocessed and repopulated the information and told me no further action was required on my part. Staff also told me I met all statutory requirements to vote in the 2024 election.

12. I was never offered an opportunity to fix any supposed problems with my registration, either before or after Election Day. If I had been notified of any such issue, I would have done whatever I could to make sure my ballot would count.

betrayed and enraged. I am stunned that any fair public official would let voters be disfranchised with this cynical tactic after generations of my family members have protested, been beaten, had to push forward legal challenges — all for the right to vote. Griffin's challenge is simply a rinse and repeat of previous unconstitutional garnesmanship against the right to vote. The intentional removal of people of the rolls is not unique to Griffin — he is part of a 200-year pattern trying to limit access to the franchise. It is a betrayal of the fundamental premise of what this country is. I am tired of people in positions of authority irresponsibly allowing this nonsense to go on. This is a government by "we the people," and this challenge betrays that tenet.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on February 1, 2025.

Wesley Hogan-Philipsen

G.S. § 10B-43 NOTARIAL CERTIFICATE FOR AN OATH OR AFFIRMATION

Date J

Signed and sworn to before me this day by Wesley Hogan - Ph. 11 psen Name of principal
Date: Feb 2, 2025
Official Seal Official Signature of Notary Kathe Crisp, Notary Public Notary's printed or typed name My commission expires: OC-1062 3 2028
This certificate is attached to a affidant, signed by Wester Logan-Philipse. Title Type of Document Name of Principal Signer(8)

of pages

STATE OF NORTH CAROLINA WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION Nos. 24CV040619-910, 24CV040620-910, 24CV040622-910

JEFFERSON GRIFFIN,

Plaintiff,

v.

NORTH CAROLINA STATE BOARD OF ELECTIONS,

Defendants.

AFFIDAVIT OF

ELIZABETH HUNTER KESLING

I, Elizabeth Hunter Kesling, hereby declare as follows:

- 1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- I lived in North Carolina from 2010-2014 and moved back in the fall of 2020. I am currently a resident of Hillsborough, North Carolina, in Orange County. I have lived at my current residence since September 2020.
 - 3. I am a wife and mother of two children ages 7 and 10-years-old.
- 4. I am a teacher and learning specialist for preschool through grade four. I have been a teacher for nearly 20 years.
 - 5. I am a citizen of the United States.
- 6. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- 7. I have been a registered voter in this state since 2020; I registered to vote at my current address on October 7, 2020.

- 8. Voting is important to me because I think in a world where the problems and issues can seem insurmountable, that showing up to vote is one concrete step I can take to act on my beliefs and hopefully work toward a better future for myself and others. Also, as a woman, I understand those who came before me fought for the right to vote, and I like to honor their legacy every time I cast my ballot. In short, I do not take the right of being able to vote lightly.
- 9. I cast a ballot in the November 5, 2024, election by going to an early voting site in my county during the early voting period. When voting, I was required to show a photo ID, so I provided my driver's license obtained from the NC Department of Motor Vehicles. Because I have been a registered voter in my county since 2020, I did not utilize Same-Day Registration.
- by Judge Griffin. I did not receive mail at my house regarding the challenge. I found out about the challenge from my friend who was looking up people he knew on the list and texted my spouse who informed me. I was also later informed by neighbors and other friends.
- 11. I am aware that my vote has been included on Judge Griffin's challenge list because my voter registration record is allegedly missing either a Social Security Number or a driver's license number according to Judge Griffin. I do not understand how this information could be missing because I believe I provided my Social Security Number at the time I registered to vote.
- 12. I do not recall receiving any contact, either before or after the election, about an issue with my registration. No one has reached out to me from the local or state government to tell me there was a problem with my registration.
- 13. I was never offered an opportunity to fix any supposed problems with my registration/absentee ballot, either before or after Election Day. If I had been notified of any issue, I would have done whatever I could to make sure my ballot would count.

14. If my ballot is retroactively discarded under Judge Griffin's protest, I will feel angry that my vote is being potentially thrown out for what seems like an adult temper tantrum. I teach young people and students about using one's voice to speak up for what you believe in; accepting when things do not go your way; and that we have systems to create fairness. The message of this is contrary to what I have always taught students. I hope there is an outcome here that does not leave voters like me disillusioned with the system.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on February 1, 2025.

Elizabeth Hunter Kesling

STATE OF NORTH CAROLINA WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION Nos. 24CV040619-910, 24CV040620-910, 24CV040622-910

JEFFERSON GRIFFIN,	
Plaintiff, v.	AFFIDAVIT OF
NORTH CAROLINA STATE BOARD OF ELECTIONS,	KEVIN HUNTER KESLING
, Defendants.	

I, Kevin Hunter Kesling, hereby declare as follows:

- I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I was born in Chapel Hill, North Carolina and lived there from birth to college. After various moves between North Carolina and Indiana I relocated to Hillsborough, North Carolina (Orange County) in September 2020. I have lived at my current residence since September 2020.
 - 3. I am a husband and father of two children ages 7 and 10-years-old.
 - 4. I am a software engineer and have held this role for roughly 10 years.
 - 5. I am a citizen of the United States.
- 6. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- 7. I registered to vote in North Carolina on October 7, 2020. I registered to vote at the Orange County Board of Elections, in Hillsborough using my US Passport and Social Security Number. I am registered to vote at my current address.

- 8. Voting is important to me because I believe if "all Men are created equal" (inclusive of the 15th and 19th) then we must ensure that all people are "treated" equally. No one voice, viewpoint, or desire is more important than another, and so voting—in its fundamental form—is a means to let a group of people decide "fairly." The right to vote is a proxy for equality and it is important that all are allowed to exercise this expression with dignity and an implicit expectation of fairness.
- 9. With these principals in mind, I went to cast a ballot at an early voting site in my county. While at the early voting site, I was required to show a photo ID. As instructed, I provided my valid North Carolina driver's license issued by the NC Department of Motor Vehicles. I was given a ballot and I voted. There were no issues raised during my voting experience.
- 10. Shortly after the election, I learned, from a friend, that my name was on a list of voters challenged by Judge Griffin.
 - 11. I never receive mail or a notice regarding this challenge.
- 12. I am aware that my vote has been included on Judge Griffin's challenge list because he claims that my voter registration record is allegedly missing either a Social Security Number or a driver's license number. His acquisition as to my voter registration is highly questionable. As indicated above, I registered to vote at the Orange County Board of Elections using my US Passport and Social Security Card.
- 13. Furthermore, North Carolina State Board of Elections never raised an issue about my registration before or after election.
- 14. Furthermore, I was never offered an opportunity to fix any supposed problems with my registration/absentee ballot, either before or after Election Day. If I had been notified of any issue, I would have done whatever I could to make sure my ballot would count.

15. If my ballot is retroactively discarded under Judge Griffin's protest, I will feel very angry. As a southerner, I learned the humility of taking my losses gracefully, and respecting when I was wrong.

16. There is nothing legally or factually wrong or invalid with my voter registration.

17. If my vote is discarded, it is explicitly a declaration to me that those who have means have a "more equal" voice than those who justly follow the law -- and that is not what America should stand for. It is my hope that this court will see Griffin's challenge for what it is to me—a disgruntled candidate who is using his weight and political pull to overthrow an election that he lost fair and square.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on February 1, 2025.

Kevin Hunter Kesling

Acknowledgement

STAT	EOF north anolina	
COUN	NTY OF Orange	
I certi to me I furth	that he or she signed the foregoing document er certify that (select one of the following ide	appeared before me this day, acknowledging Affidavit of Kurin Hanter Kesting, Name or description of attached document entification options):
	☐ I have personal knowledge of the ident	ity of the principal(s)
	federal identification with the principal's ph	e principal's identity, by a current state or notograph in the form of a wipe of identification
	A credible witness,	, has sworn or affirmed to me the strength of the strength of the foregoing tion.
Date: _	2/3/25	Davin Bry Wydon
	(Official Seal)	Notary Public Gailey Blolock Nullan Typed or Printed Notary Name My commission expires: 2426/26
	BLALOCK NEW	My commission expires: <u>Nw2A</u>

14

STATE OF NORTH CAROLINA WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 24CV040619-910; 24CV040620-910; 24CV040622-910

JEFFERSON GRIFFIN,

Plaintiff,

ν.

NORTH CAROLINA STATE BOARD OF ELECTIONS,

Defendants.

AFFIDAVIT OF

LESLEY-ANNE LEONARD

I, Lesley-Anne Leonard, hereby declare as follows:

- I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I was born in Stamford, Connecticut and attended Salem College in Winston Salem, North Carolina from 2004 to 2008. During that time my parents moved from Connecticut to Winston Salem, North Carolina in Davidson County. After graduating in 2008 I decided to stay in Winston-Salem, currently reside there, in Forsyth County. I have lived at my current residence since 2021.
 - 3. I am a 38-year-old white woman and I am a citizen of the United States.
- 4. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- 5. I have been a registered voter in Forsyth County since 2010, and I last updated my registration shortly after moving residences in 2021 to my current address.

- 6. I have been very civically and politically engaged since I was young, and my parents instilled in me the importance of voting. I believe voting is an important way to have my voice heard and I try to vote in as many elections as I can. I have voted in every general election without issue since I first registered in Forsyth County in 2010.
- I cast a ballot in the November 5, 2024, election by going to an early voting site in my county. When asked to present photo ID, I provided my North Carolina driver's license.
- 8. Shortly after the election, I learned that my name was on a list of voters challenged by Judge Griffin. I got a postcard in the mail about the election protests, but I did not really understand what it was and thought it was probably junk mail. I did go to the link that was included in the QR code but could not find my name in the spreadsheets posted and so I did not think it applied to me and tossed the notice. I went to the Board of Elections website to check that my vote counted and it did, so I thought there was no problem with my vote.
- 9. Later in January 2025 I saw information on Facebook about the challenges, and one of my friends texted me to tell me my name was in fact on the list. That prompted me to go back and call the Forsyth County Board of Elections and the State Board of Elections, and they confirmed that my vote had been counted.
- 10. I am aware that my vote has been included on Judge Griffin's challenge list because my voter registration record is allegedly missing either a Social Security Number or a driver's license number according. I was confused by this because I have both of these numbers and had them when I registered in Forsyth County in 2010 and knew I would have provided them when I first registered. I have also been able to vote without issue in every general election since I registered in the County.

11. On Friday, January 24, 2025, I went to Forsyth County Board of Elections. They were able to pull up my original registration in their database and found that my driver's license number and my social security number were both listed there, but when I got married in 2021 and my last name was changed, my ID information was not carried over to the updated registration profile. So, it appears my challenge is completely based on an administrative error and not because I did not provide identifying information when I registered.

12. I was never told of or offered an opportunity to fix any supposed problems with my registration before Election Day. If I had been notified of any such issue, I would have done whatever I could to make sure my ballot would count.

betrayed by those in charge of our elections. I was extremely angry and offended when I learned my vote had been challenged even though I have done everything I was supposed to do to cast a valid ballot and am an eligible voter in this state. It feels very unfair and dangerous that the fate of my ballot and the ballots of thousands of others like me, who followed the rules when we voted, is being left up to the courts and others and that it is not within my control to ensure my vote will count.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on January 31, 2025.

Lesley-Anne Leonard

G.S. § 10B-43 NOTARIAL CERTIFICATE FOR AN OATH OR AFFIRMATION

Forsyth County, North Carolina	T.
Signed and sworn to before me this day by Lesley Anne Name of pri	Leonard
Date: 1/31/2025	
THE BATTER IN COLUMN ()	De-
Morguerite Notary's printed or	McGr, Notary Public typed name
My commission exp	ires: 9/17/2029
OPTIONAL	
This certificate is attached to a Affidavit	signed by Lesley-Anne Leonard Name of Principal Signer(s)
Title/Type of Document	Name of Principal Signer(s)
on 1/31/2025, and includes 3 pages.	

EXHIBIT

15

STATE OF NORTH CAROLINA WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION Nos. 24CV040619-910, 24CV040620-910, 24CV040622-910

JEFFERSON GRIFFIN,	
Plaintiff,	
v.	AFFIDAVIT OF
NORTH CAROLINA STATE BOARD OF ELECTIONS,	GAYNELLE LITTLE
,	
Defendants.	

I, Gaynelle Little, hereby declare as follows:

- 1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I am a 59-year-old Black female resident of the state of North Carolina. I was born in Nash County, North Carolina and am currently a resident of Knightdale, North Carolina, in Wake County. I have lived at my current residence since June 2005.
 - 3. I am a citizen of the United States.
- 4. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- 5. I have been a registered voter in this state since approximately 1986, and I registered to vote at my current address in July 2005. I last updated my voter registration shortly after moving residences on July 5, 2005.

- 6. I have been voting regularly in North Carolina elections for decades because voting is incredibly important to me. It is really important for me to vote regularly so that I know that my voice is heard as to who will represent me in both my county, my state, and my nation.
- 7. I cast a ballot in the November 5, 2024 election by going to an early voting site in Wake County on October 31, 2024. To satisfy the photo voter ID requirement, I showed my North Carolina driver's license at the time that I early voted. I did not utilize Same-Day Registration because I was already registered to vote.
- 8. Shortly after the election, I learned that my name was on a list of voters challenged by Judge Griffin. I only found out I was on the list because I received a text from a group called Carolina Federation asking to check whether I was on the list of challenged voters. I do not recall receiving a postcard from Judge Griffin's campaign about my name being on this list.
- 9. I am aware that my vote has been included on Judge Griffin's challenge list because my voter registration record is allegedly missing either a Social Security Number or a driver's license number. I do not understand how this information could be missing because I believe I provided my driver's license number at the time I registered to vote. I have been voting for decades in North Carolina without an issue.
- I was not offered an opportunity to fix any supposed problems with my registration, either before or after election day. If I had been notified of any such issue, I would have done whatever I could to ensure that my ballot would count.
- 11. If my ballot is retroactively discarded under Judge Griffin's protest, I will feel robbed of my constitutional right to vote, misled, targeted, and angry.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on February 3, 2025.

Gaynelle Little

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION Nos. 24CV040619-910, 24CV040620-910, 24CV040622-910

JEFFERSON GRIFFIN,	
Plaintiff,	
ν.	AFFIDAVIT OF
	Jenna Marie Marrocco
NORTH CAROLINA STATE BOARD OF ELECTIONS,	
,	
Defendants.	

I, Jenna Marie Marrocco, hereby declare as follows:

- 1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I am a 27-year-old White female resident of the state of North Carolina. I was born in Annapolis Maryland and moved to North Carolina in 1998. I am a resident of Raleigh, North Carolina. I have lived at my current residence since July 2021.
 - 3. I am a citizen of the United States.
- 4. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- 5. I initially registered to vote in this state in 2016. To date, I am registered to vote at my current address.
- 6. As a citizen of the United States, I understand that I have a fundamental right to vote. As a citizen of the United States my lawfully cast vote should count.
- 7. Around September 2024, I reviewed my voting eligibility. I found out that my voter registration was listed as "inactive".

- 8. I diligently searched for and obtained the information I needed to update my voter registration. To update my voter registration, I needed to provide my valid driver's license and a utility bill to an election official prior to voting.
- 9. With this understanding in mind, I presented to the South East YMCA located in Wake County during the early voting period. Prior to casting my vote, I handed my valid driver's license and a utility bill to the election official. To my knowledge, my registration was updated at this time.
 - 10. Thereafter, I was given a ballot and I cast my vote without any problems.
- 11. To my surprise, shortly after the election, I was informed by a friend that my name was on a list of voters challenged by Judge Griffin. I never received a postcard or any other form of communication from Judge Griffin's campaign regarding my name being on his list. Further, I never heard from the State Board of Election regarding issues with my vote.
- 12. Once I became aware that my vote was being challenged by Judge Griffin because of "incomplete registration", I personally reached to his campaign for answers. To date, my efforts to get answers from both Judge Griffin and from the State Board of Election have gone unanswered.
- 13. As a citizen of the United States, I took it upon myself to do my due diligence to participate in a free and fair election. Despite taking the necessary steps to ensure my registration was proper, my vote is still being challenged.
- 14. Prior to this experience, I would have never imagined that a US citizen, properly registered to vote, could have their lawfully cast vote retroactively discarded. Unfortunately, this is exactly what the Griffin Protest is trying to do to my vote.
- 15. For me, allowing a candidate for the North Carolina Supreme Court to disenfranchise me and 60,000 other citizens just so the candidate can preside over the State's highest court, calls the judicial system into question as a whole.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on February 2, 2025.

Jenna Marie Marrocco
Jenna Marie Marrocco

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION Nos. 24CV040619-910, 24CV040620-910, 24CV040622-910

JEFFERSON GRIFFIN,	
Plaintiff,	AFFIDAVIT OF
ν.	
NORTH CAROLINA STATE BOARD OF ELECTIONS,	AUDREY MEIGS
,	
Defendants.	

I, Audrey Meigs, hereby declare as follows:

- 1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I am a 23-year-old Asian American female resident of North Carolina. I was born in China and am currently a resident of Chapel Hill, North Carolina, in Durham County. I have lived at my current residence since June 2023.
- 3. I am a citizen of the United States.
- 4. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- 5. I pre-registered to vote in North Carolina when I obtained my driver's license in 2018 at the age of 16; and I registered to vote at my current address on May 7, 2024.
- 6. Voting is incredibly important to me. I have been working in the voting rights space since high school, when I held voter registration drives in my hometown of

Asheville, North Carolina. I am very dedicated to this work and to serving and empowering the Asian American community, a community that often gets left out of the political process.

- 7. I cast a ballot in the November 5, 2024, election by going to an early voting site in Durham County. To comply with the photo voter ID requirement, I showed my North Carolina driver's license. I did not utilize Same-Day Registration because I was already registered to vote.
- 8. Shortly after the election, I learned that my name was on a list of voters challenged by Judge Griffin. I received a postcard from the NC GOP that said that there might be something wrong with my vote, and it provided me with a QR code to go to a website. However, the QR code only led me to an error page, and so I thought perhaps this was a scam. I didn't truly understand that my vote was being challenged and might not be counted until I was told more about this challenge by my co-workers at North Carolina Asian Americans Together (NCAAT).
- 9. I am aware that my vote has been included on Judge Griffin's challenge list because my voter registration record is allegedly missing either a Social Security Number or a driver's license number according to Judge Griffin. I do not understand how this information could be missing because I provided the last 4 digits of my Social Security Number on my registration form.
- 10. When I learned I was on Judge Griffin's list of voters whose registrations lacked these identification numbers in my voter file, I contacted the Durham County Board of

Elections. The Durham CBOE told me that I provided all of the necessary information when I registered, and that no further action was needed on my part.

- 11. I was never offered an opportunity to fix any supposed problems with my registration, either before or after Election Day. If I had been notified of any such issue, I would have done whatever I could to ensure that my ballot would count.
- 12. If my ballot is retroactively discarded under Judge Griffin's protest, I will feel angry and disheartened. It is despicable to me that someone who is running for a seat in the justice system is denying the right to vote to North Carolinians. Someone who doesn't have the same resources and proficiency as me would likely not even know what it means to be on this list, or what action they can or should take.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on February <u>2</u>, 2025.

Audrey Meigs

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION Nos. 24CV040619-910, 24CV040620-910, 24CV040622-910

JEFFERSON GRIFFIN,	
Plaintiff,	
v.	AFFIDAVIT OF
NORTH CAROLINA STATE BOARD OF	BRUKLYN MILLER
ELECTIONS,	
,	
Defendants.	

I, Bruklyn Miller, hereby declare as follows:

- 1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I am a 27-year-old African American resident of the state of North Carolina. I was born in Durham, North Carlina. I've been a resident of Durham County, North Carolina since 2020. I have lived at my current residence since July 2024.
 - 3. I am a part-time barista and videographer.
 - 4. I am active in the Durham County community.
 - 5. I am a citizen of the United States.
- 6. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- 7. I registered to vote in North Carolina on August 23, 2017. I am registered to vote at my current residence.

- 8. As my voting record demonstrates, I am an active voter. I have participated in almost every primary and general election held in North Carolina since 2020. I have never had any issues with casting my ballot.
- 9. Voting is important to me because I know how my ancestors took to the street to protest and organize, to provide me with the opportunity to vote. It would feel wrong to know they fought hard for our right to vote and not use that right. Voting is my way of expressing my voice in a society that tries to suppress it.
- 10. During the 2024 early voting period, I cast my vote at a church in my county. Prior to receiving a ballot, a poll worker requested a copy of my driver's license. I complied by showing my North Carolina driver's license issued by the NC Department of Motor Vehicles. Prior to getting my ballot, I raised the concern of my address not being updated on my registration. The poll worker changed it in the system. No other issues were raised by the poll worker regarding my registration.
- 11. There was nothing out of the ordinary about my voting experience. I was able to exercise my right and cast my ballot.
- 12. Shortly after the election, my friend called and asked if I received a letter in the mail regarding the Judge Griffin challenge. She had received a letter in the mail and observed my name on the list. To the best of my knowledge, that conversation happened on November 17, 2024.
- 13. I checked the mail, and I received a card. The card stated to talk to the NC State Board of Elections ("NCSBE"). I called the NCSBE and was told they would get back to me on the matter, however, I never received a call or response from them. That same day I checked the list myself and found my name. The protest list was hard to work through, but I eventually found my name.
 - 14. I did not contact anyone from the Judge Griffin campaign.

15. I am annoyed and extremely frustrated about the situation. It feels like a complete disregard for what people go through just to vote. This challenge has been going on for months, weeks after the other races have been certified – this is frustrating. If my ballot is retroactively discarded under Judge Griffin's protest, I will lose trust and faith in our democracy.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on February 1, 2025.

Evely Miller_____

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 24CV040619-910; 24CV040620-910; 24CV040622-910

JEFFERSON GRIFFIN,

Plaintiff,

v.

NORTH CAROLINA STATE BOARD OF ELECTIONS,

DIRK PHILIPSEN

I, DIRK PHILIPSEN, hereby declare as follows:

Defendants.

- I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- I am currently a resident of Durham, North Carolina, in Durham County. I have lived at my current residence since August 2013.
 - 3. I am 65 years old, white, and male.
 - 4. I am a citizen of the United States.
- 5. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- 6. I have been a registered voter in this state since 2013, and I registered to vote at my current address on September 24, 2013. I registered to vote using the last four digits of my Social Security Number.
- 7. I believe participating in your community and voting is a central part of my responsibility as a citizen. To the best of my knowledge, I have not missed a single election in my

entire life since I have been able to vote. To me, the sanctity of the voting process is crucial, and to disenfranchise someone in this way is in violation of every democratic principle I have ever learned.

- 8. I cast a ballot in the November 5, 2024, election by going to an early voting site in my county. I was already registered to vote, and I showed my North Carolina driver's license to election officials to vote.
- 9. Shortly after the election, I learned that my name was on a list of voters challenged by Judge Griffin. A colleague of mine sent out an email with a link to the list of challenged voters. When I checked the list, my name was on it. I do not remember receiving a postcard alleging my vote was being challenged. I was offended, shocked, and outraged to see my name on this list. It is a concerted effort to disenfranchise people with no evidence.
- 10. I am aware that my vote has been included on Judge Griffin's challenge list because my voter registration record is allegedly missing either a Social Security Number or a driver's license number according to Judge Griffin. There is no basis for this allegation because I remember providing my Social Security Number to my county board when I registered originally, and I showed my North Carolina driver's license to vote.
- 11. When I learned I was on Judge Griffin's list of voters whose registrations lacked these identification numbers in my voter file, I contacted the Durham County Board of Elections. Staff confirmed that my voter registration application did include my Social Security Number. I am not sure why it was not entered into my voter registration record.
- 12. When I learned I was on Judge Griffin's challenge list, I contacted the Durham County Board of Elections to see if there was anything I needed to do to make sure my ballot

counted. The staff I communicated with assured me that no further action was necessary on my part.

- 13. I was never notified of any alleged problem with my registration or offered an opportunity to fix any supposed issues, either before or after Election Day. If I had been notified of any such issue, I would have done whatever I could to make sure my ballot would count.
- 14. If my ballot is retroactively discarded under Judge Griffin's protest, I would no longer trust the political process. Outrage is almost too mild a term for what I would feel. I would feel disenfranchised and would be appalled. However, it would give me motivation to be more politically active to defeat the actors responsible.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on February 1, 2025.

Dirk Philipsen

G.S. § 10B-43 NOTARIAL CERTIFICATE FOR AN OATH OR AFFIRMATION

Signed and sworn to before me this day by Dick Philipson. Name of principal
Date: 2/2/2025
Official Signature of Notary Kathe Go Official Signature of Notary Kathe Crisp , Notary Public Notary's printed or typed name My commission expires: Cctober 3, 2028
OPTIONAL
This certificate is attached to a market of Document signed by Dirk Philip Schrift Name of Principal Signer(s)
on Feb 2 2025, and includes 3 pages.

EXHIBIT

20

STATE OF NORTH CAROLINA WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 24CV040619-910; 24CV040620-910; 24CV040622-910

JEFFERSON GRIFFIN,

Plaintiff,

v.

NORTH CAROLINA STATE BOARD OF ELECTIONS,

Defendants.

AFFIDAVIT OF

LARRY REPANES

I, LARRY REPANES, hereby declare as follows:

- 1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I was born in New York and am currently a resident of Charlotte, North Carolina, in Mecklenburg County. I have lived at my current residence since December 2022. I moved to Charlotte in July 2022 and was living at a temporary location until my home at my current address was built. I received mail at my current address at that time.
 - 3. I am 68 years old, white, and male.
 - 4. I am a citizen of the United States.
- 5. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- 6. I have been a registered voter in this state since 2022, and I registered to vote at my current address on August 22, 2022.
 - 7. Voting is important to me because it is a right and is key to democracy.

- 8. I cast a ballot in the November 5, 2024, election by going to an early voting site in my county. I already was registered to vote and showed my North Carolina driver's license to cast a ballot.
- 9. Shortly after the election, I learned that my name was on a list of voters challenged by Judge Griffin. I do not remember receiving a postcard from Judge Griffin's campaign or any other organization. I received the list of challenged voters from a neighbor, and when I checked the list, I saw my name was on it.
- 10. I am aware that my vote has been included on Judge Griffin's challenge list because my voter registration record is allegedly missing either a valid Social Security Number or a driver's license number according to Judge Griffin. I remember providing my Social Security Number and driver's license when I registered to vote. I also showed election officials my North Carolina driver's license when I voted in the 2024 election.
- 11. When I learned I was on Judge Griffin's list of voters whose registrations lacked these identification numbers in my voter file, I contacted the Mecklenburg County Board of Elections. I wanted to make certain my ballot counted. They suggested that I come to the Board of Elections in person and bring my supporting documentation.
- 12. Staff informed me that both my Social Security Number and driver's license were present but not validated. After discussion, they suggested that because my Social Security records was listed under "Lawrence" and my registration was under "Larry," that could be the reason my Social Security information was not validated. The Mecklenburg County Board of Elections validated my Social Security information and assured me that no further action was required on my part.

13. I was never offered an opportunity to fix any supposed problems with my registration, either before or after Election Day. If I had been notified of any such issue, I would have done whatever I could to make sure my ballot would count.

14. If my ballot is retroactively discarded under Judge Griffin's protest, I would be angry, shocked, and stunned that my vote was thrown out on a technicality that could have and should have been resolved before the election. Certainly, someone knew that 200,000 registered voters were considered to have invalid information, and by not doing anything, they accepted us as registered voters. The court would disenfranchise us if it throws out our votes, and that is anti-democratic.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on January 31, 2025.

Larry Repanes

G.S. § 10B-43 NOTARIAL CERTIFICATE FOR AN OATH OR AFFIRMATION

Mecklenburg County, North	Carolina
Signed and sworn to before me thi	is day by Larry Refunes. Name of principal
Date: 2/1/25	
(Official Seal)	Official Signature of Notary
MARYJANE C. CONTI NOTARY PUBLIC MECKLENBURG COUNTY NORTH CAROLINA	Mary one C. Conti, Notary Public Notary's printed or typed name My commission expires: 8/21/2027
MY COMMISSION EXPIRES 8/21/2027	
	OPTIONAL

is certificate is attached	AFFIDAVIR OF LARRY RES	PANES, signed by	LARRY REPANES
	Title/Type of Documen		Name of Principal Signer(s)
2/1/2 5 Date	, and includes # of pages	pages. INCLUDING	THIS.

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION Nos. 24CV040619-910, 24CV040620-910, 24CV040622-910

JEFFERSON GRIFFIN,

Plaintiff,

AFFIDAVIT OF

v.

NORTH CAROLINA STATE BOARD OF ELECTIONS,

Defendants.

I, Anna Louise Richards, hereby declare as follows:

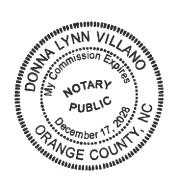
- 1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I am a 74-year-old Black woman currently living as a resident of Chapel Hill, North Carolina, in Orange County. I have lived at my current residence since July 2024.
 - 3. I am a citizen of the United States.
- 4. I am a retired finance executor who worked for the Boeing company in Seattle Washington. At the time I cast my vote in the 2024 General Election, I was a County Commissioner for Orange County.
- 5. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- 6. I have been a registered voter in this state since 2013; I updated my registration to reflect the change in address to my current residence on the first day of Early Voting, October 17, 2024.

- 7. I have been voting since the age of eighteen. Voting is important because it is a fundamental right and this is a democracy. I am a participant not a spectator. My ancestors fought hard for me to have this right. It is something to take seriously; it is a sacred right for me.
- 8. I cast a ballot in the November 5, 2024, election by going to vote on the first day of early voting October 17, 2024 in my county. To satisfy the photo voter ID requirement, I showed my North Carolina driver's license issued by the North Carolina Department of Motor Vehicles ("DMV"). While I did not utilize Same-Day Registration because I was already registered to vote, I did update my registration to reflect the change in my residence.
- 9. Shortly after the election, I learned that my name was on a list of voters challenged by Judge Griffin. I received a call from a friend but also got a postcard in the mail stating that my vote was being challenged. I believe the postcard was from the State Board of Elections. I am aware that my vote has been included on Judge Griffin's challenge list because of "incomplete registration."
- I am aware that my vote has been included on Judge Griffin's challenge list because my voter registration record is allegedly missing either a Social Security Number or a driver's license number according to Judge Griffin. I do not understand how this information could be missing because I believe I provided my Driver's License Number at the time I registered to vote. When updating my registration for the 2024 General Election, I was not asked for additional information or informed of any issues regarding my registration.
- 11. I was never offered an opportunity to fix any supposed problems with my registration/absentee ballot, either before or after Election Day. If I had been notified of any issue, I would have provided whatever information was necessary to ensure my ballot would count.

12. If my ballot is retroactively discarded under Judge Griffin's protest, I will feel outraged because we are supposed to be a democracy. I registered and cast my vote legally and therefore, I want my vote counted.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on February 1, 2025.

Anna Louise Richards



IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION Nos. 24CV040619-910, 24CV040620-910, 24CV040622-910

JEFFERSON GRIFFIN,

Plaintiff,

AFFIDAVIT OF

V.

NORTH CAROLINA STATE BOARD OF ELECTIONS,
,

Defendants.

I, Lila Richardson, hereby declare as follows:

- 1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I am a 23-year-old white female resident of North Carolina. I was born in Asheville, North Carolina and currently reside there, in Buncombe County.
 - 3. I am a citizen of the United States.
- 4. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- 5. I have been a registered voter in this state since 2020 and I registered to vote at my current address on July 17, 2024.
- 6. Voting is an incredibly important opportunity for me to expand the future of my community and ensure that my own concerns and values are heard and represented. Generations of women before me have worked tirelessly to provide the right to vote, and through my own civil duty I am continuing their work.

- 7. I cast a ballot in the November 5, 2024, election by early voting in Buncombe County. To satisfy the photo voter ID requirement, I showed my North Carolina driver's license. I did not utilize Same-Day Registration because I was already registered to vote.
- 8. Shortly after the election, I learned that my name was on a list of voters challenged by Judge Griffin. I received a postcard in the mail from the Jefferson Griffin campaign and tried to look up my name using the QR code shared on the postcard. It was very hard for me to navigate the link, and it wasn't clear to me at all what action I was supposed to take next on the provided website.
- 9. I am aware that my vote has been included on Judge Griffin's challenge list because my voter registration record is allegedly missing either a Social Security Number or a driver's license number according to Judge Griffin. I do not understand why this information would be listed as missing from my registration record.
- 10. When I learned I was on Judge Griffin's list of voters whose registrations lacked these identification numbers in my voter file, I contacted the State Board of Elections and was on the phone with them for at least thirty minutes, trying to get someone on the phone who could explain what action I need to take, if anything. The individual I spoke to was not able to tell me how to proceed and told me I would instead have to contact the Buncombe County Board of Elections.
- 11. I was never offered an opportunity to fix any supposed problems with my registration/absentee ballot, either before or after Election Day. If I had been notified of any such issue, I would have done whatever I could to ensure that my ballot would count.
- 12. If my ballot is retroactively discarded under Judge Griffin's protest, I will feel frustrated and discouraged especially as I am reeling from, along with my neighbors and

community members of Western North Carolina, the traumatic impacts of Hurricane Helene. It is now more than ever that my community needs support and aid, and to be discounted despite the efforts I made to show up to the polls and represent myself would feel incredibly disrespectful.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on February 3, 2025.

Lila Richardson

Lila Richardson

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 24CV040619-910; 24CV040620-910; 24CV040622-910

JEFFERSON GRIFFIN,

Plaintiff,

v.

NORTH CAROLINA STATE BOARD OF ELECTIONS,

Defendants.

AFFIDAVIT OF

SOPHIA "FELIX" ANGELITA SOTO

- I, Sophia "Felix" Angelita Soto, hereby declare as follows:
- I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I was born and raised in North Carolina, and currently live in Oak Ridge, North Carolina, in Guilford County. I was accepted to U.N.C. Chapel Hill in 2024 and was chosen for the Global Gap Year Fellowship, providing me with a stipend to work in service abroad. For this program, I worked at a small animal vet practice in Costa Rica from September to December, 2024. I always intended to return home to my parents' residence after I temporarily worked overseas.
 - I am half Puerto Rican and half white, 18 years old, and male.
 - 4. I am a citizen of the United States.
- I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.

- 6. I have been a registered voter in this state since 2024. I was able to pre-register when I was 17 and vote in the 2024 primary election since I would be 18 before the general election in November.
- 7. I was so excited to vote for the first time in the 2024 primary election and then again in the General. Voting is not just a right, it is a civic duty.
- 8. I was planning to submit a mail-in ballot before I was going to travel in September 2024, and even called the Guilford County Board of Elections to make sure the ballots would be distributed before I would have to leave, and made my travel plans accordingly. I did not anticipate the delay in printing absentee ballots that occurred in the fall, and so I had to call the county board of elections again to make sure they did not send me a mail-in ballot and that I could instead vote from overseas.
- 9. I cast a ballot in the November 5, 2024, election from overseas and using the directions provided to me by Guilford County Board of Elections. I actually sent in a copy of my passport when I first tried to submit the overseas ballot, but there was an issue with the ballot I first submitted. I was told by an election worker with the county board of elections that I would have to submit it again and that I did not have to provide a copy of any ID when I did so.
- 10. I learned that my name was on a list of voters challenged by Judge Griffin when my mother saw something on Facebook about the challenges and looked up my name in an online list. I do not recall ever getting a postcard in the mail about the election protest, and neither do my parents.
- I am aware that my vote has been included on Judge Griffin's challenge list because I did not provide a copy of my photo ID with my absentee ballot. As I mention above, I actually did try to include a copy of my passport but was told it was not required.

12. My father contacted the Guilford County Board of Elections on my behalf when we learned about the challenge and left a message but never heard back.

13. I was never offered an opportunity to fix any supposed problems with my absentee ballot, either before or after Election Day. If I had been notified of any such issue, I would have 110% done whatever I could to make sure my ballot would count.

14. If my ballot is retroactively discarded under Judge Griffin's protest, I will feel disappointment at the system for not recognizing that I am a North Carolinian who just wanted his voice to be heard. I was excited more than most eighteen-year-olds I know about voting, and I would be upset that all the work I and my parents did to get my ballot in would be cast aside on this basis.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on February 3, 2025.

Sophia "Felix" Angelita Soto

G.S. § 10B-43 NOTARIAL CERTIFICATE FOR AN OATH OR AFFIRMATION

<u>Guilford</u> County, North Ca	rolina
Signed and sworn to before me this d	lay by Jophia Coto Name of principal
Date: 1.3.2025	
THE COUNTRIES OF THE CO	Official Signature of Notary GRace, A. Follos, Notary Public Notary's printed or typed name My commission expires: 1110 2025
	OPTIONAL
This certificate is attached to a	, signed by
on and incl	

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 24CV040619-910; 24CV040620-910; 24CV040622-910

JEFFERSON GRIFFIN,	
Plaintiff,	
ν .	AFFIDAVIT OF
NORTH CAROLINA STATE BOARD OF ELECTIONS,	ALEXA ADAMO VALVERDE
, Defendants.	

I, ALEXA ADAMO VALVERDE, hereby declare as follows:

- 1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I was born in Florida and am currently a resident of Chapel Hill, North Carolina, in Chatham County. I have lived at my current residence since 2020.
 - 3. I am 54 years old, white, and female.
 - 4. I am a citizen of the United States.
- 5. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- 6. I have been a registered voter in this state since 2020, and I registered to vote at my current address on September 11, 2020.
- 7. Voting matters to me because democracy matters. I grew up believing that living in a free country means every voice counts. Casting a vote is the most powerful way we, as individuals, can shape the future and make our voices heard.

- 8. I cast a ballot in the November 5, 2024, election by going to an early voting site in my county. I showed my North Carolina driver's license and was already registered to vote.
- 9. Shortly after the election, I learned that my name was on a list of voters challenged by Judge Griffin. My neighbor told me I was on the list. I do not remember receiving any postcard from the Griffin Campaign alleging my vote was being challenged.
- 10. I am aware that my vote has been included on Judge Griffin's challenge list because my voter registration record is allegedly missing either a Social Security Number or a driver's license number according to Judge Griffin. I do not understand how that information could be missing because I registered to vote at the DMV when I received my North Carolina driver's license. I was appalled to learn my name was on the list. I was confused and frustrated because I registered to vote at a state-run office, and I don't understand how my registration could not be valid.
- 11. When I learned I was on Judge Griffin's challenge list, I contacted the Chatham County Board of Elections to see if there was anything I needed to do to make sure my ballot counted. Staff told me in order to fix the supposed issue with my registration, I should re-register to vote and bring documentation of my North Carolina driver's license or Social Security Number. I presented that documentation and re-registered to vote.
- 12. I was never offered an opportunity to fix any supposed problems with my registration, either before or after Election Day. If I had been notified of any such issue, I would have done whatever I could to make sure my ballot would count.
- 13. If my ballot is retroactively discarded under Judge Griffin's protest, I will feel outraged. I have been voting for decades. To follow the rules, vote, and then after the fact take my vote away is unacceptable. To use a process that I was told to utilize by registering at the DMV

and then have my vote not count would tell me there is something broken in the system, and/or someone is trying to commit a crime against me.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on February 2, 2025.

Alexa Adamo Valverde

G.S. § 10B-43 NOTARIAL CERTIFICATE FOR AN OATH OR AFFIRMATION

Dunam County, North Carolina
Signed and sworn to before me this day by Alexa Adams Valvede Name of principal
Date: February 2, 2025
Official Signature of Notary Vate Cosp., Notary Public Notary's printed or typed name My commission expires: October 3, 2028
OPTIONAL This certificate is attached to a mark dant signed by Alexa Adanc Valued Name of Principal Signer(s) on 2/2/2025, and includes pages. # of pages
Completed on 2/2/2015 according to the emergency requirements contained in G.S. 10B-25.
Notary was in Dolhan county during the emergency notarization.
Principal was in county during the emergency notarization.

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 24CV040619-910; 24CV040620-910; 24CV040622-910

JEFFERSON GRIFFIN,	
Plaintiff,	
ν .	AFFIDAVIT OF
NORTH CAROLINA STATE BOARD OF ELECTIONS,	DIANE WYNNE
,	
Defendants.	

I, DIANE WYNNE, hereby declare as follows:

- 1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I was born in New Jersey and am currently a resident of Wilmington, North Carolina, in New Hanover County. I have lived at my current residence since September 2022.
 - 3. I am 56 years old, white, and female.
 - 4. I am a citizen of the United States.
- 5. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- 6. I have been a registered voter in this state since June 2022, and I registered with the last four digits of my Social Security Number. I last updated my registration shortly after moving residences in September 2022.
- 7. Voting is important to me because it is the say we get in how our country is run. I vote regularly and have worked as a poll worker.

- 8. I cast a ballot in the November 5, 2024, election by going to an early voting site in my county. I already was registered to vote, and I showed my driver's license.
- 9. Shortly after the election, I learned that my name was on a list of voters challenged by Judge Griffin. Someone from an organization, though I cannot recall which organization, called me and said my vote was being challenged, and I remembered I had received a postcard in the mail before. However, I thought the postcard was confusing and was a scam because I did not know how a vote could be challenged and taken away after the fact.
- 10. When I learned my vote was being challenged, I felt shocked at first and wondered how that was possible. I was confused at first and then angry because they have no grounds to challenge my vote, and the challenge was totally baseless.
- 11. I am aware that my vote has been included on Judge Griffin's challenge list because my voter registration record is allegedly missing either a Social Security Number or a driver's license number according to Judge Griffin. I did not understand the challenge because I remember providing a Social Security Number to my county board when I registered originally, and I showed my North Carolina driver's license when I voted in the 2024 election.
- When I learned I was on Judge Griffin's list of voters whose registrations lacked these identification numbers in my voter file, I contacted the New Hanover Board of Elections to request a copy of my submitted voter registration form. When that copy was provided to me, it showed that my voter registration application did include my Social Security Number. I also noticed that the form said I should provide my Social Security Number "or" my driver's license number. Staff informed me that because my Social Security records are listed under "Diane E Wynne" and my registration was under "Diane Elizabeth Wynne," that could be the reason for the invalid Social Security information.

13. When I learned I was on Judge Griffin's challenge list, I contacted the New Hanover Board of Elections to see if there was anything I needed to do to make sure my ballot counted. The staff I spoke to said if I wanted to re-register, I could, but it was not required. They assured me that no further action was necessary on my part.

14. I was never offered an opportunity to fix any supposed problems with my registration/absentee ballot, either before or after Election Day. If I had been notified of any such issue, I would have done whatever I could to make sure my ballot would count.

15. If my ballot is retroactively discarded under Judge Griffin's protest, that would be outrageous. I filled the form out correctly, and I voted correctly. I did everything right. If my vote does not count, I would feel that our country is not what I thought it was. I also could see this discouraging a lot of people from voting, and I would question the point of voting if it could be taken away. Voting would be a gamble when it shouldn't be—it should be a definite thing.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on January 31, 2025.

Diane Wynne

THE FOREGOING INSTRUMENT WAS ACKNOWLEDGED

ON THIS 31 DAY OF January, 2025

BY: Diage INVO

NOTARY SIGNATURE For 6 con my



STATE OF NORTH CAROLINA WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 24CV040619-910; 24CV040620-910; 24CV040622-910

EFFERSON GRIFFIN,	
Plaintiff,	AFFIDAVIT OF
ν.	
NORTH CAROLINA STATE BOARD OF ELECTIONS,	PHOEBE ZERWICK
Defendants.	

I, Phoebe Zerwick, hereby declare as follows:

- 1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I was born in New York City and am currently a resident of Winston Salem, North Carolina, in Forsyth County. I have lived at my current residence since around 2006.
 - 3. I am 64 years old, a woman, and white.
 - 4. I am a citizen of the United States.
- 5. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
 - 6. I have been a registered voter in this state and in Forsyth County since at least 1988.
- 7. Voting is the most fundamental right we have. It is the bedrock of our democracy and a free society. Until recently, I held the basic assumption I could vote and have voted in almost every general election I was qualified for since I became registered. Lots of people have shed blood to defend this right, and I believe it is a duty of citizenship to vote.

- 8. I cast a ballot in the November 5, 2024, election by overseas ballot because I was teaching abroad in Venice, Italy, as the resident faculty member for a study abroad program with Wake Forest University. This was my first time voting using the overseas system, and I was grateful to be voting using an electronic system because the mail system is not always reliable in Italy and I learned paper ballots were going to be printed late in 2024.
- 9. About two weeks ago, I learned my vote was being challenged by reading The Assembly and learning that Judge Griffin was challenging overseas ballots, including in my county. I then looked online for the list of challenged voters and found my name. I was shocked to learn this because I understood that my ballot had been cast and accepted. I do not recall receiving a postcard or any other mailing about the election protest.
- I am aware that my vote has been included on Judge Griffin's challenge list because I did not provide a copy of my photo ID with my absentee ballot. I did not do this because it was not required under the instructions I was provided to submit my overseas ballot. However, I have a North Carolina driver's license and a passport, both of which I believe to be qualifying photo ID under North Carolina law. If it had been required under the election rules, I could have easily provided a picture of either ID with my returned absentee ballot.
- 11. I was never offered an opportunity to fix any supposed problems with my absentee ballot, either before or after Election Day. If I had been notified of any such issue, I would have done whatever I could to make sure my ballot would count. I even would have gotten on a plane and flown home if necessary, this is how dedicated I am to ensuring my vote will count.
- 12. I am already furious and outraged about the fact that my ballot has been challenged.

 If my ballot is retroactively discarded under Judge Griffin's protest, I will feel stripped of my citizenship and completely betrayed.

I declare under penalty of perju	ry under the laws of No	rth Carolina that the fo	regoing is true and
correct.			

Executed on Feb 3 ___, 2025.

Phoebe Zerwick

G.S. § 10B-43 NOTARIAL CERTIFICATE FOR AN OATH OR AFFIRMATION

County, North Card	olina
Signed and sworn to before me this day	y by Phoche Zerwick Name of principal
Date: 02.03.25	
(Official Seal) B. GOOMMESSION EXPIRES O.S. J. G. J. C.	Official Signature of Notary Hannah B. Ceccinc, Notary Public Notary's printed or typed name My commission expires: 05 26.27
	OPTIONAL
This certificate is attached to a	, signed by
on, and includ	les pages.

27

1,000 Challenged Voters Declare: "Respect Our Votes"

It's an understatement to say we are unhappy to learn our ballots are being challenged by Jefferson Griffin.

We, the undersigned, declare: Our votes must be respected, not rejected!

Endorsers of this declaration were obtained through phone calls and electronic messages.

Aaron Dovid Bendix-Balgley, Buncombe Co. Abigail Elaine Gross, Buncombe Co. Abigail Grace Dowell, Catawba Co. Abigail Marie Saaranen, Wake Co. Abigail Wheeler-Naranjo, Durham Co. Abigail Wieting Jamieson-Drake, Durham Co. Abraham Joshua Saldana, Moore Co. Ada Leticia Ortiz-Ramirez, New Hanover Co. Adai Rivers, Durham Co. Adam Patrick Linens, Mecklenburg Co. Addison Layman Bortz, Mecklenburg Co. Addyson Shaver, Stokes Co. Ade Balogun, Wake Co. Adele Jeannette Trueblood, Orange Co. Adriana Michelle Barrera Ramirez, Forsyth Co. Adrianna Marie Lewis, Craven Co. Agustin Emanual Britt, Jackson Co. Alberta Argueta, Catawba Co. Albertha Foy Garnes, Wake Co. Aldana Allen, Mecklenburg Co. Alejandra Reta Mashburn, Chatham Co. Alessandro Racioppi, Orange Co. Alexa Adamo Valverde, Chatham Co. Alexander Henry French, Chatham Co. Alexander Reid Nordquist, Wake Co. Alexander Richard Lafond, Wake Co. Alexandra Joy Bonin, New Hanover Co. Alexandra Matthews, Durham Co Alexia Lianna Chavis, Guilford Co. Alexis Alvarez, Carteret Co. Alexis Davis, Beaufort Co. Alfred Peter Lumbis, Buncombe Co. Alicia Guldin, Carteret Co. Alicia Kathleen Elrod, Iredell Co. Alicia Marie Jacobson, New Hanover Co. Alisha Peoples, Alamance Co. Alissa Renee Nicole Richardson, Wake Co. Alyson Marie Windsor, Forsyth Co. Alyssa Clare Zeitouni, Mecklenburg Co. Alyssa Lean Linvell, Orange Co. Alyzza-May Victoria Callahan, Guilford Co. Amanda Engracia C Jensen, Rockingham Co. Amanda Miles-Graeter, Buncombe Co. Amanda Monique Oswalt, Granville Co. Amanda Verner Davis, Buncombe Co. Amani John Holder, New Hanover Co. Amber Nicole Gilot, Madison Co. Amber Nicole Workman, Rockingham Co. Amelia Kailey Martin Hannah, McDowell Co. Amy Dix, Buncombe Co. Amy Grace Bryant, Durham Co.

Amy Gramza Easter, Forsyth Co. Amy Jo Leader, Buncombe Co. Amy Michelle Clemmons, Wake Co. Ana Maria Xet-Mull, Orange Co. Andrea Beth Weissman, Mecklenburg Co. Andrea J Addison-Sorey, Robeson Co. Andrea Noel Smith, Orange Co. Andrew James Culwell, New Hanover Co. Andrew Lee Armstrong, Cabarrus Co. Andrew Ostrowski, Carteret Co. Andrew Schuyler Tompkins, Forsyth Co. Andria Robinson, Mecklenburg Co. Angela Rogers, Burke Co. Ann Bartley Bradley, Lincoln Co. Anna Aimei Pechmann, Orange Co. Anna Blair, Durham Co. Anna Emily Spinelli, Watauga Co. Anna Hadley, Wake Co. Anna Louise Richards, Orange Co. Anna Magdalena Van Dyk, Wake Co. Anna Ruth Souhan, Guilford Co. Annalysa Mary Kaianne Fakir, Durham Co. Anne Bowers, Mecklenburg Co. Anne Elisabeth Raven Jorgensen, Moore Co. Anne M Mejia-Downs, Forsyth Co. Anthony Carpenter, New Hanover Co. Anthony David Flis, Haywood Co. Anthony Martignetti, Carteret Co. Anthony Volpe, Wake Co. Antoinette G Kerr, Davidson Co. Antony Kinyanjui Kinuthia, Wake Co. April Boatner-Allen, Onslow Co. April Dawn Duby, New Hanover Co. April Leah Bilisoly, New Hanover Co. Ariel M Shumaker-Hammond, Buncombe Co. Arthur Jerome Byrnes, Mecklenburg Co. Arthurene Lindsey Williams, Polk Co. Asher Reuben Cohn, Orange Co. Ashlee Ann Kinnaird, Buncombe Co. Ashley Christine Merrill, Wayne Co. Ashley Degennaro Kight, Buncombe Co. Ashley Michelle Rifenburg, Gaston Co. Ashley Nicole Traynum-Carson, Orange Co. Ashley Paige Dunigan, Gaston Co. Audia Tessa Frazer-Dacas, Cumberland Co. Audrey C Dyson, Brunswick Co. Audrey Eugenia Xiajie Meigs, Durham Co. Audrey Maya Cobb, Buncombe Co. Ava Parkhurst MacKay-Smith, Durham Co. B Meric Rice-Lewis, Mecklenburg Co. Barbara Elizabeth Long, Durham Co.

Barbara Jill Nardini, Wake Co. Barclay Walter Newlin, Polk Co. Benjamin Emad Al-Abdalli, Wake Co. Bertha Leverette, Granville Co. Bessie Clayton, Forsyth Co. Beth Merlin Ahmadieh, Wake Co. Betty A Clark, Mecklenburg Co. Beverly B Glover-Wood, Carteret Co. Billy K Richburg, Carteret Co. Bing Crosby Cox, Durham Co. Brayden Meckler, Onslow Co. Breana Ashley Lavallee, Wake Co. Brenda Marie Smith, Randolph Co. Brendon R Buckanavage, Mecklenburg Co. Bret Robert Frk, Buncombe Co. Brett Osborn Smith, Alamance Co. Brian Jason Ogle, Polk Co. Brian Lee Matlock, Buncombe Co. Brian Matthew Attis, Orange Co. Brian Matthew Wert, Wake Co. Brian Wiltshire Sharp, New Hanover Co. Briana Charia Edwards, Orange Co. Brielle Clare Herlein, Pitt Co. Brittany Alexandra Boyd, Haywood Co. Brittany Leisey, Buncombe Co. Brittany Suzanne Boggs, Mecklenburg Co. Brooke B Nigro, New Hanover Co. Brooke Nicole Davis, Wake Co. Brooks H Emanuel, Durham Co. Bruce Allen Elmore, Harnett Co. Bruklyn Miller, Durham Co. Bryan Scott Evans, Durham Co. Burl B Snyder, Carteret Co. Cailin Elizabeth Lewis, Jackson Co. Caleb R Davis, Mecklenburg Co. Callie Diane Barnard, Guilford Co. Callie Louise Daniels-Howell, Durham Co. Cameron James Bennett, Wake Co. Camille Shelton, Durham Co. Candis Clarke, Buncombe Co. Capri M Williams, Forsyth Co. Cara Cox, Carteret Co. Carie Delphin Scott, Wake Co. Carla Efird, Durham Co. Carlos Arcos Ibanez, Buncombe Co. Carlos Santiago-Hernandez, Chatham Co. Carlton Jordan Hockaday, Wake Co. Carly Marie O'Neill, Harnett Co. Carmen M Sicat, Onslow Co. Carmen Ramos-Kennedy, Buncombe Co. Carmen Yolanda Mattocks, Onslow Co.

Carol Ann Boersema, Guilford Co. Carole Lee Johnson, Carteret Co. Carolina Pantoja, Mecklenburg Co. Caroline Carswell Ririe, Wake Co. Caroline M Ginley, Chatham Co. Caroline Marie Luther, Durham Co. Caroline Marie-Inez Steiblin, Guilford Co. Carolyn Chance McFarlin, Edgecombe Co. Carolyn McGill, Union Co. Carolyn Yvette Donaldson, Cumberland Co. Carrie Ann Russpatrick, Buncombe Co. Carrie Miller Conley, Guilford Co. Carson Reece McGowen, Buncombe Co. Cassandra Baker-Dabney, Greene Co. Catherine Reed, Granville Co. Catherine Vanessa Ford-Coates, Buncombe Co. Cathy Adelman, Mitchell Co. Cathy-Joan MacDonald Palmer, Orange Co. Cecilia De La Guardia, Durham Co. Cecilia Mary Fortune-Greeley, Durham Co. Celina Taylor Tolbert, Guilford Co. Celine Wang, Durham Co. Chad Marquis Wherry, Mecklenburg Co. Chaniece S T Bulluck-Draughn, Cumberland Co. Chanol Blondell Abraham, Mecklenburg Co. Chantal Danielle Reid, Durham Co. Charity Faith Cimarron, Buncombe Co. Charles C Coates, Carteret Co. Charles Council, Cumberland Co. Charles Henry Lee, Buncombe Co. Charles Kenneth Morehead, Cabarrus Co. Charles McLaughlin Stone, Durham Co. Charles Richie Holsenback, Durham Co. Charles Sandora, Chatham Co. Charlotte Gilreath Behrends, Polk Co. Charlotte James Weis, Mecklenburg Co. Chelsea Erin Phipps, Jackson Co. Cheryl J Johnson, Buncombe Co. Cheryl M Spencer, Lincoln Co. Chervl Tabor Richardson, Franklin Co. Christian Serpico, Mecklenburg Co. Christina Chambers, Forsyth Co. Christina Lee Worrall, Union Co. Christina Leone Yokeley, Wake Co. Christina Marie Lynch, Union Co. Christina Marie Quattone, Carteret Co. Christine Anne Chetwynd, Buncombe Co. Christine M Riggs, Durham Co. Christopher Daniel McMahan, Forsyth Co. Christopher Huysentruyt, Alamance Co. Christy Baker Tamayo, Chatham Co. Christy Laguardia, Durham Co. Chyanne Marie Stafford, Onslow Co. Cindy Oates Anthony, Jackson Co. Claudia Goodson Kennedy, Forsyth Co. Claudia Holderegger McCormack, McDowell Co. Claudia Scott Craig, Buncombe Co. Clay Edgar Heath, Guilford Co. Clayton Jesse Simon, Wake Co. Clifton Eugene Wright, Vance Co. Cody William Bennett, Wake Co.

Colby Lee Mask, Orange Co. Cole Parke-West, Durham Co. Coleman Dalton Smith-Rakoff, Guilford Co. Colleen Elizabeth Girouard, Wake Co. Connie Frances Dugan, Carteret Co. Connie Mathiews, Carteret Co. Connie McClamroch, Carteret Co. Connor James Ennis, Durham Co. Connor Jude Addison, Wake Co. Connor Michael Haughey, Orange Co. Corelutta Reid, Mecklenburg Co. Corey Johnson-Erday, Buncombe Co. Corey Loan Halbert, Durham Co. Cory Junior McNeill, Cumberland Co. Courtney Corriber, New Hanover Co. Courtney Lynn Webster, Chatham Co. Courtney Morris Gardner, McDowell Co. Criss Berke, Mecklenburg Co. Crystal Anne Pritchett, Catawba Co. Crystal Michelle Bryant, Carteret Co. Crystal Perez-Velazquez, Columbus Co. Cynthia A Hinson-Gardner, Union Co. Cynthia Dance, Johnston Co. Cynthia Denise Patton Poley, Mecklenburg Co. Cynthia Lou Costa, Chatham Co. Dale W Davis, Carteret Co. Damali Alston, Orange Co. Damon Goldman, Buncombe Co. Dana Ellis McQuitty, Macon Co. Daniel Aloysius Opiela, Mecklenburg Co. Daniel Andres Briceno, Wake Co. Daniel Edwin Niccum, Buncombe Co. Daniel Graham Vanfleteren, Mecklenburg Co. Daniel James Wesley, Forsyth Co. Daniel K Bryant, New Hanover Co. Daniel Lawrence Hirsch, Orange Co. Daniel Michael Leszczak, Wake Co. Danielle Elizabeth McConnell, Forsyth Co. Danielle Marie Brown, Cabarrus Co. Danielle Mevin Koonce, Cumberland Co. Darla Kay Deardorff, Durham Co. David Allan Hurst, Carteret Co. David Allen Speckhart, Forsyth Co. David Andrew Harper, Durham Co. David Anthony Ivester, Mecklenburg Co. David H Anderson, Buncombe Co. David Isaias Ortiz Melo, Wake Co. David Jay Boersema, Guilford Co. David Lyle Hoffmann, Durham Co. David Patrick Wickeresty, Forsyth Co. David Paul Conradt, Durham Co. David Soriano-Garcia, Durham Co. David Twiggs, Polk Co. Dawn Baldwin Gibson, Pamlico Co. Dawn Monique Osborne-Adams, Orange Co. Dawn Smith Lisk, Mecklenburg Co. Dawna Jean Williams-Landis, Buncombe Co. Dayang Chen, Wake Co. Deborah Anne Grossman Garber, Durham Co. Deborah Janine Malenfant, Camden Co.

Deborah Longfellow, Moore Co.

Deborah Sickler, Lincoln Co. Deboriah Lynne Adams, Yancey Co. Debra Lynn Silver, Orange Co. Debra Pacchiano Wagner, Watauga Co. Dedreanna Alesia Scott, Cumberland Co. Deepti Srivastava Tilly, Wake Co. Delaney Jarmon, Durham Co. Dena Christine, Forsyth Co. Denigua Roshanda Adderley, Mecklenburg Co. Denise Ann Musante, Chowan Co. Denise Bradley Carman, Chatham Co. Denise Trujillo Fernandez, Forsyth Co. Dennis Christman, Durham Co. Derb S Carter, Orange Co. Destiny Delaney, Carteret Co. Destiny Keely Lester, Cumberland Co. Devon Micole Miller, Forsyth Co. Dewayne Smoots, Union Co. Dexter Phuong, Durham Co. Diana Marcela Victoria Barona, Wake Co. Diane Elizabeth Wynne, New Hanover Co. Diane Hutchins Taylor, Yadkin Co. Diane Lynn Welch, Jackson Co. Dirk Peter Philipsen, Durham Co. Donald E Zimmerman, Carteret Co. Donald James Matthis, Cumberland Co. Donielle Maria Preusser, Pender Co. Donna M Padgett, Nash Co. Donna Marie Valleix, Pender Co. Donna S Ellis, Wake Co. Dorothy Brown, Guilford Co. Dorothy Geneva Teague, Chatham Co. Douglas Arnold Darrell, New Hanover Co. Duane L Deardorff, Durham Co. Dylan Bryan Verinder, Chatham Co. Dylan Cole Burgess, Watauga Co. Dylan Egan-Dailey, Durham Co. Earl Lafayette Hall, Durham Co. Edgar Guillermo Garrido, Wake Co. Edward C Hanna, Carteret Co. Edward Noel Keating, Union Co. Edward Thiedeman, Wake Co. Eileen F Tonelli, Carteret Co. Eileen Maryann Asselta, Vance Co. Elaina Alzaibak, Forsyth Co. Elaine Lindsay Harris-Rich, Guilford Co. Eleanor Lorraine Knack, Wake Co. Eleanor Rebecca P Teweles, Buncombe Co. Elena Maria Bravo-Taylor, Durham Co. Elinor Hudson Flynn-McIver, Buncombe Co. Elizabeth Ann Klaimon, Surry Co. Elizabeth Cart Riddle, Buncombe Co. Elizabeth D Kuentzel, Buncombe Co. Elizabeth Grace Foushee, Wake Co. Elizabeth Hunter Kesling, Wake Co. Elizabeth Janet Boyack, Durham Co. Elizabeth MacDonald, Buncombe Co. Elizabeth Michelle Blackwell, Durham Co. Elizabeth Z Devoid, New Hanover Co. Ella Hughes Kromm, Durham Co. Elle Garner Laprad, Jackson Co.

Ellen Gartrell McGeorge, Durham Co. Elliot Louis Totten Cook, Orange Co. Elmer Patton, Brunswick Co. Elsa Aracely Schmitt, Hyde Co. Emer Mary Colleran, Guilford Co. Emily Elizabeth Brinton, Gaston Co. Emily Eve Weinstein, Orange Co. Emily Grace Lund, Durham Co. Emily H Huang, Orange Co. Emily Kathryn Hodge, Wake Co. Emily Schultz, Durham Co. Emily Spring Page, Durham Co. Emmanuelle Quenum, Pitt Co. Eric Christopher Brown, Union Co. Erica Babson Batounis, Lincoln Co. Erik James Schettig, Wake Co. Erik Skye Alex Anckarstrom-Rose, Swain Co. Erika Jane Gruber-Hollingshead, Wake Co. Esther Holsen, Buncombe Co. Ethan Asriel Ward, Guilford Co. Eunice Estrada Soto, Iredell Co. Evan Gregory Jones, Buncombe Co. Evan Palmer Hoke, Wake Co. Ezekiel Douglas Seaton, Yancey Co. Faith Willey, Carteret Co. Farrell Powers Hudzik, Mecklenburg Co. Fashaad Crawford, Durham Co. Felicia Miranda Flanders, Durham Co. Felicite Alice Lazaras-South, Buncombe Co. Fernando Ivan Vega-Delgado, Durham Co. Florence M Siman, Orange Co. Florence O Ikechukwu, Halifax Co. Frances R Cowan, Madison Co. Frances Smith McGaha, Wake Co. Francia Aranda, Orange Co. Francis Joseph Elfring, Pasquotank Co. Francisco N Garcia Luna, New Hanover Co. Frank Harold Peterson, Swain Co. Frank-Paul Sampino, Wake Co. Fransisco C Rossi, Buncombe Co. Frederick Eugene Click, Cumberland Co. Frederick J Reindl, Carteret Co. Freya Ruth Bairdsen, Buncombe Co. Garland R Miller, Mecklenburg Co. Gary Singletary, Robeson Co. Gavin Wade Bouma, Alamance Co. Gaynelle Little, Wake Co. Genevieve Collins, Durham Co. Genevieve Elizabeth Singer, Guilford Co. George Anthony Gardin, Gaston Co. George Hans Reddin, Wake Co. George R Talton, Carteret Co. George Randall Stephens, Forsyth Co. George V Almeida, Wake Co. Gerald Carter, Carteret Co. Gershan Maurice Strange, Durham Co. Giles Wayne Russell, Gates Co. Gillian Kayla Szabo, Wake Co. Glory Rain Rognstad, Ashe Co. Godshen Pallipparambil Robert, Wake Co. Gracie Felice Hemphill, Mecklenburg Co.

Grayson Elizabeth Weavil, Forsyth Co. Greg Scott Evans, Buncombe Co. Gregory Lee Daniels, Wake Co. Gregory Wayne McKinley, Wake Co. Greta Evelyn Yarger Browner, Durham Co. Gyovanni L Boston-Crompton, Mecklenburg Co. H Ray McPhail, Macon Co. Hakim Hamlet Dowdy, Chatham Co. Hampton Allen Blount, Pamlico Co. Hannah Britt, Robeson Co. Hannah Ekerete Akpaete, Durham Co. Hannah Frowner, Cumberland Co. Hannah Katrina Harber, Randolph Co. Hannah Leah Rainey, Durham Co. Hannah Ramsay Bernhardt, Durham Co. Haroun Kabba Kamara, Guilford Co. Harrison William Riley, Guilford Co. Hassan Omar, Orange Co. Hayley Jane Laufer, Alamance Co. Hazel Hill Credle, Craven Co. Hazel Mack, Forsyth Co. Heather Lyn Riesenbeck, Brunswick Co. Heidi Dawn Varner, Randolph Co. Helen Jones, Craven Co. Holly Esken, Iredell Co. Holly Glover, New Hanover Co. Hugh Kinsey, Mecklenburg Co. Ian Daniel Edgerly, Lee Co. lan James Hausen, Durham Co. Ianfranco Antonio Quinones-Rivera, Wake Co. Ilona Benedetti. New Hanover Co. Irene Overton-Spivey, Bertie Co. Irwin Mogill Daniel-Marshall, Guilford Co. Isaac Arnold, Orange Co. Isaac Jenkins, Moore Co. Isabel Patten Whelchel, Buncombe Co. Jack Rustin Turnwald, Wake Co. Jackie Boyd Wier-Smith, Durham Co. Jackson Boyd, Jackson Co. Jackson Hill Magdanz, Watauga Co. Jackson Thomas Vaughan, Wake Co. Jacob Fleitman, Wake Co. Jade Carolina Luna-Ramos, Wake Co. Jailyn Monet Farmer, Forsyth Co. Jake Antonio Juliano, Wake Co. James Andrew Keith, Yancey Co. James Bennett, Anson Co. James Dillard Stovall, Chatham Co. James Duncan, Durham Co James G Wellspeak, Carteret Co. James Gregory, Madison Co. James Hardy, Brunswick Co. James Lawrence Bryant, Randolph Co. James Moehringer, Buncombe Co. James Scott Broughton, Ashe Co. Jamie Parisi, Carteret Co. Jamilla Marshay Parks, Cumberland Co. Jane Brown, Durham Co. Jane Lee Romine, Carteret Co. Janet Hickerson Manuel, Chatham Co.

Janice Marie Little, Durham Co.

Jaquella Aviana Parker, Cumberland Co. Jared Abraham Miller, Forsyth Co. Jasmine Jewel Vieau, Buncombe Co. Jason D Scott, Forsyth Co. Jason Edward Phillippi, Orange Co. Jason Gardner, Buncombe Co. Jason Matthews, Durham Co Jason Mitchell, New Hanover Co. Javier Francisco Bolea, Buncombe Co. Jayati Sridhar, Wake Co. Jayden Lee, Craven Co. Jayse Angela Sessi, Orange Co. Jazmyn Amanda Graves, Wake Co. Jean Cary, Durham Co. Jean P Folger, Swain Co. Jean Reiner, Durham Co. Jeff Martin Ware, Wake Co. Jeffery Kelly Hembree, Avery Co. Jeffery Preston Short, Yancey Co. Jeffrey Alan Summerlin-Long, Henderson Co. Jeffrey Collins, Surry Co. Jeffrey Douglas Messer, Buncombe Co. Jeffrey Glenn Couch, Wake Co. Jeffrey Simpson, Carteret Co. Jenna Marie Marrocco, Wake Co. Jennifer Dawn Callahan, Buncombe Co. Jennifer Elizabeth Walker, Buncombe Co. Jennifer Kimzey, Carteret Co. Jennifer Melody Wyatt, Mecklenburg Co. Jennifer Milfrod Parrish, Durham Co. Jeramie Antwan Gillespie, Mecklenburg Co. Jeremiah Cody Capko, Iredell Co. Jeremy Lapada Galsim, Orange Co. Jeremy Peter Tilley, Wake Co. Jerry Dean Brown, Jackson Co. Jerry Jordan, Edgecombe Co. Jerry Lee Dowd, Union Co. Jessica Ann White Phillip, Cumberland Co. Jessica Klein, Orange Co. Jessica L Webb, Swain Co. Jessica Lee Madison Krug, Mecklenburg Co. Jessica Leigh Molnar, Chatham Co. Jessica Rhiannon Guice-Albritton, Orange Co. Jhana Snehal Parikh, Wake Co. Jill Elizabeth Sergison, Durham Co. Jillian Susan Haeseler, Guilford Co. Jim Dalton Echerd, Davidson Co. Joan Marie Pierce, Wake Co. Joanna Jean Miles-Basta, New Hanover Co. Jocelyn Francisca Garcia Rivero, Wake Co. Joey J Maddox, Cleveland Co. John A Sherman, Carteret Co. John Alan Culp, Cabarrus Co. John Berekely Coats, Craven Co. John Christopher Stein, Davidson Co. John D Riley, Carteret Co. John David DeHoll, Buncombe Co. John I MacKowiak, Carteret Co. John Joseph Devlin, Wake Co. John Nicholas Batounis, Lincoln Co. John Paul Browner, Durham Co.

John Regis Zayak, Iredell Co. John S Hoover, Durham Co. Johnathan Weldon Ridley, Wake Co. Johnie Jay Lakey, Buncombe Co. Jon Aiden McGee, Wake Co. Jon McCready, Columbus Co. Jonah Turner, Buncombe Co. Jonathan C St George, New Hanover Co. Jonathan David Johnson, Chatham Co. Jonathan Fread Dinerstein, Durham Co. Jonathan Steven Merchant, Guilford Co. Jonathan Wesley Blaylock, Wake Co. Jordan Elizabeth Lodato Hunt, Orange Co. Jorden Terrell Davis, Durham Co. Jose Benito del Pliego, Orange Co. Joseph P Schubauer-Berigan, Buncombe Co. Joseph Quigley, Chatham Co. Joseph Tillman Elliott, Durham Co. Josh William Hyden, Durham Co. Joshua Argentine, Buncombe Co. Joshua C G Jerrick, Cumberland Co. Josue Gonzalez, Mecklenburg Co. Joy Cordell Westdorp, Orange Co. Joynazia Phillips, Edgecombe Co. Jude Edgar Brooke-Totty, Buncombe Co. Jug Juniper Kpor, Guilford Co. Julia Louise Workmon, Watauga Co. Julian Case Gardner, Wake Co. Julie M Halpert, Durham Co. Julie Miranda Longland, Durham Co. Julio Cesar Rosado, Durham Co. Justin Scott Grindstaff, Buncombe Co. Kai-Shawna Rose Freeman, Guilford Co. Kameron Southerland, Durham Co. Kameryn Hinton, Orange Co. Kaneesha Laree Dobson, Forsyth Co. Kara Boothe Petersen, Wake Co. Karen Benjamin Guzzo, Chatham Co. Karen Louise Masson, Buncombe Co. Karen Randle, Transylvania Co. Karen Sugden, Durham Co. Karen Weck Taylor, Orange Co. Karendaysu Wolfe, Wake Co. Karine Rupp Stanko, Buncombe Co. Karla Jimelle Branch, Guilford Co. Karsyn Riley Forehand, Wake Co. Karthik Iyer, Wake Co. Katarina Suzanne Muller, Durham Co. Katherine Ann Sullivan, Wake Co. Katherine Coleene Milby, Durham Co. Katherine Graham McCormick, Wake Co. Katherine Marie Shannon, Union Co. Katherine McNeill Paguin, Wake Co. Kathleen Gresham Everett, Gaston Co. Kathryn Ann Haycraft, Watauga Co. Kathryn Lucas Murray, Orange Co. Kathy Jane Huntey, Brunswick Co. Katie Ann Sutton, Wake Co. Kaye Candler Usry, Orange Co. Kayela Buffaloe, Chatham Co. Kayla Cangelosi Massey, Wake Co.

Kayla M Biese, Harnett Co. Kayla Nicole Taylor, Halifax Co. Keara Cousins, New Hanover Co. Keenan Eugene Conder, Durham Co. Kelly Fan, Orange Co. Kelly J Zwiesdak, Guilford Co. Kelly Jackson, Henderson Co. Kemeka Shonta Sidbury, Brunswick Co. Kemi Rim Oladuja, Durham Co. Kenneth Morales-Walton, Durham Co. Kent L Mosier, Carteret Co. Kevin Hunter Kesling, Wake Co. Kevin Michael Stokes, New Hanover Co. Kevin Wade Cox, Wake Co. Kevin William Moeller, Guilford Co. Keya Echols, Durham Co. Kia Lynn Swan-Moore, Mecklenburg Co. Kimberly Hardy, Cumberland Co. Kimberlyn Darnell Totten, Gaston Co. Kirsten Black, Gates Co. Klodia Olivia Badal, Orange Co. Kobie Kareem Joyner, Wake Co. Kristen B Scheib, Carteret Co. Kristen Nguyen Parrish, Durham Co. Kristina Marie Cocke, Buncombe Co. Kristine Rose Markatos-Soriano, Durham Co. Kyle Edward Farson, Guilford Co. Kyle Patrick Bingham, Wake Co. Kylee Ray, Durham Co. Lacey Miller Caldwell Senko, Wake Co. Lana Emad Elmasri, Nash Co. Landon Taylor Sherrill, Chatham Co. Lara Antoinette O'Neil-Dunne, Durham Co. Larry David Ridings, Cleveland Co. Larry Efird, Durham Co. Larry Jay Repanes, Mecklenburg Co. Latonia Loretta Heath Batts, Pitt Co. Latoya Christina Rivers, Mecklenburg Co. Laura McLeod Cash, Wake Co. Laurel Hedger, Gaston Co. Laurel Holtzapple, Mecklenburg Co. Lauren E Burke, Durham Co. Lauren Elizabeth Grove, Durham Co. Lauren Morgan Hill, Orange Co. Lauren Stepneski Winkler, Orange Co. Lauryn Makayla Drayton, Guilford Co. Lawanda Simmons, Johnston Co. Lawrence McKenzie, Vance Co. Lawrence Paul Leigh, Orange Co. Laynettie Taylor Haney, Carteret Co. Lea James Butcher, Forsyth Co. Lei Susan Zhang, Durham Co. Leigh Welborn Stephenson, Wake Co. Leona Harrison, Iredell Co. Lesley Jasmine Niemczyk, Guilford Co. Lesley-Anne Leonard, Forsyth Co. Leslie Moen Willeford, Cabarrus Co. Levern Robinson, Durham Co. Lewis Hipes, Cumberland Co. Liam Vangsnes Hysjulien, Durham Co. Liisa Sinikka Ogburn, Wake Co.

Lila Richardson, Buncombe Co. Lillian C McCormick, Durham Co. Lilly Wheeler Hamilton, Cleveland Co. Lily Eliana Levin, Durham Co. Lindsay Morgan Kozak, Catawba Co. Lindsay Sassaman, New Hanover Co. Lindsey Hope King, Buncombe Co. Linwood E Smith, Carteret Co. Lisa Ann Lindman, Cumberland Co. Lisa Jean Yarger, Durham Co. Lisa Maria Levenstein, Orange Co. Lisa Martin, Carteret Co. Lorrie Contino, Macon Co. Louanne Caspar, Wake Co. Luana Sueko Peres-Damjanovic, Forsyth Co. Luann Rudolph, Johnston Co. Lucas Caldwell Best, Durham Co. Lucas Gordon Mallison, Forsyth Co. Lucas Michael Heilig, Buncombe Co. Lucy Wanjiru Wachira, Wake Co. Luis Enrique Borges Espinosa, Orange Co. Luke Andrew Whiteside, Orange Co. Luverta Renee Gilchrist, Wake Co. Lydia Jones Foust, Jackson Co. Lynne T Jefferson, Durham Co. Lyse Loren Natalie Rochleder, Durham Co. Mable Faison, Sampson Co. Madeleine Irene Lamothe, Brunswick Co. Madeline Virginia Scott, Jackson Co. Madena Dennis, Cabarrus Co. Madison M Golojuch, Carteret Co. Madison Shilling, Buncombe Co. Malcolm Adrian Albergo-Radisch, Durham Co. Marcia Edwina Herman, Chatham Co. Marcia Lynn Culley, Chatham Co. Marcus D Moody, Forsyth Co Marcy Lynne Rozelle, Franklin Co. Margaret Ann Woodlief, Wake Co. Margaret Eleanor Ebell, Mecklenburg Co. Margaret MacColl Evans, Wake Co. Maria Angelica Ceballos, Buncombe Co. Maria Leigh Tsioikas, Forsyth Co. Maria McRae Ramirez, Durham Co. Maria Romaine Miller, Cumberland Co. Maria Theresa Bailey, Durham Co. Maria Victoria Lopez, Durham Co. Marie Eileen Kenyon, Lincoln Co. Marie Swegle, Mecklenburg Co. Marion Sessoms Pierce, Durham Co. Mariora Texier, Wake Co. Marjorie Jo Allison, Buncombe Co. Mark Arthur Crispell, Durham Co. Mark Peter Tierney, Buncombe Co. Mark Watson Williams, Durham Co. Marlow M Gibbs, Pamlico Co. Marlowe Eliza Crews Kovach, Buncombe Co. Marshal Livingstone, Union Co. Martha Hamer, New Hanover Co. Martha McCrummen Fraser Kelly, Durham Co. Mary Alice Bidwell, Forsyth Co. Mary Ann Pruter, Wake Co.

Mary Baldwin Morris, Chatham Co. Mary Elizabeth Walker, Pitt Co. Mary Ellen Pruneau Amend, Carteret Co. Mary Grace Hatch, Wake Co. Mary Helene Cates, Forsyth Co. Mary Hornady Spilsbury, New Hanover Co. Mary Jo Laporte, Buncombe Co. Mary Jo Zulli, Mecklenburg Co. Mary K Osborne, Wilson Co. Mary Karen Miller, Rowan Co. Mary Kay Heling, Wake Co. Mary Kevin Welch, Carteret Co. Mary Spooner De Rocca, Moore Co. Mary Margaret Eitel, Orange Co. Mary-Ann Devita Palmieri, Durham Co. Matthew Alex Krasner, Durham Co. Matthew Giangrosso, Buncombe Co. Matthew Grubbs, Forsyth Co. Matthew James McAndrews, Durham Co. Matthew Ryan Orsi, Rockingham Co. Matthew Thomas Mureton, Cumberland Co. Matthew Thomas O'Connell, Durham Co. Matthew Tuttle, Guilford Co. Maurice Wells, Forsyth Co. Max David Owen, Wake Co. Maya E Clinton, Durham Co. McArthur Wright, Carteret Co. McKenzie Brooke Griffin, Iredell Co. McKinley Wayne Hales, Gaston Co. Meagan Janelle Chalmers, Guilford Co. Megan Elizabeth Koceja, Buncombe Co. Melanie Faith Gall, Wake Co. Melissa Edmonds Kruep, Mecklenburg Co. Melissa Jeanne Earl, New Hanover Co. Melissa Marie Temple-Agosta, Orange Co. Melissa Parks, Randolph Co. Melissa Stansbury, Wake Co. Meredith Brooke Bass, Wake Co. Micaela Elanor Simeone, Orange Co. Michael E Sellers, Pender Co. Michael John Struett, Wake Co. Michael Patterson Jr, Cumberland Co. Michael Kacer, Durham Co. Michael Lawrence Flanagan, Forsyth Co. Michael Lee Hickey, Orange Co. Michael Maxwell Burnette, Wake Co. Michael Midthun, Durham Co. Michael L Nixon Sr, Harnett Co. Michael Reed, Forsyth Co. Michael Robert Lindley, Watauga Co. Michael S Chambers, Wake Co. Michael Sean Dragen, Wake Co. Michael Sherrill, Catawba Co. Michael Todd Horne, Buncombe Co. Michael Tolocka, Durham Co Michaela Anne Gazdik Stofer, Wake Co. Michaela Renee Deas, Mecklenburg Co. Michel D Mitchell, Durham Co. Michele Helene Kleinhandler, Iredell Co. Michelle Brosnan, Henderson Co. Michelle M Solomon-Brown, Wake Co.

Miguel Rimer-Surles, Durham Co. Mikeal Norris Price, Guilford Co. Miles Taylor Henning, Orange Co. Mindy Paula Beller, Buncombe Co. Miranda C Clinton, Durham Co. Mitchell Treadwell Albers, Buncombe Co. Molly Livingstone, Union Co. Mona Bryant Shanklin, Alamance Co. Monica Hammond Hamrick, Buncombe Co. Monika Narain, Durham Co. Morgan Leigh Bines, Forsyth Co. Morgan Rae Lepson, Yancey Co. Morolake O Laosebikan-Buggs, Guilford Co. Muneeb Mustafa, Durham Co. My Thuy Jenness, Durham Co. Nancy Ann Cobb-Zoll, Moore Co. Nancy Ann Griffiths, Catawba Co. Natalia Edna Ortega-Felix, Wake Co. Natalia Maria Espinosa, Durham Co. Natalie Michelle Arthur, Wake Co. Natalie Pierce Obrien, Chatham Co. Nathan James Cox, Durham Co. Nathaniel Thomas Murray, Beaufort Co. Nawal Katrina Maalouf, Forsyth Co. Nicholas Anthony Sarrocco, Wake Co. Nicholas Rvan Jones, Durham Co. Nicole Stephanie Wolfgang, Wake Co. Nielsen Frankie, Lee Co. Nikhita Parbhakar Tsambasis, Wake Co. Nikita Dawn Bell, Franklin Co. Noah Patrick Lenhardt, Durham Co. Noah Samuel Bendix-Balgley, Buncombe Co. Noel Costa, Chatham Co. Noel Sumrall, Buncombe Co. Nora Fenn Gilman, Mecklenburg Co. Nora Hawkins Norred, Guilford Co. Nora Shelly Kushner Salitan, Durham Co. Nyerere Otto Obita, Mecklenburg Co. Nyla Christina Baxter, Guilford Co. Oakel Parrish, Guilford Co. Obinna Ogochukwu Adibe, Chatham Co. Oksana Maria Moravek, Chatham Co. Olijah Milton Clarke, Cumberland Co. Olivia Marie Vaughn, Johnston Co. Oluwakemi Olawumi Upchurch, Wake Co. Omar Mustafa Alchab, Watauga Co. Ondine Alexandra Peck-Voll, Durham Co. Oscar Dessauer, Durham Co. Othello Belanger Edmond, Durham Co. Paige Lynn Christie, Swain Co. Pamela Ann Reefer, Wake Co. Pamela D Miller, Forsyth Co. Pamela M Frey, Transylvania Co. Pamela W Bacon, Davidson Co. Pandora Morrissette-Hill, Mecklenburg Co. Patricia Bowen Wilder, Wayne Co. Patricia Deanna Wilmoth, Franklin Co. Patricia Glaser Johnson, Orange Co. Patricia Lynn Twomey, Wake Co. Patrick Craven, Brunswick Co. Patrick Reed Terry, New Hanover Co.

Patrick Sean Hoolihan, Cabarrus Co. Paul Anthony Yelton, Forsyth Co. Paul Hakes Pacheco, Orange Co. Paul Thomas Anderson, Chatham Co. Paula Ann Kuzma, Guilford Co. Paula McKinzie, Orange Co. Paula Richburg, Carteret Co. Paulina Leticia McDonald, Jackson Co. Peggy K Jennings, Orange Co. Peggy Mutter Blackburn, Orange Co. Peter Angelo Gaeta, Lincoln Co. Peter Billingsley, Buncombe Co. Peter Christopher Lehmann, Durham Co. Peter Robert Franklin, Polk Co. Philip Daniel Covington, New Hanover Co. Philip-Peter Joachim Maxeiner, Rutherford Co. Phoebe Zerwick, Forsyth Co. Phuquain Morales-Walton, Durham Co Phyllis Wolfeld LeFevre, Johnston Co. Pier Angela Wilson-Crocker, Orange Co. Pruthvi Chodisetty, Wake Co. Puck Krista Lee Askew, Buncombe Co. Rachel Anne Hawkins, Jones Co. Rachel Anne Levesgue, Wake Co. Rachel Karasik, Durham Co. Rachel Murray Peet, Mecklenburg Co. Rachel Suzanne Arnold, Guilford Co. Raimy Oneil Turner, Chatham Co. Ralim Allston, Pasquotank Co. Ralph Leonard Parker, Chatham Co. Ramona Phillimeano, Carteret Co. Ran T Song, Guilford Co. Randyl Cochran, New Hanover Co. Raguel Teresa Umpierrez, Guilford Co. Ray Anthony Valencia Basanes, Wake Co. Raymond Eric Paynter, Durham Co. Reba Lanese Currie. Cumberland Co. Rebecca Ailina Schisler, Cabarrus Co. Rebecca Ann Pinnell, Wake Co. Rebecca Langham, Durham Co. Rebecca Nell Williams Vasquez, Wake Co. Rebekah Lee Shields, Rutherford Co. Reginia May Howard-Davis, Vance Co. Reune Edwina Cooper, Forsyth Co. Rhea Anva Stephen, Guilford Co. Rhoda Ann Forrest, Durham Co. Ricardo Alfredo Chicas, Orange Co. Richard Christian Nelson, Polk Co. Richard D Wood, Buncombe Co. Richard Michael Fetter, Mitchell Co. Richard Roderic Cartier, Orange Co. Ricky Lee Allred, Rutherford Co. Robbin Herang Palmer, Mecklenburg Co. Robert Allen Monroe, Randolph Co. Robert Dylan Nichols, Buncombe Co. Robert Earl Henry, Craven Co. Robert Harold Carey, Currituck Co. Robert Samuel Parrish, Durham Co. Robert Simon, New Hanover Co. Robin Leslie Fann Costanzo, Buncombe Co. Robin S Cook, Guilford Co.

Rocio Saucedo, Forsyth Co. Roland Hayes McNeil, Cumberland Co. Ronnie Carroll Hicks, Franklin Co. Rory Sanford McFarlane, Dare Co. Rosalie Marie Bolin, Surry Co. Ross Alexander McLarnon, Wake Co. Roy Chen, Durham Co. Rudolf Josef Colloredo-Mansfeld, Orange Co. Rufus Samuel Britt, Johnston Co. Rupa Lavanya Sridharan, Wake Co. Ruth Helen Hewlett, Buncombe Co. Ryan Bradley Lowery-Brace, Mecklenburg Co. Ryan Gustin, Guilford Co. Sakina Carter Jenkins, Lee Co. Sally Helms Fri, Durham Co. Sally Jernigan-Smith, Durham Co. Samantha Andria Favitta, Craven Co. Samantha Dawn Eubanks, Martin Co. Samantha Kemp Lehman, Wake Co. Samone T Mathis, Durham Co Samuel R Almaguer, Durham Co. Sandra A Stokey, Franklin Co. Sandra Atef Zeitouni, Mecklenburg Co. Sandy Elizabeth Graves, Graham Co. Sandy R Fifer, Carteret Co. Sara Ann Riggle, Orange Co. Sara Elizabeth Feldman, Durham Co. Sara Madden, Orange Co. Sara Meade Inglisjenson, Buncombe Co. Sarah Ashford Boney, Wake Co. Sarah Catherine Pence, Durham Co. Sarah Cochran-Murray, Wake Co. Sarah Elizabeth McBrayer, Wake Co. Sarah Gabrielle Douglas, Wake Co. Sarah Gretchen Humphreys, Carteret Co. Sarah Lucille Palmatier, Durham Co. Sarah Marie Gattis, Durham Co. Sarah Miejin Choi, Wake Co. Schercitha Miller, Mecklenburg Co. Sean Drew Porter, Johnston Co. Sean Michael Maupin, Iredell Co. Seguia Annise Holland-Ellis, Onslow Co. Seth Chandler Goldwire, Union Co. Shakira Turner, Cumberland Co. Shalee Ford, Cumberland Co. Shamiika Queen-Glenn, Guilford Co. Shannon Marie Egan-Dailey, Durham Co. Shanon Greig, Forsyth Co. Shanshan Yao, Buncombe Co. Shantala Ester Owenby, Buncombe Co. Shantee Sheree Griffin-Crowell, Wake Co. Sharon Denise Jarman, Duplin Co. Sharon Puff Kropp, Bladen Co. Sharon Swindell, Carteret Co. Shawnie A Gruber, Buncombe Co. Shaylan Ferrell, Catawba Co. Shea Kelly Stanley, Durham Co. Shearice Guerrero, Johnston Co. Sheila Nell Chapman, Buncombe Co. Shel Wilson Anderson, Durham Co. Shelby Caitlin Willis, Cabarrus Co.

Sheri Anne Whipple, Carteret Co. Sherry Ann Arledge Boles, Polk Co. Shirley Bellamy, Wilson Co. Sian Nicole Kolozvary, Mecklenburg Co. Signe Kristen Waldbauer, Durham Co. Silvia Anderson Smith, Catawba Co. Sofia Dib-Gomez, Durham Co. Sofia McLane Rangel, Orange Co. Solomon Arreola, Carteret Co. Sonya Elizabeth Williams, Durham Co. Sophia Angelita Soto, Guilford Co. Spencer Phillip Cooksey, Harnett Co. Spring Rose Dawson-McClure, Orange Co. Sreeja Prasanth, Wake Co. Stacy Mary Barnes, Wake Co. Stacy Young Bartolini, Carteret Co. Stefani Brooke Engelstein, Durham Co. Stephanie H Jarvis, Carteret Co. Stephen Alan Levitin, Guilford Co. Stephen Andrew Green, Wake Co. Stephen Clark Shumaker, Buncombe Co. Stephen E Nemecek, Johnston Co. Stephen J Devoid, New Hanover Co. Stephen Paul Atkinson, Durham Co. Stephen W Rogers, Burke Co. Steven Andrew Erickson, Chatham Co. Steven Brent Terry, Burke Co. Steven Leon Wilkes, Guilford Co. Steven R Salmon, Carteret Co. Steven Wyatt Pitts, Mecklenburg Co. Summer A Beesley, New Hanover Co. Sunny Ream Spillane, Orange Co. Susan B Lamberth, Carteret Co. Susan E Pfeiffer-Vega, Carteret Co. Susan Lee McQuiddy, Forsyth Co. Suzanne Galloway Fox, Transylvania Co. Suzette P Campos Herrera, Chatham Co. Swamy Prasad Atchutanna, Wake Co. Sydney Nicole Schildnecht, Durham Co. Sylvia Marice Rose, Wake Co. Tanesha Hendley, Cumberland Co. Tanya Andrea Teat Foreman, Onslow Co. Tanya Darnice White-Rollins, Mecklenburg Co. Tarqueena Taylor, Wake Co. Tatiana Seguio Madrazo, Wake Co. Taylor Rebecca Locascio, Henderson Co. Tenecia Joy McKinley, Durham Co. Teresa Ann Cole-Smith, Jackson Co. Terrance Williams, New Hanover Co. Terri L Burwell, Granville Co. Terry Beisel, Rockingham Co. Terry Bentley, Catawba Co. Terry R Guldin, Carteret Co. Terryn Denise Hall, Durham Co. Thaddeus White, Northampton Co. Thesolonia McLean, Alamance Co. Thierry Gandelheid, Orange Co. Thomas Allen Grant, Jackson Co. Thomas Hairston, Wake Co. Ti'esh Harper, Orange Co.

Tianna Jenay McCoy, Guilford Co.

Timothy Earl Langdon, Wake Co. Timothy James Hines, Mecklenburg Co. Timothy Wojoski, Wake Co. Tomika Brinkley, Wake Co. Tommi Lee Young, Polk Co. Tonia Jean Jackson, Wake Co. Tony M Richards, Cumberland Co. Tracey Diane Rumer, Wake Co. Traci Kirk Graham, Randolph Co. Tracy DeVonne Russell, Forsyth Co. Tracy Littlejohn Mathews, Johnston Co. Tracy Tyner, Chowan Co. Travis Guy Nelson, Guilford Co. Travis H Lamarr Longo, Rockingham Co. Treasure White Lathan, Burke Co. Trent Merritt Harmon-Marshall, Forsyth Co. Trimette Charmelle Holland, Guilford Co. Trinia C Holbert, Durham Co Trudi Rene Harrison, Franklin Co. Tyshiana Grace, Harnett Co. Ursula Fragoso-Vogt, Mecklenburg Co. Valerie Jeanette Fields, New Hanover Co. Valoree Haven Hanson, Alamance Co. Vanessa A Cherif-Speight, Wake Co. Vanessa Marie Courts, Mecklenburg Co. Vermell F Graves, Guilford Co. Vernon Lynn Baucom, Durham Co. Vernon Richard Ash, Johnston Co. Vicki Cunningham Sykes, Carteret Co. Victor Leopoldo Huertamolina, Forsyth Co. Victoria Jean Lebrun, Durham Co. Victoria Tenant, Randolph Co. Viola Alston, Vance Co. Virginia Alise Dalton, Catawba Co. Virginia Bopp Orosz, Surry Co. Vivian Chavis Gill, Vance Co. Wade Michael Davis, Buncombe Co. Walter Zakahi, Durham Co. Wayne Johns, Guilford Co. Wendy Marie Parker, Forsyth Co. Wesley C Hogan-Philipsen, Durham Co. Whitney D Stanley, Durham Co. Whitney Laura George, Buncombe Co. Wilbur E Rosier, Carteret Co. Willette Smith, Franklin Co. William Anthony Lowder, Stanly Co. William Barker, New Hanover Co. William Christopher Delamar, Durham Co. William Ferenc Kistler, Durham Co. William Holden-Wingate, Mecklenburg Co. William R Cauley, Durham Co. Willie Lee Wilson, Pitt Co. Willojane Barbara Charns, Durham Co. Yen-Kwang Lin, Wake Co. Zachary Alexander Rodrigue, Wake Co. Zachary John Copeland, Durham Co. Zoe Hana Cantu-Backhaus, Wake Co. Zoe Judith Martin del Campo, Orange Co. Zoren Xavier Byrd-Locklear, Durham Co. Zorida Pacheco, Randolph Co. Zyah Moniet McColley, Cumberland Co.

EXHIBIT 28

AFFIDAVIT OF CARRIE CONLEY

- I, Carrie Conley, hereby declare as follows:
- 1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I was born in High Point, NC, and have also previously resided in Greensboro, NC. My husband is active duty in the U.S. Army, and because of that, I have been living in Italy since May 2022.
 - 3. I am a citizen of the United States.
- 4. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- 5. I have been a registered voter in North Carolina since I was 18 years old, and I have always been registered in Guilford County. I have voted regularly in both primary and general elections since I first registered in 2002.
- 6. Voting is incredibly important to me. I think about the fact that my grandmother who was born in 1911 wouldn't have even been able to vote, and I know that this is an opportunity I do not want to waste.
- 7. I cast an absentee ballot in the November 5, 2024, election from overseas and used the directions provided to me by the Guilford County Board of Elections. I utilized an online portal with a secure login, just as I had done to vote from overseas in the November 2022 election. I was not asked to submit a photo identification with my absentee ballot, nor was there even an option to provide such identification when casting my ballot.
- 8. Shortly after the election, I learned that my name was on a list of voters challenged by Judge Griffin. I saw the news stories about voters being challenged, and someone on social

media shared the link to Common Cause's Griffin List website where you can look up your name to see if you are one of the voters being challenged. When I searched the list and saw my name pop up, I was both shocked and upset.

- 9. I am aware that my vote has been included on Judge Griffin's challenge list because I did not provide a copy of my photo ID with my absentee ballot. I did not do this because it was not required under the instructions I was provided to submit my overseas ballot. However, I have a North Carolina driver's license, which is a qualifying photo ID under North Carolina law. If it had been required under the election rules, I would have provided a copy of it with my returned absentee ballot.
- 10. When I learned I was on Judge Griffin's challenge list, I contacted the Guilford County Board of Elections to see if there was anything I needed to do to make sure my ballot counted. I received a response from the same person who I requested my ballot from, and she confirmed that my license and SSN were connected to my account, and that at no point was I required to provide photo identification with my absentee ballot.
- 11. I was never offered an opportunity to fix any supposed problems with my absentee ballot, either before or after Election Day.
- 12. If my ballot is retroactively discarded under Judge Griffin's protest, I will feel very upset. I do not think you should be able to change the rules after an election has already happened, and I followed all the rules to cast my ballot in November 2024, just as I have done numerous times before. I have already contacted my federal and local representatives to let them know how upset I am that my vote is being challenged.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on February 26, 2025.

Carrie Corley

AFFIDAVIT OF DANIELLE BROWN

I, Danielle Brown, hereby declare as follows:

- 1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I am a 40-year-old Black woman who was born in Prince George, Maryland. I moved to North Carolina in 2006. I am a current resident of Kannapolis, North Carolina, in Cabarrus County.
 - 3. I am a citizen of the United States.
- 4. I am the National Field Co-Director for Black Voters Matter. I work very closely with elections and promote voter engagement.
- 5. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- 6. I have been a registered voter in this state since 2006, and I last updated my registration shortly after moving residences on September 26, 2016.
- 7. Voting is important to me because it is my political voice. It is being able to exercise who I am essentially hiring and firing to make overall decisions for me, my family, and the community in which I live. Our vote determines important decisions regarding how our state operates such as where our tax dollars are being spent, what individuals lead our state agencies and many other decisions that have a direct impact on our everyday lives. Because I understand the importance of voting and the role it plays in my life, I have participated in every general election, and many primary and municipal elections, since I turned 18-years-old.
- 8. I cast a ballot in the November 5, 2024, election by going to an early voting site in my county on October 25, 2024. I provided my North Carolina Driver's License obtained from the North Carolina Department of Motor Vehicles. I was given a ballot and was able to cast my vote

without any problems. Because I was already registered at my current address, I did not utilize Same Day Registration. No one at the voting site expressed any issues with my registration.

- 9. Shortly after the election, I learned that my name was on a list of voters challenged by Judge Griffin. I received a text message from the nonprofit organization Democracy North Carolina ("DemNC") on January 15, 2025. I initially ignored the text because I receive various notifications from the organization and assumed that their message was not directed at me. It was not until I received a second text that I realized I was actually on the list. While I do not recall receiving notice from the State Board of Elections nor Judge Griffin regarding the challenge, I do remember receiving a mailing from the Republican party. I did not read the mailing because I assumed it was left over campaign materials that had gotten lost in the mail.
- 10. I am aware that my vote has been included on Judge Griffin's challenge list because my voter registration record is allegedly missing either a Social Security Number or a driver's license number according to Judge Griffin. I do not understand how this information could be missing. I showed my NC DMV issued driver's license when I went to vote. No one informed me that information was missing or was needed. I am shocked that it is being alleged that the information is missing from my registration.
- 11. When I learned I was on Judge Griffin's challenge list, I contacted the Cabarrus County Board of Elections to see if my name was actually on the list and if there was anything I needed to do to make sure my ballot counted. I was told information was missing and I needed to update my registration. Prior to this interaction, neither the state nor the county board of elections had contacted me or communicated to me that my registration lacked information. When casting my ballot during the 2024 General Election no one informed me of my registration lacking information. I am concerned as to why my registration is lacking information now when I provided all required information when I registered and cast my ballot.

- 12. I was never offered an opportunity to fix any supposed problems with my registration/absentee ballot, either before or after Election Day.
- 13. If my ballot is retroactively discarded under Judge Griffin's protest, I will feel as my voice has been stolen. I, as well as other NC voters, have already exercised our voice. We need you to certify this election and let the people's voice stand this is what democracy is all about!

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on February 24, 2025.



AFFIDAVIT OF JEAN MARIE CARY

I, Jean Marie Cary, hereby declare as follows:

- I am over eighteen years of age. I have personal knowledge of the facts set forth herein.
 If called to testify before this Court, I would do so to the same effect.
- I am a 75-year-old female, born in Louisville, Kentucky. After law school I moved to North Carolina. I have lived in North Carolina for over 40 years. I currently reside in Durham, County.
- I am a retired trial attorney and law school professor. I have taught at the University of North Carolina School of Law, Central Law School, and Campbell School of Law. Prior to becoming a Law School professor, I worked for North Carolina Legal Services.
- 4. I am a citizen of the United States.
- I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- I have been a registered voter in this state since 1976. My registration was last updated in 2017. I am registered to vote at my current address.
- 7. Voting is important to me. When I grew up my parents were divided politically, but united on the importance of voting. Each election cycle, I witnessed my parents hold hands as they walked into the voting establishment to cast their ballots. My parents voted despite knowing that they were cancelling out one another's vote. Watching them vote taught me that, despite the outcome, my vote mattered. I have carried this principle with me throughout my life.
- 8. I have voted in every election since I moved to Durham in 1983.
- I cast a ballot in the November 5, 2024, election by going to an early voting site in my county. On the day I voted, I arrived at the voting location, I presented a valid form of photo identification, I was given a ballot, and I voted.
- 10. Shortly after the election, I learned that my name was on a list of voters challenged by Judge Griffin. I never received a postcard from Judge Griffin or the Republican Party.
- Instead, I received a phone call from a friend reporting that my name was on the list of challenged voters. I was in disbelief.
- 12. After I researched and confirmed my vote was being challenged, I called the Durham County Board of Elections. I spoke with Debra Hart, who informed me that my registration was proper. She indicated that my registration contained my driver's license number and the last four (4) digits of my social security number.
- 13. Following this conversation, I sent a letter to Judge Griffin requesting that he remove my name from the list. I never heard a response from him or the Griffin Campaign.
- 14. To this day, it is not clear to me why my vote is being challenged. No one has ever contacted me or even offered me an opportunity to fix any supposed problems with my hallor.
- 15. As a retired trial attorney, who spent the vast majority of my legal career training North Carolina lawyers, I am shocked that my fundamental right to vote is being litigated.
- 16. The outcome of the election was decided by the people. It is not the role of the courts to reverse the people's choice.
- 17. Judge Griffin's case is without merit and should be dismissed.

declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on February 24, 2025.

[afflant]

State of North Carolina County of Durham

Sworn to and subscribed before me
On this 26 _____day of February, 2025.

Julia Borbely-Brown

My Commission Expires: 5May 2024



AFFIDAVIT OF KEMEKA SHONTA SIDBURY

- I, Kemeka Shonta Sidbury, hereby declare as follows:
- I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- I am a 48-year-old African American female resident of the North Carolina. I was born in Philadelphia, Pennsylvania, but I was raised in Wilmington, North Carolina. I reside in Brunswick County, North Carolina. I have lived at my current residence since 2021.
 - I am a wife and mother of two adult children and one teenager.
- I am an educator. I have taught middle school and adult education for over two decades.
 - 5. I am active in the Wilmington community.
 - 6. I am a citizen of the United States.
- 7. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- I initially registered to vote while attending North Carolina Agricultural and Technical State University. Upon graduation, I have always kept my registration updated.
- I am an active voter. I have participated in nearly every election held in my county.
 I have never had any issue with voting.
- 10. Voting is important to me and my family. Voting awards every citizen a voice and an opportunity to elect representatives who will reflect what matters to their constituents. For me, voting is an inherence that my ancestors fought and died for. Every time I exercise my right to vote, I believe I am honoring my ancestors' sacrifice.

- 11. During the 2024 general election, I traveled to Leland Cultural Art Center with my husband, father, and my 23-year-old son. After standing in line, I handed a poll worker my driver's license, I was given a ballot, and I voted.
 - 12. There was nothing out of the ordinary about my voting experience.
- 13. After the election, I found out my vote was being challenged on January 22, 2025. The New Hanover County NAACP President circulated an email advising chapter members to review the entire list of Griffin's protest, to determine if their vote was being challenged. I opened and evaluated the list. I was shocked to find my name on the list.
- 14. After finding my name, I contacted the County Board of Elections. I was told that the office would send information out to me. To date, I've only obtained a registration card indicating that I am registered
 - 15. I never received a postcard from the Griffin Campaign.
- 16. As an upstanding United States citizen who has dedicated my life to educating our future leaders, it is heartbreaking to now learn that that a candidate, for the North Carolina Supreme Court, is asking the court to strip me of my lawful vote.
- 17. Disenfranchising my vote, along with over 50,000 citizens, in order to hand the victory to the losing candidate is not what democracy looks, it is not what democracy feels like, and it is certainly not what my ancestors died for.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on February 25, 2025. North Carolina County of Brunswick Kemeka Showta Sidbury, appearing before the undersigned notary and being duly sworn and subscribed before me this ___ February, 2025. Parker Knycle Parker Kazee **NOTARY PUBLIC** Official Signature of Notary Brunswick County, NC

Parker Kazee

Notary's printed or typed name

, Notary Public

EXHIBIT 32

AFFIDAVIT OF LYSE LOREN ROCHLEDER

I, Lyse Loren, hereby declare as follows:

- 1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.
- 2. I am a 25-year-old biracial woman. I was born in Annapolis, Maryland but moved to Durham, North Carolina when I was four years old. I have been a resident of Durham, North Carolina ever since. I am a military member and am currently stationed in Alaska, however, Durham, North Carolina is still my official residence. I have been stationed in Alaska for two years and intend to return to North Carolina once my service here is over.
 - 3. I am a citizen of the United States.
- 4. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.
- 5. I have been a registered voter in this state, at my current address, since July 25, 2017.
- 6. This is my fourth time voting. In both 2018 and 2022, I cast my ballot using Early Voting. In 2020, I voted absentee. For the most recent 2024 General Election, I requested my absentee ballot in August and cast my ballot via absentee.
- 7. Voting is important to me because I consider voting as a duty that every citizen should fulfill. I think everyone has an opinion on how they would like to see the government run. Everyone should get to express their opinion and our way of doing so is through voting.
- 8. I cast a ballot in the November 5, 2024, election from Alaska. The absentee ballot came to me through my email. I went to the absentee portal and entered my Social Security Number when prompted. I followed the instructions provided. To submit, there was an electronic or mailing option. I chose to submit my absentee ballot electronically.

- 9. After the election, I learned that my name was on a list of voters challenged by Judge Griffin. I found out about the challenge from my mom. She pays close attention to elections in North Carolina and informed me that both me and my father's absentee ballots were being challenged. A few days later I was contacted by this Amicus team. To my knowledge, I did not receive any mailings or notification from the State Board of Elections or the Griffin Campaign regarding issues with my registration.
- I am aware that my vote has been included on Judge Griffin's challenge list because I did not provide a copy of my photo ID with my absentee ballot. I did not do this because it was not required under the instructions I was provided to submit my overseas ballot. I have a North Carolina Driver's License issued by the Department of Motor Vehicles, which is a qualifying photo ID under North Carolina law. If it had been required under the election rules, I would have provided a copy of it with my returned absentee ballot. While I was not instructed to provide a copy of my photo ID, I was required to provide my Social Security Number for verification.
- 11. I was never offered an opportunity to fix any supposed problems with my absentee ballot, either before or after Election Day.
- 12. If my ballot is retroactively discarded under Judge Griffin's protest, I will feel very disappointed. Like I'm sure all of the other absentee voters being challenged did, I followed the law. I used the system provided by the state. I followed all of the necessary processes to have my vote count. I made sure I did everything the right way. My vote, as well as all of the others beign challenged, should count.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on February 26, 2025.

Lyse Rochleder

Lyse Loren Rochleder