

STATE OF NORTH CAROLINA

COUNTY OF WAKE

JEFFERSON GRIFFIN,

Petitioner,

vs.

NORTH CAROLINA STATE BOARD
OF ELECTIONS,

Respondent.

IN THE GENERAL COURT OF JUSTICE

SUPERIOR COURT DIVISION

24CV040619-910; 24CV040620-910;

24CV040622-910

**MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF BY IMPACTED VOTERS
AND NON-PARTISAN ORGANIZATIONS**

Proposed *amici curiae* Amici Ralim Allston, Cindy Oates Anthony, Rachel Arnold, Amy Bryant, Denise Carman, Louanne Caspar, Alexia Chavis, 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, Brooklyn Miller, Dirk Philipsen, Larry Repanes, Anna Richards, Lila Richardson, Sophia “Felix” Soto, Alexa Adamo Valverde, Diane Wynne, and Pheobe 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 proposed “Organizational Amici,” together with the Impacted Voters, the proposed “Amici”) respectfully move under North Carolina Rule of Civil Procedure 7(b) for leave to file the appended Brief of Amici Curiae in opposition to the relief sought by Petitioner Jefferson Griffin, which would change the rules of the 2024 election after the voters of our state already went to the polls. As the proposed Brief of Amici Curiae and accompanying voter affidavits show, granting the relief requested by Judge Griffin would

invalidate the lawful ballots of eligible North Carolina voters who simply followed the rules of voting then in effect.

As nonpartisan, nonprofit organizations dedicated to protecting and advancing the rights of voters, and as the voters at risk of disenfranchisement if these protests are successful, proposed *Amici* have a substantial interest in this case and in ensuring that the election protest statutory scheme is properly applied, that the protestor is held to the correct burden of proof, and that the constitutional rights of the challenged North Carolina voters are protected.

Amici sought consent from the parties to file this motion. Counsel for Judge Griffin do not oppose the request. Counsel for the North Carolina State Board of Elections and intervenor Justice Allison Riggs consent.

NATURE OF THE INTEREST OF AMICI CURIAE

The **Impacted Voters** are individuals appearing on the list of challenged voters submitted by Judge Jefferson Griffin in the Election Protests because they *(i)* are alleged to lack certain identifying information in their voter file (driver's license number or last four digits of the Social Security Number ("SSN")) or *(ii)* voted from overseas and were not required to meet the voter identification requirements administered for domestic ballots pursuant to 8 N.C. Admin. Code § 17.0109. As set forth in the affidavits appended to the proposed Brief of *Amici Curiae* as Exhibits 1 through 26, each of the Impacted Voters is an eligible North Carolina voter who at the time of voting met all the requirements under North Carolina law to register and vote and lawfully voted under the laws and regulations that existed during the voting process. Many voters challenged for lacking identifying information in fact provided this information to the State Board, and others could have and would have provided this information if required to when they had registered to vote and if they were given notice that the absence of that information would place their ballot in

jeopardy. All individuals were duly registered under the procedures applicable at the time of registration and under state law when they went to cast a ballot. Similarly, the Impacted Voters who voted overseas without voter identification could have satisfied a voter ID requirement if at any point in the voting process they were informed it was required.

The **Organizational Amici** are non-partisan, non-profits registered under Section 501(c)(3) of the Internal Revenue Code that engage in extensive year-round voter outreach, voter education, and voter protection activities across North Carolina. As part of this work, Organizational Amici regularly help voters navigate every aspect of the voting process including understanding eligibility requirements, registering to vote, casting a ballot, and ensuring that the ballot is counted. Since the filing of election protests by Petitioner Jefferson Griffin, Organizational Amici have engaged with their members, their volunteers, voters and other community contacts and networks on this issue. Through that work, they have encountered numerous voters appearing on the list of challenged voters. As organizations deeply committed to and engaged in voter outreach, advocacy and education, the Organizational Amici have an interest in values directly at risk in this matter: Ensuring every eligible voter's ballot is protected, and ensuring voters maintain confidence in the integrity and fair administration of the State's elections.

REASONS WHY AN AMICUS BRIEF IS USEFUL TO THE COURT

The proposed Brief of Amicus Curiae is beneficial to the Court's consideration of this matter because it directly addresses the required showing for an election protest that challenges voter eligibility and explains in detail why Judge Griffin's protests fall far short of these requirements and must be dismissed. This is true on the face of the allegations in the protests themselves, which fail to specifically allege or show the ineligibility of any voter challenged as lacking a SSN or driver's license number in their voter registration (so-called "Incomplete") or not

presenting voter ID when voting overseas (“Overseas ID”) as a sole reason for disqualification.¹ As a matter of state law, Judge Griffin must show affirmative proof of voter ineligibility to show an outcome-determinative violation of election law. His complete lack of individualized allegations as to the eligibility of “Incomplete” and “Overseas ID” voters fails to carry his statutory burden.

The inadequacy of Judge Griffin’s election protests is further emphasized by the personal accounts of voters who appear on Judge Griffin’s challenged lists, appended as voter affidavits to the proposed Brief of Amici Curiae as Exhibits 1 through 26. These affidavits prove that qualified North Carolina voters have been targeted here, all of whom took care to fulfill the requirements presented to them when they voted, and all of whom would have worked to resolve any issues with their registration or ballots if they had known a different set of rules would apply. Moreover, some impacted voters even *did* satisfy the alternative (erroneous) set of rules Judge Griffin has advocated for, having provided identifying information when they registered and having attempted to transmit photo ID when they voted from overseas. *See* Ex. 23, 26. In other words, the Impacted Voter Amici are qualified under North Carolina law to vote and would be unjustly denied that fundamental right if Judge Griffin’s relief were granted.

Additionally, Judge Griffin cannot show that, had his preferred interpretation of the law applied to challenged voters and they had instead voted under that alternative set of laws, any of the “Incomplete” voters could not have still registered to vote, and any of the “Overseas-No ID” voters could not have met an ID requirement presented to them. He alleges no voter fraud, and no ballots cast by a non-citizen or otherwise disqualified voter. The sworn affidavits from impacted

¹ 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.

voters in fact prove otherwise, that voters were qualified and would have done everything they could to cast a ballot according to the rules presented to them.

WHEREFORE, Amici respectfully request that they be permitted to submit the attached amicus.

Respectfully submitted, this the 3rd day of February, 2025.

By: /s/ Caitlin A. Swain

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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:

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/s/ Jeffrey Loperfido

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**BRIEF OF IMPACTED VOTERS AND NON-PARTISAN ORGANIZATIONS AS
AMICI CURIAE SUPPORTING RESPONDENT**

Amici Ralim Allston, Cindy Oates Anthony, Rachel Arnold, Amy Bryant, Denise Carman, Louanne Caspar, Alexia Chavis, 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, Sophia “Felix” Soto, Alexa Adamo Valverde, Diane Wynne, and Pheobe 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

¹ No person or entity other than the amici curiae and counsel helped write or contributed money to this brief.

INTRODUCTION

More than 60,000 voters are at risk of having their ballots cancelled because Judge Jefferson Griffin, the losing candidate for a North Carolina Supreme Court seat, has challenged their ballots in the 2024 General Election by means of this election protest. Their transgression? Voting exactly how the State Board of 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 in good faith reliance on the rules promulgated by the State Board of Elections, in order to cast their ballots, make their voices heard, and ensure that the will of the people remains the lodestar of our political system. These are voters who have not only done nothing wrong, but who in fact followed all the rules that were asked of them.

Through all of the legal wrangling and exhaustive, unprecedented procedural maneuvering amongst the parties to date, the voices of the thousands of challenged voters themselves have been glaringly absent. Despite airing his vehement disagreement with North Carolina’s State Board at length, Judge Griffin never once makes any attempt to reckon with the interest of the voters whose ballots he seeks to discard or give even minimum effort to show that these voters actually did anything wrong. These voters not only deserve to be heard, but they deserve 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 baselessly silenced.

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 unprecedented challenges and followed an alternative hypothetical set of rules, never provided to them by the state, when casting their ballot. This evidence is required under state law, and it is the protester's burden of proof to make this showing by *substantial* evidence. This failure to allege, let alone prove, that any of the challenged voters is actually ineligible to vote in North Carolina is a sufficient, independent ground to reject Judge Griffin's protest.

The protests also request sweeping and unprecedented remedies that would permanently destabilize the post-election canvass period and deny voters any assurance their ballots will be counted, despite having met North Carolina's eligibility and photo identification requirements in precisely the way that was required of them. If Judge Griffin's protests succeed, no election will ever have finality in North Carolina again until losing candidates have taken their crack in the courts. These requests are without basis in state law and dubious both in the eyes of bedrock constitutional principles and fundamental fairness. Put simply, Judge Griffin's protests ask for extraordinary relief with an extraordinary lack of evidence.

The distrust that granting Judge Griffin's request would engender cannot be overstated. If Judge Griffin receives his extraordinary remedy, on the basis of novel legal theories being adopted *ex post facto* and applied retroactively, despite seeking to cut procedural corners and without meeting his statutorily mandated burden, it will shake North Carolina elections to the core. If he

is able to take these actions at the expense of voters whose greatest sin was taking the state at its word and following the North Carolina State Board of Elections' stated rules and regulations to cast a legally compliant ballot, it will create a winter of distrust in the democratic process amongst all North Carolinians. To avoid precisely that outcome, and in accordance with North Carolina law, Amici respectfully request that this Court reject Judge Griffin's protests in their entirety.

INTEREST OF AMICI CURIAE

Amici are (1) North Carolina voters who at the time of voting in the 2024 General Election met all the requirements under North Carolina law to register and vote, lawfully voted under the laws and regulations that existed during the voting process, and now face threat of disenfranchisement by the relief sought in Judge Griffin's Election Protests, specifically voters challenged as 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") as a sole reason for disqualification (hereinafter the "Impacted Voters")²; and (2) non-partisan, non-profit North Carolina-based organizations that engage in extensive year-round voter outreach, voter education, and election protection activities across the state with a focus on communities of color (hereinafter, "Organizational Amici").

As described in Exhibits 1 through 26, and summarized below, each of the Impacted Voters have an interest in the outcome of this matter both with regard to their challenged ballot in the 2024 General Election and their broader faith in North Carolina elections should their lawful vote be canceled due to no fault of their own. Judge Griffin's protests also disproportionately impact the Black and brown constituents and members of the Organizational Amici, whose voting rights are under consistent attack in the state of North Carolina, which provides a unique and particularly

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.

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

Ralim Allston, a 35-year-old Black man residing in Pasquotank County, has been a registered voter in North Carolina since 2008. He checked his registration before voting in November 2024, and he voted early in-person with no issues. If his ballot is retroactively discarded under Judge Griffin’s protest, he will feel angry and discouraged because he thought the United States was a democracy, and that voting was supposed to be fair. Allston believes that this challenge is stripping him of his right to vote. Ex. 1.

Cindy Oates Anthony was born in Gaston County, North Carolina, and has resided in Jackson County since 2008. She is a fully qualified voter, and has been a registered voter in the state since at least 1992. Ms. Anthony presented her driver’s license when she voted early in the November 2024 General Election. She learned that her name was on the list of voters challenged by Judge Griffin from a member of her church, and contacted the Jackson County Board of Elections to confirm that she did provide her driver’s license number on her registration form. Anthony believes it is the right and responsibility of citizens to vote and that everyone who is eligible should be able to cast a ballot and have that vote counted. If her ballot were discarded, she

³ According to an analysis completed by the News and Observer, “Black registered voters were twice as likely to have their votes challenged [by Judge Griffin] as white voters.” “Black NC Voters Twice as Likely to Have Ballots Challenged in Griffin Election Protests,” (Jan. 7, 2025), <https://www.newsobserver.com/news/politics-government/election/article296693744.html>. Professor Chris Cooper from Western Carolina University also published an analysis of how the voters on Judge Griffin’s list compared to the entire pool of voters who cast a ballot in the November 2024 election, as well as compared to all active registered voters in North Carolina. Professor Cooper concludes 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” (Jan. 12, 2025), <https://www.oldnorthstatepolitics.com/2025/01/an-analysis-of-challenged-voters-in.html>.

would feel like a fundamental right were taken away, and she would wonder what this means for all of the elections that have occurred. Ex. 2.

Rachel Suzanne Arnold is a 51-year-old senior vice president of a government affairs firm. She has resided in Guilford County since moving to North Carolina in 2009. She is an active voter and has participated regularly in primary and general elections held in Guilford County since registering to vote in 2009. She has never had any issue with voting. Arnold believes voting is a form of expression and a statement of values. She participated in early voting during the November 5, 2024 General Election. While at the voting site, she gave her “Real ID” to poll worker and she received a ballot to vote. Although there were no issues, Arnold received a mailer from the North Carolina Republican Party suggesting that her vote could be rejected. She assumed it was junk mail. She called the NC Republican Party and left a message, but no one returned her call. Shortly thereafter, she stumbled upon the Griffin Challenge list circulating on social media and was floored to see her name. She contacted the State Board of Elections and was told that if there was a hearing she would be notified. Arnold believes she is an upstanding citizen and always adheres to the voting laws. She believes that the process contesting her vote is unfair and it has shown her how easily a miscarriage of justice can happen in our democratic society. Ex. 3.

Amy Grace Bryant is a physician, a wife, a mother, and an educator. Dr. Bryant moved to Durham, North Carolina, in 2011. She has resided in the same location since 2011. Dr. Bryant registered to vote at the North Carolina DMV in 2011 and she has voted in every election held in her county since that time. In the November 5, 2024 General Election, Dr. Bryant voted at an early voting site. She used her North Carolina driver’s license to vote without any complications. Dr. Bryant learned that her vote was being challenged after she received a post card from the North Carolina Republican Party. She initially thought that it was junk mail because it was addressed to

“Amy Bryant or current resident.” She eventually found her name on this list of voters whose registration was being questioned by Judge Griffin’s campaign. Dr. Bryant has reached out to the Griffin campaign and has not received any response. Dr. Bryant spends her working hours caring for patients and educating medical trainees, and she finds it sickening that she now must fight to save her lawfully cast vote. Dr. Bryant believes this entire process is unfair and that to cancel her vote along with the 60,000 others would be a blow to our democracy. Ex. 4.

Denise Bradley Carman, a 59-year-old white woman residing in Chatham County, has been registered to vote in North Carolina since 2004. She has also served as an Election Judge for the Goldston precinct for the past 18 months. She feels strongly that everyone who is eligible to vote should have the opportunity to do so and enjoys working for our state’s elections as a way to contribute to a process that is important to her in a non-partisan way. Ms. Carman presented her passport as identification when she voted early in the 2024 General Election. When she learned through her election work that her vote was being challenged due to an allegedly “incomplete” registration record, she contacted the Chatham County Board of Elections, which recommended she submit a new voter registration application but did not have any advice for what she could do about the challenge. She will feel angry if, as a qualified voter of the state, her ballot is discarded and also concern for others who do not understand the process as well. She is particularly concerned such a challenge will deter others from voting, and wonders if that might be a motivation for the current challenges that are happening. Ex. 5.

Louanne Flanagan Caspar is a 52-year-old white woman residing in Wake County. Caspar has voted regularly since registering to vote at the age of 18, and she also volunteers regularly at the polls as a precinct official. Caspar voted in the November 5, 2024 General Election at an early voting site in Wake County, and she presented her North Carolina driver’s license as

her photo ID. When she learned she was on Judge Griffin's list of voters whose registrations lacked either a Social Security Number or a driver's license number, she contacted the Wake Board of Elections to request a copy of her submitted voter registration form, which shows that her voter registration application did include her Social Security Number. Caspar will feel disenfranchised if her ballot is retroactively discarded under Judge Griffin's protest and believes it is fundamentally unfair to discount her vote. Ex. 6.

Alexia Chavis is a student of North Carolina Agricultural and Technical State University ("NC A&T") and a resident of Greensboro, North Carolina. Chavis pre-registered to vote in North Carolina in 2020. Voting is very important to her, and she currently serves as the Vice President for NC A&T's chapter of Black Girls Vote. She cast her ballot in the November 5, 2024 election by early voting in person at a site in Guilford County, and she showed her student ID to comply with the photo ID requirement. If her ballot is discarded under this protest, she will feel disheartened, frustrated and disappointed. Chavis feels that voters should not have to deal with voter suppression from people that they elect, and that this burden should not fall on the voters when they did not do anything wrong. Ex. 7.

J. Benito Del Pliego is a naturalized citizen of the United States and has lived in North Carolina since 2002. He is a fully qualified voter, and votes regularly because he believes voting is one of the basic principles of our democracy, and that it is fundamental as a citizen that he exercise his right to vote. Mr. Del Pliego learned his name was on a list of voters challenged by Judge Griffin from a friend and when he learned of the challenge, he contacted the Orange County Board of Elections to request a copy of his registration form. That form shows that he did provide the last four digits of his Social Security Number when he registered to vote. He was told that the county may have had issues reconciling his registration and his Social Security Number because

his last name has two words, but there was no further action required on his part. Del Pliego believes challenge feels like a malicious effort to suppress his vote, and if his vote is discarded he will feel that the basics of our democracy are being challenged without reason. Ex. 8.

Sofia Dib-Gomez, a 19-year-old Hispanic woman residing in Durham County, registered to vote for the very first time in 2024. As a student at Duke University, Dib-Gomez is a member of the Student Voting Rights Lab and a first-year fellow for Duke Votes, a non-partisan student group at Duke which works to educate, register and mobilize the Duke community to vote. She cast a ballot in-person in Durham County without issue, and did not realize that her vote was being challenged until she found her name on the list through her work at the Student Voting Rights Lab. When she found out that her ballot was being challenged, she contacted the Durham County Board of Elections, which confirmed that she provided her Social Security Number when she registered to vote. If her ballot is thrown out under this protest, she will feel very frustrated to have her vote not counted in the first election in which she was eligible to vote. Ex. 9.

Mary Kay Heling was born in Wisconsin but has lived in Raleigh, North Carolina, since January 2016. Heling believes that voting is not just a right, but a responsibility and requirement. Heling has been voting in North Carolina for 9 years and has not been informed of any issues with her registration during that time. She cast a ballot in the November 5, 2024 General Election by early voting, and presented her North Carolina driver's license as her photo ID. She confirmed with the Wake County Board of Elections that she provided a Social Security Number at the time she registered, and that no further action was required on her part. Heling is frustrated and angry about her ballot being potentially discarded because her right to vote is being stripped away despite doing all that was required of her. Ex. 10.

Wesley Hogan-Philipsen, a 54-year-old white female residing in Durham County, has lived at her current residence since August 2013. She voted in the November 5, 2024 General Election by going to an early voting site, and she used her North Carolina driver's license as her photo ID. When she contacted the Durham County Board of Elections after learning that she was on the list of challenged voters, staff told her that because she had requested an absentee ballot overseas in 2022, the Social Security Number and driver's license information that was previously in her registration record was depopulated to meet ballot distribution deadlines required by federal law. Staff reprocessed and repopulated the information and told her no further action was required on her part. If her vote is not counted, Hogan-Philipsen sees the intentional removal of people from the rolls as a 200-year pattern and believes doing so would undermine the fundamental premise of what this country is supposed to stand for. Ex. 11.

Elizabeth Hunter Kesling, a wife and mother of children ages 7 and 10-years-old, has been a resident of Hillsborough, North Carolina, since the fall of 2020. She has been registered at her current residence since October 2020. She cast her ballot in the November 5, 2024 election by going to an early voting site in her county. When voting, she provided her NC driver's license. Hunter Kesling believes that in a world where problems and issues can seem insurmountable, that showing up to vote is one concrete step she can take to act on her beliefs and hopefully work toward a better future for herself and others. She also feels that as a woman, she understands those who came before her fought for the right to vote, and she likes to honor their legacy every time she casts her ballot. If her ballot is retroactively discarded under Judge Griffin's protest, she will be disillusioned with the electoral system. Ex. 12.

Kevin Hunter Kesling, husband, father, and software engineer, was born in Chapel Hill and—after several moves out of the state—now lives in Hillsborough, in Orange County. He has

lived at his current address since September 2020. Hunter Kesling registered to vote in North Carolina on October 7, 2020 at the Orange County Board of Elections in Hillsborough using his United States Passport and Social Security Number. For the November 5, 2024 election, he cast his ballot at an early voting site in his county. While voting, he provided his North Carolina driver's license. He did not experience any issues regarding his registration during his voting experience. Voting is important to Hunter Kesling because he believes 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. Ex. 13.

Lesley-Anne Leonard, a 38-year-old white woman residing in Forsyth County, moved to North Carolina in 2004 for college and decided to stay post-graduation. She has been a registered voter in Forsyth County since 2010, and has voted in every general election without issue since she first registered. Her parents instilled in her the importance of voting, and she tries to vote in as many elections as she can. It was not until January 2025, when a friend texted her, that she learned she was in fact on the list and was being challenged as having an "incomplete" registration record. She contacted the Forsyth County Board of Elections, which confirmed that her original registration did include both her driver's license number and the last four digits of her Social Security Number. If her ballot is discounted now, she will feel betrayed, especially because she has done everything she was supposed to do to cast a valid ballot and is eligible to vote in the state. Ex. 14.

Gaynelle Little, a 59-year-old Black woman residing in Wake County, has been registered to vote in North Carolina since 1986, and has been voting regularly in North Carolina for decades without issue. She voted in the November 5, 2024 General Election by going to an early voting site and provided her North Carolina driver's license as her photo ID at that time. Little was

surprised to learn she was on the challenge list because she followed all the requirements to register and vote, and she will feel robbed of her constitutional right to vote if her ballot is retroactively discarded under Judge Griffin's protest. Ex. 15.

Jenna Marie Marrocco is a 27-year-old North Carolina resident. Marrocco has lived in North Carolina since 1998 and registered to vote in 2016. In September 2024, Marrocco checked her voter status and found out that her voter registration was listed as "inactive". She did her due diligence and determined what she needed to do prior to voting. Accordingly, she presented to the South East YMCA in Wake County during the early voting period. Prior to casting her vote, she handed her valid driver's license and a utility bill from her current address to the election official. She was given a ballot and she was able to vote. She never received a postcard or any other form of communication from Judge Griffin's campaign challenging her vote, nor did she hear from the State Board of Elections. Marrocco believes she took every step to make sure she was eligible to vote. Ex. 16.

Audrey Meigs, a 23-year-old Asian American woman residing in Durham County, was born in China but now lives in Chapel Hill, North Carolina. Meigs has been working in the voting rights space since high school, when she held voter registration drives in her hometown of Asheville, North Carolina. She is very dedicated to voting rights work and serving the Asian American community because she feels they are often left out of the political process. When she learned that she was being challenged on Judge Griffin's list, she contacted the Durham County Board of Elections, who confirmed that she had provided her Social Security Number when she registered and that no further action was required on her part. If her vote is thrown out as a result of these protests, Meigs will feel angry and disheartened, because someone running for a seat in the justice system should not be denying the right to vote to North Carolinians. Ex. 17.

Brooklyn Miller, a 27-year-old African American resident of Durham, North Carolina, is a part-time barista and videographer. She is a native of Durham County and is active in the Durham community. She registered to vote in on August 23, 2017 and is registered at her current residence. Miller is an active voter who has participated in several primary and general elections held in North Carolina since 2020. For the November 5, 2024 General Election, she cast her vote at a church in her county during the early voting period. She provided her North Carolina driver's license. Prior to getting her ballot, she raised the concern of her address not being updated on her registration. The poll worker changed it in the system. No other issues were raised by the poll worker regarding my registration. She has never had any issues casting her ballot. Voting is important to Miller because she knows elders took to the street to protest and organize in order to provide her the opportunity to vote. Miller believes voting is her way of expressing her voice in a society that tries to suppress it, and is extremely frustrated that her vote is being challenged. Ex. 18.

Dirk Philipsen, a 65-year-old white male residing in Durham County, has lived at his current residence since August 2013. He has been registered to vote in North Carolina since 2013 and remembers registering using the last four digits of his Social Security Number. He voted in the November 5, 2024 General Election by going to an early voting site, and he used his North Carolina driver's license as his photo ID. Philipsen contacted the Durham County Board of Elections after learning his vote was being challenged for incomplete registration; staff told him his registration included his Social Security Number and assured him no further action was required on his part. Philipsen believes participating in your community and voting is a central part of one's responsibility as a citizen. If Judge Griffin's protest is successful and his vote is not counted, Philipsen would no longer trust the political process, he would feel disenfranchised, and would be appalled. Ex. 19.

Larry Repanes, a 68-year-old white male residing in Mecklenburg County, was born in New York and is currently a resident of Charlotte, North Carolina. He believes voting is a right and is key to democracy. Repanes voted in the November 5, 2024, election by going to an early voting site and showing his North Carolina driver's license to cast a ballot. After learning he was on the list of challenged voters from a neighbor, Repanes contacted the Mecklenburg County Board of Elections, and the staff informed him that both his Social Security Number and driver's license were present but not validated. Staff validated his Social Security information and assured him that no further action was required on his part. Repanes would be angry, shocked, and stunned if his vote were thrown out on a technicality that he believes could have and should have been resolved before the election. He believes the court not counting his and others' votes would be disenfranchisement and anti-democratic. Ex. 20.

Anna Richards, a 74-year-old Black woman residing in Orange County, has been voting since she was 18-years-old, and has been a registered voter in North Carolina since 2013. She is a retired corporate financial executor and a former County Commissioner for Orange County. She takes voting very seriously because her ancestors fought for her right to vote. Richards voted in the November 5, 2024 General Election at an early voting site in Orange County, and she presented her North Carolina driver's license as her photo ID. If her vote is thrown out as a result of Judge Griffin's protest, she will feel outraged because the United States is supposed to be a democracy, and she registered and cast her vote legally. Ex. 21.

Lila Richardson, a 23-year-old white woman living in Buncombe County, was born and raised in Asheville and still lives there today. Richardson has been registered to vote since she turned 18, and she believes that voting is an incredibly important opportunity for her to expand the future of her community. She cast her ballot in the November 5, 2024 election by early voting in

person at a site in Buncombe County, and she showed her North Carolina driver's license to comply with the photo ID requirement. Richardson does not understand why her vote is being challenged because of incomplete registration, and found it difficult to navigate the process of obtaining more information on this challenge. If her ballot is discarded, she will feel frustrated and discouraged as she and her neighbors are still reeling from the traumatic effects of Hurricane Helene, and to have her vote discounted after the efforts she made to show up at the polls would feel disrespectful. Ex. 22.

Sophia "Felix" Angelita Soto is a resident of Guilford County, North Carolina. He pre-registered to vote when he was 17-years-old, and was excited to vote for the first time in the 2024 primary elections and again in the November 5, 2024 General Election after he turned 18. He had planned to vote by mail in the general election, but could not receive a ballot before traveling abroad because of the delay in printing absentee ballots in fall 2024. Instead, Soto voted from overseas. He initially provided a copy of his passport when voting, but the Guilford County Board of Elections requested that he submit a new ballot because of an error and informed him that overseas voters do not need to provide a copy of photo ID. Soto will feel disappointed in the electoral system if his ballot is retroactively discarded, because he was excited for his voice to be heard. Ex, 23.

Alexa Adamo Valverde is a mental health therapist and nonprofit director, plus the mother of a 14 year old and a 9 year old. She was born in Florida and is currently a resident of Chapel Hill, North Carolina, in Chatham County. She voted in the November 5, 2024 General Election by going to an early voting site, and used her North Carolina driver's license as her photo ID. She registered to vote at the DMV when she received her North Carolina driver's license, so she does not understand how her Social Security Number or driver's license number could be missing. Ms.

Valverde was raised to value democracy and believes that in a free country, every individual exercises their power by voting. If her vote is not counted, Ms. Valverde will feel outraged, and that something is broken in the system. Ex. 24.

Diane Wynne, a 56-year-old white female residing in New Hanover County, was born in New Jersey and is currently a resident of Wilmington, North Carolina. She votes regularly and has worked as a poll worker. She voted in the November 5, 2024 General Election by going to an early voting site, and she used her North Carolina driver's license as her photo ID. When she contacted the New Hanover County Board of Elections, staff told her that her registration contained her Social Security Number, and no further action was required on her part. If her ballot is retroactively discarded under Judge Griffin's protest, Wynne feels that would be outrageous because she filled the form out correctly and voted correctly. She did everything right. She also would feel that our country is not what she thought it was and would question the point of voting if her vote could be taken away. Ex. 25.

Phoebe Zerwick, a 64-year-old white woman residing in Forsyth County, was born in New York City and has been registered to vote in Forsyth County since about 1988. She believes that voting is the bedrock of our democracy and a free society, and that it is her civic duty to vote regularly. Zerwick voted in the November 5, 2024 General Election by casting an overseas ballot while she was teaching abroad through Wake Forest University. She was not required to provide a photo ID with her overseas ballot, but has both a North Carolina driver's license and a passport which are permissible photo IDs in North Carolina. Zerwick is furious that her ballot has been challenged in Judge Griffin's protest, and will feel stripped of her citizenship if it is retroactively discarded. Ex. 26.

North Carolina State Conference of the NAACP (“North Carolina NAACP”) strives to achieve equity, political rights, and social inclusion by advancing policies and practices that expand human and civil rights, eliminate discrimination, and accelerate the well-being, education, and economic security of Black people and all persons of color. North Carolina NAACP has 70 adult branches and numerous student and youth branches, composed of over 10,000 members. Its members are predominantly Black or from other communities of color and include registered voters across the state. The organization has members that appear on the lists of voters protested by Petitioner as not having a driver’s license number or last four digits of their SSN in their registration record. Due in part to this fact, North Carolina NAACP was accepted as Amicus Curiae by the United States Court of Appeals for the Fourth Circuit in the related matter *Republican National Committee v. North Carolina State Board of Elections*, No. 24-2044 (4th Cir. Oct. 25, 2024). Furthermore, the relief sought in this suit—discounting the votes of over 60,000 North Carolinians—frustrates a core part of the organization’s mission, i.e., registering voters, educating them, and mobilizing them to polls. Casting aside these tens of thousands of votes would compromise all the hard work that North Carolina NAACP did throughout the 2024 General Election.

North Carolina Black Alliance (“NC Black Alliance”) is a nonpartisan 501(c)(3) organization that addresses policy and economic issues to enhance Black communities by developing and promoting systemic policy change. To further its mission, NC Black Alliance works to mobilize the electorate through registration and education, including by eliminating barriers to voting participation. NC Black Alliance has also created a platform (located at <https://safevoternc.org/>) to provide voters with credible, up-to-date information regarding voting options and clear guidelines on how they can vote and avoid obstacles while voting at the polls. In

direct response to the election protests, NC Black Alliance has created a resource at <https://ncblackalliance.org/countdontcancel/> to ensure the voice of the people is respected. In all of its efforts, NC Black Alliance works toward state-level systemic change through democratic engagement and collaboration with grassroots networks, and Petitioner's request to remove 60,000 voters' ballots from the count is detrimental to its efforts.

Common Cause Education Fund is a nonpartisan, 501(c)(3) organization which, along with its sister organization, Common Cause, has over 1.5 million members nationwide and staff in 25 states, including North Carolina. Common Cause Education Fund's mission centers on fair elections and encouraging a more representative, open, and responsive democracy. Common Cause Education Fund's North Carolina office created a website about the election protests (<https://www.commoncause.org/north-carolina/griffin/>), which includes information to help voters see if their name is on the election protests list. It also hosted a town hall event, launched a statewide public service campaign to raise awareness about the election protests, issued press releases, and posted information to its social media. Additionally, a number of Common Cause Education Fund's members and supporters are on the lists of voters challenged by Petitioner in these election protests. Common Cause Education Fund seeks to ensure those members' votes are counted and their voices are heard. In the course of the organization's work to reach voters challenged in the protest, Common Cause Education Fund's North Carolina office and its partner organizations, including other amici organizations, prepared and verified a list of more than 1,000 voters who are speaking out against being challenged wrongfully in this election by Judge Griffin. *See Ex. 27.*

Democracy North Carolina ("Democracy NC") is a nonpartisan 501(c)(3) organization dedicated to increasing voter access and participation and reducing the corrupting role of money

in politics through research, organizing, and advocacy. By engaging in substantial election protection efforts to ensure that voters can access the ballot, and spending substantial time and effort to produce nonpartisan voter guides to educate voters about candidates and issues, Democracy NC works for pro-democracy reforms that protect voting rights and improve government accountability and ethics. Democracy NC's volunteers, who are registered North Carolina voters from every region of the state, form grassroots coalitions throughout the state and spend thousands of hours advocating for more early voting sites and times to ensure that all voters have reasonable access to the franchise. Democracy NC has joined other nonprofit organizations in a public service campaign about the election protests to educate North Carolinians and affected voters and shared information to its social media. Petitioner's attempt to remove 60,000 voters' ballots from the election results is counter to Democracy NC's goals.

El Pueblo is 501(c)(3) organization with a mission to build collective power through leadership development, organizing, and direct action so that the Latin American community and other marginalized communities control their own stories and destinies. To accomplish its mission, El Pueblo operates robust civic engagement program, which includes aiding community members in obtaining United States citizenship, helping them obtain proper identification, registering eligible voters and newly naturalized citizens to vote, ensuring that all registered voters have the resources and language access they need to cast their ballots, and mobilizing voters to the polls. For example, El Pueblo has partnership with U.S. Citizen and Immigration Services and attends naturalization ceremonies at least twice month, where it passes out voter guides in both English and Spanish. Petitioner's attempt to discount tens of thousands of voters' ballots directly impacts El Pueblo's engagement efforts.

North Carolina Asian Americans Together (“NCAAT”) is nonpartisan, nonprofit organization committed to supporting equity and justice for all by fostering community among Asian Americans and allies in North Carolina through civic engagement, leadership development, grassroots mobilization, and political participation. A key tenet of NCAAT’s mission is to empower Asian Americans statewide in civic engagement and movement building by providing resources, training, and education toward a long-term social justice agenda. To accomplish this mission, NCAAT engages in variety of voter education programming, including producing print and digital materials about how to register and vote in North Carolina and how to access language assistance. Additionally, in major election years, NCAAT hosts a nonpartisan election protection hotline available in up to twenty-two Asian languages, which community members can call with questions about voting in North Carolina. A primary focus of NCAAT’s civic engagement work is geared toward newly naturalized citizens. Once community members obtain United States citizenship, NCAAT follows up with them to ensure they get registered to vote and have the resources they need to participate in upcoming elections. NCAAT’s work in aiding and advocating for voters will be undermined if Petitioner’s request to throw out 60,000 ballots is granted.

North Carolina Poor People’s Campaign (“NC Poor People’s Campaign”) is a state chapter of the national Poor People’s Campaign, led by the North Carolina non-profit organization, Repairers of the Breach, which organizes around public policies to eliminate poverty. It also educates and advocates for a living wage, affordable healthcare, and voting rights. As part of its voting rights advocacy, the NC Poor People’s Campaign organized a Moral March to the Polls campaign and engaged in the National Council of Churches’ Freedom Summer to educate and empower voters through voter registration, education, and mobilization in the 2024 General Election. It also organized several get-out-the-vote canvasses and rallies leading up to the

November 5, 2024 General Election. In response to the election protests, NC Poor People’s Campaign has supported petitions to Judge Griffin to respect the will of voters. Petitioner’s request to discard 60,000 ballots would compromise the work of the Poor People’s Campaign in 2024, and would greatly impact their voting rights advocacy work, creating distrust among members that their valid votes will be respected and counted in future elections.

ARGUMENT

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

When the North Carolina Supreme Court dismissed Judge Griffin’s request for a writ of prohibition and instead remanded these protests to this Court, it instructed that the protests should proceed in the normal course, by appeal from the State Board of Elections to the Superior Court of Wake County. *Griffin v. State Board of Elections*, No. 320P24, at 2-3 (N.C. Jan. 22, 2025) (citing N.C.G.S. § 163-182.14(b)) (hereinafter “Supreme Court Order”); *see also id.* at 10 (Newby, C.J., concurring) (Judge Griffin’s protests “need[] to follow the statutorily provided procedures.”); *id.* at 11 (Earls, J., dissenting) (agreeing that the protests must proceed in Wake County Superior Court). “The process was designed by the people’s representatives in the General Assembly as the lawful way to inquire into elections and is transparently set out in the General Statutes.” *Id.* at 6 (Newby, C.J., concurring) (citing the election protest statutory scheme at N.C.G.S. §§ 163-182.9 to -182.15).

Importantly, the North Carolina Supreme Court’s instruction that these protests be considered in the ordinary course, as required by state law, confers an obligation to proceed under the proper statutory scheme. This requires more than simply returning to this Court. It also requires adherence to the specific burdens of proof required under the North Carolina election protest scheme, as well as substantive standards for considering and challenging voter eligibility mandated

under our state’s election law by the North Carolina General Assembly. If those standards are not satisfied, an election protest cannot succeed.

An election protest may be granted only when there is “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). A successful election protest must demonstrate, by “substantial evidence[,]” that such an irregularity actually casts doubt on the results of the election. *Id.* Election protests may challenge voter eligibility if “claims regarding the eligibility of certain voters” constitute “evidence that an outcome-determinative violation of election law, irregularity, or misconduct has occurred.” *In re Consideration of Certain Legal Questions Affecting the Authentication of the 2016 General Election*, at 1-2 (N.C. State Bd. of Elections Nov. 28, 2016); *see also Bouvier v. Porter*, 386 N.C. 1, 4, 900 S.E.2d 838, 843 (2024). The “substantial evidence” standard requires evidence “strong enough to *establish* to a reasonable person that the claimed irregularities occurred and that those irregularities swayed the election.” North Carolina State Board of Elections, *Election Protest Procedures Guide*, at 8 (last updated June 27, 2022);⁴ *see also Lackey v. N.C. Dep’t of Hum. Res.*, 306 N.C. 231, 238, 293 S.E.2d 171, 176 (1982); *Humble Oil & Ref. Co. v. Bd. of Aldermen*, 284 N.C. 458, 470–71, 202 S.E.2d 129, 137 (1974).

But the mere fact of raising these voter challenges in the election protest context does not vitiate the statutory standards for voter challenges. Indeed, in order for a protester to show a “violation of the election law or other irregularity or misconduct,” as required by N.C.G.S. § 163-182.10(d)(2), they must articulate a theory that is consistent with the whole of the election code. And when a voter (or over 60,000 voters) has their eligibility to cast a ballot challenged, state law

⁴ <https://s3.amazonaws.com/dl.ncsbe.gov/Requests/2020/Election%20Protest%20Procedures%20Guide.pdf>.

governs how such a challenge must proceed and to what standard of proof it must be held. Those statutory standards apply with just as much force here.

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). The statutory scheme also circumscribes when protesters may contest the eligibility of a voter. “Challenges 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). In order to prevent indiscriminate challenges, the proffered evidence must be specific to the individual voter being challenged. *See* North Carolina State Board of Elections, *Voter Challenge Procedures Guide*, at 6 (last updated Dec. 18, 2023).⁵ “[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 State Bd. of Elections & Ethics Enf’t*, No. 1:16-CV-01274, 2018 WL 3748172, at *7 (M.D.N.C. Aug. 8, 2018).

Faithful adherence to the statutory scheme, both for considering election protests and for substantively determining whether any irregularity of election law occurred, requires careful testing of the allegations, legal theories, and proof—or lack thereof—offered in support of the election protests. For the purposes of Judge Griffin’s protests, this means holding his voter eligibility challenges to the statutorily mandated burden of proof, and requiring that, even if he articulates plausible legal theories of voter ineligibility (a legal conclusion that Amici do not

⁵ <https://s3.amazonaws.com/dl.ncsbe.gov/Legal/Voter%20Challenge%20Guide.pdf>.

concede), he must not only allege, but then prove via affirmative, individualized evidence that these voters are actually ineligible. Only by holding Judge Griffin's protests to these statutory standards can the election protest procedure "designed by the people's representatives in the General Assembly as the lawful way to inquire into elections" be properly administered. Supreme Court Order at 6 (Newby, C.J., concurring).

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.

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

The procedural complications in this and related matters to date have obscured a fundamental, and fatal, oversight in Griffin's protests: he has not alleged or offered *any* evidence—let alone substantial evidence—that *any* Incomplete or Overseas ID challenged voter is actually ineligible to vote, as he is required to do in order to prevail under state law.

Judge Griffin does not provide (or even allege the existence of) any evidence, let alone substantial evidence, in support of his sweeping claims. Protesters do not allege that even a *single* voter whose registration allegedly lacks a driver's license or Social Security number is *actually* ineligible to vote under state law. Nor does Judge Griffin offer any investigation into the specific circumstances of any voter he identifies as potentially ineligible. As a result of these omissions, he fails to offer any evidence whatsoever that any of the voters challenged is in fact ineligible. What's more, he does not dispute that each challenged voter was successfully able to cast a ballot in the General Election pursuant to a registration appearing on the state's official list of valid registrants at the time of the election. "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). This lack of individualized allegations or evidence alone is sufficient to immediately dismiss Judge Griffin's protest.

Instead, the lists of voters whose registrations are purportedly incomplete as submitted by Judge Griffin with his protests rely upon precisely the kind of systematized data query that the Board has specifically said does not meet a challenger's (or protester's) burden to challenge voter ineligibility. *See* Voter Challenge Procedures Guide at 6. This kind of baseless mass challenge is exactly the circumstance that the North Carolina election code is designed to prevent.

Furthermore, this failure to proffer any allegations, let alone affirmative proof, of actual ineligibility is expressly barred by the burden of proof codified in state statute. Challenges "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). This affirmative requirement serves a state interest of fundamental importance: ensuring that when North Carolina voters participate in the democratic process and exercise their fundamental right to vote, those voters are not wantonly disenfranchised without definitive proof they were ineligible to vote.

Judge Griffin also fails to account for the readily available alternative explanations that do not bear on voter eligibility for both the voters who appear in his "Incomplete Registration" protests and in his "Overseas ID" protests. Instead of arguing that these voters are substantively ineligible to vote in North Carolina, as required by N.C.G.S. § 163-90.1, Griffin instead focuses on purported technical defects that do not bear on those voters' actual eligibility. These efforts should fail because there are numerous possible explanations for these supposed omissions that do not show any voter's actual ineligibility, even under Judge Griffin's flawed theories of state law.

Starting with the Incomplete protests, there are a multitude of reasons why an eligible voter's file might be missing a driver's license or Social Security number. For example, voters may have provided a driver's license or Social Security number at the time of registration, and it was either not entered into or was somehow removed from their voter registration file. *See, e.g.,*

Exs. 2, 6–15, 17, 19–22, 25 (Impacted Voters who remember providing identifying information, including some who confirmed this with their county board of elections). This includes voters who might have provided a driver’s license or Social Security number at the time of registration, but had their information mismatch to the DMV database or Social Security Administration databases for reasons unrelated to eligibility (such as inadvertent typos in information, misspelling or reasonable variation in names) and thus omitted in the voter file, a possibility the State Board has expressly recognized. *See* NCSBE Decision and Order at 16 (Dec. 13, 2024) (“[W]hen a registrant provides one of these numbers but the number does not validate through a database match among different government databases, their voter registration database record will lack such a number.”) These and other voters may also have provided a driver’s license or Social Security number at a later date, 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.*, Ex. 1-3, 6, 8, 10-22, 24, 25 (Impacted Voters who provided their driver’s license when they voted). Moreover, other voters also might not possess a driver’s license or Social Security number but still be a North Carolina citizen who is eligible to register and vote, a scenario that is contemplated by both state and federal law. In other words, even if Judge Griffin’s erroneous view of state and federal law as to alleged “Incomplete” voters were true (it is not), his failure to include specific allegations as to specific voters’ eligibility is fatal to his protests.

At base, 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 show that the voters they claim are ineligible are, in fact, ineligible to vote. Yet Judge Griffin has done nothing to rebut or disprove the presumption of eligibility, much less account for

the many plausible alternative explanations for the inclusion of any of the voters he challenges on the “incomplete registration” list, let alone establish actual ineligibility for any of these voters.

In short, Judge Griffin’s protests elide any examination of what actually happened in the case of these voters, preferring instead to seize on technicalities and hypotheticals to merely insinuate ineligibility in conclusory terms. When combined with the presumption of eligibility and the failure of Griffin to even contemplate, much less rebut, these explanations, his protests fail as a matter of state law.

Griffin’s Overseas ID protests omit an even more obvious explanation for the purported violation of election law: Each and every voter included on this list did not include a copy of their identification documents with their absentee ballot because the State Board expressly told them, with approval by the Rules Regulatory Commission, there was no need to do so under state law.⁶ Mystifyingly, Griffin contends that these voters should be disqualified for *following* the State Board’s instructions. To add insult to injury, he lodges this claim without making any attempt to show that these voters were not eligible to cast their ballots and could not otherwise satisfy the ID requirement if asked. He never alleges even one vote cast by this group of challenged voters was fraudulent. Even a cursory individuated examination of these voters, as well as basic common sense, demonstrates that if it had 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 provided for by state law. *See* Exs. 23, 26. Judge Griffin does not even dispute this explanation, let alone rebut it. And as with the Incomplete Registration protests, Judge Griffin offers no evidence whatsoever that these voters are actually ineligible to cast a ballot in the first place. For

⁶ <https://www.oah.nc.gov/minutes-march-meeting-2024-signedpdf/open> (8 N.C. Admin. Code § 17.0109 approved unanimously).

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 that Judge Griffin had shown a practice administered by the State Board of Elections during the 2024 General Election that was an irregularity or violation of law, which he has not, he 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. For example, he cannot show that had the “correct” voter registration form been utilized for voters, that they did not already, or that they could not have completed and satisfied the requirements of state law if given the opportunity. (As the appended affidavits show, many in fact did.) Likewise, he has not alleged that if any of the challenged overseas voters who followed all requirements set forth for the 2024 election had, in fact, been required to satisfy the photo voter ID requirement or been provided the option of a reasonable impediment exception form that they could not have complied. As for purported “non-resident” voters, who voted based on a state law explicitly granting them that right, N.C.G.S. § 163-258.2(1)(e), those voters number fewer than 300, far below the margin of victory here, and thus would not be outcome determinative alone.⁷

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 interpretation should

⁷ And even then, if Judge Griffin’s “preferred” version of the law had been adopted by the General Assembly since UMOVA’s passage, who is to say whether any voter might not have established some residency in the state to successfully cast a ballot.

have been in place during that time. If the Court find this untimely theory plausible, both state law and fundamental fairness demand that Judge Griffin must then show voters could not have satisfied those alternative requirements.

This he cannot do. Judge Griffin's legal arguments and factual allegations, then, even if assumed true, could not support the conclusion that an outcome-determinative number of voters could not have still cast a ballot if his preferred set of rules had been in place. This provides an alternative ground for the Court to affirm the dismissal of his protests here.

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 determinative 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 the weight of an evidentiary record. While Amici do not believe this omission controls the outcome here, both due to the lack of merit in Griffin's theories and the constitutional and equitable concerns with applying them retroactively, even if one assumes *arguendo* they are correct, it is indisputable that the complete lack of such a record would bar relief on even a meritorious theory with no constitutional concerns. The statutory election protest scheme requires an evidentiary record before consideration of granting any substantive relief.

On this point, North Carolina's election protest statutes are again clear. Pursuant to N.C.G.S. § 163-182.12, the State Board of Elections took jurisdiction over the protests at issue here. *See* NCSBE Decision and Order on Protests at 4. When the State Board of Elections takes jurisdiction of a protest, it follows the normal protest procedures laid out in N.C.G.S. § 163-182.10. More importantly, the burden of proof to establish "substantial evidence of any violation, irregularity, or misconduct sufficient to cast doubt on the results of the election" remains in place,

as it must for all election protests. *See* N.C.G.S. § 163-182.10(d)(2). Without such evidence, it is impossible for a protest to succeed. *Id.*

Griffin has no such evidence. Not only do his protests not contain any evidence, let alone substantial evidence, he has neglected to account for or rebut the plausible alternative explanations for the purported technical defects he identifies. And even more fundamentally, he has failed to show that any of the voters he challenges are actually ineligible to vote in North Carolina. These are all allegations that, even if they were sufficient to articulate a valid protest theory, must be tested through evidence, especially where the voters have followed the law and alternative and innocent explanations exist. The lack of evidentiary record in this case necessarily prevents Judge Griffin's protests from establishing anything by substantial evidence, let alone a violation of state election law. There is no evidentiary basis to prove anything with here.

James v. Bartlett, 359 N.C. 260 (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 an outcome-determinative violation of state election law. 359 N.C. at 270. 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 state law. *Id.* There is no such evidentiary record here, and there is significant dispute about whether the technical deficiencies identified by Judge Griffin actually occurred or are the result of administrative errors. If Judge Griffin's 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).⁸ That is the opposite of the case here, where the State Board first, announced prominent rules governing each of Griffin’s protests well in advance of the 2024 election and then, operated in compliance with the election rules existing at the time of the election, and where each category of impacted voters cast their ballots in accordance with the State’s announced rules and procedures. *James* does not require, or even counsel, granting Griffin’s protests.

Judge Griffin’s contention that “this is not an instance in which an election official affirmatively instructed a voter” to take a specific course of action is wholly inaccurate. Griffin Brief, Case No. 619-910, at 41.⁹ 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, <https://www.ncsbe.gov/voting/military-and-overseas-voting> (last visited Feb. 3, 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).¹⁰ These are prominent, unambiguous announcements of State

⁸ Judge Griffin’s insistence that the 2004 general election was not the first time out-of-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.

⁹ Pagination is noted in PDF pages as opposed to page numbering.

¹⁰ <https://s3.amazonaws.com/dl.ncsbe.gov/HAVA%20Administrative%20Complaints/2023-10-06%20Snow/NCSBE%20HAVA%20Complaint%20Decision%20-%20Snow.pdf>.

Board policy and election law. Voters were entitled to rely on these affirmative instructions about how to vote.¹¹

If the Court decided to consider Judge Griffin's flawed protests on the factual merits, it would need an evidentiary record where the factual basis for the protests could be tested. Under the election protest statutes, it is the protester's burden to establish the purported violations both occurred and were outcome determinative (and in so doing, establish actual ineligibility on behalf of an outcome-determinative number of voters), and to do so by adducing substantial evidence.

Under state law, Judge Griffin's requested remedies, wherein he asks this Court to first, reverse the State Board and then, direct them to exclude all challenged ballots from the final count, is entirely unavailable without an evidentiary record to overcome his burden, a record which he has taken no steps to provide this Court.

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

While Griffin has failed to even allege, let alone prove, actual ineligibility on the part of any challenged voter, his protests are virtually certain to fail for an even more basic reason. 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 and voted in compliance with state law.

¹¹ For over a century, the North Carolina Supreme Court has recognized that otherwise eligible and registered voters should not have their vote 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 Com.*, 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).

Since Griffin’s protests were filed, there has been significant public reporting on the voters who are on Griffin’s challenge lists. The overwhelming weight of this reporting demonstrates that these voters are eligible North Carolina voters who cast ballots pursuant to the rules laid out by the State Board. Many such voters have confirmed that they provided their Social Security numbers when registering to vote, despite Judge Griffin’s claims that their registration record includes no such number.¹² Also among those faced with the possibility of having their ballots discarded are citizens that already face barriers to exercising their right to vote. Elizabeth MacDonald lives in an area of western North Carolina that was ravaged by Hurricane Helene and she made a special effort to vote in November, in spite of the devastation in her community and while caring for her infant. 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).¹³ Connor Addison, who already takes special care to vote due to his epilepsy, used a state-approved ID card to vote in 2022 and 2024 but now faces disenfranchisement. *Id.* This should give the Court extreme pause before granting any of Griffin’s requested relief.

Simply put, these voters, including the individual voters directly impacted by the challenged represented in this brief, and thousands of others similarly situated, are eligible to vote in North Carolina. There has been no impropriety - they registered and voted pursuant to the rules and regulations applicable to them at the time they voted. These voters followed the law. To

¹² Abraham Rubert-Schewel, from Durham County, retrieved a copy of his voter registration form from 2020 and confirmed that it included the last four digits of his Social Security Number, and said that the protest “really weakens [his] sense of our democracy in North Carolina.” 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/>. Likewise, Spring Dawson-McClure of Orange County verified that her 2012 voter registration contained her Social Security Number and was told by her County Board of Election that she likely was flagged for the challenge list because her Social Security Number matches her maiden name, and not her married name. Joe Bruno, *Voter whose ballot is being challenged provided SSN during registration*, YAHOO NEWS (Jan. 8, 2025), <https://www.yahoo.com/news/voter-whose-ballot-being-challenged-215500041.html?guccounter=1>.

¹³ <https://www.propublica.org/article/north-carolina-voters-jefferson-griffin-supreme-court-challenge>.

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. To do so without ever alleging even one of these voters is actually ineligible, or offering any proof in support of such an allegation, renders that attempt woefully insufficient under state law.

CONCLUSION

For the reasons stated above, Amici respectfully requests that the Court 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.

Respectfully submitted, this the 3rd day of February, 2025.

By: /s/ Caitlin A. Swain

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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:

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This the 3rd day of February, 2025.

/s/ Jeffrey Loperfido

STATE OF NORTH CAROLINA

COUNTY OF WAKE

JEFFERSON GRIFFIN,

Petitioner,

vs.

NORTH CAROLINA STATE BOARD OF
ELECTIONS,

Respondent.

IN THE GENERAL COURT OF JUSTICE

SUPERIOR COURT DIVISION

24CV040619-910; 24CV040620-910;

24CV040622-910

**INDEX OF EXHIBITS
TO AMICUS CURIAE BRIEF BY IMPACTED VOTERS AND NON-PARTISAN
ORGANIZATIONS**

EXHIBIT 1	Affidavit of Ralim Allston
EXHIBIT 2	Affidavit of Cindy Oates Anthony
EXHIBIT 3	Affidavit of Rachel Suzanne Arnold
EXHIBIT 4	Affidavit of Amy Grace Bryant
EXHIBIT 5	Affidavit of Denise Bradley Carman
EXHIBIT 6	Affidavit of Louanne Flanagan Caspar
EXHIBIT 7	Affidavit of Alexia Chavis
EXHIBIT 8	Affidavit of J. Benito del Pliego
EXHIBIT 9	Affidavit of Sofia Dib-Gomez
EXHIBIT 10	Affidavit of Mary Kay Heling
EXHIBIT 11	Affidavit of Wesley Hogan-Philipsen
EXHIBIT 12	Affidavit of Elizabeth Hunter Kesling
EXHIBIT 13	Affidavit of Kevin Hunter Kesling
EXHIBIT 14	Affidavit of Lesley-Anne Leonard

EXHIBIT 15	Affidavit of Gaynelle Little
EXHIBIT 16	Affidavit of Jenna Marie Marrocco
EXHIBIT 17	Affidavit of Audrey Meigs
EXHIBIT 18	Affidavit of Bruklyn Miller
EXHIBIT 19	Affidavit of Dirk Philipsen
EXHIBIT 20	Affidavit of Larry Repanes
EXHIBIT 21	Affidavit of Anna Louise Richards
EXHIBIT 22	Affidavit of Lila Richardson
EXHIBIT 23	Affidavit of Sophia “Felix” Angelita Soto
EXHIBIT 24	Affidavit of Alexa Adamo Valverde
EXHIBIT 25	Affidavit of Diane Wynne
EXHIBIT 26	Affidavit of Pheobe Zerwick
EXHIBIT 27	Common Cause Impacted Voters List

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

RALIM ALLSTON

I, Ralim Allston, 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 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,

v.

NORTH CAROLINA STATE BOARD OF
ELECTIONS,

,

Defendants.

AFFIDAVIT OF

CINDY OATES ANTHONY

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.

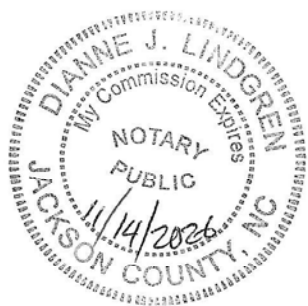
10. I was never offered an opportunity to fix any supposed problems with my registration before Election Day. If I had been notified of any such issue, I would have done whatever I could to make sure my ballot would count.

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 January 31, 2025.

Cindy Oates Anthony
Cindy Oates Anthony

Sworn to (or affirmed) and subscribed before me this the 31 day of JANUARY, 2025.



Dianne J Lindgren
Official Signature of Notary

DIANNE J LINDGREN, Notary Public

My Commission Expires: 11/14/2026

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****Rachel Suzanne Arnold**

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.


Rachel Suzanne Arnold

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

Amy Grace Bryant

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.



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.

AFFIDAVIT OF

DENISE BRADLEY CARMAN

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 February 1, 2025.

Denise Bradley Carman
Denise Bradley Carman

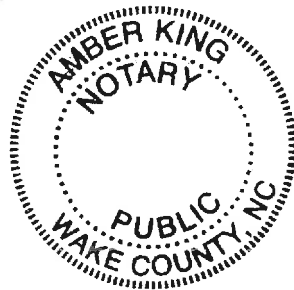
State of North Carolina
County of Wake

I, Amber King, a Notary Public for said County and State, do hereby certify that Denise Bradley Carman personally appeared before me this day and acknowledged the due execution of the foregoing instrument.

Witness my hand and official seal, this the 1 day of February, 2025
month year

Amber King
signature of notary public

My commission expires 08/03, 2028
month year



STATE OF NORTH CAROLINA
WAKE COUNTY

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

<p>JEFFERSON GRIFFIN, <i>Plaintiff,</i> v. NORTH CAROLINA STATE BOARD OF ELECTIONS, <i>Defendants.</i></p>	<p>AFFIDAVIT OF LOUANNE FLANAGAN CASPAR</p>
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I, Louanne Flanagan Caspar, 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 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.
5. 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.
6. 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.

Louanne Flanagan Caspar
Affiant

Wake County, North Carolina

I certify that the following person appeared personally 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
Jacqueline S. Jones,
Notary Public
My commission expires
April 23, 2025

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

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.

NORTH CAROLINA STATE BOARD OF
ELECTIONS,

,

Defendants.

AFFIDAVIT OF

ALEXIA CHAVIS

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 postcard 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.

A handwritten signature in black ink, appearing to read "Alexia Chavis". The signature is written in a cursive style with a large initial "A" and a stylized "C".

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:

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 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.

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 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.

7. I 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.

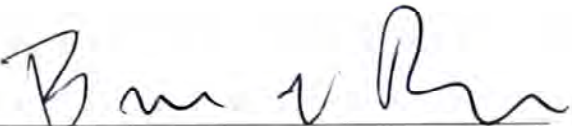
9. I have since learned that my vote has been included on Judge Griffin's challenge list because my voter registration record is allegedly missing either a Social Security Number or a driver's license number according to Judge Griffin. I have since contacted the Orange County Board of Elections to request 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.

Executed on January 31, 2025.



J. Benito Del Pliego

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

Orange County, North Carolina

Signed and sworn to before me this day by Jose Benito Delpliego
Name of principal

Date: 01/31/2025



[Signature]
Official Signature of Notary
Flor Diaz, Notary Public
Notary's printed or typed name

My commission expires: 03/22/2027

OPTIONAL

This certificate is attached to a _____, signed by _____
Title/Type of Document *Name of Principal Signer(s)*

on _____, and includes _____ pages.
Date *# of 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:

1. 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.

3. 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-partisan student group at Duke which works to educate, register, and mobilize the Duke community to vote.

6. Voting is incredibly important to me. Through my work as a first-year fellow at Duke 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 Dib-Gomez
2/3/2025

DURHAM, NC USA
FEBRUARY 03rd, 2025
Notary: SAM SAWAYA

Commission Expires on:
07/29/2029



STATE OF NORTH CAROLINA

WAKE COUNTY

JEFFERSON GRIFFIN,

Plaintiff,

v.

NORTH CAROLINA STATE BOARD OF
ELECTIONS,

Defendants.

I, Mary Kay Heling, hereby declare as follows:

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

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.

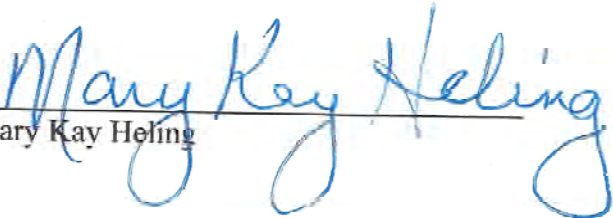
12. I was never offered an opportunity to fix any supposed problems with my registration/absentee ballot, either before or after Election Day. If I had been notified of any such

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

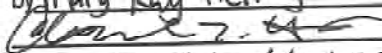
2

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 Wake
The foregoing instrument was acknowledged before me
this 1st day of February 2025
by Mary Kay Heling
 Notary Public
My Commission Expires 6/13/28

ALEXANDER THOMAS HENSON
NOTARY PUBLIC
WAKE COUNTY, N.C.
My Commission Expires 6/13/28

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.

2. 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.

13. If my ballot is retroactively discarded under Judge Griffin's protest, I will feel 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 gamesmanship 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-Phillipsen

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

Durham County, North Carolina

Signed and sworn to before me this day by Wesley Hogan-Philipson
Name of principal

Date: Feb 2, 2025



Katie Crisp
Official Signature of Notary

Katie Crisp, Notary Public
Notary's printed or typed name

My commission expires: October 3, 2028

OPTIONAL

This certificate is attached to a an affidavit, signed by Wesley Hogan-Philipson
Title/Type of Document *Name of Principal Signer(s)*

on February 2, 2025, and includes 3 pages.
Date *# of pages*

STATE OF NORTH CAROLINA
WAKE COUNTY

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

<p>JEFFERSON GRIFFIN, <i>Plaintiff,</i> v. NORTH CAROLINA STATE BOARD OF ELECTIONS, <i>Defendants.</i></p>	<p>AFFIDAVIT OF ELIZABETH HUNTER KESLING</p>
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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.
2. 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.

10. Shortly after the election, I learned that my name was on a list of voters challenged 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**

<p>JEFFERSON GRIFFIN, <i>Plaintiff,</i> v. NORTH CAROLINA STATE BOARD OF ELECTIONS, <i>Defendants.</i></p>	<p>AFFIDAVIT OF KEVIN HUNTER KESLING</p>
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I, Kevin 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.

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

STATE OF North Carolina

COUNTY OF Orange

I certify that Kevin Hunter Kestling personally appeared before me this day, acknowledging to me that he or she signed the foregoing document: Affidavit of Kevin Hunter Kestling.
Name or description of attached document

I further certify that (select one of the following identification options):

- I have personal knowledge of the identity of the principal(s)
- I have seen satisfactory evidence of the principal's identity, by a current state or federal identification with the principal's photograph in the form of a NCIDL 20451458
type of identification
- A credible witness, _____, has sworn or affirmed to me the
name of credible witness
identity of the principal, and that he or she is not a named party to the foregoing document, and has no interest in the transaction.

Date: 2/3/25

(Official Seal)



Gailey Blalock Newberry
Notary Public

Gailey Blalock Newberry
Typed or Printed Notary Name

My commission expires: 2/2029

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

LESLEY-ANNE LEONARD

I, Lesley-Anne Leonard, 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 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.

7. 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.

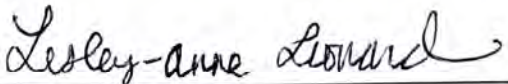
10. I am aware that my vote has been included on Judge Griffin's challenge list because my voter registration record is allegedly missing either a Social Security Number or a driver's license number according. I was confused by this because I have both of these numbers and had them when I registered 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.

13. If my ballot is retroactively discarded under Judge Griffin's protest, I will feel 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

Signed and sworn to before me this day by Lesley Anne Leonard
Name of principal

Date: 1/31/2025



Marguerite McLain
Official Signature of Notary

Marguerite McLain, Notary Public
Notary's printed or typed name

My commission expires: 9/17/2029

OPTIONAL

This certificate is attached to a Affidavit, signed by Lesley-Anne Leonard
Title/Type of Document *Name of Principal Signer(s)*
on 1/31/2025, and includes 3 pages.
Date *# 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
GAYNELLE LITTLE**

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.

10. 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

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

Jenna Marie Marrocco

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

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

AUDREY MEIGS

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.

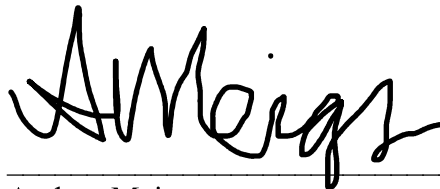
10. When I learned I was on Judge Griffin's list of voters whose registrations lacked these identification numbers in my voter file, I contacted the Durham County Board of

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 2, 2025.

A handwritten signature in black ink, appearing to read 'A Meigs', written over a horizontal line.

Audrey Meigs

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****BRUKLYN MILLER**

I, Brooklyn 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 Carolina. 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.



Brooklyn Miller

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

DIRK PHILIPSEN

I, DIRK 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.

2. 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

Durham County, North Carolina

Signed and sworn to before me this day by Dirk Philipson
Name of principal

Date: 2/2/2025



Katie Crisp
Official Signature of Notary

Katie Crisp, Notary Public
Notary's printed or typed name

My commission expires: October 3, 2028

OPTIONAL

This certificate is attached to a affidavit, signed by Dirk Philipson
Title/Type of Document *Name of Principal Signer(s)*
on Feb 2, 2025, and includes 3 pages.
Date *# of pages*

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.

A handwritten signature in black ink, appearing to read 'Larry Repanes', written over a horizontal line.

Larry Repanes

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

Mecklenburg County, North Carolina

Signed and sworn to before me this day by Larry Repanes.
Name of principal

Date: 2/1/25

(Official Seal)

Maryjane C. Conti
Official Signature of Notary

**MARYJANE C. CONTI
NOTARY PUBLIC
MECKLENBURG COUNTY
NORTH CAROLINA**

Maryjane C. Conti, Notary Public
Notary's printed or typed name

My commission expires: 8/21/2027



MY COMMISSION EXPIRES 8/21/2027

OPTIONAL

This certificate is attached to a AFFIDAVIT OF LARRY REPANES, signed by LARRY REPANES
Title/Type of Document *Name of Principal Signer(s)*

on 2/1/25, and includes 4 pages. INCLUDING THIS.
Date *# 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

ANNA LOUISE RICHARDS

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."

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 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

State of NC County of Orange
The foregoing instrument was acknowledged before me
this 31 day of February, 2025
by Anna Louise Richards
[Signature] Notary Public
My Commission Expires 12-17-2028



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

LILA RICHARDSON

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.

A handwritten signature in cursive script that reads "Lila Richardson". The signature is written in dark ink and is positioned above a horizontal line.

Lila Richardson

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

SOPHIA “FELIX” ANGELITA SOTO

I, Sophia “Felix” Angelita Soto, 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 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.

3. I am half Puerto Rican and half white, 18 years old, 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 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.

11. 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.

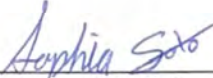
12. My father contacted the Guilford County Board of Elections on my behalf when we learned about the challenge and left a message but never heard back.

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

Guilford County, North Carolina

Signed and sworn to before me this day by Sophia Foto
Name of principal

Date: 2.3.2025



Grace A. Follas
Official Signature of Notary

Grace A. Follas, Notary Public
Notary's printed or typed name

My commission expires: 1.16.2025

OPTIONAL

This certificate is attached to a _____, signed by _____
Title/Type of Document *Name of Principal Signer(s)*

on _____, and includes _____ pages.
Date *# of pages*

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

ALEXA ADAMO VALVERDE

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.

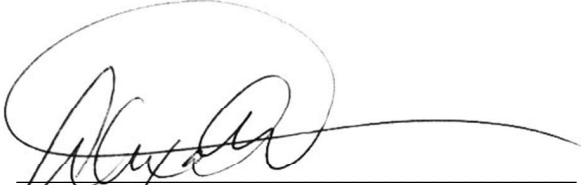
11. When I learned I was on Judge Griffin's challenge list, I contacted the Chatham County Board of Elections to see if there was anything I needed to do to make sure my ballot counted. Staff told me in order to fix the supposed issue with my registration, I should re-register to vote and bring documentation 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.



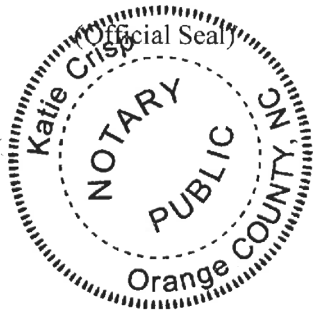
Alexa Adamo Valverde

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

Durham County, North Carolina

Signed and sworn to before me this day by Alexa Adamo Valverde
Name of principal

Date: February 2, 2025



Katie Crisp
Official Signature of Notary

Katie Crisp, Notary Public
Notary's printed or typed name

My commission expires: October 3, 2028

OPTIONAL

This certificate is attached to a an affidavit, signed by Alexa Adamo Valverde
Title/Type of Document *Name of Principal Signer(s)*
on 2/2/2025, and includes 3 pages.
Date *# of pages*

Completed on 2/2/2025 according to the emergency requirements contained in G.S. 10B-25.

Notary was in Durham county during the emergency notarization.

Principal was in Chatham county during the emergency notarization.

STATE OF NORTH CAROLINA
WAKE COUNTY

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

<p>JEFFERSON GRIFFIN, <i>Plaintiff,</i> v. NORTH CAROLINA STATE BOARD OF ELECTIONS, , <i>Defendants.</i></p>	<p>AFFIDAVIT OF DIANE WYNNE</p>
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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 way 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.

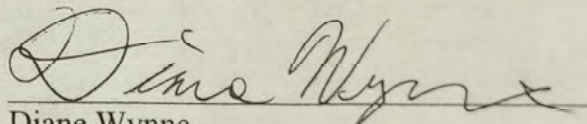
12. When I learned I was on Judge Griffin's list of voters whose registrations lacked these identification numbers in my voter file, I contacted the New Hanover Board of Elections to request a copy of my submitted voter registration form. When that copy was provided to me, it showed that my voter registration 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.

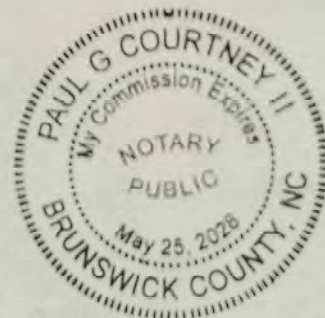
14. I was never offered an opportunity to fix any supposed problems with my registration/absentee ballot, either before or after Election Day. If I had been notified of any such issue, I would have done whatever I could to make sure my ballot would count.

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

STATE OF NC COUNTY OF New Hanover
THE FOREGOING INSTRUMENT WAS ACKNOWLEDGED
ON THIS 31st DAY OF January, 2025
BY: Diane Wynne
NOTARY SIGNATURE Paul G Courtney II



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

PHOEBE ZERWICK

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.

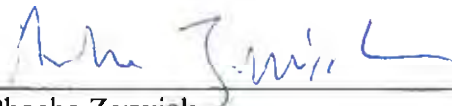
10. I am aware that my vote has been included on Judge Griffin's challenge list because I did not provide a copy of my photo ID with my absentee ballot. I did not do this because it was not required under the instructions I was provided to submit my overseas ballot. However, I have a North Carolina driver's 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 perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on Feb 3, 2025.



Phoebe Zerwick

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

Forsyth County, North Carolina

Signed and sworn to before me this day by Phoebe Zerwick
Name of principal

Date: 02.03.25

(Official Seal)



Hannah B. Gooding
Official Signature of Notary

Hannah B. Gooding Notary Public
Notary's printed or typed name

My commission expires: 05.26.27

OPTIONAL

This certificate is attached to a _____, signed by _____
Title/Type of Document *Name of Principal Signer(s)*

on _____, and includes _____ pages.
Date *# of pages*

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.	Amy Gramza Easter, Forsyth Co.	Barbara Jill Nardini, Wake Co.
Abigail Elaine Gross, Buncombe Co.	Amy Jo Leader, Buncombe Co.	Barclay Walter Newlin, Polk Co.
Abigail Grace Dowell, Catawba Co.	Amy Michelle Clemmons, Wake Co.	Benjamin Emad Al-Abdalli, Wake Co.
Abigail Marie Saaranen, Wake Co.	Ana Maria Xet-Mull, Orange Co.	Bertha Leverette, Granville Co.
Abigail Wheeler-Naranjo, Durham Co.	Andrea Beth Weissman, Mecklenburg Co.	Bessie Clayton, Forsyth Co.
Abigail Wieting Jamieson-Drake, Durham Co.	Andrea J Addison-Sorey, Robeson Co.	Beth Merlin Ahmadieh, Wake Co.
Abraham Joshua Saldana, Moore Co.	Andrea Noel Smith, Orange Co.	Betty A Clark, Mecklenburg Co.
Ada Leticia Ortiz-Ramirez, New Hanover Co.	Andrew James Culwell, New Hanover Co.	Beverly B Glover-Wood, Carteret Co.
Adai Rivers, Durham Co.	Andrew Lee Armstrong, Cabarrus Co.	Billy K Richburg, Carteret Co.
Adam Patrick Linens, Mecklenburg Co.	Andrew Ostrowski, Carteret Co.	Bing Crosby Cox, Durham Co.
Addison Layman Bortz, Mecklenburg Co.	Andrew Schuyler Tompkins, Forsyth Co.	Brayden Meckler, Onslow Co.
Addyson Shaver, Stokes Co.	Andria Robinson, Mecklenburg Co.	Breana Ashley Lavallee, Wake Co.
Ade Balogun, Wake Co.	Angela Rogers, Burke Co.	Brenda Marie Smith, Randolph Co.
Adele Jeannette Trueblood, Orange Co.	Ann Bartley Bradley, Lincoln Co.	Brendon R Buckanavage, Mecklenburg Co.
Adriana Michelle Barrera Ramirez, Forsyth Co.	Anna Aimei Pechmann, Orange Co.	Bret Robert Frk, Buncombe Co.
Adrianna Marie Lewis, Craven Co.	Anna Blair, Durham Co.	Brett Osborn Smith, Alamance Co.
Agustin Emanuel Britt, Jackson Co.	Anna Emily Spinelli, Watauga Co.	Brian Jason Ogle, Polk Co.
Alberta Argueta, Catawba Co.	Anna Hadley, Wake Co.	Brian Lee Matlock, Buncombe Co.
Albertha Foy Garnes, Wake Co.	Anna Louise Richards, Orange Co.	Brian Matthew Attis, Orange Co.
Aldana Allen, Mecklenburg Co.	Anna Magdalena Van Dyk, Wake Co.	Brian Matthew Wert, Wake Co.
Alejandra Reta Mashburn, Chatham Co.	Anna Ruth Souhan, Guilford Co.	Brian Wiltshire Sharp, New Hanover Co.
Alessandro Racioppi, Orange Co.	Annalysa Mary Kaienne Fakir, Durham Co.	Briana Charia Edwards, Orange Co.
Alexa Adamo Valverde, Chatham Co.	Anne Bowers, Mecklenburg Co.	Brielle Clare Herlein, Pitt Co.
Alexander Henry French, Chatham Co.	Anne Elisabeth Raven Jorgensen, Moore Co.	Brittany Alexandra Boyd, Haywood Co.
Alexander Reid Nordquist, Wake Co.	Anne M Mejia-Downs, Forsyth Co.	Brittany Leisey, Buncombe Co.
Alexander Richard Lafond, Wake Co.	Anthony Carpenter, New Hanover Co.	Brittany Suzanne Boggs, Mecklenburg Co.
Alexandra Joy Bonin, New Hanover Co.	Anthony David Flis, Haywood Co.	Brooke B Nigro, New Hanover Co.
Alexandra Matthews, Durham Co.	Anthony Martignetti, Carteret Co.	Brooke Nicole Davis, Wake Co.
Alexia Lianna Chavis, Guilford Co.	Anthony Volpe, Wake Co.	Brooks H Emanuel, Durham Co.
Alexis Alvarez, Carteret Co.	Antoinette G Kerr, Davidson Co.	Bruce Allen Elmore, Harnett Co.
Alexis Davis, Beaufort Co.	Antony Kinyanjui Kinuthia, Wake Co.	Bruklyn Miller, Durham Co.
Alfred Peter Lumbis, Buncombe Co.	April Boatner-Allen, Onslow Co.	Bryan Scott Evans, Durham Co.
Alicia Guldin, Carteret Co.	April Dawn Duby, New Hanover Co.	Burl B Snyder, Carteret Co.
Alicia Kathleen Elrod, Iredell Co.	April Leah Bilisoly, New Hanover Co.	Cailin Elizabeth Lewis, Jackson Co.
Alicia Marie Jacobson, New Hanover Co.	Ariel M Shumaker-Hammond, Buncombe Co.	Caleb R Davis, Mecklenburg Co.
Alisha Peoples, Alamance Co.	Arthur Jerome Byrnes, Mecklenburg Co.	Callie Diane Barnard, Guilford Co.
Alissa Renee Nicole Richardson, Wake Co.	Arthurene Lindsey Williams, Polk Co.	Callie Louise Daniels-Howell, Durham Co.
Alyson Marie Windsor, Forsyth Co.	Asher Reuben Cohn, Orange Co.	Cameron James Bennett, Wake Co.
Alyssa Clare Zeitouni, Mecklenburg Co.	Ashlee Ann Kinnaird, Buncombe Co.	Camille Shelton, Durham Co.
Alyssa Lean Linvell, Orange Co.	Ashley Christine Merrill, Wayne Co.	Candis Clarke, Buncombe Co.
Alyzza-May Victoria Callahan, Guilford Co.	Ashley Degennaro Kight, Buncombe Co.	Capri M Williams, Forsyth Co.
Amanda Engracia C Jensen, Rockingham Co.	Ashley Michelle Rifenburg, Gaston Co.	Cara Cox, Carteret Co.
Amanda Miles-Graeter, Buncombe Co.	Ashley Nicole Traynum-Carson, Orange Co.	Carie Delphin Scott, Wake Co.
Amanda Monique Oswald, Granville Co.	Ashley Paige Dunigan, Gaston Co.	Carla Efird, Durham Co.
Amanda Verner Davis, Buncombe Co.	Audia Tessa Frazer-Dacas, Cumberland Co.	Carlos Arcos Ibanez, Buncombe Co.
Amani John Holder, New Hanover Co.	Audrey C Dyson, Brunswick Co.	Carlos Santiago-Hernandez, Chatham Co.
Amber Nicole Gilot, Madison Co.	Audrey Eugenia Xiajie Meigs, Durham Co.	Carlton Jordan Hockaday, Wake Co.
Amber Nicole Workman, Rockingham Co.	Audrey Maya Cobb, Buncombe Co.	Carly Marie O'Neill, Harnett Co.
Amelia Kailey Martin Hannah, McDowell Co.	Ava Parkhurst MacKay-Smith, Durham Co.	Carmen M Sicat, Onslow Co.
Amy Dix, Buncombe Co.	B Meric Rice-Lewis, Mecklenburg Co.	Carmen Ramos-Kennedy, Buncombe Co.
Amy Grace Bryant, Durham Co.	Barbara Elizabeth Long, Durham 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.
 Cheryl 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 Corriher, 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.
 Deborah 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.
 Deniqua 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 Nicole 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-Mclver, 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 Pallippambil 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.
 Ian 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 Milfred 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.
 Jordan 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 Paquin, 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 Tsoikas, 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 Ryan 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 Morrisette-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 Levesque, 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.
 Randy Cochran, New Hanover Co.
 Raquel 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 Anya 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.
 Sequia 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 Sequio Madrazo, Wake Co.
 Taylor Rebecca Locascio, Henderson Co.
 Tenecea 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.
 Terry 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.