

EXHIBIT D

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

College Democrats of North Carolina, et al.,

Plaintiffs,

v.

North Carolina State Board of Elections, et al.,

Defendants.

Case No. 1:26-cv-92-TDS-JLW

**DECLARATION OF ROSE DAPHNE YARD IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Rose Daphne Yard, declare as follows:

1. I am a U.S. citizen, over the age of 18, and am competent to testify. I have personal knowledge of the facts and information set forth in this declaration.
2. I am a freshman at Western Carolina University (“WCU”), where I live on campus and am actively involved in campus life. In addition to my full class load, I participate in the Trans+ Student Union and Digali’i, WCU’s Native Student Union. I am also a part of the Cherokee Choir at Cullowhee Baptist Church, and volunteer at a food pantry most Sundays.
3. I am a transgender student and an activist. Being able to participate fully in civic life—including voting—is deeply important to me, both as a young person and as someone whose rights, safety, and access to care are shaped by government decisions.
4. I am originally from Texas, and attending WCU is my first experience living in North Carolina and in Jackson County. As a freshman, I am still learning how to navigate a new county, a new state, and unfamiliar systems of local government and public services.

5. For the March 2026 primary election, I planned to update my voter registration to reflect my current address in Jackson County and vote early at WCU’s on-campus early voting site. I made this plan because WCU has had an on-campus early voting site in every recent federal election, and students have been able to register and vote early on campus. But the Jackson County Board of Elections and North Carolina State Board of Elections recently voted to eliminate the on-campus early voting site.

6. Having an on-campus early voting site would have made voting accessible, visible, and integrated into student life. I expected to be able to register and vote in a familiar location that I already use—the Hinds University Center, where early voting has taken place in the past. The Hinds University Center houses study rooms, spaces for club meetings and events, and is directly next door to the dining hall and the gym. The Trans+ Student Union offices are also located in this building, which would have made it easy for me to both vote and attend meetings in the same trip. These facilities are walkable, predictable, and designed to be accessible to students without cars, as I believe early voting sites should be.

7. Without an on-campus early voting site, my only options for getting to an off-campus early voting location are extremely limited. Like most WCU students, I do not have a car.

8. There is no campus shuttle or regular public transit route that takes students directly to the only remaining early voting site in Jackson County—the Cullowhee Recreation Center. I believe there is a limited Jackson County shuttle, but my understanding is that its routes and schedule are very limited and does not reliably serve

campus destinations, making it an unrealistic and unreliable option for students like me with fixed class times. Rideshare services like Uber and Lyft are inconsistent around WCU's campus, and often unavailable. When I previously tried to order an Uber, I was simply never connected to a driver, and I had to cancel. Walking is not a safe or realistic option, as it would require traveling nearly two miles along roads, including across a four-lane highway, without sidewalks or pedestrian infrastructure, and in the winter no less. For a student without a car or local support network, these options are unsafe, impractical, or effectively unavailable to me. The same is true for many other freshmen at WCU.

9. If the on-campus early voting site is not restored, I may not be able to vote early in the March 2026 primary. And if I cannot vote early, I may not be able to vote at all. Since I am not yet registered to vote in Jackson County, I do not know where my assigned election day polling location will be. If it is the Cullowhee Recreation Center, I will face the same logistical and safety barriers that make it burdensome to travel off campus for early voting, only on a much more limited timeframe. If I have back-to-back classes or other obligations on that day, finding time to arrange transportation or make the dangerous walk, wait in line, and return to campus would likely be impossible.

10. Similarly, voting by mail is not an accessible alternative for me or many students. Because I am not yet registered to vote in Jackson County, I would first need to complete my voter registration. Mail-in voting requires requesting a ballot weeks in advance, receiving it, and mailing from a campus address where mail delivery can be unreliable. As a first-time Jackson County voter, I am unfamiliar with both the registration and absentee voting processes and worried about making mistakes that could cause my

registration or ballot to be rejected. I have no experience navigating these procedures, and without in-person assistance, I have no way to know if I am completing the forms correctly or if my ballot will be accepted.

11. Voting is especially important to me because, as a trans woman, my body is often the subject of political debate. I am acutely aware that political decisions have immediate, personal, and often life-altering consequences. For that reason, I pay close attention to how elected officials and public institutions make decisions about health care access, public services, and civil rights.

12. Voting is one of the few direct ways I can advocate for myself and for others in my community. Being able to vote where I live—early, accessibly, and without unnecessary obstacles—is essential to my sense of safety, dignity, and belonging in this community.

13. For students like me, who are new to the state and still learning how to engage with local institutions, the loss of on-campus voting removes a clear and trusted entry point into civic life. It replaces clarity with uncertainty and accessibility with isolation, at the very moment when students are trying to establish themselves as members of their new community. It also sends an unmistakable message: election officials do not care whether students can vote, and worse, seem to be trying to prevent us from participating because they know that when we vote, we have the power to change things.

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

Executed on: 1/30/2026



Rose Daphne Yard

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