

EXHIBIT F

RETRIEVED FROM DEMOCRACYDOCKET.COM

**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-JWL

**DECLARATION OF ZACH POWELL IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Zach Powell, 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 student at Western Carolina University ("WCU") in Jackson County, North Carolina, where I am pursuing a degree in political science. I expect to graduate in May 2026 and plan to begin a graduate degree at North Carolina State University in the fall.
3. I have a full class load and am actively involved in campus life. I am the president of the WCU College Democrats and a member of the WCU trans+ student union. In prior semesters, I have been involved in student government. During my time at WCU, I have also consistently had a job during the school year. I currently work 30 hours per week at my parttime job and have previously worked as a liaison for the University of North Carolina Association of Student Governments.

4. Even though I technically live off campus, my apartment is just a few minutes away, and I spend a significant amount of my time on the WCU campus. I am on campus daily for classes, attend College Democrats meetings and events at the university center, and frequently meet friends for meals on campus.

5. I am a first-generation college student. I do not have family members who have previously navigated the college experience or the voting process as a student living away from home. Coming to WCU and becoming involved in student leadership and civic engagement has been one of the most important experiences of my life.

6. Becoming president of the WCU College Democrats has been about more than just politics for me. It's about showing other first-generation students and students from underrepresented backgrounds that they belong in our democracy, and that their votes count. I have always tried to be a voice for other students and have consistently looked for ways to be an advocate for others.

7. During the 2024 primary election, I used WCU's early voting site to register and cast my ballot on the same day. I also voted at WCU's early voting site during the 2024 general election. Given my familiarity with the location, I planned to vote at the on-campus early voting location for the March 2026 primary, but the Jackson County Board of Elections and North Carolina State Board of Elections recently voted to eliminate the on-campus early voting site.

8. I attended multiple meetings where the Jackson County Board of Elections discussed whether to eliminate WCU's on-campus early voting site, including the meeting where they voted to do so. On behalf of the WCU College Democrats, I explained to the

Board that the on-campus early voting site was the product of student advocacy, was approved by a bipartisan vote, and meaningfully improved access to voting for students at WCU. I did not feel like my comments were taken into consideration. Instead, board members suggested that WCU students are capable enough to find a way to vote no matter how burdensome it is. I vividly remember Chairman Bill Thompson dismissing concerns about WCU students' lack of accessible transportation saying, "students find ways to Ingles [our local convenience store] to buy beer. If they really wanted to vote, they would find a way." Chair Thompson also stated that because he has never personally felt disenfranchised by the lack of a walkable early voting site, closing the WCU site was not an act of disenfranchisement. These patronizing comments confirmed to me that Chair Thompson has no interest in understanding the realities of students' lives and does not value our ability to access the franchise.

9. The on-campus early voting site at WCU has been critical to WCU students' ability to vote, including my own. Because WCU is in a rural and mountainous part of Jackson County, traveling even short distances off campus is difficult for many students, and especially for students like me who balance demanding class schedules, campus involvement, and a job.

10. Getting to the only other early voting location in Jackson County—the Cullowhee Recreation Center, which is nearly two miles away from campus—will require me and other students to overcome significant logistical and transportation barriers.

11. I do not have a car, and there is effectively no public transportation that is accessible from campus or the surrounding area. Jackson County does operate some form

of transit service, but WCU does not publish any information about it on campus, and it is so poorly publicized that I know very little about how it operates, what routes it runs, or how frequently service is available. From what I understand, the transit system only comes directly to campus if service is prearranged at least a day in advance, and there is an associated fare. Because the transit system requires advance planning and payment, and does not operate on a regular schedule that I can rely on, and is so poorly publicized that I lack basic information about how to use it, public transit is not a viable option for reaching an off-campus polling location.

12. Ride-sharing and taxi services do not provide a reliable alternative in Cullowhee. Ride-share availability is sparse and inconsistent, and wait times are unpredictable. On one occasion when I attempted to use a ride-share service to travel off campus, I waited twenty minutes without the driver making meaningful progress toward my location and ultimately had to cancel the request. As for taxi availability, I believe there is an individual who drives a private taxi based in Sylva, about 5 miles from WCU, but I have never seen that taxi operating near campus and do not know any students who have successfully relied on it for transportation. These options are effectively unavailable for WCU students.

13. Walking to the Cullowhee Recreation Center is not a safe or feasible option. There is no pedestrian-safe route from campus to the facility. Reaching it would require walking along, and eventually crossing, a four-lane highway where the speed limit is 45 miles per hour, with no sidewalks and no safe shoulder, creating a serious risk to my and

other students' safety. Attached as Exhibit A are two photos of the route, including a complex intersection with no crosswalks.

14. In practice, the only remaining way for me—and most other students—to reach the nearest early voting site would be to arrange a ride with another student who has a car. Most WCU students do not have personal vehicles, and those who do often have rigid schedules due to classes, employment, and campus responsibilities. Coordinating a ride during the hours when early voting sites are open is uncertain and difficult. I have experienced this challenge firsthand: there have been occasions where I have had to miss work because a friend was unable to drive me. There is no reliable way for me or other students to ensure that such transportation would be available when we are able to vote.

15. When early voting is available on campus, it allows students to access the franchise and make their voices heard. In the past, the on-campus site has been located in the Hinds University Center, a place where most students already spend time attending meetings, campus events, and using study rooms. Being able to vote at this familiar, central location allowed us to vote between classes or campus commitments without needing to arrange transportation or significantly alter our schedules. Having an early voting site on campus makes voting accessible, and reduces the uncertainty, cost, and practical obstacles associated with voting off campus.

16. If on-campus early voting is not restored, voting in the upcoming primary election will be significantly more difficult and burdensome for me. The combination of limited transportation options, safety concerns, and my scheduling restrictions mean that voting will require extensive advance planning, coordinating rides around others'

schedules, and potentially missing classes or work—barriers I would not face if I could simply walk to an on-campus early voting site between classes. The same is true for many WCU students.

17. If I cannot vote early, voting on election day will be even more difficult. My assigned election day polling location is also the Cullowhee Recreation Center, so I will encounter the same barriers to getting there and must do so on election day while polls are open. If I have class or work during polling hours, or if I cannot arrange a ride on that specific day, or if I cannot afford transportation on that day, I simply cannot vote.

18. For many students on campus, voting by mail is not a reliable alternative to early voting. I have heard from several students that they had previously requested absentee ballots but did not receive them. I have also heard of students who returned their ballots in the mail, but they were not received by the board of elections or counted. The possibility that a ballot might get lost in the mail, arrive too late, or be rejected for a technical error is a real deterrent to voting by mail, particularly for first-time voters who lack confidence in navigating the process. When students hear stories from their peers about ballots that disappeared or were not counted, many choose not to risk it—especially when they have no way to verify their ballot was received or to fix problems before the deadline passes.

19. As a student balancing academic responsibilities, campus involvement, and other obligations, the loss of an on-campus early voting site makes participating in elections significantly more difficult and feels extremely discouraging. The elimination of the campus site turns what was once a manageable civic responsibility into a complex logistical challenge.

20. Based on my experience, the elimination of on-campus early voting affects not only me but most students at WCU. Most of the student population does not have access to a car and relies on campus-based resources to engage in civic life. Removing the on-campus early voting site creates obstacles that are likely to deter student participation more broadly, particularly among students who are voting independently for the first time, who have disabilities, or who are navigating financial and scheduling constraints.

21. From my perspective as a student at WCU, the elimination of on-campus early voting sends a clear message that our leaders will do whatever they can to suppress student turnout because they know students can change elections. The removal of this site is not about logistics or cost savings—it is about making it harder for young voters to participate in our democracy. Students are uniquely affected by transportation barriers, rigid schedules, and unfamiliarity with local voting logistics, and on-campus early voting directly addresses those realities. The effect of removing that access is not mere inconvenience. It disproportionately burdens young voters, making participation harder—and at times impossible—precisely for a group that already faces structural obstacles to voting. And more fundamentally, it risks silencing the voices of young voters at WCU who are trying to engage in the democratic process.

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

Executed on: 1/30/2026



Zach Powell

Exhibit A

