

# EXHIBIT I

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**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; ,

Defendants.

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

**DECLARATION OF ZAYVEON DAVIS IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Zayveon Davis, 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 North Carolina A&T State University ("NC A&T") in Greensboro, North Carolina, on track to graduate in May 2027.
3. NC A&T is the country's largest historically Black college or university, and I am a proud Black student and come from a deep legacy of college-educated Black people. Both of my parents are NC A&T alumni, along with both of my siblings and their spouses.
4. I work on campus five days a week in the Office of Leadership and Civic Engagement. In addition to working, I serve in multiple student leadership positions. I am an Andrew Goodman Foundation Ambassador, serve on the Student Development Committee for Exceptional Males in Business, and am President of the NC A&T Society for Human Resource Management chapter. I also carry a full course load.

5. My schedule is extremely demanding. Between classes, work shifts, and leadership responsibilities, I have to carefully plan every hour of my day. I typically wake up at 5:00 a.m. to begin organizing myself for the day and tackling my to-do list. These limitations directly affect my ability to access off-campus voting locations.

6. During the early voting period ahead of the 2025 Guilford County municipal election, I updated my voter registration to reflect my on-campus address in Guilford County and voted early on the same day. I participated in a student-led march to the Old Guilford County Courthouse, which is the nearest early voting location to NC A&T in elections where there is no on-campus early voting, such as the 2025 municipal election.

7. Walking to the Old Courthouse was not merely inconvenient—it was physically demanding, time-consuming, and unsafe. The Courthouse is approximately 1.6 miles from campus, a distance that took nearly thirty minutes one way and required carving out a significant portion of my day. We traveled as a group for safety reasons, and we had a police escort because the route required walking along busy streets. The walk took place in late October, when cold temperatures and steady rain made the trip even more difficult and uncomfortable. I completed this walk once because I was determined to vote, but having already experienced how burdensome, difficult, and risky it was, I do not want to be forced to repeat it in order to exercise my right to vote.

8. For the 2026 primary and general elections, I would have voted early at the on-campus early voting site at NC A&T, which was open to students for the most recent federal primary and general elections. But the Guilford County and North Carolina State Boards of Elections voted to eliminate the on-campus early voting site.

9. Being able to vote on campus would dramatically reduce the barriers I faced voting in Guilford County last year. I would be able to vote between my work shifts or classes without having to leave campus. I would simply walk to the voting site on campus when my schedule allowed.

10. Without an on-campus early voting site for the upcoming federal election, I will be forced to take hours out of my day to get to the courthouse—time I cannot afford to lose given my work schedule and class obligations that have grown even more demanding since the fall.

11. Because I do not have a car, my options for getting to an off-campus early voting site are: taking public transportation, arranging a ride from a friend, walking, or paying for a taxi or rideshare service. All of these options come with considerable challenges for me and other students at NC A&T.

12. Taking public transportation would require significant extra time beyond just the travel time. I would need to walk from my campus housing to the bus stop, wait for the bus, potentially transfer buses, and coordinate my work and class schedule around the bus schedule. I would then need to vote and do the same thing in reverse. This would realistically take several hours out of my day, which I cannot afford to sacrifice without missing class, work, or time dedicated to my leadership duties.

13. Arranging rides from friends may be difficult or impossible. Many students, like me, do not have a car on campus. In fact, there is a university policy that freshman cannot have cars on campus unless they meet certain narrow exceptions. And even if I could find a classmate with a car, my friends also have classes and jobs, so I would have

to find someone who can give me a ride at a time that works with both my schedule and theirs—a logistical puzzle that may not have a solution.

14. Walking 1.6 miles each way on my own is not a realistic option. Based on my experience walking this route to the courthouse in 2025, I know it is not safe to walk alone. To reduce those risks, I would need to coordinate a specific time to vote around the availability of other students willing to walk together. That requirement adds a significant burden, forcing me to plan my ability to vote around others' schedules rather than my own.

15. Paying for a taxi or rideshare like Uber or Lyft would cost money that I need for other expenses. As a working student, every dollar matters, and spending money on transportation to vote would mean having less money for food, school supplies, and other necessities.

16. Because I work on campus five days per week, attend classes on campus, and live on campus, the NC A&T campus is the center of my daily life. My demanding work and class schedule leaves me very limited flexibility in when I can travel off campus. On-campus early voting would allow me to vote without leaving the place where I already spend my time—I could vote between work shifts, between classes, or during a break in my day. This is why I planned to vote early on campus rather than on election day or at an off-campus location.

17. If the on-campus early voting site is not restored, it will be much more difficult for me to vote early. Because I work in the Office of Civic Life and Engagement, I will have to spend more time during the early voting period ensuring that other students have the resources and information they need to vote early, leaving me with less time to

vote myself. Although there is an on-campus polling place on Election Day, relying on Election Day voting presents its own challenges. Election Day voting is limited to a single day with fixed hours, which do not provide the same flexibility as early voting's extended schedule. For a student with classes, work, and other campus obligations that cannot easily be rescheduled, this significantly narrows the window in which I can vote. That is why early voting is especially important for students, many of whom have demanding schedules and limited flexibility.

18. Voting by mail is also not a reliable alternative for me. NC A&T's campus mail system is slow and unpredictable, and I have personally experienced getting notified about mail days after it reaches campus. It is not uncommon for students to be notified about their mail arriving on campus up to five days after it initially arrived, making it difficult to ensure that a mail ballot would be received, completed, and returned within the required deadlines. Given these delays, relying on mail voting would require me to assume significant risk that my ballot would not be counted, which further limits my practical options for participating in the election. The same is true for other NC A&T students.

19. I was at the North Carolina State Board of Elections meeting when they voted to eliminate NC A&T's on-campus early voting location. Watching the decision unfold was upsetting and demoralizing. Board members attempted to justify the decision by referencing concerns about logistics while disregarding the real and predictable impact the decision would have on students. From my perspective, they minimized the effort students had made to show up, be heard, and advocate for themselves, and avoided engaging with us directly. After the vote, none of the Board members who voted for the elimination

addressed us directly or acknowledged their decision to remove an early voting site from the campus of the largest historically Black college or university in the country. Based on this lack of response, the context of the decision, and the history of NC A&T, I believe the Board's made a deliberate choice not to make voting accessible at NC A&T and make it more difficult for its heavily Black student body to engage politically.

20. I believe that the elimination of on-campus early voting at NC A&T is deeply unfair. Many of my fellow students at NC A&T also do not have cars and work to pay for college. The elimination of on-campus early voting burdens all of us. Students at NC A&T deserve the same convenient access to voting that other voters in Guilford County have.

21. NC A&T is not just any college campus. It is the largest HBCU in the country and the birthplace of the sit-in movement. In 1960, four A&T freshmen—Jibreel Khazan, formerly known as Ezeel Blair Jr., David Richmond, Franklin McCain, and Joseph McNeil—sat down at a whites-only lunch counter in Greensboro and sparked a movement that spread across the South and helped dismantle Jim Crow. My work promoting civic engagement on this campus is a direct continuation of what they started. Eliminating on-campus early voting at NC A&T—at this place, with this history—carries significant weight. It is a message that young Black North Carolinians still have to fight harder, travel farther, and prove ourselves more worthy than others to exercise our constitutional rights. It feels like history repeating itself in a different form.

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

1/30/2026  
Executed on: \_\_\_\_\_



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Zayveon Davis

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