

STATE OF NORTH CAROLINA
JUSTICE

IN THE GENERAL COURT OF

COUNTY OF WAKE

SUPERIOR COURT DIVISION
FILE NO. _____

NORTH CAROLINA)
DEMOCRATIC PARTY,)

Plaintiff)

v.)

KIM STRACH, in her official)
capacity as the Executive Director)
of the North Carolina State Board)
of Elections)

Defendant)

AFFIDAVIT OF WILLIAM HARRISON DUBBS

1. My name is William Harrison Dubbs. I am 24 years old and a resident of Wake County, North Carolina. I have served as the Organizing Director of the North Carolina Democratic Party Coordinated Campaign since May 1, 2016.
2. The Organizing Department oversees approximately 250 staff and is tasked with collecting voter registrations and building volunteer capacity.
3. The Coordinated Campaign has collected voter registration forms in every county in the state. The last week before the voter registration deadline was expected to be by far the heaviest week of form collection over the course of the election cycle, but collection efforts were severely reduced throughout the state over the weekend of October 7-9. Collection of forms was interrupted statewide on Saturday, October 8, 2016 due to heavy rain and wind. All outdoor activities and most registration events were cancelled throughout the state due to safety concerns and staff and volunteer unavailability.
4. Most forms are collected outside, when the voter fills out a form on a volunteer or staff member's clipboard. New voters tend to be generally un-informed of the process, so they will meet a staff member or volunteer outside of a popular area and register to vote then. That form will then be processed at a Coordinated Campaign field office, and then taken to the county Board of Elections (BOE) office.

5. The Coordinated Campaign operates 33 field offices around the state, including offices in Raleigh, Cary, Durham, Lillington, Sanford, Lumberton, Fayetteville, Kill Devil Hills, Elizabeth City, Rocky Mount, Greenville, Goldsboro, Kinston, New Bern, Jacksonville, Wilmington, and Morehead City.
6. All of these offices were impacted by Hurricane Matthew and were evacuated due to a loss of power, beginning on Friday evening, October 7, 2016. All remained closed over the weekend of October 7-9. The Greenville field office reopened on October 13. The Lumberton, Goldsboro, Kinston, Rocky Mount, Elizabeth City, and Kill Devil Hills field offices will only reopen today.
7. The closure of field offices inhibits the collection of forms. Outdoor canvasses for forms are staged from field offices. The closure of these offices prohibited most registration activities for their respective counties.
8. Beyond the closure of offices, volunteers were not able to reach places that they could register voters due to road closures, particularly interstate road closures. In addition, some staff reallocated to areas not affected by the storm, ceasing all volunteer activities for a number of days.
9. Even in those areas not significantly affected by major flooding, voter registration activities and particularly volunteer capacity have been reduced. This includes counties like Wake and Durham. Widespread power outages, downed trees, and flooded streets negatively impacted the number of volunteers able to conduct voter registration drives and reduced the number of collected forms in the days immediately following the storm.
10. The Coordinated Campaign typically delivers collected forms to the county BOE office. My understanding, according to Coordinated Campaign staff, is that BOE offices have been closed for at least a day following the storm in at least Beaufort, Bladen, Columbus, Cumberland, Duplin, Edgecombe, Greene, Harnett, Hertford, Hoke, Hyde, Johnston, Jones, Lenoir, Pasquotank, Robeson, Sampson, and Scotland Counties. The Coordinated Campaign has been unable to deliver forms to these BOE offices.
11. In Lumberton, approximately 150 completed forms were stranded in our evacuated field office for the past week. These forms were only gathered and turned into the Robeson County Board of Elections yesterday, October 13, due to field staff disregarding evacuation orders and returning to the office for the purpose of turning in the forms before today's deadline.

I hereby declare that the above statements are true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

Dated this 14th day of October, 2016, in Raleigh, North Carolina.



William Harrison Dubbs

WAKE COUNTY

NORTH CAROLINA

I Carol Abken, a Notary Public of Wake County, North Carolina do hereby certify that William Harrison Dubbs, personally appeared before me on this day, and acknowledges the due execution of the foregoing instrument.

Witness my hand and official seal this the 14th day of October, 2016.


Notary Public
My Commission Expires: 8/9/2020

