

**United States District Court
Eastern District of North Carolina
Western Division**

VOTER INTEGRITY PROJECT NC, INC.

Plaintiff,

v.

WAKE COUNTY BOARD OF ELECTIONS,

Defendant.

Civ. No. 16-_____

Declaration of Jay DeLancy

I, Jay DeLancy, make the following declaration from personal knowledge pursuant to 28 U.S.C. § 1746:

1. I am a citizen of the United States and a resident of North Carolina.
2. I am the Director of the Voter Integrity Project NC, Inc. (“VIP-NC”) and have served in this capacity since the formation of the organization in 2011.
3. VIP-NC is a North Carolina “C” corporation with a mission of ensuring free and fair elections for all lawfully registered voters.
4. VIP-NC has dedicated significant time and resources to ensure that voter rolls in the state of North Carolina, and in Wake County, are free from ineligible registrants, non-citizens, individuals who are no longer residents and individuals who are registered in more than one location.

5. As one example, in 2012, VIP-NC formally asked the defendants to review the citizenship status of approximately 550 registrants in Wake County pursuant to N.C. Gen. Stat. § 163-85.


6. As a result of that challenge, the Wake County Board of Elections determined that there was probable cause to move forward on 18 of those registrants and, ultimately, at least three ineligible registrants were removed.

7. As another example, in 2012, VIP-NC formally asked the defendants to review 336 individuals on the rolls in Wake County that Plaintiff believed were deceased.

8. Subsequently, the vast majority of those registrants were removed from the rolls.

9. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on July 18, 2016


Jay DeLancy, Director
Voter Integrity Project NC, Inc.