



September 17, 2025

Sam Hayes  
Executive Director, North Carolina State Board of Elections  
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**VIA EMAIL AND CERTIFIED MAIL**

Dear Mr. Hayes:

I write on behalf of the Democratic National Committee (DNC) to inform you of two ongoing violations of the National Voter Registration Act (NVRA), 52 U.S.C. §§ 20501-11, in the State of North Carolina. *First*, North Carolina has not designated paratransit offices as voter registration agencies, pursuant to Section 7(a)(2)(B) of the NVRA, 52 U.S.C. § 20506(a)(2)(B), and those offices do not provide voter registration services required by Section 7(a)(4) and Section 7(a)(6) of the Act, 52 U.S.C. § 20506(a)(4), (6). *Second*, North Carolina has not designated disability services offices at public colleges and universities as voter registration agencies, pursuant to Section 7(a)(2)(B) of the NVRA, and those offices also do not provide voter registration services required by Section 7(a)(4) and Section 7(a)(6) of the Act.

Section 7(a)(2) of the NVRA requires North Carolina to “designate as voter registration agencies all offices in the State that provide State-funded programs primarily engaged in providing services to persons with disabilities.” 52 U.S.C. § 20506(a)(2). This includes local paratransit offices, *see, e.g.*, Consent Decree, *United States v. New Jersey*, No.3:21-cv-14618 (D.N.J. Sept. 2, 2021), ECF No. 10; *ACORN v. Ridge*, No. 94-cv-7671, 2000 WL 31808, at \*1 (E.D. Pa. Jan. 14, 2000), and disability services offices at public colleges and universities (DSOs), *see, e.g.*, *Nat’l Coal. for Students with Disabilities Educ. & Legal Def. Fund v. Allen*, 152 F.3d 283, 288-92 (4th Cir. 1997). North Carolina has not designated paratransit offices and DSOs as voter registration agencies. Although North Carolina law authorizes designation of offices that provide applications for “State-funded state or local government” disability services programs, specific designation must be carried out “by the State Board of Elections.” N.C. Gen. Stat. § 163-82.20(a)(2). To date, the State Board appears to have designated only statewide agencies. *See* N.C. State Bd. Of Elections, *National Voter Registration Act (NVRA)*, <https://www.ncsbe.gov/registering/national-voter-registration-act-nvra>.

In turn, Section 7(a)(6) of the NVRA requires designated offices that provide state-funded disability services to distribute voter registration applications to all applicants for disability services, unless an applicant declines to register in writing using a statutorily prescribed form. 52 U.S.C. § 20506(a)(6). These voter registration agencies must also assist applicants with voter registration, unless assistance is declined, and must accept completed applications for transmittal to appropriate election officials. *See id.* § 20506(a)(4), (a)(6). Publicly available materials establish that paratransit offices and DSOs in North Carolina do not distribute voter registration applications alongside applications for services. *See, e.g.*, GoRaleigh ACCESS Program, *ADA*

*Paratransit Application* (2016), <https://cityofraleigh0drupal.blob.core.usgovcloudapi.net/drupal-prod/COR28/ADAParatransitApplication.pdf>; University of North Carolina Asheville, Office of Accessibility, *Online Student Application*, <https://sierra.accessiblelearning.com/s-UNCA/ApplicationStudent.aspx>. Even if paratransit offices and DSOs in North Carolina were designated—and they are not—these failures would violate Section 7 of the NVRA. Failure to provide voter registration opportunities to paratransit clients—who typically do not have registration opportunities when obtaining a driver’s license—denies citizens opportunities to register to vote or update registration information. Similarly, failure to provide voter registration opportunities to college and university students with disabilities—who are frequent movers—leaves inaccurate data on the rolls and leaves many students off the rolls entirely. These failures harm the DNC’s efforts to contact, persuade, organize, and turn out registered voters and other eligible voters in North Carolina.

To facilitate discussion of the necessary relief, please produce the following records within thirty days, pursuant to Section 8(i) of the NVRA, 52 U.S.C. § 20507(i), and Section 6 of the North Carolina Public Records Act, N.C. Gen. Stat. § 132-6.

- Any and all lists of offices in North Carolina designated as voter registration agencies for purposes of Section 7 of the NVRA, including but not limited to formal designations, communication distribution lists, and audit materials.
- Any and all forms, notices, manuals, instructions, and training materials concerning the provision of voter registration services—including but not limited to the services outlined in Sections 7(a)(4) and 7(a)(6) of the NVRA—at or through paratransit offices or public college and university DSOs in North Carolina.

Any charge for these records must be a “reasonable cost.” 52 U.S.C. § 20507(i)(1). Please inform me of the expected cost prior to delivery if such cost may exceed \$100. I would prefer to receive all records in electronic format via email or other electric method to [freemand@dnc.org](mailto:freemand@dnc.org). If this is not possible, I would be happy to confer about other ways I may meaningfully access these records.

This letter constitutes written notice of violations of the NVRA, pursuant to Section 10(b)(1) of the Act, 52 U.S.C. § 20510(b)(1). Given the nature of these violations, I hope that they may be resolved without the unnecessary expense of contested litigation. I will reach out to the Office of Attorney General Jackson shortly to arrange a meeting at which we might negotiate a settlement. I may be reached through your counsel at (202) 923-6429 or [freemand@dnc.org](mailto:freemand@dnc.org). If the violations identified above are not corrected by December 16, 2025, the DNC may file suit to seek declaratory or injunctive relief. *See* 52 U.S.C. § 20510(b)(2).

Sincerely,

*Daniel J. Freeman*

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