December 18, 2025

Via Electronic Mail

North Carolina State Board of Elections
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Re: Recommendations for Guilford County's 2026 Primary Election Early Voting Site Allocation Plan

Dear Members of the State Board of Elections, Director Hayes, Mr. LiVecchi, and General Counsel Hoegemeyer:

The undersigned non-partisan pro-democracy groups—the Legal Defense Fund, Common Cause North Carolina, Southern Coalition for Social Justice, ACLU of North Carolina, Black Voters Matter Fund, Campaign Legal Center, Democracy North Carolina, Forward Justice, League of Women Voters North Carolina, North Carolina Association of Educators, North Carolina Black Alliance, and North Carolina Campus Engagement—write to urge the North Carolina State Board of Elections ("the State Board") to reject the proposed early voting plan for the 2026 primary election selected by a majority of the Guilford County Board of Elections (the

"Proposed Plan"). As currently crafted, the Proposed Plan will leave historic communities with sizeable Black populations—in High Point and in the southeast area of Greensboro—and students of North Carolina Agricultural and Technical State University ("NC A&T"), the largest public historically Black college or university in the nation, and the University of North Carolina at Greensboro ("UNCG"), the largest university in Guilford County that also educates a significant number of minority students—*without* fair access to early voting sites. At a bare minimum, we urge this Board to approve a plan with at least two additional early voting sites, such as those at Washington Terrace Park in High Point and Barber Park in southeast Greensboro. We also strongly encourage the Board to take seriously the persistent call for the County's sizeable college student population to have on-campus early voting accessibility. There has been a relentless demand by NC A&T students in particular for on-campus voting opportunities.

The Proposed Plan will harm the ability of eligible voters in High Point, the southeast area of Greensboro, and at its universities in Guilford County to participate in the electoral process.

On November 18, 2025, a divided (3-2) Guilford County Board of Elections adopted the Proposed Plan, providing for the following ten early voting sites for the 2026 primary election:[1] the Old Courthouse, Culler Senior Center, Brown Recreation Center, Bur-Mil Club, Deep River Recreation Center, Jamestown Town Hall, Lewis Recreation Center, Craft Recreation Center, Leonard Recreation Center, and the Agriculture Center.

Notably, the Proposed Plan fails to include the Barber Park and Washington Terrace early voting sites in southeastern Greensboro and High Point, respectively, both of which are areas of the County with high overall population density and a high concentration of Black voters in particular.[2] Washington Terrace in High Point, in

[1] We understand that the early voting site allocation for the County's 2026 primary election is likely to differ and to provide less early voting sites than the County will and should allocate for the 2026 general election.

[2] For a visible representation of the concentration of the Black population in Greensboro and High Point, *see generally* CTR. FOR INCLUSIVE DEMOCRACY, GUILFORD COUNTY EARLY VOTING MAP, https://nc.cidvlot.org/county.html?county=081 ("Demographic & Population Data" --> "Black Percent of Population"). Included as an **Appendix** to this letter also are certain visible representations of the County's demographics.

particular, has been a historic, expected early voting site that voters have relied upon in many primary elections over the last decade.[3] Moreover, eligible voters in both of these southern areas of the County would be denied fair access to early voting sites that provide critical opportunities for same-day voter registration, as compared to Election Day voting in which only previously registered eligible voters may vote at assigned sites.

Without adequate access to early voting sites in the southwestern and southeastern areas of Guilford County, significant portions of the County's Black population also are likely to be burdened in, if not denied, the ability to participate in the 2026 primary election by having to access sites *outside* their communities.[4] As officials should be well aware, public transportation in Guilford County is limited, and where it is available, requires significant time and other expenses.[5] Researchers have also documented how placing voting locations even a few miles away from where people live can present barriers to voting, requiring eligible voters to access transportation and/or have the ability to walk, to exercise their right to vote.[6]

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[3] *See, e.g.*, N.C. STATE BD. OF ELECTIONS, EARLY VOTING SITES FOR THE MARCH 5, 2024 ELECTION, https://s3.amazonaws.com/dl.ncsbe.gov/one-stop_early_voting/2024/early%20voting%20schedules%20-%20march%205%2c%202024%20primary%20election.pdf; N.C. STATE BD. OF ELECTIONS, ONE-STOP VOTING SITES FOR THE MARCH 3, 2020 ELECTION, https://s3.amazonaws.com/dl.ncsbe.gov/one-stop_early_voting/2020/one-stop%20site%20list%20-%20march%202020%20primary%20election.pdf; NC. STATE BD. OF ELECTIONS, ONE-STOP VOTING SITES FOR THE MAY 8, 2018 ELECTION, https://s3.amazonaws.com/dl.ncsbe.gov/one-stop_early_voting/2018/one-stop%20site%20list_may_8_2018_updated_04132018.pdf; N.C. STATE BD. OF ELECTIONS, ONE-STOP VOTING SITES FOR THE MARCH 15, 2016 ELECTION, https://dl.ncsbe.gov/?prefix=One-Stop_Early_Voting/2016/ (accessed at "One-StopSiteList 2016-03-15.xls").

[4] Once officials provide early voting, they must do so on an equal basis. *See Harper v. Va. State Bd. of Elections*, 383 U.S. 663, 665 (1966) ("For it is enough to say that once the franchise is granted to the electorate, lines may not be drawn which are inconsistent with the Equal Protection Clause of the Fourteenth Amendment" to the U.S. Constitution.).

[5] *Cf* Sarah Winkelmann, *Guilford County Wants Ideas on How to Spend $1 Million on Transportation*, MYFOX8 (Apr. 25, 2024), https://myfox8.com/news/north-carolina/piedmont-triad/guilford-county-wants-ideas-on-how-to-spend-1-million-on-transportation/ ("Guilford County does not provide transportation on a large scale.").

[6] *See, e.g.*, Scott Abramson & Sharece Thrower, *The Direct Cost to Voters of Polling Site Closures and Consolidation*, POL. SCI. RSCH. & METHODS, Aug. 27, 2025, at 3–4. https://www.cambridge.org/core/journals/political-science-research-and-methods/article/direct-cost-to-voters-of-polling-site-closures-and-consolidation/ED175109BF6725AA82A06D908C3DB58E ("[O]n average, moving polling sites decreased in-person turnout by 5.65–6.9 percentage points . . . . We show that nearly all of our estimated 'reassignment' effect is driven by changes in the travel distance to an individual's new polling location. This finding suggests that voters are most impacted by the additional distance to a new polling site rather than the informational or habit-disrupting fixed costs of simply changing locations.").

The Proposed Plan also fails to include sites on Guilford County's two largest college campuses, NC A&T and UNCG, both of which have significant populations of Black and other racial minority eligible voters. In recent elections, students and community members in areas surrounding these important learning institutions–which also have high concentrations of voting-age Black residents–have relied on campus early voting sites to same-day register to vote and to vote early. Same-day voter registration during early voting provides flexibility in the voting process for new voters, which many college students are. This opportunity is significant for new voters because it reduces the likelihood that students (and non-students) will have an Election Day ballot rejected because they attempt to vote when not properly registered. Instead, students can learn *if* there are any potential registration or documentation issues during the early voting process and address them in real time while there is still an opportunity to ensure their ballot gets counted.[7]

It also has been well-documented and widely publicized that student voters have urged an on-campus early voting site, particularly at NC A&T, for several years. Indeed, before the 2020 election, NC A&T students voted at the Old Guilford County Courthouse, which required students to walk nearly an hour roundtrip to register and/or vote. In 2019, due to the difficulties of accessing the Old Guilford County Courthouse, students advocated for an early voting site on NC A&T's campus.[8] In response to their advocacy, Guilford County approved an early voting site on NC A&T's campus for the 2020 primary elections.[9] Students and community members

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[7] Prior guidance from the State Board of Elections has acknowledged and sought to address the "specific challenge" that "[s]tudents living in a campus housing facility, such as a dormitory" may have in "producing a qualifying document displaying their on-campus address." N.C. STATE BD. OF ELECTIONS, SAME-DAY REGISTRATION DURING ONE-STOP EARLY VOTING, NUMBERED MEMO 2016-15 (Sept. 22, 2016), https://s3.amazonaws.com/dl.ncsbe.gov/sboe/numbermemo/2016/Numbered_Memo_2016-15_Same-Day_Registration.pdf. On-campus early voting sites help to address these difficulties.

[8] *See, e.g.*, Naomi P. Brown, *NC A&T To Be Considered As Early Voting Site*, WUNC (Oct. 2, 2019), https://www.wunc.org/news/2019-10-02/nc-a-t-to-be-considered-as-early-voting-site ("Students and faculty have been lobbying for an early voting site in time for next year's primaries. They said not having a location on campus could amount to voter suppression."); Staff Writer, *Guilford County Board of Elections Votes in Favor of Early Voting Site at North Carolina A&T State University*, WFMY NEWS 2 (Oct. 1, 2019), https://www.wfmynews2.com/article/news/local/north-carolina-a-and-t-early-voting-site-aggies-voter-suppression-guilford-county-board-of-elections/83-00f50625-ccd2-42d6-a56e-35142b844977.

[9] *See* Staff Writer, *supra* note 8. The Guilford County Board of Elections' 2020 decision to respond to its NC A&T student constituency stands in stark contrast to state officials' efforts to otherwise place barriers to students' access to the political process. For example, in 2016, state legislators split the community campus between two congressional districts. *See* Lewis Kendall, *How a Republican Plan*

turned out in higher numbers than some other early voting sites in that primary election.[10] For this reason, it would be shortsighted for decisionmakers to look at turnout in primary elections alone to assess the needs of college-age eligible voters for early vote sites and then deny on-campus early voting sites, as some proponents of the Proposed Plan would do.[11]

Failing to provide on-campus early voting access also will adversely impact student voters who rely on accessible, flexible voting options so that they can balance their civic responsibilities with their academic, employment, and familial obligations. Under the Proposed Plan, the closest polling site for NC A&T students is the Old Courthouse, which, as noted above, was their early voting site before the 2020 primaries. It requires a 25-minute one-way walk to a site with limited parking and no direct public transportation line. Even if a NC A&T student was able to overcome the myriad obstacles and expenses, like time, to navigate the limited, public transportation system, she would still need to walk to the polling site because the County lacks a public transportation option that directly connects students to the Old Courthouse. Thus, reducing early voting sites perpetuates lackluster student participation at the polls rather than ameliorating it, as the County should be doing. It does so to a voting population that is still developing the habit of voting and has not yet demonstrated any affiliation to a particular candidate or political party.

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to Split a Black College Campus Backfired, THE GUARDIAN (Nov. 1, 2020), https://www.theguardian.com/us-news/2020/nov/01/republican-north-carolina-sixth-district-gerrymandering. Additionally, state officials pursued a stringent photo-ID requirement for in-person voting, resulting in the State Board of Elections rejecting the use of student IDs from 12 of 17 of North Carolina's higher education institutions, including NC A&T, in the 2020 election. *See* Lynn Bonner, *Most UNC System Students Won't Be Able to Use School IDs to Vote in 2020*, THE NEWS & OBSERVER (Mar. 16, 2019), https://www.newsobserver.com/news/politics-government/article228029634.html.

[10] *See* N.C. STATE BD. OF ELECTIONS, EARLY VOTING SITES FOR THE MARCH 3, 2020 ELECTION, https://s3.amazonaws.com/dl.ncsbe.gov/One-Stop_Early_Voting/2020/One-Stop%20Site%20List%20-%20March%202020%20Primary%20Election.pdf.

[11] *See, e.g.*, Yasmine Regester, *Guilford Elections Board Cuts A&T and UNCG From Early Voting Sites*, CAROLINA PEACEMAKER (Nov. 21, 2025), https://peacemakeronline.com/stories/guilford-elections-board-cuts-at-and-uncg-from-early-voting-sites,83225; Amber Lake & Madelyn Ricket, *Students at NC A&T and UNCG Resist Closure of Early Voting Sites*, WFMY NEWS 2 (Nov. 20, 2025), https://www.wfmynews2.com/article/news/local/uncg-ncat-early-voting-sites-closing-student-protest/83-48b14d66-658f-4b59-97db-f7ee27619f36. Indeed, while NC A&T and UNCG each had fewer than 800 voters in the 2024 primary election, each of those sites had over 6,400 voters in the 2024 general election, as reflected in the publicly available data.

We urge the Board to adopt additional early voting sites in Guilford County.

Under state law, the State Board must now adopt an early-voting site because the Guilford County Board of Elections did not adopt a unanimous plan for the 2026 primary election.[12] The State Board has the authority to consider alternative plans and seriously consider the information offered by the signatories to this letter.[13] And in doing so, the State Board must adopt a plan that when viewed as a whole does not "disproportionately favor[] any party, racial or ethnic group, or candidate."[14] Accordingly, the undersigned urge the Board to add at least two more sites to Guilford County's 2026 early voting primary plan, to provide fairer and more accessible opportunities to register and vote, particularly for Black and student voters in Guilford County, who will otherwise be disfavored under Guilford County's Proposed Plan. Specifically, we encourage the Board to adopt a plan that at minimum adds the early voting sites in Barber Park and Washington Terrace. Additionally, we urge the Board to encourage youth participation by adopting a plan that includes an early voting site on the campuses of NC A&T and UNCG.

Not only is adding these early voting sites in High Point and southeastern Greensboro possible, but also the Guilford County Board of Elections approved a plan that included many of these same sites just last year for the 2024 primary.[15] Additionally, this County Board considered a plan for the 2026 primary season from one of its members that would have retained all four of the early voting sites that have served voters in the southwest of the County in High Point and also in southeast Greensboro, not only the two sites we urge restoring.[16] A bare majority of the Guilford County Board of Elections, however, rejected this plan in favor of the Proposed Plan.[17]

Accordingly, we urge the Board to adopt a plan with additional early voting sites for the 2026 primary election that more fairly serve voters in the County like

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[12] *See* N.C.G.S.A. § 163-166.35(a).
[13] *See id.*
[14] *Id.*
[15] *See* N.C. STATE BD. OF ELECTIONS, EARLY VOTING SITES FOR THE MARCH 5, 2024 ELECTION, https://s3.amazonaws.com/dl.ncsbe.gov/One-Stop_Early_Voting/2024/Early%20Voting%20Schedules%20-%20March%205%2C%202024%20Primary%20Election.pdf.
[16] *See* Regester, *supra* note 11.
[17] *Id.*

the Barber Park and Washington Terrace sites would. Additionally, because the State Board and Guilford County should be encouraging, rather than burdening, young voters seeking to register and vote, we also strongly encourage the State Board to provide on-campus early voting at NC A&T and UNCG.[18]

For any questions, please reach out to Colin Burke at cburke@naacpldf.org or Leah Aden at laden@naacpldf.org.

Sincerely,

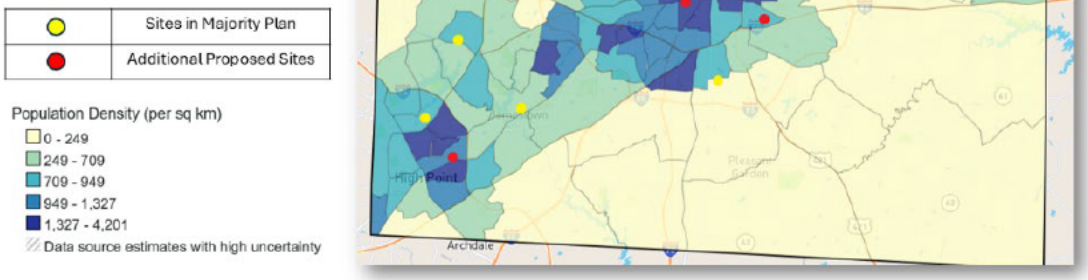
Signatory Groups

Legal Defense Fund
Southern Coalition for Social Justice
Common Cause North Carolina
ACLU of North Carolina
Black Voters Matter Fund
Campaign Legal Center
Democracy North Carolina
Forward Justice
League of Women Voters North Carolina
North Carolina Association of Educators
North Carolina Black Alliance
North Carolina Campus Engagement

[18] The undersigned note a disturbing trend of North Carolina's county boards of elections limiting students' access to early voting. For example, the Jackson County Board of Elections voted to remove an early voting site on Western Carolina University's campus, despite the university serving as an early voting site in primaries for the past decade. *See* Taylor Thompson, *Jackson County Board Votes to Close WCU Polling Site; Issue Heads to State*, ABC13 NEWS (Dec. 9, 2025) https://wlos.com/news/local/jackson-county-board-elections-reject-closing-wcu-western-carolina-university-voting-site-cullowhee-issue-heads-north-carolina-board-raleigh; Dave Russell, *Board Considers Closing WCU Early Voting Primary Election Site*, THE SYLVA HERALD (Nov. 25, 2025), https://www.thesylvaherald.com/news/article_ad6a73c8-347e-4dff-9439-99b5849a45c3.html. Because that County's Board was split, this State Board has the ability to restore that site for the 2026 primary election. *See* N.C.G.S. §163-166.35.

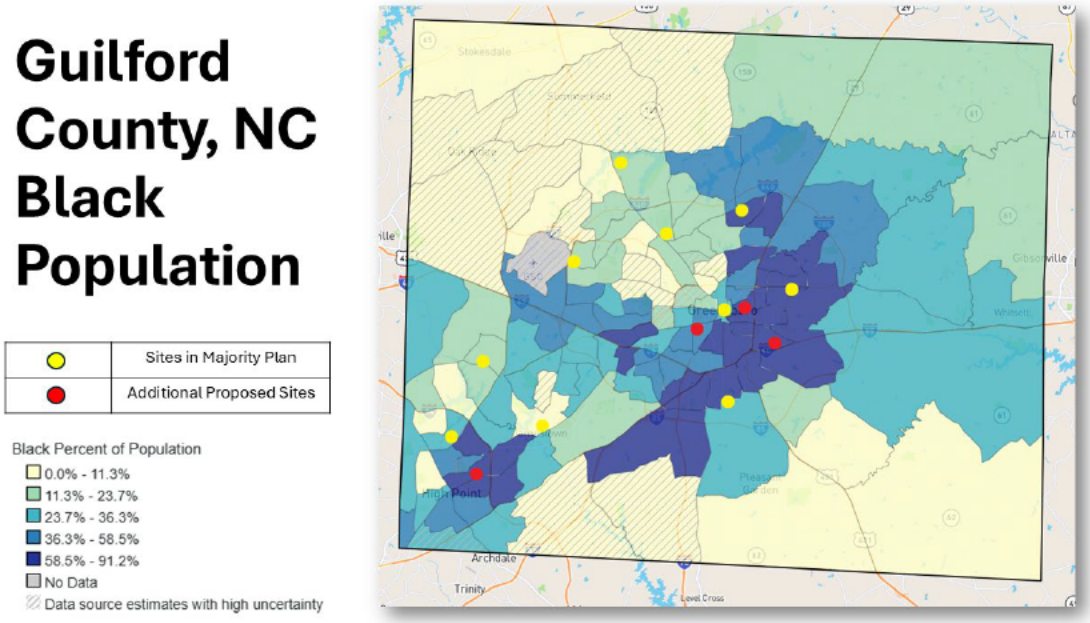
APPENDIX

Guilford County, NC Population Density

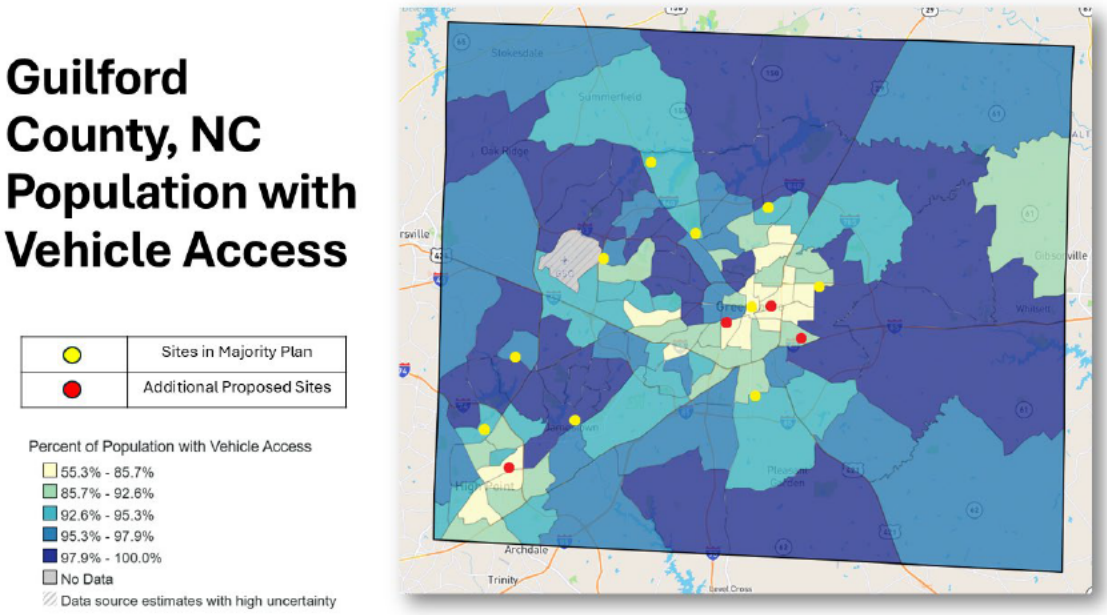


Source: CTR. FOR INCLUSIVE DEMOCRACY, GUILFORD COUNTY EARLY VOTING MAP, https://nc.cidvlot.org/county.html?county=081.

Guilford County, NC Black Population



Source: CTR. FOR INCLUSIVE DEMOCRACY, GUILFORD COUNTY EARLY VOTING MAP, https://nc.cidvlot.org/county.html?county=081.



Source: CTR. FOR INCLUSIVE DEMOCRACY, GUILFORD COUNTY EARLY VOTING MAP, https://nc.cidvlot.org/county.html?county=081.