

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

VOTER INTEGRITY PROJECT NC, INC.,

Plaintiff,

v.

No. 5:16-cv-683-BR

WAKE COUNTY BOARD
OF ELECTIONS,

Defendant,

and

JENNIFER MORRIS, EDWARD JONES,
and SIOBHAN MILLEN,

Proposed Defendant-Intervenors.

DECLARATION OF SIOBHAN MILLEN

I, Siobhan Millen, hereby declare as follows:

1. I am a U.S. citizen and a resident of North Carolina. I reside at 1600 Craig Street, Raleigh NC 27608. I am a registered voter in Wake County, and have resided in Wake County for nearly thirty years.

2. I am very involved in various civic engagement volunteer efforts. In 2008, I first started doing civic engagement work for the Obama campaign. I did voter registration and get out the vote work. More recently, I have become active

with a group of women in Wake County which seeks to encourage political engagement on the state and local level. As part of that group, I have helped sponsor candidate forums, campaigns of writing letters to the editor of various newspapers, and voter registration drives. In the past two years, that group has teamed with an organization called You Can Vote on voter registration drives.

3. I personally do voter registration at a number of different sites and events in Wake County. I have worked at the Brier Creek Walmart, the Alliance Medical Ministry, Advance Health, Urban Ministry and other locations, asking people entering and exiting the buildings if they are registered to vote or if they would like to register to vote and educating voters about early voting dates and locations. I also do voter registration at festivals and other gatherings, such as the recent Bluegrass Festival.

4. More recently, I have also been organizing an effort to register voters who are detained at Wake County jails. Many people may not understand this, but North Carolinians who are detained because of a misdemeanor charge or conviction have not lost their right to vote. Likewise, even citizens who have a felony charge pending and may be incarcerated because of that still have not lost their right to vote. I have been working to ensure that all eligible voters, regardless of their current detention status, are afforded their constitutional rights to register and vote absentee if necessary.

5. Outside of Wake County, I also do voter registration work at the citizenship ceremonies in Durham County that are held weekly. I have been doing voter registration work at those ceremonies for approximately two to three years. I watch these new citizens take their citizenship oath, and then I provide them with voter registration forms during the ceremony and collect many of them when they are finished with the ceremony. Residents from all over the Triangle (Raleigh, Durham, Chapel Hill and neighboring regions) take part in the Durham citizenship ceremonies. I help many Wake County residents fill out voter registration forms after they take their citizenship oath, and I deliver those forms to the Wake County Board of Elections. I deliver other county registrations to the State Board of Elections.

6. Because many of the voters that I register are new citizens or may have had some interaction with the criminal justice system (but have not lost their right to vote), I worry that they may be wrongly purged from the Wake County voter rolls. That would make the work I do for naught. More generally, if eligible voters are purged from the Wake County voter rolls, that will make my volunteer voter registration work more onerous.

I declare under penalty of perjury under the laws of the United States of America that the foregoing Declaration is true and correct to the best of my knowledge.

Executed on 2nd day of October, 2016.

A handwritten signature in cursive script, reading "Siobhan Millen", written over a horizontal line.

Siobhan Millen