

★★ FOURTH CIRCUIT ★★

THE RIGHT TO VOTE

2020 Student Essay Contest

What barriers remain today in exercising the right to vote? What changes, if any, would you make to protect or expand voting rights?



Constitution Day Program

Virtual Ceremony
September 17, 2020
2:30 p.m. ET



Program

OPENING REMARKS

THE HONORABLE ROGER L. GREGORY
Chief Judge

INTRODUCTION

SUZANNE CORRIELL

READING OF THE THIRD PLACE ESSAY

JUSTIN GOLDMAN
Introduced by Jocelyn Mitchell Manion

READING OF THE SECOND PLACE ESSAY

ALEXANDRA LORINCZ
Introduced by Sarah Carr

READING OF THE FIRST PLACE ESSAY

JOSHUA NELSON JR.
Introduced by Joseph L. Coleman, Jr.

PRESENTATION OF AWARDS & CLOSING REMARKS

THE HONORABLE ROGER L. GREGORY

About the Contest

As long as we remain focused on promoting young citizens' understanding of the Constitution, it will remain a powerful instrument for ensuring the stability of our government and the liberty of the governed. The United States Court of Appeals for the Fourth Circuit is pleased to have contributed to this effort through the 2020 Fourth Circuit Essay Contest. In observation of the 100th anniversary of the ratification of the 19th Amendment, extending the right to vote to women and expanding on the principle of equality, students were asked to respond to the questions: "What barriers remain today in exercising the right to vote? What changes, if any, would you make to protect or expand voting rights?"

The contest was open to high school students currently in grades 9 through 12 in Maryland, Virginia, West Virginia, North Carolina, and South Carolina. The court received 262 submissions. The top three submissions were selected by our panel of judges through a blind review process.

The court extends its appreciation to its panel of judges for their work in reviewing the essays and selecting the top three submissions: **Susan Bon, J.D., Ph.D.**, Professor and Higher Education Program Coordinator, University of South Carolina; Affiliate Professor, University of South Carolina School of Law; Presidential Fellow, Faculty Civility Advocate; **Andrew K. Clark, J.D.**, Member, Hirschler Fleischer; Director, Federal Bar Association; Trustee, Historic Richmond; Director, Historical Society for the Eastern District of Virginia; **Carolyn A. Dubay, J.D.**, Executive Director, North Carolina Judicial Standards Commission; **Paula M. Stanton, Ph.D.**, English Department Chair, Bel Air High School; 2018 Harford County, Maryland Teacher of the Year; Advisor, National English Honor Society; Adjunct Associate Professor, University of Maryland; and **Patricia Proctor, J.D.**, Founding Director, Simon Perry Center for Constitutional Democracy, Marshall University.

We would like to thank the judges, attorneys, educators, court staff, and students from throughout the Fourth Circuit whose contributions of time and effort helped make our annual high school essay contest a success.

First Place Joshua Nelson Jr. Chesapeake, VA



Joshua Nelson Jr. is a sophomore at Great Bridge High School in Chesapeake, VA. His favorite subjects are math and science along with English and history. Joshua is interested in aeronautics, and plans to possibly attend the U.S. Air Force Academy. He enjoys baseball, playing basketball with friends, and reading.

Martin Luther King Jr. led his famous March on Washington on the eighth anniversary of Emmett Till’s death. Fifty years later, his son, Martin Luther King III, led another march—this one to celebrate his father’s legacy and address “the festering injustices of inequality, racism, [sic] and poverty in this country.”^[2] Now, nearly seven years later, in the midst of nationwide riots protesting the unjust treatment and subsequent death of George Floyd, the words of Martin Luther King III continue to resonate: The challenge of our generation is “to restore the Voting Rights Act, strengthen voting rights, [sic] and broaden voter access in the legislatures of the 50 states.”^[2]

Congress passed the Voting Rights Act (VRA) in 1965, at the height of the Civil Rights Movement. The VRA prohibited southern states from imposing racist and discriminatory voting laws. Since then, minority voters have had an opportunity to fully participate in our democracy. In fact, according to Hans Von Spakovsky, a Senior Legal Fellow of the Heritage Foundation, “By 2005, the registration rate [and turnout rate] of black voters was on par with and in many states exceeded that of white voters.”^[4] However, in 2010, Shelby County, a white suburb located in Birmingham, Alabama, challenged

the constitutionality of the VRA. Residents claimed the VRA was “Unconstitutional because Congress used outdated criteria to determine which jurisdictions would be subject to the preclearance requirements.”^[7] In 2013, during the *Shelby County v. Holder* case, the Supreme Court ruled in a five to four decision that portions of the Voting Rights Act were unconstitutional. Today states previously covered under the VRA no longer need federal approval before enacting changes to their voting laws and 17 states, including North Carolina, South Carolina, and Virginia, have completely reworked their election laws.^[3] For example, two months after the *Shelby County v. Holder* case overturned portions of the VRA, North Carolina passed a voting bill that implemented a strict photo ID requirement, curtailed early voting, eliminated same-day registration, restricted pre-registration, prohibited annual voter registration drives, and prevented county boards of elections from keeping polls open for an additional hour.^[1] While some of these changes might have been rejected due to the VRA, there was no longer any legislation to stop them from being passed. This is why we as a people must rally together to restore the VRA. We must propose a new coverage plan to apply to the VRA, so that states will once again have their voting laws put in check. The VRA is a symbol of civil rights, and we must not let that symbol be trampled on.

Advocating for voting rights is hard work, and people all over the country have been doing it for decades. Lawsuits such as *NAACP v. McCrory* and *NAACP v. Steen* have targeted and successfully put an end to some of the discriminatory laws that restricted minorities from voting.^[1] This is a step in the right direction. Putting an end to discriminatory laws will further strengthen voting rights, and we need to do this now more than ever. According to the Federal Commission on Civil Rights, federal actions to enforce voting rights for minorities have declined sharply since the Supreme Court struck down the core of the 1965 Voting Rights Act seven years ago.^[5] This hampers the ability of minorities to fully participate in the voting process. In America, full participation in the voting process has never come easy, but segregation is not the only reason for this.

Providing reasonable access to poll stations is a continuing issue for many Americans, but particularly for urban voters. Poll

stations are typically fraught with long lines and lengthy wait times that tend to discourage voters. In fact, when asked why voting can be difficult, an anonymous voter replied, “Because voting is a painful process. [This past election], I stood in line for three hours in the rain just to vote.”^[1] Another voter who spoke on the condition of anonymity stated, “The churches where I vote keep closing down due to low attendance, so I am not completely sure what [voting] location I’ll have to go to right now.”^[1] These are just some of the problems that make poll stations inconvenient. Not only do the locations of poll stations frequently change, but limited voting hours cause voters to wait in large lines for extended periods of time. Since many employers do not provide workers with time off to vote, and many states, such as Virginia and South Carolina, do not require employers to do so, this presents a significant problem.^[5] Increasing the number of volunteers assisting at poll stations would cut down on the amount of time voters have to wait in line, and mandating that poll stations be accessible to everyone—including minorities—will increase voter turnout. Enacting these measures will improve voter access throughout America.

In conclusion, constitutional amendments have provided voting rights to all citizens, but those rights are not yet secure. In order to protect the basic right to vote, *We the People* must be willing to challenge the ideas and laws that discriminate against minorities. Martin Luther King, Jr.’s March on Washington was an impetus for change, but King’s dream of a society in which justice and the ability to fully participate in the democratic process is not dependent on the color of one’s skin is not yet fully realized. King dreamed that “[his] children [would] one day live in a nation where they [would] not be judged by the color of their skin, but by the content of their character.” Today King’s son, Martin Luther King III, is 62 years old—seven years older than Emmett Till would have been—had he lived—and fifteen years older than George Floyd. There is still time to make the changes needed to honor the men and women who have dedicated their lives to the pursuit of equal rights. Why wait any longer?

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Second Place ★★ Alexandra Lorincz ★★ Marriottsville, MD



Alexandra Lorincz is a senior at Marriotts Ridge High School in Marriottsville, MD. Her favorite subjects are engineering, U.S. government, science, and art. She plans to major in architecture, architectural design, industrial design or a related field.

Alexandra enjoys Mock Trial, Howard County Teen Court, Baltimore Humane Society, architecture, guitar, studio art.

Barriers to Voting

The right to vote is a vital part of democratic governance. Despite this, many barriers to voting exist. Legislators have enacted laws limiting access to voting. Furthermore, the Supreme Court has weakened laws designed to protect the right to vote. Some of the most egregious examples of current barriers to voting are discussed below. Given the fundamental importance of voting, these barriers to voting should be removed, and the right to vote should be accessible to all eligible people.

Weakening of the Voting Rights Act

The Voting Rights Act of 1965 made substantial contributions to ensuring the right to vote.¹ For example, Section 4(b) provided a formula for the federal government to use in identifying jurisdictions with histories of racial discrimination. Section 5 required those jurisdictions to notify voters and “to seek permission from the Justice Department or from a federal court before changing voting laws or procedures.”² This requirement protected minority voting rights because “when a town wanted to close polling places in black

neighborhoods but keep them open in white areas, it had to seek approval in advance.”³

In *Shelby County v. Holder*, the Supreme Court held that Section 4(b) was unconstitutional.⁴ In doing so, the Court “rendered the protection [of Section 5] unusable.”⁵ In fact, since *Shelby*, over 1500 polling places in former Section 5 jurisdictions have closed.⁶ *Shelby* presents a barrier to voting because it gutted two key provisions in the Voting Rights Act that had protected minority voting rights.

Voter ID Laws

Many states require their citizens to show identification prior to voting.⁷ In *Crawford v. Marion County Election Board*, the Supreme Court held that Indiana’s strict voter ID law, which required photo identification, did not violate the constitution.⁸ However, strict voter ID laws are a barrier to voting for many, especially minorities or those with low incomes.⁹ Government- issued IDs take time and money to obtain, leading some jurists to compare such laws with unconstitutional poll taxes.¹⁰ Even Judge Posner, who wrote the appellate opinion for *Crawford*, admits the decision is widely regarded as a means of voter suppression rather than fraud prevention.¹¹

Election Disinformation

Moreover, the spread of false information is a common tactic used “to dampen turnout among targeted groups.”¹² For example, in 2005, Oklahoma counties gave incorrect information about when former felons would be permitted to register to vote. As a result, “thousands of people [were] deprived of the fundamental right to vote even when they [were] legally entitled to exercise that right.”¹³ Another example includes a current Facebook policy that refuses to deny ad space for false 2020 election information.¹⁴ “No federal law specifically criminalizes deliberately giving false information to the public about the requirements to register or vote, or misinforming voters about polling place locations, or the dates of elections, or the hours polling sites are open.”¹⁵ Spreading false information to suppress voter turnout is a barrier to voting.

Gerrymandering

Gerrymandering is the drawing of district lines so that one party has a greater electoral advantage. “In Florida[,] one congressional district was ninety miles long and no more than three miles wide.”¹⁶ Recently, in *Rucho v. Common Cause*, the Supreme Court decided in a 5-4 opinion that federal courts have no authority to decide controversies regarding partisan gerrymandering.¹⁷ The Court’s ruling is likely to “empower an explosion of extreme partisan gerrymandering.”¹⁸ Gerrymandering undermines a person’s right to vote because it can dilute the impact of his or her vote when district lines are drawn to concentrate members of a specific group and is discriminatory when based on race.¹⁹

Limited Access to Voting by Mail

Several states, such as Colorado, Washington, and Hawaii, routinely hold elections by mail.²⁰ Mail-in ballots provide numerous advantages, such as allowing people to vote without having to take time off of work. It also allows the public to practice social distancing for health reasons during the present Coronavirus Pandemic.²¹ However, there is currently “litigation . . . , which has sought to block emergency measures related to covid-19, such as proactively mailing ballots to voters sheltering at home.”²² Other lawsuits seek to ensure that every voter has access to mail-in ballots.²³ While it is unclear how these litigations will be decided, it is clear that in-person voting during a contagious pandemic presents a barrier to voting that will need to be addressed.

Ways to Protect and Expand Voting Rights

Our society must protect and expand voting rights so that voting is accessible to all eligible voters. First, the Voting Rights Act should be strengthened to protect minority voters and prevent the unnecessary closing of polling places. Second, because “in the modern era, studies have debunked the notion of widespread voter fraud corrupting American elections,”²⁴ voter ID requirements present an unnecessary barrier to voting that should be abolished. Third, to combat election disinformation, it should be a crime to “deliberately giv[e] false information to the public about the

requirements to register or vote” or the date and times of elections.²⁵ Fourth, to ensure a fair political climate in the future and to minimize gerrymandering, districts should be drawn by independent, bi-partisan commissions. Fifth, each district should have a reasonable number and distribution of polling places. Sixth, voting by mail should be widely available.

Finally, while the right to vote is discussed several times in the Constitution, the Constitution does not explicitly guarantee a right to vote.²⁶ This lack of an explicit guarantee has been used by the Supreme Court to refuse to decide voting cases based upon strict scrutiny,²⁷ leading to weakening of voting protections. Thus, the adoption of a Constitutional Amendment explicitly guaranteeing the right to vote would empower federal courts to provide strong protections to secure voting rights.

Voting gives people the ability to express their views through the ballot, making it a crucial link between the people and our government. Through implementing each of these solutions, the right to vote can be strengthened and made more accessible.

¹ Voting Rights Act of 1965, Pub. L. 89-110, 79 Stat. 437 (1965).

² MICHAEL WALDMAN, *THE FIGHT TO VOTE* 229-30 (Simon and Schuster 2016) [hereinafter Waldman].

³ Waldman at 230.

⁴ *Shelby County v. Holder*, 570 U.S. 529 (2013).

⁵ Waldman at 232.

⁶ The Leadership Conference Education Fund, *Democracy Diverted: Polling Place Closures and the Right to Vote*, Sept. 2019 p.12, available at <http://civilrightsdocs.info/pdf/reports/Democracy-Diverted.pdf>.

⁷ ALLAN J. LICHTMAN, *THE EMBATTLED VOTE IN AMERICA: FROM THE FOUNDING TO THE PRESENT* 187 (Harvard University Press 2018) [hereinafter Lichtman].

⁸ *Crawford v. Marion County Election Board*, 553 U.S. 181 (2008).

⁹ ARI BERMAN, *GIVE US THE BALLOT: THE MODERN STRUGGLE FOR VOTING RIGHTS IN AMERICA* 254 (Farrar, Straus and Giroux 2015).

¹⁰ Paul J. Weber, *Judge Again Throws Out Texas Voter ID Rules Backed by Trump, Compares Law to 'Poll Tax'*, CHICAGO TRIBUNE, Aug. 24, 2017, available at <https://www.chicagotribune.com/nation-world/ct-texas-voter-id-law-20170823-story.html>.

¹¹ Lichtman at 193.

¹² FRANCES FOX PIVEN ET AL., *KEEPING DOWN THE BLACK VOTE: RACE AND THE DEMOBILIZATION OF AMERICAN VOTERS* 167 (The New Press 2009) [hereinafter Piven].

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- ²⁵ Piven at 167.
- ²⁶ Lichtman at 188.
- ²⁷ *Id.*

Third Place ★★ Justin Goldman ★★ Richmond, VA



Justin Goldman is a senior at Maggie L. Walker Governor's School in Richmond, VA. His favorite subjects are government and history. He plans to major in political science and become a civil rights attorney. Justin also enjoys politics (volunteering on political campaigns), sports (playing soccer and running track and cross country), and community service (helping run an educational nonprofit and hosting a yearly book drive).

As citizens of the United States of America, our most prized action is exercising the right to vote. To have the privilege of saying “I helped elect that candidate” is a priceless feeling. Voting is how we, as Americans, voice our opinions and use our intellect to engage in democracy. In fact, our country boasts voting as a fundamental piece of a strong democracy. But how truly universal is this cherished activity? It seems almost contradictory to encourage such a cause when it is a futile excursion for some. Barriers to voting access, such as ID laws, polling place changes, and felon disenfranchisement, haunt the explicit rights given to all citizens in the Constitution and risk introducing moral corruption into the American democratic system.

Gaining the right to vote has been the objective of many passionate and determined movements in American history. With the ratification of the 15th amendment granting all men the ability to vote, as well as the 19th amendment giving women the right to vote, it seemed the issue of voter suppression had been resolved. As years progressed and discriminatory policies towards minorities survived,

the notion that everyone had equal rights was proved false. Through grandfather clauses, literacy tests, and poll taxes, voters of minority races were effectively blocked from a majority-dominated voting arena. While it seems that these issues were finally solved with the Voting Rights Act of 1965, other forms of voter suppression have emerged over time.

One of the most prevalent barriers to voting access in the United States is Voter-ID laws. Legislation in some states requires eligible voters to present an acceptable form of identification to participate in an election. Currently, thirty-four states have enacted these strict laws, essentially negating the years of progress made towards voting equality for minorities and lower-income groups. For some, it is difficult to obtain identification due to financial hardship or being incapacitated. The overall cost of applying for an ID can be anywhere from \$75 to \$175, according to Richard Sobel of Harvard Law School. While this may not seem like a hefty fee, for those surviving on close to minimum wage, it could be a large blow to their monthly income. It is more practical for them to purchase food rather than spend their money on travel expenses, document fees, and waiting times to receive a form of identification. In certain rural areas, the closest office to apply for a photo ID is almost 170 miles away (Sobel 2014, 22). With public transportation often being a scarce commodity in such localities, a heavy burden is placed on those applying for a form of identification. Without direct access to mandatory IDs, capable and qualified citizens are prohibited from voicing their opinions, only further adding to the systemic racism and pervasive discrimination in our country.

Commonly seen in many black communities, polling place closures or changes bar large populations from voting in local, state, and national elections. Following the 2013 Supreme Court decision in *Shelby County v. Holder* which eliminated certain provisions set forth in the Voting Rights Act of 1965, it became easier to shut down or alter the location of polling places. Decreasing the number of polling places can have a profound impact on voter turnout around the country. According to the Bipartisan Policy Center, with fewer polling places, there are longer lines and citizens have to travel further in order to vote. The lengthy wait is too much time away from work for

some. Voting officials change the precincts in order to throw the election in their favor, suppressing those of a lower socioeconomic status throughout the United States.

A substantial number of felons have their voting rights restricted after being released from prison. This not only contributes to widespread disenfranchisement, but by neglecting certain citizens, it does not accurately portray the decisions of a district. Around 6.1 million U.S. felons have been denied voting access, with one in every thirteen African Americans disenfranchised due to their prison sentencing. While some believe that felons may contain weakened judgement by cause of their crimes, impeding the rights of these humans diminishes the idea of universal suffrage and can negatively affect civil participation in communities around the country.

It is essential to regulate these pressing issues to conserve our nation's inherent principles of democracy. To expand voting rights to those who may feel excluded from the American politics, multiple changes could be made. First, increased accessibility to applying for forms of identification would greatly benefit those rejected from polling places as a result of no photo ID. This would mean expanding the number of respective offices for photo ID application, and also providing free resources such as no-cost application fees and stronger public transportation in rural areas. Next, regarding the closure and movement of polling locations, petitions for legislation could be enacted, requiring officials to confirm equally dispersed polling places and set mandates to limit location changes. While it's extremely difficult to push legislation into party agendas simply through advocating, it would still be useful to raise awareness for the issue. Lastly, stripping felons of their intrinsic voting rights is a problem still rampant in states across the U.S. While some governors have taken the preliminary steps in fixing the matter, states such as Kentucky and Iowa still fully ban felons from casting their vote in any political election. Passing legislation to prohibit voter suppression will require extensive campaigning and lobbying on the state and national level.

Voting is how residents of a country express their opinions. It's the driving force that keeps the engine of democracy running and functional. Without it, the United States would be an elitist oligarchy,

essentially confiscating the inherent power given to the people. The absence of barriers to voting signals a country where each and every citizen’s voice is truly heard. In order to protect the foundational liberties and keep governmental power in the hands of the citizens, voter suppression must be solved and thus, completely abolished.

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United States Court of Appeals for the Fourth Circuit

THE HONORABLE ROGER L. GREGORY
Chief Judge

THE HONORABLE J. HARVIE WILKINSON III

THE HONORABLE PAUL V. NIEMEYER

THE HONORABLE DIANA GRIBBON MOTZ

THE HONORABLE WILLIAM B. TRAXLER, JR.

THE HONORABLE ROBERT B. KING

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