

STATE OF NORTH CAROLINA

IN THE GENERAL COURT OF JUSTICE

SUPERIOR COURT DIVISION

WAKE COUNTY

No. 24CV028888-910

REPUBLICAN NATIONAL
COMMITTEE; and NORTH
CAROLINA REPUBLICAN PARTY,

Plaintiffs,

v.

NORTH CAROLINA STATE
BOARD OF ELECTIONS; ALAN
HIRSCH, JEFF CARMON, KEVIN
N. LEWIS, SIOBHAN O'DUFFY
MILLEN, STACY "FOUR" EGGERS
IV, in official capacity as members of
the NCSBE; and KAREN BRINSON
BELL, in official capacity as
Executive Director of the NCSBE,

Defendants,

and

DEMOCRATIC NATIONAL
COMMITTEE,

Intervenor-Defendant.

**INTERVENOR-DEFENDANT THE
DEMOCRATIC NATIONAL
COMMITTEE'S OPPOSITION TO
PLAINTIFFS' MOTION FOR
TEMPORARY RESTRAINING ORDER
OR EXPEDITED PRELIMINARY
INJUNCTION**

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INTRODUCTION

This lawsuit is an eleventh-hour bid to confuse and potentially disenfranchise up to 40,000 individuals who attend or work at North Carolina’s flagship state university, just weeks before they head to the polls for early voting. Plaintiffs ask the Court to punish students and employees at the University of North Carolina at Chapel Hill (“UNC”) for using the digital identification cards that UNC issued and encouraged them to use as voter identification, on the baseless theory that North Carolina law implicitly prohibits digital voter identification cards.

The North Carolina State Board of Elections (“Board”) determined after careful scrutiny of the statutory requirements for voter identification that UNC-issued digital photo identification cards—the default form of UNC campus identification, accessible only through a secure application on a cardholder’s mobile phone—qualify as voter identification, just as UNC’s plastic photo identification cards long have. After sitting in wait for weeks while the state and local organizations implemented that decision and assured students that they could rely on their mobile identification cards to vote, plaintiffs filed this last-minute request for an emergency injunction of that ruling. Such an injunction could disenfranchise thousands of registered and qualified North Carolina voters, and should be denied.

To start, plaintiffs’ challenge is not likely to succeed on the merits. Plaintiffs cannot point to any statutory provision that bars mobile identification cards as an acceptable form of voter identification, and UNC’s mobile “One Card” meets the detailed content and security requirements of the voter-identification law.

Moreover, the relief plaintiffs seek is foreclosed by both federal law and North Carolina's Constitution. Plaintiffs' extreme unlikelihood of success is reason enough to deny their motion.

In addition, plaintiffs will suffer no irreparable harm if registered voters are allowed to display their photographs on a mobile phone rather than a plastic identification card. And any trivial harm plaintiffs identify is far outweighed by the grave harm to UNC students and employees, who could be confused, misled, and disenfranchised by a late-stage judicial reversal of assurances their state made to them. This balance of harms is an independent reason to deny plaintiffs' motion.

Finally, plaintiffs' delay in bringing this lawsuit until the eve of an election should independently bar the extraordinary equitable relief they seek.

BACKGROUND

On December 19, 2018, North Carolina enacted a law requiring registered voters to present one of several acceptable forms of photographic identification in order to vote in person. See N.C. Gen. Stat. § 163-166.16. After years of litigation, the requirement took effect shortly before the 2023 municipal elections. See *Holmes v. Moore*, 384 N.C. 426 (2023). Under the law, acceptable forms of identification include a "student identification card issued by a constituent institution of The University of North Carolina," N.C. Gen. Stat. § 163-166.16(a)(1)(g), and an "employee identification card issued by a state or local government entity," *id.* § 163-166.16(a)(1)(h)—which includes UNC—provided that the Board approves those cards. The Board "shall" approve UNC-issued student and employee

identification cards so long as enumerated criteria are met. *Id.* §§ 163-166.17(a), 163-166.18(a). Institutions must submit new identification cards for approval and verify that the cards meet the enumerated criteria. *Id.* These criteria include detailed security requirements, including that the card contain a photograph and an expiration date, and that misuse of the card is punished. *Id.* Institutions also must provide copies of student and employee identification cards to the Board “to assist with training purposes.” *Id.* §§ 163-166.17(a)(1)(g), 163-166.18(a)(1)(g).

In 2019, the Board approved the plastic UNC One Card—which UNC issued to all students and employees at that time—as an acceptable form of voter identification. *See* Affidavit of William A. Robertson (“Robertson Aff.”), ¶ 3 & Ex. 1, UNC, *One Cards Approved As 2020 Voting ID For Employees, Students* (Dec. 10, 2019), <https://tinyurl.com/4r49932z>. But in 2023, UNC transitioned away from plastic One Cards, launching a mobile One Card as a new form of student and employee identification. *See* Robertson Aff. ¶ 4 & Ex. 2, UNC, *Mobile One Card Launches on Campus* (Aug. 23, 2024), <https://tinyurl.com/5dfsjdsc>. The mobile identification cards provide an additional layer of security; because they are stored on a cardholder’s phone, they are harder to lose, can be displayed only by the phone’s owner, and can be “instantly and remotely ... revoked,” Robertson Aff. ¶ 5 & Ex. 3, UNC, *Mobile One Card*, <https://tinyurl.com/5x8k2mhx>. UNC students and employees cannot obtain a mobile identification card until their photographs are reviewed by software and staff and they obtain a secure mobile credential accessible only through secure systems. *See* Robertson Aff. ¶ 6 & Ex. 4, UNC *Mobile One Card*

Application, at 2-3, 9. Moreover, the “mobile credential that serves as a student identification card is secured by the HID global system” which is “contained in highly secure data centers” and is the same technology used for credit and debit cards. *Id.* at 3. UNC touted this “secure mobile solution” as a “new and convenient” way to “access campus buildings, make payments and purchases, and more!” Ex. 2. When a digital One Card is added to a student’s or employee’s Apple Wallet (a secure digital wallet application available on the iPhone), the individual’s plastic One Card is deactivated. *Id.*

For the 2024-2025 school year, UNC ceased issuing plastic One Cards to new students and employees, making digital One Cards mandatory unless a student or employee qualifies for an exception and pays a fee. *See* Robertson Aff. ¶ 7 & Ex. 5, UNC, *Get My Card*, <https://tinyurl.com/bde3bdpm>. In June, UNC submitted its digital One Card for Apple Wallet for approval by the Board as voter identification, explaining how the digital card satisfies each statutory requirement. *See* Ex. 4. The application explained that digital One Cards are accessible only through the secure Apple Wallet application, which cannot display a One Card until the person’s identity has been verified. *See id.* at 2-3, 9.¹

¹ Although students with Android phones can use a mobile One Card for campus access through a third-party ID-management application, UNC submitted only the One Card for Apple Wallet for Board approval, *see* Robertson Aff. ¶ 8 & Ex. 6, UNC, *Android Device FAQs and Support*, <https://tinyurl.com/mvupdbtn>, indicating its seriousness about ensuring digital IDs are optimally secure before seeking approval for use as voter ID.

After rejecting other universities' applications to have their mobile student identification cards approved because they failed to meet the statutory requirements (such as the requirement that the identification display an expiration date), the Board approved UNC's application in August. *See State Board Meeting*, 7:00–23:30 (Aug. 20, 2024), <https://tinyurl.com/44bkb9vu>. As one Board member explained, UNC “jumped through a lot of hoops”—including robust security criteria—before its mobile identification card could be approved. *Id.* at 19:50. UNC accordingly began advertising that the digital One Card could be used as voter identification. Robertson Aff. ¶ 9 & Ex. 7, UNC, *Mobile UNC One Card for Apple Wallet Approved for Voter ID Use* (Aug. 23, 2024), <https://tinyurl.com/22kb5p7d>. Students have relied on UNC's representation that the mobile One Card is approved for use as voter identification in North Carolina, and they plan to vote with their mobile One Card in reliance on that representation. Ex. B, Affidavit of Vijaykrishna Bajaj ¶¶ 12-13.

Last week, the Republican National Committee (“RNC”) and North Carolina Republican Party (“NCRP”) filed a complaint and motion for a temporary restraining order or expedited preliminary injunction, seeking to prevent use of the digital One Card as voter identification.

LEGAL STANDARD

A temporary restraining order (“TRO”) or preliminary injunction “is an extraordinary measure taken by a court to preserve the status quo of the parties during litigation” that is not lightly granted. *A.E.P. Indus., Inc. v. McClure*, 308

N.C. 393, 401 (1983). Such orders should issue only if a plaintiff is (1) “able to show likelihood of success on the merits” and (2) “likely to sustain irreparable loss unless the injunction is issued, or if, in the opinion of the Court, issuance is necessary for the protection of a plaintiff’s rights during the course of litigation.” *Id.* at 401 (citations omitted). Mandatory injunctions, such as the one plaintiffs seek here compelling the State Board to revise its guidance and reverse a prior decision, “are disfavored as an interlocutory remedy.” *Roberts v. Madison Cnty. Realtors Ass’n, Inc.*, 344 N.C. 394, 400 (1996). Such orders demand an even greater showing—plaintiffs must prove “serious irreparable injury to the petitioner if the injunction is not granted, no substantial injury to the respondent if the injunction is granted, and predictably good chances of success on the final decree by the petitioner.” *Id.*

ARGUMENT

I. PLAINTIFFS ARE NOT LIKELY TO SUCCEED ON THE MERITS.

A. The “UNC One Card” Meets The Requirements Of The Voter-ID Statute.

1. Under North Carolina law, if “a registered voter presents to vote in person, the ... voter shall produce” one of several “forms of identification that contain a photograph of the ... voter.” N.C. Gen. Stat. § 163-166.16(a). One acceptable “form[],” *id.*, is photo identification issued by UNC to its students and/or employees, *id.* § 163-166.16(a)(1)(g), (h). “The purpose of the identification require[ment] ... is to confirm the person presenting to vote is the registered voter on the voter registration records.” *Id.* § 163-166.16(g). Contrary to plaintiffs’ allegation, nothing about that textual purpose, nor anything else in the statutory

text, requires UNC-issued photo identification to be a “tangible, physical item,” Compl. ¶ 44, to qualify as voter identification.

To the contrary, the relevant text provides only that “[t]he State Board shall approve the use of student identification cards issued by ... The University of North Carolina ... if [certain] criteria are met.” N.C. Gen. Stat. § 163-166.17(a); *see also id.* § 163-166.18(a) (same for UNC-issued employee-identification cards). The criteria include detailed security requirements—including that the card contain a photograph and an expiration date, and that misuse of the card is punished. *See id.* §§ 163-166.17(a)(1); 163-166.18(a)(1). None of the criteria requires that the card be printed on paper or plastic, i.e., that it be a “tangible, physical item,” Compl. ¶ 44.

2. Plaintiffs contend that the word “card” supplies the tangibility requirement. But contrary to the premise underlying this contention (*see* Compl. ¶ 41), “card” is not defined anywhere in the statute. And absent a “statutory definition,” courts in this state look to “common usage” to interpret a statutory term. *Jernigan v. Hanover Fire Ins. Co. of N.Y.*, 235 N.C. 334, 335 (1952). That approach defeats plaintiffs’ argument, because the word “card” is commonly used, including by North Carolina state institutions, to describe digital records.

For example, the digital form of identification at issue here is called the “UNC One Card” and is described on UNC’s website as a “campus ID card.” Robertson Aff. ¶ 10 & Ex. 8, UNC, *UNC One Card*, <https://onecard.unc.edu>. Similarly, the policy agreement between UNC and One Card holders states that the One Card “is a multipurpose identification card” that “may be physical or mobile.”

Robertson Aff. ¶ 11 & Ex. 9, UNC One Card Cardholder Agreement Policy. And the policy defines “any student, employee, or affiliate of UNC-Chapel Hill who acquires a UNC One Card, physical or mobile” as a “cardholder.” *Id.*

To take another example, during the COVID-19 pandemic, several North Carolina health groups—“including NCDHHS, UNC Health, ... and others”—were “members of the coalition that developed SMART Health Cards,” which are “digital card[s]” enabling North Carolinians to prove their vaccination status. Robertson Aff. ¶ 12 & Ex. 10, Kimberly Cataudella, *Lost Your Vaccine Card? You May Get a Digital Replacement*, Raleigh News & Observer (Jan. 29, 2022), <https://tinyurl.com/49ffhetk>. Elsewhere in the General Statutes, the legislature has used the term “card” in circumstances that plainly encompass digital cards. *See, e.g.*, “The Financial Transaction Card Crime Act,” N.C. Gen. Stat. § 14-113.8 *et seq.*

Other examples abound. To illustrate, a Lexis News search for variants of the terms “digital card” OR “digital identification card” turns up over 5,000 results from English-language publications in the United States over the last decade. Robertson Aff. ¶ 13 & Ex. 11.

3. Plaintiffs’ argument that a non-textual tangibility requirement should be judicially added to the statute violates “the long-standing rule[] of interpretation and construction in this state” that “the expression of one thing is the exclusion of another.” *Mangum v. Raleigh Bd. of Adjustment*, 196 N.C. App. 249, 255 (2009). “Under this canon of statutory construction, when a statute lists the situations to which it applies, it implies the exclusion of situations not contained in the list.”

Town of Midland v. Harrell, 385 N.C. 365, 375-376 (2023). Here, the statute lists criteria that, if satisfied, render an identification card acceptable. Because a tangibility requirement is “not contained in the list,” *id.*, any such requirement is excluded.

Plaintiffs’ posited tangibility requirement likewise violates the closely related canon that “a matter not covered is to be treated as not covered,” *Woody v. AccuQuest Hearing Ctr., LLC*, 284 N.C. App. 540, 548 (2022). As the North Carolina Supreme Court has explained, courts construing a statute may not “insert words that are not used.” *N.C. Farm Bureau Mut. Ins. Co. v. Dana*, 379 N.C. 502, 510 (2021). Applying the same rule, the Supreme Court of Maryland held that its board of elections could not mandate legibility as a condition of accepting a signature because the statute requiring the signature did not expressly demand legibility. *Montgomery County Volunteer Fire Rescue Association v. Montgomery Cnty. Bd. of Elections*, 15 A.3d 798, 808 (Md. 2011). Similarly here, the Board not only acted lawfully by accepting UNC’s digital identification card, but also lacked discretion to reject the card based on an atextual tangibility requirement.

4. Plaintiffs make four arguments to overcome the lack of any textual or common-sense basis to say that a UNC-issued “card” *must* be tangible. Each lacks merit.

First, plaintiffs assert that, “as with other permissible identification cards, the law contemplates that UNC will have equipment for *printing* the identification cards,” which plaintiffs say implies that the cards must be tangible. Compl. ¶ 42

(emphasis added); *see also id.* ¶ 35. But unlike the statutory section governing a different type of voter-identification card—a section that *does* refer to “equipment necessary to print voter photo identification cards,” N.C. Gen. Stat. § 163-82.8A(b)—the statutory sections governing UNC-issued identification cards refer to “equipment for *producing*” the cards, *id.* § 163-166.17(a)(1)(c) (emphasis added); *see also id.* § 163-166.18(a)(1)(c). Plaintiffs’ attempt to equate “producing” with “print[ing]” violates the interpretive rule that “[d]ifferent words used in the same statute should be assigned different meanings,” *In re M.I.W.*, 365 N.C. 374, 379 (2012); *see also N.C. Farm Bureau Mut. Ins. Co. v. N.C. Dep’t of Revenue*, 2023 WL 2754645, *8 (N.C. Super. Apr. 3, 2023).

Second, plaintiffs argue that the statute’s reference to cards being “issued” suggests that “there is a physical, tangible item created.” Compl. ¶ 45. But to “issue” means merely “to put forth officially” or “to send out or distribute officially.” *Mining Energy, Inc. v. Dir., Office of Workers’ Comp. Programs*, 391 F.3d 571, 575 (4th Cir. 2004); *see also Griswold v. United States*, 59 F.3d 1571, 1580 (11th Cir. 1995). Many non-tangible items are “issued.” For example, courts issue opinions on their websites, companies electronically issue stock, and military officers issue verbal orders. Indeed, the General Assembly recently recognized that mobile drivers’ licenses could be “issued” by the DMV. N.C. Sess. Law 2024-30 § 1(b).

Third, plaintiffs contend that a state regulation’s reference to a “‘photograph appearing *on* the photo identification’ implies that [the identification] is a physical, tangible item.” Compl. ¶ 48 (quoting 08 NCAC 17 .0101). But the word “on” does not

imply tangibility. Indeed, the statute at issue here refers to material “*on* the State Board’s Web site,” which is by definition digital. N.C. Gen. Stat. § 163-166.17(c) (emphasis added).

Fourth, plaintiffs argue that the Board’s prior guidance that “[a]n image of a photo ID, either as photocopy or a photo on a mobile device, is not one of the permitted forms of photo ID when voting in person” bars digital One Cards. Compl. ¶ 51 (quoting Karen Brinson Bell, Numbered Memo 2023-03 at 3 (updated Feb. 23, 2024), <https://tinyurl.com/2sf8zf8c>). This misunderstands both the guidance and how digital identification cards work. The guidance bars individuals from photocopying or taking a photo of their identification card and presenting that photocopy or picture of their physical ID at the polls. But as the Board’s general counsel explained to the Board, digital identification cards are not photographs. *See State Board Meeting, supra* p.5. Just as a digital credit card or airline boarding pass accessible through Apple Wallet is not a picture of the physical credit card or boarding pass, digital identification cards are not stored on the mobile device and are accessible only through a secure application on the phone.

In sum, there is no basis for imposing an atextual tangibility requirement for approving UNC-issued identification cards as an acceptable form of voter identification.

B. The Relief Plaintiffs Seek Is Barred By Both Federal Law And The North Carolina Constitution.

With just weeks to go until early voting starts, plaintiffs ask this Court to risk disenfranchising potentially thousands of registered and qualified UNC voters

who plan to rely on their mobile identification to vote. It will soon be too late (and in some cases, may be too burdensome) for these people to obtain alternative identification; they likely will have to stay home. Such denial of “one of the most cherished rights in our system of government,” *Blankenship v. Bartlett*, 363 N.C. 518, 522 (2009), would violate the Fourteenth Amendment’s Due Process Clause, *see* U.S. Const. amend. XIV, and North Carolina’s Free Elections and Law of the Land Clauses, N.C. Const. art. I, §§ 10, 19, which our supreme court “has consistently interpreted ... to provide the utmost protection for the foundational democratic freedom[] of ... voting,” *Kennedy v. N.C. State Bd. of Elections*, 2024 WL 4119196, at *1 (N.C. Sept. 9, 2024) (alteration in original).

Moreover, plaintiffs’ requested relief, which would disproportionately burden young and Democratic voters, would also violate the state constitution’s equal-protection guarantee. *See* N.C. Const. art. I, §§ 1, 19. “The right to vote on equal terms is a fundamental right” under the Law of the Land Clause, and rules that deprive some voters of the franchise violate it. *Northampton Cnty. Drainage Dist. No. One v. Bailey*, 326 N.C. 742, 747 (1990).

C. Plaintiffs Have Not Adequately Pleaded Any Entitlement To Declaratory Or Injunctive Relief, Let Alone The Extraordinary Remedy Of Mandamus.²

Plaintiffs’ request for mandamus is manifestly insufficient. Mandamus is available only to require state officers to perform required ministerial duties. *In re*

² Plaintiffs seek “an expedited writ of mandamus and [a] preliminary and permanent injunction.” Compl. 23-24. This request is redundant. *See Ponder v. Joslin*, 262 N.C. 496, 504 (1964).

T.H.T., 362 N.C. 446, 453-454 (2008). A duty is ministerial, moreover, only when it is “absolute, certain, and imperative, involving merely the execution of a specific duty arising from fixed and designated facts.” *Meyer v. Walls*, 347 N.C. 97, 113 (1997). And mandamus may invalidate an exercise of discretion only if “it clearly appears” that “there has been an abuse of discretion.” *Ponder*, 262 N.C. at 504.

Plaintiffs have failed to show that the Board is under *any* legal obligation to bar digital photo-identification cards; its obligation is to “approve” UNC-issued identification cards “if” the requirements set forth in Gen. Stat. § 163-166.17(a) (for student cards) or § 163-166.18(a) (for employee cards) are met. If there is ambiguity as to whether the list implicitly contains a tangibility requirement, moreover, the Board retains discretion to “make such reasonable rules and regulations ... as it may deem advisable so long as they do not conflict with” the election laws. N.C. Gen. Stat. § 163-22(a). As explained, plaintiffs have not shown that the Board’s decision to approve UNC’s One Card conflicts with any other requirement. Further, plaintiffs have an adequate alternative remedy. State law allows plaintiffs to challenge voters who they believe lack an adequate form of voter ID. *See* N.C. Gen. Stat. § 163-87(5), or challenge a practice that they believe violates state law in a protest, *id.* § 163-182.9. Mandamus is therefore unavailable. *See Burgin v. N.C. State Bd. of Elections*, 214 N.C. 140, 145 (1938).

II. THE BALANCE OF HARMS FAVORS DENIAL OF AN EMERGENCY INJUNCTION.

Plaintiffs will suffer no (let alone serious) irreparable harm if denied the last-minute injunction they seek, nor would denying an injunction threaten any right of

theirs. Plaintiffs contend (Mot. ¶ 27) that allowing election officials to accept digital One Cards would cause them “palpable” harm because it “would violate fundamental principles of free election.” But the bedrock of free elections is access to the polls, including “protect[ing] voters from interference ... in the voting process.” *Harper v. Hall*, 384 N.C. 292, 361 (2023). “By definition, [t]he public interest ... favors permitting as many qualified voters to vote as possible.” *League of Women Voters of N.C. v. North Carolina*, 769 F.3d 224, 247 (4th Cir. 2014). Plaintiffs cannot explain how allowing UNC students and employees who are already “registered voter[s],” N.C. Gen. Stat. §163-166.16(a), to identify themselves with their mobile One Cards makes the election less free for plaintiffs or anyone else.

Plaintiffs assert (Mot. ¶ 27) that accepting UNC’s digital One Card will “dilute or annul every legal voter[’s] clearly established statutory and constitutional rights.” But the photo-identification requirement’s purpose is “to confirm the person presenting to vote is the registered voter on the voter registration records.” N.C. Gen. Stat. § 163-166.16(g). There is no basis for plaintiffs’ implication that digital One Cards will enable ineligible persons to vote. An ineligible voter could not use her digital One Card to vote because she would not be registered. Nor could she use someone else’s digital One Card to vote, because she would not match the photograph on the card. And she could not show a doctored photo of a card, because One Cards are displayable only through Apple Wallet, not through photo applications, *see supra* p. 4-5. Plaintiffs have not shown how using a mobile One Card would dilute votes, nor why properly trained election officials

could not mitigate any such risk—for example, by checking that voters open the mobile One Cards through the Apple Wallet application.

Plaintiffs' delay in seeking relief further supports the lack of any irreparable harm here, as their cry for immediate relief is a problem “of their own making.” *Kennedy*, 2024 WL 4119196, at *2. Their attempt at obtaining an eleventh-hour reversal of the Board's decision, which UNC, its students, and election officials have been implementing for weeks, would not only disrupt the status quo, but also throw the election into further confusion and disarray.

Weighed against the “potential harm to the defendant if injunctive relief is granted,” *Williams v. Greene*, 36 N.C. App. 80, 86 (1978), whatever abstract harm plaintiffs have identified is trivial and insufficient to warrant misleading voters in elections that are weeks away. In considering late-stage challenges to election procedures, in particular where the relief sought would risk “misleading” voters so close to the election, the grave harm of potential disenfranchisement is paramount and must be “appropriately weigh[ed].” *Kennedy*, 2024 WL 4119196, at *1. Here, a judicial declaration that digital One Cards are not valid voter identification, after contrary assurances from both UNC and the Board, *see Robertson Aff.* ¶ 6 & Ex. 6, would risk “disenfranchis[ing] countless voters who mistakenly believe,” in reliance on government assurances, that they can access the polls with their digital card, *Kennedy*, 2024 WL 4119196, at *1. Unless they happen to have another form of acceptable photo identification, such voters could be turned away by election officials at the polls or forced to cast provisional ballots. And others may not even

show up to vote, as “voter confusion has a strong potential to negatively impact voter turnout,” *Holmes v. Moore*, 270 N.C. App. 7, 35 (2020), *rev’d on other grounds*, 384 N.C. 426 (N.C. 2023).

Put simply, allowing registered voters to vote using their digital One Cards would cause plaintiffs no irreparable harm, while an order issued weeks before the election barring the use of One Cards as voter identification could confuse, mislead, and even disenfranchise thousands of eligible voters. That (im)balance of harms militates strongly against an emergency injunction.

CONCLUSION

Plaintiffs’ motion for a TRO or expedited preliminary injunction should be denied.

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Respectfully submitted, this 17th day of September, 2024.

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CERTIFICATE OF SERVICE

The foregoing document was electronically filed and served by electronic mail upon the following:

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This 17th day of September, 2024.

/s/ William A. Robertson
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**INDEX OF EXHIBITS TO
INTERVENOR-DEFENDANT THE DEMOCRATIC NATIONAL
COMMITTEE'S OPPOSITION TO PLAINTIFFS' MOTION FOR TEMPORARY
RESTRAINING ORDER OR EXPEDITED PRELIMINARY INJUNCTION**

Exhibit No.		Document
A		Affidavit of William A. Robertson
	1	One Cards approved as 2020 voting ID for employees, students
	2	Mobile One Card Launches on Campus
	3	Mobile One Card
	4	UNC-CH Digital Card
	5	Get My Card
	6	Android Device FAQs and Support
	7	Mobile UNC One Card for Apple Wallet Approved for Voter ID Use
	8	UNC One Card Website
	9	UNC One Card Cardholder Policy Agreement
	10	N&O, <i>Lost Your Vaccine Card? You May Get a Digital Replacement</i>
	11	Lexis News Search for Digital ID card
B		Affidavit of Vijaykrishna Bajaj

EXHIBIT A

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STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
24CV028888-910

REPUBLICAN NATIONAL
COMMITTEE and NORTH
CAROLINA REPUBLICAN PARTY,

Plaintiffs,

v.

NORTH CAROLINA STATE BOARD
OF ELECTIONS, ALAN HIRSCH,
JEFF CARMON, KEVIN N. LEWIS,
SIOBHAN O'DUFFY MILLEN,
STACY "FOUR" EGGERS IV, in
Official Capacity as Members of
NCSBE, and KAREN BRINSON
BELL, in Official Capacity as
Executive Director of NCSBE,

Defendants.

**AFFIDAVIT OF WILLIAM A.
ROBERTSON**

William A. Robertson, being first duly sworn, deposes and says:

1. My name is William A. Robertson. I am over the age of 18 and under no disability. The facts stated in this affidavit are known to me personally, unless otherwise specifically stated, and I am competent to testify to them.

2. I am counsel for Intervenor the Democratic National Committee ("DNC") in this matter.

3. Attached hereto as **Exhibit 1** is a true and correct copy of the following article published the University of North Carolina at Chapel Hill's ("UNC") website: UNC, *One Cards Approved As 2020 Voting ID For Employees, Students*, (Dec. 10, 2019). I obtained a copy of this article from UNC's website on September 16, 2024.

4. Attached hereto as **Exhibit 2** is a true and correct copy of the following article published UNC's One Card website: UNC, *Mobile One Card Launches on Campus* (Aug. 15, 2023). I obtained a copy of this article from UNC's One Card website on September 16, 2024.

5. Attached hereto as **Exhibit 3** is a true and correct copy of the following webpage published UNC's One Card website: UNC, *Mobile One Card*. I obtained a copy of this webpage from UNC's One Card website on September 17, 2024.

6. Attached hereto as **Exhibit 4** is a true and correct copy of the UNC Mobile One Card Application to the North Carolina State Board of Elections. This information is publicly available on the North Carolina State Board of Elections (the "State Board") webpage containing meeting documents for the State Board's August 20, 2024 board meeting.

7. Attached hereto as **Exhibit 5** is a true and correct copy of the UNC, *Get My Card* webpage. I obtained a copy of this webpage on September 16, 2024.

8. Attached hereto as **Exhibit 6** is a true and correct copy of the following webpage published UNC's One Card website: UNC, *Android Device FAQs and Support*. I obtained a copy of this webpage from UNC's One Card website on September 17, 2024.

9. Attached hereto as **Exhibit 7** is a true and correct copy of the following article published UNC's One Card website: UNC, *Mobile UNC One Card for Apple Wallet Approved for Voter ID Use* (Aug. 23, 2024). I obtained a copy of this article from UNC's One Card website on September 16, 2024.

10. Attached hereto as **Exhibit 8** is a true and correct copy of the main webpage for UNC's One Card website. I obtained a copy of this webpage from UNC's One Card website on September 16, 2024.

11. Attached hereto as **Exhibit 9** is a true and correct copy of the UNC One Card Cardholder Agreement Policy. I obtained a copy of this webpage from UNC's policies.unc.edu website on September 16, 2024.

12. Attached hereto as **Exhibit 10** is a true and correct copy of Kimberly Cataudella, *Lost Your Vaccine Card? You May Get a Digital Replacement*, Raleigh News & Observer (Jan. 29, 2022). I obtained a copy of this article from newsobserver.com on September 16, 2024.

13. Attached hereto as **Exhibit 11** is a true and correct copy of a Lexis News search for variants of the terms "digital card" OR "digital identification card," which turned up over 5,000 results from English-language publications in the United States over the last decade. I obtained the results of this search on September 17, 2024.

14. A true and correct copy of the video recording of the State Board's August 20, 2024 meeting is available at the following link:
<https://tinyurl.com/44bkb9vu>.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

Further the affiant sayeth naught. This the 17th day of September, 2024.

William A Robertson

William A. Robertson

STATE OF NORTH CAROLINA

WAKE COUNTY

Subscribed and sworn to (or affirmed) before me this day by William A. Robertson, personally known to me or proved to me on the basis of satisfactory evidence to be the person who appeared before me, and executed the foregoing instrument for the purposes set forth therein and in the capacity indicated.

Date: 8/17/24

Patricia G Douglas
Notary Public (Signature)

[official seal]

Patricia G Douglas
Notary Public (Print Name)

My Commission Expires: 5/2/29

PATRICIA G DOUGLAS
Notary Public
Wake County, NC
My Commission Expires May 2, 2029

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EXHIBIT 1

RETRIEVED FROM DEMOCRACYDOCKET.COM

UNIVERSITY NEWS

One Cards approved as 2020 voting ID for employees, students

Voters may use any acceptable form of ID, including driver's licenses, U.S. passports, tribal enrollment cards or military and veterans ID cards.

By The Well, Tuesday, December 10th, 2019

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I Accept



One Cards and other photo IDs issued by UNC System institutions will be acceptable forms of identification for the 2020 elections in North Carolina, State Elections Director Karen Brinson Bell announced Nov. 26.

“I’m pleased to share that the North Carolina State Board of Elections approved our request to allow students, faculty and staff to use their UNC One Cards as voting ID in future elections,” Interim Chancellor Kevin M. Guskiewicz said after the announcement. “Carolina is committed to

Interim UNC System President William Roper issued the following statement about the decision: “I am pleased that student and employee identification cards at each of our 17 institutions have now been approved by the N.C. State Board of Elections. This approval will allow any voting-eligible employee or student to exercise their civic duty. We wish to thank all of those who worked hard for months behind the scenes to make this happen.”

Beginning in 2020, voters in North Carolina will be asked to present photo identification to vote, though certain exceptions apply. Voters may use any acceptable form of ID, including driver’s licenses, U.S. passports, tribal enrollment cards or military and veterans ID cards. Voters who do not have an acceptable ID may get a free North Carolina voter ID from their county board of elections.

Carolina’s original request to allow One Cards as voter IDs was denied by the elections board in March because the University’s process allowed for individual photo upload. The law was rewritten to require a University staff member to obtain

approval by the State Board of Elections allowing them to be used as voter IDs.

Next year, UNC-Chapel Hill students, faculty and staff may opt to use their UNC One Card as a voter ID. However, starting in 2021, One Cards will need to be stamped with an expiration date to be used as a voter ID. Cards issued starting in July 2020 will have 10-year expiration dates. One Card holders who want to use them as voter IDs will need to get a new card stamped with an expiration date.

CATEGORIES [University News](#)

KEEP READING

Message from Interim Chancellor Kevin M. Guskiewicz about concerns about the Confederate Monument

**YOU MAY ALSO
LIKE...**



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**FOCUS ON
HOUSING**

The initiative will work with communities across the state to improve affordable housing access and availability.

**SPACE
HISTORY**

Weeks after becoming the youngest woman to cross the Kármán line, the proud Carolina senior is “still processing it

**WITH
LIFESAVING
DONATION**

In August, Samantha Lewis offered a stem cell donation that was years in the making.

© 2024 The University of North Carolina at Chapel

Hill

RETRIEVED FROM DEMOCRACYDOCKET.COM all.”

EXHIBIT 2

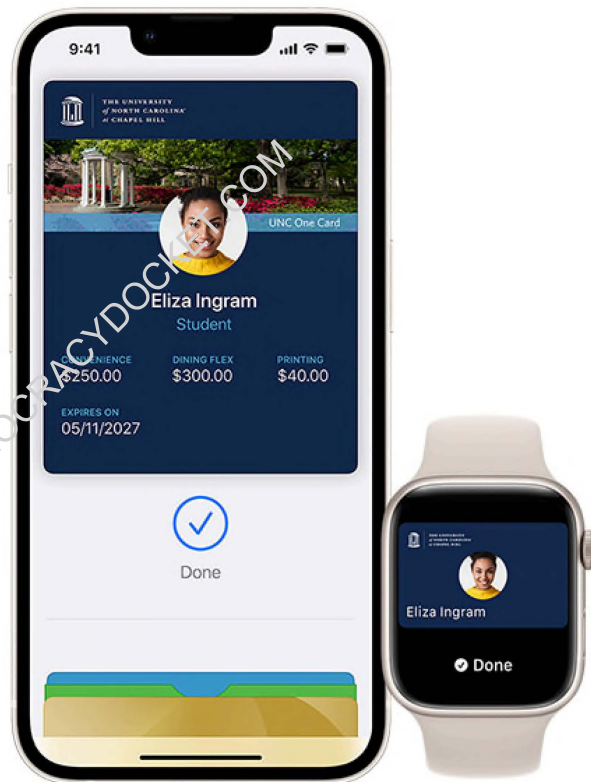
RETRIEVED FROM DEMOCRACYDOCKET.COM

Mobile One Card Launches on Campus

August 15, 2023

Starting today, the UNC One Card can now be added as a mobile ID to compatible iPhone and Apple Watch devices. Students, employees and affiliates will be able to use the mobile One Card to access campus buildings, make payments and purchases, and more!

“We are excited to offer this secure mobile solution to our campus community,” said Scott Myers, executive director of Auxiliary Services. “We continuously look for new technologies, and we think that students and employees will appreciate this new and convenient way to use their One Cards from their phones.”



The mobile One Card is considered a valid form of University ID and provides an additional level of convenience and accessibility. Once added to Apple Wallet, the mobile One Card can be used anywhere the physical card is used, both on and off campus (except as voter ID.) Using contactless technology, cardholders can present

their iPhone or Apple Watch to card readers to pay for food and vending, open campus doors, and access parking lots and athletic events. You don't have to wake the device or open an app.

Cardholders can view meal plan, Flex and other account balances directly on their mobile One Card. Mobile One Cards can also be instantly and remotely issued, revoked or reactivated, offering an added level of control and fraud protection for cardholders.

To add your One Card to your iPhone or Apple Watch, follow the step-by-step instructions at [Mobile One Card](#). You can add the One Card to both your iPhone and Apple Watch, but only one format of the card (physical or mobile) will be permitted.

Once a card is added to Apple Wallet, the physical card will no longer work.

However, cardholders are encouraged to keep their physical card to use as a valid voter ID.

Building and parking lot access is no longer provided through the GET or Mobile ID apps. Cardholders should add the mobile One Card to their device to continue accessing locked and gated entrances on their phones.



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EXHIBIT 3

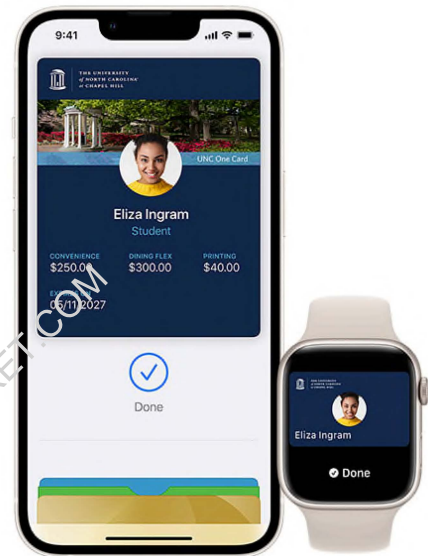
RETRIEVED FROM DEMOCRACYDOCKET.COM

Mobile One Card

The mobile One Card is your official UNC-Chapel Hill ID located on your iPhone or Apple Watch. Once added to Apple Wallet, you can use the mobile One Card to access campus buildings, make payments and purchases, and more.

The mobile One Card is considered a valid form of University ID and provides an additional level of convenience and accessibility. Once added to Apple Wallet, the mobile One Card can be used anywhere the physical card is used, both on and off campus. Using contactless technology, cardholders can simply tap their iPhone or Apple Watch to card readers to pay for food and vending, open campus doors, and access parking lots and athletic events. The mobile One Card for Apple Wallet on iPhone is also approved as voter ID in North Carolina.

Cardholders can view meal plan, Flex and other account balances directly on their mobile One Card. Mobile One Cards can also be instantly and remotely issued, revoked or reactivated, offering an added level of control and fraud protection for cardholders.



How do I get the mobile One Card on my Apple devices?

1. If you have not previously been issued a One Card, visit [Get My Card](#) and complete the steps to obtain your One Card.
2. Ensure that you have an [approved photo](#) on file. A new, updated photo will be required if the cardholder photo on file is more than five years old.
3. Download and configure the [GET Mobile app](#).
4. Select "University of North Carolina at Chapel Hill" from the list of institutions, login with your Onyen and password, and complete the DUO authentication.
5. Select the "Add to Apple Wallet" button, then select whether you would like to add your One Card to your iPhone or Apple Watch.

You can add the One Card to both your iPhone and Apple Watch, but only one format of the card (physical or mobile) will be permitted. **Once a card is added to Apple Wallet, the physical card will no longer work.** However, cardholders are encouraged to keep their physical for use as a valid voter ID.

For additional information on eligible devices and using the One Card in Apple Wallet, visit [Apple Device FAQs and Support](#).

The mobile One Card is not currently available for Google Wallet on Android devices. For more information on using your One Card on Android devices via the GET Mobile app, visit the [Android Device FAQs and Support](#).

EXHIBIT 4

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STUDENT IDENTIFICATION APPROVAL REQUEST FORM 2023-2024



NC State Board of Elections • P.O. Box 27255 • Raleigh, NC 27611-7255 • (866) 522-4723

Please return completed form to VoterID@ncsbe.gov

1 Information About Your Institution

This institution is a: Constituent Institution of the University of North Carolina *
 Eligible Private University or College Community College*
** Use this form for student IDs only; use the [Employee ID Approval Form](#) for approval of staff IDs.*

The University of North Carolina at Chapel Hill

Name of Institution

Mobile UNC One Card

Name/Type of Card

Orange

County or Counties with Campuses

2 ID Card Requirements

Indicate that this is a new request for approval or that the identification has not changed since its approval on March 15, 2019.



Check this box if you are seeking approval of a digital ID card or mobile credential. **If you check this box, you must attach additional documentation to this form describing how the digital ID or mobile credential meets the requirements in 1. through 8.**

New Request. The following requirements have been met and will not knowingly be violated with regard to student identification cards issued during the approval period: *(you must check each box for this option to be complete)*

- 1. The identification cards that are issued by the university or college contain photographs of students obtained by the university or college or its agents or contractors, and the photograph obtained is a frontal image that includes the student's face and represents a clear, accurate likeness of the student to whom the identification card is issued. **If the photograph used is not produced by the university or college or its agents, you must certify in detail the process used by the university or college to ensure the photograph is that of the student to whom the identification card is issued and must certify the process is designed to confirm the identity of the student to whom the identification card is issued. (You must attach additional documentation to this form describing the process used if the photograph is not produced by the university or college or its agents.)**
- 2. The identification cards are issued after an enrollment or other process that includes one or more methods of confirming the identity of the student using information that may include, but is not limited to, the social security number, citizenship status, and birthdate of the student.
- 3. Access to the equipment for producing the identification cards is restricted through security measures.
- 4. Misuse of the equipment for producing the identification cards would be grounds for student discipline or termination of an employee.
- 5. University or college officials would report any misuse of student identification card equipment they have knowledge of to law enforcement if G.S. 163-275(19) was potentially violated.
- 6. ID cards issued by the university or college during the approval period will contain an expiration date.
- 7. The university or college will provide copies of student identification cards to the State Board for training purposes.
- 8. The college or university will provide to students who are issued the student identification card a copy of, or an electronic link to, the Voting as a College Student Infosheet that details the information required by G.S. 163-166.17(a)(1)h.

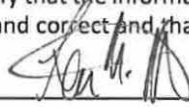
If you have any concerns about whether your institution meets any of the requirements, please attach additional documentation explaining the processes used.

Statement of No Changes. No changes have been made to the student identification cards that were approved by the State Board on March 15, 2019. *Current cards and cards approved on Mar. 15, 2019 must have an expiration date.*

3 Attestation

I have attached additional documentation to this form.

I certify that the information provided on this form, and any additional documentation attached to this form, are true and correct and that I am the Chancellor, President, or Registrar of the university or college.

X 

Signature

X Lauren M. DiGrazia

Print Name

06/12/2024

Date

Assistant Provost & University Registrar

Print Title (Chancellor, President, or Registrar)

The University of North Carolina at Chapel Hill
Approval for Student Identification Cards- Mobile Credential Only

At present, mobile credentials are only available for students who use Apple phones.

Requirement 1- Photo submission process

The identification cards that are issued by UNC-CH contain photographs of students submitted by students to UNC-CH through a secure process. Self-submitted photographs must meet quality and composition criteria designed to ensure that submissions are suitable for identification card use. UNC-CH staff review submitted photographs and reject those that fail to meet the criteria.

The criteria given to individuals submitting photos are below:

“Your photo must

- Show you looking directly at the camera with a neutral expression or smiling.
- Have your face clearly visible and shoulders square to the viewer.
- Have a white or solid, light-colored background.
- Include only your head and upper shoulders (complete head must be in photo)
- Pixelated or grainy photos not accepted.
- Face should be visible (dark or light photos will not be accepted)
- Do not show other people, animals etc. or parts thereof.
- Orientation of photo must be correct (if photo is sideways, it will not be accepted)
- No filters accepted or watermarks (this includes black and white photos)
- No picture of a picture please
- Avoid headgear or sunglasses (an exception is made for reasons of religious observance)”

To submit a photograph for use on a student identification card, students must log onto a UNC-CH website using a unique identifier assigned and maintained by UNC-CH. That unique identifier is assigned after students provide their full legal name, gender, and birthdate. Students then use their unique identifier to obtain individual login credentials. They must use their individual login credentials to upload and associate their photograph with their unique identifier. They also must upload identification with the photo, including a U.S. Driver’s License, U.S. Visa, U.S. Passport, U.S. State issued ID, or a U.S. Military ID.

To receive a mobile credential that serves as a student identification card, students submit an official photo identification, such as a license, military ID, or passport. An AI program compares the official photo identification and the student’s physical appearance in the current photo submitted prior to providing the mobile credential. UNC staff also review the identification and the photo. A mismatch in the photo and the identification would trigger an error.

Requirement 2-The identification cards are issued after an enrollment or other process that includes one or more methods of confirming the identity of the student using information that may include, but is not limited to, the social security number, citizenship status, and birthdate of the employee.

As with physical identification cards, mobile credentials that serve as student identification cards are not issued until after the application and enrollment process is complete.

Requirement 3- Access to the equipment for producing the identification cards is restricted through security measures.

Access to the mobile credential is through secured systems. The equipment involved is all digitally accessed through a contract with a vendor, who has been approved by the University's data governance and Privacy offices as having secure data practices. The mobile credential that serves as a student identification card is secured by the HID Global system, the same producer of the chips in the physical identification cards. The mobile credential is issued via a secure HID Global Systems application programming interface. These systems are cloud based and contained in highly secure data centers. The same technology is used in the chip securing the UNC One Cards as the chip in credit and debit cards.

Requirement 4- Misuse of the equipment for producing the identification cards would be grounds for student discipline or termination of an employee.

As with the physical identification cards, only authorized personnel are involved in the process of creating the mobile credential. Anyone attempting to change internal control processing for creating or editing the mobile credential would similarly be subject to discipline. Only vendor personnel would have the capability to change the credential. HID is bound by the security requirements of the University's instantiated contract.

Requirement 5- University or college officials would report any misuse of student identification card equipment to law enforcement if G.S. 163-275(19) was potentially violated.

Tampering with the mobile credential would be a crime and reported to law enforcement as soon as University personnel were aware or made aware by the vendor. This would be similar to a data or other technology security breach as the equipment is not physically housed at the University.

Requirement 6- ID cards issued by the university or college during the approval period will contain an expiration date.

There is an expiration date displayed on the mobile credential under the photograph of the user.

Requirement 7- The university or college will provide copies of student identification cards to the State Board for training purposes.

An image of a sample mobile credential is attached.

Requirement 8- The college or university will provide to students who are issued the student identification card a copy of, or an electronic link to, the Voting as a College Student Infosheet that details the information required by G.S. 163-166.17(a)(1)h.

The One Card Office will provide an electronic link on its website to the Voting as a College Student Infosheet after the mobile credential is approved.

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EMPLOYEE IDENTIFICATION APPROVAL REQUEST FORM 2023-2024



NC State Board of Elections • P.O. Box 27255 • Raleigh, NC 27611-7255 • (866) 522-4723

Please return completed form to VoterID@ncsbe.gov

1

Information About Your Entity

This entity is a: State Government Entity Local Government Entity Charter School

The University of North Carolina at Chapel Hill

Name of Entity
Mobile UNC One Card

Name/Type of Card
Orange

County

2

ID Card

Requirements

Indicate that this is a new request for approval or that the identification has not changed since its approval on March 15, 2019.



Check this box if you are seeking approval of a digital ID card or mobile credential. If you check this box, you must attach additional documentation to this form describing how the digital ID or mobile credential meets the requirements in 1. through 8.

New Request. The following requirements have been met and will not knowingly be violated with regard to employee identification cards issued during the approval period: (you must check each box for this option to be complete)

- 1. The identification cards that are issued by the state or local government entity or charter school contain photographs of the employees obtained by the state or local government entity or charter school employing entity or its agents or contractors, and the photograph obtained is a frontal image that includes the employee's face and represents a clear, accurate likeness of the employee to whom the identification card is issued. **If the photograph used is not produced by the state or local government entity or charter school, you must certify in detail the process used by the state or local government entity or charter school to ensure the photograph is that of the employee to whom the identification card is issued and must certify the process is designed to confirm the identity of the employee to whom the identification card is issued. (You must attach additional documentation to this form describing the process used if the photograph is not produced by the state or local government entity or charter school.)**
- 2. The identification cards are issued after an employment application or other process that includes one or more methods of confirming the identity of the employee using information that may include, but is not limited to, the social security number, citizenship status, and birthdate of the employee.
- 3. Access to the equipment for producing the identification cards is restricted through security measures.
- 4. Misuse of the equipment for producing the identification cards would be grounds for termination of an employee.
- 5. State or local or charter school officials would report any misuse of identification card equipment they have knowledge of to law enforcement if G.S. 163-275(19) was potentially violated.
- 6. ID cards issued by the entity during the approval period will contain an expiration date.
- 7. The state or local government entity or charter school will provide copies of employee identification cards to the State Board to assist with training purposes.

If you have any concerns about whether your institution meets any of the requirements, please attach additional documentation explaining the processes used.

Statement of No Changes. No changes have been made to the employee identification cards that were approved by the State Board on March 15, 2019. **Current cards and cards approved on Mar. 15, 2019 must have an expiration date.**

3

Attestation

I have attached additional documentation to this form.

I certify that the information provided on this form and any additional documentation attached to this form are true and correct and that I am the head elected official or lead human resources employee of the entity.

X Rebecca Menghini

Digitally signed by Rebecca Menghini
Date: 2024.06.07 14:14:35 -04'00'

6/7/2024

Signature

Date

X Rebecca Menghini

Vice Chancellor, Human Resource & Equal Opportunity & Compliance

Print Name

Print Title (head elected official or lead HR)

The University of North Carolina at Chapel Hill
Approval for Employee Identification Cards- Mobile Credential Only

At present, mobile credentials are only available for employees who use Apple phones.

Requirement 1- Photo submission process

The mobile credentials that serve as identification cards issued to employees of UNC-CH contain photographs of employees submitted by employees to UNC-CH through a secure process.

Employees submit their own photographs to UNC-CH for use on their mobile credentials that serve as an employee identification card. Self-submitted photographs must meet quality and composition criteria designed to ensure that submissions are suitable for identification card use. UNC-CH staff review submitted photographs and reject those that fail to meet the criteria.

The criteria given to individuals submitting photos are below:

“Your photo must

- Show you looking directly at the camera with a neutral expression or smiling.
- Have your face clearly visible and shoulders square to the viewer.
- Have a white or solid, light colored background.
- Include only your head and upper shoulders (complete head must be in photo)
- Pixelated or grainy photos not accepted.
- Face should be visible (dark or light photos will not be accepted)
- Do not show other people, animals etc. or parts thereof.
- Orientation of photo must be correct (if photo is sideways it will not be accepted)
- No filters accepted or watermarks (this includes black and white photos)
- No picture of a picture please
- Avoid headgear or sunglasses (an exception is made for reasons of religious observance)”

To submit a photograph for use on a mobile credential that serves as an employee identification card, employees must log onto a UNC-CH website using a unique identifier assigned and maintained by UNC-CH as well as the DUO authentication system. Employees receive their individual login information after entering their Person ID Number, an identification number assigned after employees provide their full legal name, gender, and birthdate. Photographs submitted by employees are associated with this unique identifier and saved electronically.

To receive a mobile credential that serves as an employee identification card, employees submit an official photo identification, such as a license, military ID, or passport. An AI program compares the official photo identification and the employee's physical appearance in the current photo submitted prior to providing the mobile credential. UNC staff also review the identification and the photo. A mismatch in the photo and the identification would trigger an error and the mobile credential would not be issued.

Requirement 2-The identification cards are issued after an employment application or other process that includes one or more methods of confirming the identity of the employee using information that may include, but is not limited to, the social security number, citizenship status, and birthdate of the employee.

As with physical identification cards, mobile credentials that serve as employee identification cards are not issued until after the hiring or other on-boarding process is completed.

Requirement 3- Access to the equipment for producing the identification cards is restricted through security measures.

Access to the mobile credential is through secured systems. The equipment involved is all digitally accessed through a contract with a vendor, who has been approved by the University's data governance and Privacy offices as having secure data practices. The mobile credential that serves as an employee identification card is secured by the HID Global system, the same producer of the chips in the physical identification cards. The mobile credential is issued via a secure HID Global Systems application programming interface. These systems are cloud based and contained in highly secure data centers. The same technology is used in the chip securing the UNC One Cards as the chip in credit and debit cards.

Requirement 4- Misuse of the equipment for producing the identification cards would be grounds for termination of an employee.

As with the physical identification cards, only authorized personnel are involved in the process of creating the mobile credential. Anyone attempting to change internal control processing for creating or editing the mobile credential would similarly be subject to discipline. Only vendor personnel would have the capability to change the credential. HID is bound by the security requirements of the University's instantiated contract.

Requirement 5- State or local government or charter school officials would report to law enforcement any misuse of employee identification card equipment that they have knowledge of.

Tampering with the mobile credential would be a crime and reported to law enforcement as soon as University personnel were aware or made aware by the vendor. This would be similar to a data or other technology security breach as the equipment is not physically housed at the University.

Requirement 6- ID cards issued by the entity during the approval period will contain an expiration date.

There is an expiration date displayed on the mobile credential under the photograph of the user.

Requirement 7- The state or local government entity or charter school will provide copies of employee identification cards to the State Board to assist with training purposes.

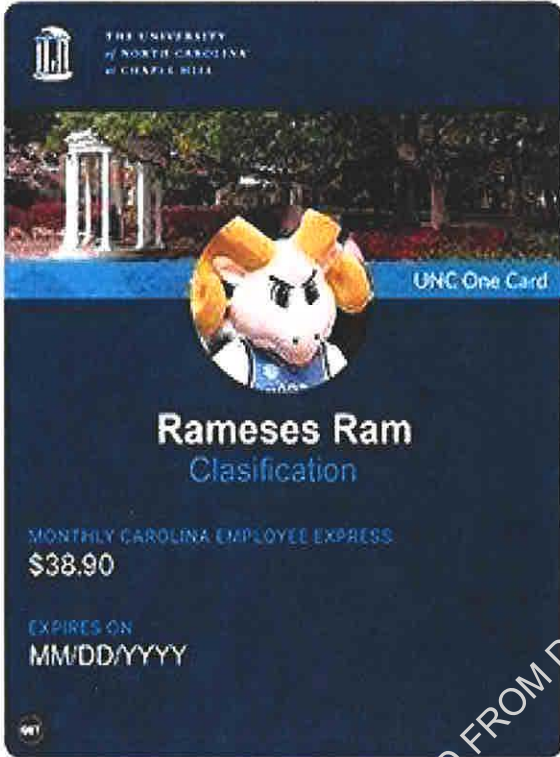
An image of a sample mobile credential is attached.

Front

4:08



Done



Back

4:08



Access Card issued by UNC-Chapel Hill

40165- Bailpfr



Call



Email



Website



GET Mobile

OPEN

Classification

ID #

Express Mode



Express Mode allows you to quickly tap your card to get into buildings on your campus. It is only available to users in your group. Express Mode needs to be changed.

Balance

\$38.90

Monthly fee for Express Mode

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From: [Lewis, Kristen Simonsen](#)
To: [Wakely, Lindsey](#); [Menghini, Becci](#)
Cc: [SBOE_Grp - Legal](#)
Subject: Re: [External] Re: Mobile UNC One Card for Voting Purposes
Date: Wednesday, July 31, 2024 2:49:29 PM

CAUTION: External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

That's correct, a user has to enter their ONYEN (and do the DUO authentication) for the Get Mobile App in order to have the Get Mobile App transmit the One Card into the Apple Wallet.

Here is the One Card user agreement:

<https://policies.unc.edu/TDClient/2833/Portal/KB/ArticleDet?ID=131704>

From: Wakely, Lindsey <Lindsey.Wakely@ncsbe.gov>
Sent: Wednesday, July 31, 2024 2:28 PM
To: Lewis, Kristen Simonsen <kslewis@email.unc.edu>; Menghini, Becci <becci_menghini@unc.edu>
Cc: SBOE_Grp - Legal <Legal@ncsbe.gov>
Subject: RE: [External] Re: Mobile UNC One Card for Voting Purposes

Thanks you Kristen. We appreciate your quick response.

I've been experimenting with the Get Mobile App. It looks like after downloading the App, a student or employee can select the University of North Carolina at Chapel Hill, but the student or employee will be prompted to enter their ONYEN ID and password in order to proceed. Is this correct? Does this mean a student or employee will not be able to download the One Card into their Apple Wallet without first entering their unique ONYEN and password?

Is it possible to get a copy of the One Card user agreement that students and employees must sign?

From: Lewis, Kristen Simonsen <kslewis@email.unc.edu>
Sent: Wednesday, July 31, 2024 2:16 PM
To: Wakely, Lindsey <Lindsey.Wakely@ncsbe.gov>; Menghini, Becci <becci_menghini@unc.edu>
Cc: SBOE_Grp - Legal <Legal@ncsbe.gov>
Subject: [External] Re: Mobile UNC One Card for Voting Purposes

CAUTION: External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

Thanks, Lindsey, happy to answer any questions. It's about the same process for both

students and employees.

Students are loaded into the University's One Card system once they arrive for orientation. Employees are loaded into the system when the One Card Office receives their assignment for their employee orientation or on their first day of employment.

Both are required to sign a One Card user agreement electronically with their ONYEN and Duo. After the signature is completed, they are approved to upload their ID and photo. They have to put an app on their phone called CBORD GET Mobile App. After the photo is approved, the button for the One Card is available for them in the GET Mobile App. It does not appear before the photo is approved. They must click on that button to download the One Card into their Apple Wallet.

From: Wakely, Lindsey <Lindsey.Wakely@ncsbe.gov>

Sent: Wednesday, July 31, 2024 11:57 AM

To: Lewis, Kristen Simonsen <kslewis@email.unc.edu>; Menghini, Becci <becci_menghini@unc.edu>

Cc: SBOE_Grp - Legal <Legal@ncsbe.gov>

Subject: Mobile UNC One Card for Voting Purposes

Good morning,

We are reviewing the UNC-Chapel Hill application for approval of the Mobile UNC One Card for voting purposes. I do have a follow up question stemming from the supplemental materials submitted as part of the attached application.

For requirement 2, you note that the mobile credential that serves as the identification card is not issued until after the student application and enrollment process is complete, or after the employee hiring or other on-boarding process is complete. Can you describe in detail how the student or employee is issued the mobile credential? How is the student or employee notified of the issuance and how the student or employee download or otherwise gain the ability to display the card on their phone or other device?

We appreciate any further information you can provide.

Sincerely,

Lindsey Wakely

Deputy General Counsel

O: (919) 814-0729



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EXHIBIT 5

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Get My Card

Welcome Tar Heel!

Your [UNC One Card](#)  will get you started on your journey here at Carolina. The One Card is a multipurpose identification card that also serves as a card for library and meal plan use, building access, copy and print services and access to campus events.

02:15

Obtaining Your Card

You must be a part of the Carolina Community (faculty, staff, enrolled student or affiliate).

If you are not sure about the status of your paperwork, contact your HR representative or call the UNC One Card Office to see if you are in the appropriate system.

Follow These Steps *(in order)*

1. Make sure that you have your [ONYEN](#), [UNC-Chapel Hill email](#) and [DUO set up](#), otherwise you won't be able to log in.
2. Complete the [One Card electronic signature](#) to sign the One Card Use Agreement.
3. [Upload a photo for your One Card](#) and a valid photo ID – driver's license, state ID card, or passport.
4. Download and set up the [UNC GET App](#). This app is for viewing meal plan and account balances, ordering meals and loading funds to your Carolina Convenience Accounts.
5. After your uploaded photo has been approved, open the [UNC GET App](#).
6. Select the "Add to Wallet" button, then select next.

All newly issued One Cards will be mobile One Cards. Physical cards will be issued on a case-by-case basis. Should you need a physical card, please come to the third floor of Student Stores Building and bring the One Card fee and a driver's license, passport or military ID.

Students! While you are here...

Meal Plan Portal: Add, cancel, or change your meal plan online. Meal plans are loaded on to One Cards when the semester starts.

Wells Fargo UNC Debit Card: The University of North Carolina at Chapel Hill and Wells Fargo have teamed up to offer you optional banking convenience with the custom-designed UNC Debit Card, exclusively for Tar Heels. Use it for your day-to-day financial needs on and off campus when it's linked to a Wells Fargo Everyday Checking account. Enjoy no-fee access to Wells Fargo ATMs nationwide. Make everyday purchases and pay bills at participating retailers and service providers. Take advantage of this optional benefit today.

Fee Information		
User Type	Mobile Card	Physical Card
Full-Time Students	Included in Student Fee	\$10.00
Classroom Studies, Part-Time Students	\$10.00	\$10.00
Faculty and Staff (Full Time/Permanent)	Included with Employment	\$10.00
Temporary Employees (Adjunct, Postdoc, etc.)	\$10.00	\$10.00
Affiliates	\$10.00 or by departmental agreement	\$10.00

EXHIBIT 6

RETRIEVED FROM DEMOCRACYDOCKET.COM



Android Device FAQs and Support

Q: What is the mobile One Card for Android?

A: The mobile One Card is just like your physical One Card, now on your Android phone!

Q: Can I have a physical One Card and a mobile One Card?

A: You can add the One Card to your Android device, but only one format of the card (physical or mobile) will be permitted.

Once a card is added to your device, the physical card will no longer work.

Q: Can I switch back to a physical card after being issued a mobile One Card?

A: To reactivate a physical One Card, email the One Card Office at onecard@unc.edu with your PID and request that your mobile One Card be disabled.

Q: What do I need?

A: You will need an Android device with the following:

- An Android phone that runs Lollipop (5.1) or higher, with NFC turned on.
- The latest version of the GET Mobile app.
- DUO Authentication to confirm your identity.
- Ensure that your handset has NFC and it is enabled for use.

Q: How do I get my UNC One Card on my Android devices?

- A:**
1. Ensure that you have an approved photo on file. The photo must be less than 5 years old. If you are not sure if you have an approved photo, contact the One Card Office at onecard@unc.edu.
 2. On your supported device, Open the [GET Mobile app from the Google Play Store](#).
 3. Choose University of North Carolina at Chapel Hill from the dropdown list.
 4. Log in using your Onyen and password, then complete the DUO authentication.
 5. Select the Add to Phone button.
 6. Your UNC One Card will now be provisioned to your device. Do not delete the GET app. If you delete the app, your UNC One Card will be removed as well.

Q: GET indicates "Mobile ID Installed (not ready)." What do I do?

A: Check the app permissions. To see permissions, press and hold the GET Mobile app, select App info from the popup and select permissions. All permissions should be set to "enabled".

Q: How do I use my UNC One Card on my Android devices?

A: To access your One Card, your device does not need to be unlocked, but the screen should be awake. Ensure NFC is turned on by going to your device's Settings. Android devices can vary in the placement of the NFC antenna. Tap the top of the phone to

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the reader. If this does not work, tap the back body of the phone to the reader. Some devices require the user to log in to the GET Mobile app once daily to utilize the mobile One Card.

Q: What Android devices are supported?

A: All Android phones that run Lollipop (5.1) or higher and are NFC capable. Android watches are not supported at this time. You cannot have a mobile One Card on both an Android and an Apple device.

Q: How can I view my PID?

A: To view your PID, open the GET Mobile App. Tap on scan card to see the ID.


Q: Does my device need to be awake to use the One Card?

A: You do not need to unlock your device (unless you have enabled Require Device Unlock), but the screen will need to be lit and awake in order to use your One Card.

Q: Can I view my meal plan, Carolina Convenience, Flex Dollars, Employee Express Plan and Expense Account balances?

A: These balances can be viewed on the GET Mobile app.

Q: Can I use the mobile One Card for Android as voter ID?

A: No. The mobile One Card is currently unavailable for Google Wallet on Android devices. Once mobile One Card for Google Wallet is available, the University will pursue approval for use as voter ID. Students and employees who use mobile One Card on Android but need a voter ID may request a physical voter ID card at the One Card Office. To learn more about voting options and photo ID requirements for voting in North Carolina, visit [Voting as a College Student](#) .

Q: I have added the One Card to my Android device, but it is not working.

A: Please try the following:

- Ensure you are presenting your mobile One Card properly at the reader — straight up and down typically works best.
- If you are presenting your mobile One Card and the reader is not reacting, open the GET Mobile app.
- After logging into GET Mobile, try to present your mobile One Card to the reader again. Some devices require the user to log in to the GET Mobile app once daily in order to utilize your mobile One Card.
- Ensure you have properly provisioned the mobile credential. In the GET mobile app, you should see the status of Mobile ID enabled.

If you are still encountering issues, please contact the One Card Office at onecard@unc.edu for support.

Q: How do I transfer my UNC One Card if I get a new device?

A: Remove your One Card from your old device. Once you have completed this, you will simply choose your new mobile ecosystem and repeat the process of provisioning through the GET app on your new device.

Q: What happens if I lose my Android device? If I find it afterward?

A: Visit the [One Card Portal](#) and select Suspend Card to disable or re-enable your One Card.

Q: Can I use my mobile One Card if my Android device has a dead battery?

A: This website uses cookies and other technologies to enhance your experience. By using this website, you consent to UNC-Chapel Hill's cookie usage in accordance with their [Privacy Notice](#).

Q: Can I use the mobile One Card without a cellular signal?

A: Your One Card can be used even if the Android device does not have network connectivity as your One Card is stored on your device.

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EXHIBIT 7

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Mobile UNC One Card for Apple Wallet Approved for Voter ID Use

August 23, 2024

The North Carolina Board of Elections has recently approved the mobile UNC One Card in Apple Wallet on iPhones as an acceptable form of in-state voter ID for UNC-Chapel Hill students, faculty and staff.

Since 2020, the UNC One Card has been an acceptable form of voter ID in North Carolina. However, prior to the recent ruling, only physical One Cards were accepted at polling locations. Other forms of acceptable voter ID include driver's licenses, U.S. passports, tribal enrollment cards, military/veteran ID cards and free county board of elections ID cards.

Launched in 2023, the mobile UNC One Card allows your UNC-Chapel Hill ID to be located on your iPhone through the Apple Wallet feature. The mobile One Card is currently unavailable for Google Wallet on Android devices but can be added to your device through the GET Mobile app. Once the mobile One Card for Google Wallet is available, the University will pursue approval for use as voter ID.

Students and employees who do not use mobile One Card for Apple Wallet but need a voter ID may request a voter ID card at the One Card Office. The Carolina community is encouraged to visit the North Carolina Board of Election's [voter ID webpage](#) for more information about what other forms of ID will and will not be accepted.

For more information about the mobile One Card, contact the One Card Office at onecard@unc.edu or (919) 962-8024.

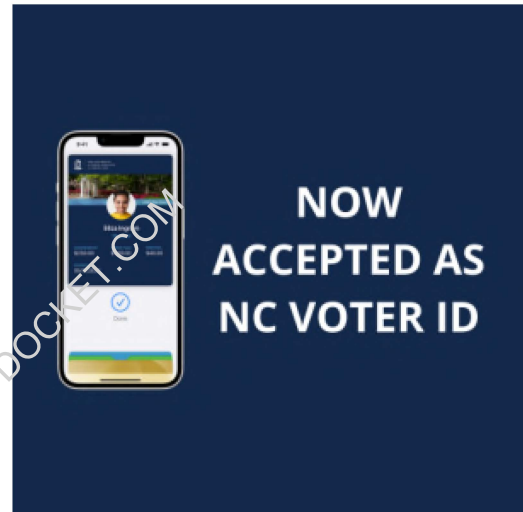


EXHIBIT 8

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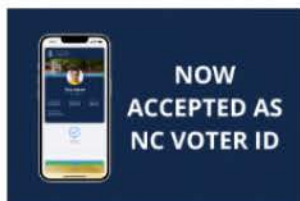


The Most Accepted Card on Campus

[One Card Login](#)

Conveniently located on the third floor of UNC Student Stores, the UNC One Card Office provides an interactive campus ID card with superior innovative technologies in financial and access transactions to our diverse customer base, including faculty, staff, students, and affiliates.

News



Mobile UNC One Card for Apple Wallet Approved for Voter ID Use

August 23, 2024

The North Carolina Board of Elections has recently approved the mobile UNC One Card in Apple Wallet on iPhones as an acceptable form of in-state voter ID for UNC-Chapel Hill students, faculty and staff.



Faces of F&O: Melinda Bakken

June 27, 2024

As director of Campus Card Services and Person ID, Melinda Bakken works with students, employees and units across campus to support their campus card needs.

Notifications

- Did you get a new phone during the break and your One Card isn't working? Here are your options:
 - Email onecard@unc.edu from your UNC email address with your PID and let us know that you have a new phone.
 - come by the One Card Office, located on the 3rd Floor of Student Stores.
- Please complete the [Meal Plan Appeal Form](#) for all meal plan cancellations and changes.

Quick Access



[My Account Login](#)



[Download One Card App](#)



[Add Value to a Card](#)



[Report a Lost or Stolen Card](#)



[Meal Plan Portal](#)



[Wells Fargo UNC Debit Card](#)

See our [Other Services](#) page to find information about cards for temporary access to buildings, departmental copy cards, custom cards and badges, the Employee Express Plan and more.

EXHIBIT 9

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UNC One Card Cardholder Agreement Policy

Summary

The University of North Carolina at Chapel Hill ("UNC") One Card is a multipurpose identification card that also serves as a card for library and meal plan use, building access, copy and print services and access to campus events. This Cardholder Agreement document explains how to get a One Card, how to report a lost or stolen One Card, and financial responsibilities that come with having a UNC One Card.

Body

Title

University of North Carolina at Chapel Hill Policy on One Card Cardholder Agreement

Introduction

Purpose

The University of North Carolina at Chapel Hill ("UNC" or "University") One Card is a multipurpose identification card that also serves as a card for library and meal plan use, building access, copy and print services and access to campus events. This Cardholder Agreement document explains how to get a One Card, how to report a lost or stolen One Card, and financial responsibilities that come with having a UNC One Card.

Scope of Applicability

This document applies to any individual who acquires a UNC One Card. The UNC One Card may be physical or mobile.

Policy

Policy Statement

Upon receiving a UNC One Card, the Cardholder agrees to the terms and conditions found in PART ONE of this Agreement. In addition to the terms and conditions found in PART ONE, any Cardholder who elects to use the UNC One Card for financial transactions also agrees to the terms and conditions found in PART TWO of this Agreement.

PART ONE: Terms and Conditions for Identification Card Purposes

Upon receiving the UNC One Card, the Cardholder agrees to the following terms and conditions:

1. Property of UNC

The UNC One Card is property of the University. The Cardholder is eligible for either a physical One Card or a Mobile One Card. Only one form of One Card will be active.

The Cardholder is obligated to provide or display the UNC One Card upon request by any University official or security personnel. The UNC One Card is valid only while the Cardholder is a registered student, active employee, or affiliate, or until the UNC One Card expires or is revoked. When the UNC One Card is no longer valid, the physical card should be returned to the UNC One Card Office or the Mobile Credential will be revoked.

2. Authorization for personal use only; Penalties for unauthorized use

The Cardholder must comply with all laws, ordinances, codes, rules, regulations, and University policies that are applicable for use or possession of the UNC One Card, including those of federal, state, and local agencies having jurisdiction and/or authority over the University or the Cardholder.

The Cardholder must not loan or otherwise transfer their UNC One Card to another person; doing so results in a violation of University policies, and, in the case of a student Cardholder, a violation of UNC's Honor Code. Any person who attempts to obtain or use, or assists in obtaining or using, a UNC One Card for fraudulent identification may be subject to disciplinary action, including, but not limited to, having the UNC One Card disabled by the UNC One Card Office.

3. Requirements to obtain a UNC One Card

The individual requesting a UNC One Card must submit an up-to-date photo in the individual's current likeness. The photo may be uploaded online or taken in the UNC One Card Office. All uploaded photos will go through an approval process to determine if they meet the photo requirements posted on the UNC One Card website. If the individual requesting a UNC One Card does not upload a photo or the uploaded photo is rejected for failure to meet the posted requirements, a photo will be taken in the UNC One Card Office. A valid U.S. driver's license, U.S. passport, U.S. visa, U.S. military ID, or U.S. state-issued identification card is required when requesting a UNC One Card. Currently enrolled students may obtain a replacement card if they provide additional verification as reasonably requested by the UNC One Card Office.

4. Obligation to report lost or stolen UNC One Card

The Cardholder is obligated to report a lost or stolen UNC One Card as soon as possible. This report can be made through the UNC One Card website or in person at either of the following locations:

- UNC One Card Office
207 South Road
3rd floor Student Stores Building, CB 1530
Chapel Hill, NC 27599

If you have questions or need directions to the UNC One Card Office, you may call 919-962-8024.

- UNC Police
Public Safety Building
285 Manning Drive
Chapel Hill, NC 27514

If you have questions or need directions to the Public Safety Building, you may call 919-962-8100.

5. Fees

The Cardholder is responsible for paying all applicable fees concurrent with the issuance of the UNC One Card. A list of fees can be found on the UNC One Card website. No charge will be imposed to replace current physical UNC One Cards that cease to function due to normal daily usage. Characteristics indicating normal usage are a worn stripe, frayed or peeling plastic overlay, or horizontal breakage/cracking. Characteristics not indicating normal usage are broken edges or corners, hole punches, and vertical breakage/cracking. A charge will be imposed for a replacement UNC One Card which is not damaged by normal use. The determination of whether a UNC One Card has been damaged by normal usage will be made at the sole discretion of the UNC One Card Office.

6. Right to amend terms and conditions

The University reserves the right to amend any term or condition contained in this Agreement. A current version of this Agreement is available upon request from the UNC One Card Office.

PART TWO: Terms and Conditions for Stored-value Card Use

The UNC One Card may, at the Cardholder's option, be used to pay for various goods and services at locations that accept the UNC One Card. The following terms and conditions will not apply until the Cardholder first uses the UNC One Card for a financial transaction. Loading funds onto the UNC One Card for future use constitutes a financial transaction.

1. Liability for all financial transactions, including unauthorized transactions

The Cardholder is responsible for all financial transactions generated by the use of their UNC One Card and agrees to pay for those transactions. If the UNC One Card is lost or stolen, the Cardholder is obligated to report the loss to the UNC One Card Office or UNC Police using the process specified in PART ONE, Section 4, of this Agreement. As determined in the sole discretion of the UNC One Card Office, the Cardholder may be responsible for: (i) up to \$50.00 in unauthorized purchases if the loss is reported within two (2) business days; (ii) up to \$500.00 in unauthorized purchases if the loss is reported after two (2) business days but within sixty (60) business days; or (iii) an unlimited dollar amount in unauthorized purchases if the Cardholder does not report the loss to the UNC One Card Office or UNC Police within sixty (60) business days.

2. Availability of periodic transaction reports

The UNC One Card Office administers all accounts. Information about the Cardholder's account balance or transaction record is available at the UNC One Card Office upon request by the Cardholder and with the presentation of proper identification, on the CBORD Get App, or through the UNC One Card website. The UNC One Card Office reserves the right to limit a transaction record to ninety (90) days immediately preceding the request.

3. Account balances and receipts

The Cardholder's account balance will display on cash registers and most other machines accepting the UNC One Card for financial transactions. The Cardholder's account balance can be checked on the CBORD Get App or through the UNC One Card website.

4. Inactive account charges and no interest earned on account

There is a 25¢ service fee for each full calendar month in which there is no activity on an account. If the balance is less than 25¢ but greater than zero, the charge for that month will be the balance amount. Activity on an account is defined as any financial transaction using that account, including adding value to that account. The Cardholder understands and agrees that no interest or other earnings will be paid to the Cardholder or credited by the University to their UNC One Card account.

5. Refund of Carolina Convenience and faculty/staff expense account balances

Cardholders with a balance on their Carolina Convenience or Faculty/Staff Expense accounts of \$10.00 or more may request a refund on their account balance with the following stipulations. An employee Cardholder may apply for a refund at any time during their employment, or up to thirty (30) calendar days following termination of employment. A student Cardholder may make a refund request through their University email account or in-person at the end of the academic year, at the end of the semester in which the Cardholder graduates, or at any other time during the semester if the Cardholder officially withdraws from enrollment at the University. If a student Cardholder requests a refund at any time other than the end of an academic year, the Cardholder may be required to produce documentation of their graduation or official withdrawal. Requests for a refund may be made through email using a University email account or in-person at the UNC One Card Office during its regular hours of operation. A Cardholder refund will only be sent by check made payable and mailed to the Cardholder's United States address in ConnectCarolina.

6. Abandoned accounts

An account that is abandoned by a Cardholder for any reason will be subject to the standard monthly 25¢ service fee (see PART TWO, Section 4) that is applied to an account with no transaction activity during the prior calendar month. After two years of inactivity, any remaining funds will be presumed abandoned pursuant to the North Carolina Unclaimed Property Act, North Carolina General Statutes § 116B-53, et seq.. The University escheats abandoned property in accordance with the provisions of Chapter 116B of the North Carolina General Statutes. The UNC One Card office will attempt to contact the Cardholder at the last known address on file with the University. After that attempt, the remaining unclaimed balance, less a \$25.00 administrative fee, will be sent to the North Carolina State Treasurer's Office.

Exceptions

None.

Definitions

Cardholder: any student, employee, or affiliate of UNC-Chapel Hill who acquires a UNC One Card, physical or mobile, under the terms and conditions of this Agreement.

Related Requirements

External Regulations and Consequences

- North Carolina Unclaimed Property Act, North Carolina General Statutes § 116B-53
- Chapter 116B of the North Carolina General Statutes

University Policies, Standards, and Procedures

- UNC Honor Code
- Finance Policy 309: Escheats Policy
- Finance Procedure 309.1: Procedure for Reconciling, Reporting, and Escheating Abandoned Property

Contact Information

UNC One Card Office
3rd Floor, Student Stores Building
207 South Road
Campus Box #1530
Chapel Hill, NC 27599

Phone: 919-962-8024

Website

Details

Details

Article ID: 131704

Created

Thu 4/8/21 9:14 PM

Modified

Mon 5/1/23 9:43 AM

Responsible Unit ⓘ

One Card Office

Issuing Officer ⓘ

Melinda Bakken

Issuing Officer Title ⓘ

Director of Campus Card Services and Personal IDs

Policy Contact ⓘ

Melinda Bakken

Next Review ⓘ

05/01/2023 12:00 AM

Last Review ⓘ

05/11/2022 12:00 AM

Last Revised ⓘ

05/11/2022 12:00 AM

Effective Date ⓘ

05/11/2022 12:00 AM

Origination ⓘ

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EXHIBIT 10

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DON'T MISS OUT 99¢ FOR 4 months Our best offer of the year! **ACT NOW**



First-ever digital ID for voting approved by NC elections board, as GOP members object



Under the Dome: NC DMV rolls out self-service kiosks



Where to get COVID, flu + RSV shots in NC (and when doctors say you should get vaccinated)



Skip the DMV line with self-service kiosks at these grocery stores in Raleigh + Charlotte

CORONAVIRUS

Lost your vaccine card? You may get a digital replacement. Here's what to do in NC.

BY KIMBERLY CATAUDELLA

UPDATED JANUARY 29, 2022 2:55 PM |

Gov. Cooper visits Carrboro restaurant requiring vaccines

00:05

01:48

Gov. Roy Cooper visited Pizzeria Mercato in Carrboro, NC on Thursday, Aug. 26, 2021, to talk about his support for businesses requiring proof of vaccination from their customers. BY JULIA WALL



Only have a minute? Listen instead

Powered by **Trinity Audio**

00:00

10 10 1.0x

06:22

If you lost your vaccine card, you probably won't be able to get an exact duplicate paper card, but there are still ways to show proof of vaccination.

Printed or digital versions of your proof of vaccination serve as valid replacements for your misplaced vaccine card, according to the [North Carolina Department of Health and Human Services](#).

Summer Tonizzo, press assistant for NCDHHS, said that the following options should, in most cases, serve as valid replacements for the physical paper card:

- A digital photo of your CDC Vaccination Record card
- Printed and/or digital versions of your vaccine information from your provider's record
- Printed versions of your vaccine information from the [NC Immunization Registry](#)

Note: If you were vaccinated at a national chain pharmacy, like Walgreens, CVS or Costco, you should contact that provider directly. If you received doses through an NC hospital network or at a health department event, you can use a portal to access your vaccine information.

Here are more details on replacing a lost vaccine card in North Carolina.

IF YOU WERE VACCINATED AT A PHARMACY IN NC

NCDHHS recommends **contacting your vaccine provider directly** to inquire about a lost vaccine card, especially if you received your vaccine from a pharmacy participating in the **Federal Retail Pharmacy Program**.

A **full list of partners** participating in this program, such as Walmart and CVS, can be found at cdc.gov/vaccines.

Scroll toward the bottom of the webpage and check out the **“North Carolina” section**.

IF YOU WERE VACCINATED AT AN NC HOSPITAL, DOCTOR'S OFFICE

Information about your doses might be available in the **COVID-19 Vaccine Management System Portal**: covid19.ncdhhs.gov/vaccines/access-vaccine-portal.

You may be able to **download and print** a new card showing proof of vaccination if you received doses at a North Carolina-specific spot, such as a local independent pharmacy, doctor’s office, health department, hospital or community event.



A man holds his COVID vaccination card while waiting to get his shot at an event by the Episcopal Farmworker Ministry targeting members of the Hispanic community in August 2021. Scott Sharpe ssharpe@newsobserver.com

HOW TO USE NC’S VACCINE MANAGEMENT SYSTEM PORTAL

Follow these steps, which [NCDHHS laid out on its website](#), to access your vaccine information using the COVID-19 Vaccine Management System Portal:

1. **Go to the portal**, which can be found at covid-vaccine-portal.ncdhhs.gov/s/login.
2. **Log in**. If you’re logging in for the first time, visit covid-vaccine-portal.ncdhhs.gov/s/forgot-username.
3. Visit the **“My Dashboard”** tab.
4. Select **“COVID-19 Vaccine Information.”**
5. Click the **“Generate Vaccine PDF”** button. You can save this PDF to your devices and/or print it out.
6. **Scan the QR code** for vaccine information. Smartphone cameras can detect and open QR codes when held to them. The QR code will pull up the person’s vaccine

information (in English) when scanned.

For more help:

- **Check out the one-page guide:** This detailed guide with images can be found at covid19.ncdhhs.gov/media/2614/open.
- **Watch the instructional video:** You can find it at youtube.com/watch?v=9UL2mTRYCt4.
- **Call the COVID-19 Vaccine Help Center:** They're available 7 a.m. to 7 p.m. weekdays and 8 a.m. to 4 p.m. weekends at (888) 675-4567.
- **Send a message:** The online form is available at bit.ly/3ALu5uk.

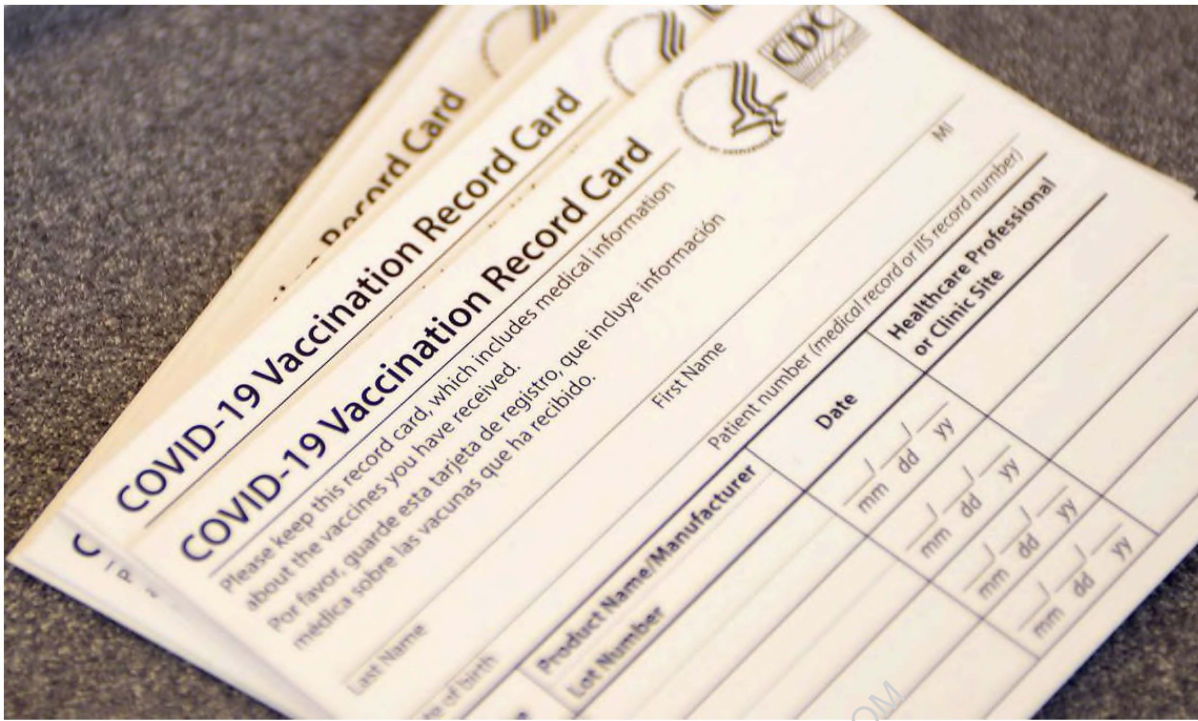
IF YOU'RE A RECENT COLLEGE GRADUATE

If you recently graduated from an NC university and used your student email when getting vaccinated, you may not have the ability to get into this portal anymore. The N&O talked to NCDHHS to help you sort this out.

Here's what to do if you **no longer have access to your account's email address**:

1. Call the COVID-19 Vaccine Help Center: (888) 675-4567.
2. An agent will verify your identity using personal data points and vaccine-related information.
3. The agent will ask for your new email address.
4. The agent will assign the ticket to a technical team member, who has the ability to update the email address for your account.

If you can't find your vaccination information in this portal or have other questions, [NCDHHS recommends](#) directly contacting your vaccine provider and/or your local health department.



COVID_19 vaccination record cards wait to be filled with client names. Jeff Siner
jsiner@charlotteobserver.com

USING MYCHART FOR PROOF OF VACCINATION FROM UNC HEALTH, DUKE HEALTH

MyChart allows you to **add your vaccine card** to [Apple Wallet](#), [Samsung Pay](#) and others, letting you keep your proof of vaccination in your pocket, purse or hand at all times.

UNC Health:

UNC Health will **not distribute new vaccine cards**, but there are other ways to get your immunization records, including for COVID-19.

Access UNC MyChart (where you can find your immunization records) by visiting myuncchart.org.

Here are some other ways to get immunization information from UNC Health:

- If you don't have UNC MyChart and want to activate your account, visit myuncchart.org/MyChart/accesscheck.asp. You can also call UNC HealthLink at (888) 996-2767.
- Contact UNC Health Medical Records at (984) 974-3226 to inquire about Epic@UNC immunization records.

Duke Health:

Duke Health also directs patients to Duke MyChart: dukemychart.org.

Here, you can pull up your vaccination record by going to “My Record,” then click on “COVID-19.” You should find your vaccination record and, if applicable, COVID-19 test results.

If you don’t have Duke MyChart and want to activate your account, visit dukemychart.org/Home/accesscheck.asp.

SMART HEALTH CARDS

SMART Health Cards provide **digital proof of vaccination**. Like MyChart, each SMART Health Card will have a QR code that will generate a PDF copy of your vaccine results, and most will have the SMART logo.

A SMART Health Card lives on your **smartphone** and will not replace the paper vaccine card that you received when you got vaccinated, but the digital card can provide vaccination proof.

To get more information about your SMART Health Card, including how you can get one, visit smarthealth.cards/en/faq.html.

North Carolina has SMART Health Cards **in use**. Numerous in-state health organizations — including NCDHHS, UNC Health, Duke Health and others — are **members of the coalition** that developed SMART Health Cards implementation guides. The coalition is called VCI, which stands for Verifiable Clinical Information.

This story was originally published January 27, 2022, 3:50 PM.

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- ### Secure Digital Card Size Worth \$13 Billion By 2030: IndustryARC

ICrowdNewswire (English) | Aug 15, 2024 | 1633 words

...demand for secure **digital cards** with advanced security features in the business and government sectors. Cloud Integration and Backup Solutions Cloud integration and backup solutions present a unique market opportunity within the secure **digital card** market. ... video recording and the growing need for larger storage solutions propels market growth. finds IndustryARC. **Secure Digital Card** By Card Type (Secure **Digital Card**, MicroSD Card, MiniSD Card, SDX, SDHC, Others), By Storage Capacity (Low, ... need for additional storage solutions like SD cards in the Asia-Pacific region. **Secure Digital Card 2024-2030: Scope of the Report** Get Access to the Full Research Report: <https://www.industryarc.com/Report/1536/Secure-Digital-Card> market trend. ... **Secure Digital Card** report Key Takeaways: • Increasing demand for High-Resolution Content Increasing demand for High-Resolution Content are a major market driver propelling the **Secure Digital Card** market forward. The rise of high-megapixel cameras. ... Businesses and government entities handle sensitive information, making them prime targets for cybercriminals, secure **digital cards** with advanced encryption features like AES-256 offer an additional layer of protection for data stored on the card. This ...
 - ### Google Wallet to get passport-based digital ID cards in the US soon

Android Headlines | Sep 12, 2024 | 355 words | Jean Leon

...Google Wallet to get passport-based **digital ID cards** in the US soon...
...get passport-based **digital ID cards** in the US soon appeared first on Android Headlines. Link to the original story...
 - ### Google Wallet may get support for California ID cards soon

Android Headlines | Aug 06, 2024 | 390 words | Jean Leon

...Wallet users in California could save their **digital ID cards** in the US... certain states have developed their own apps so that citizens can save a digital copy of their ID cards. California is one of them, and now it seems that its local DMV is starting to... get started. Then, they must tap on the ID Card option and follow the instructions to add their mDL. **digital ID card**. A description on the Wallet app states that people can use their saved ID at TSA terminals at SFO, SJC, LAX. However, the... supported by the Google Wallet app. Additionally, the **digital cards** will be generated from a photo of the physical document. The scanned documents will be available in an 'Everything Else' tab within the Wallet app. It is not yet known when this feature will...
 - ### World's First ID Card Network Closes Key Strategic Funding to Expand to Millions of Digital ID Cards

PR Newswire | Jul 15, 2022 | 510 words

...World's First ID Card Network Closes Key Strategic Funding to Expand to Millions of **Digital ID Cards**.
...PR Newswire Unum ID, the **digital ID card** network, has raised a \$2M strategic round led by 1414 Ventures and Outliers, with participation from Oraper Associates, Tappan Hill Ventures, and others. This round of funding will cement Unum ID's position as the... leader in reusable identity, supercharging growth from thousands to millions of verified **digital ID cards** to crack the cold start problem of reusable identity. Our dream is that you'll never have to fill out a form again; you'll present a verified digital... software install required. Users receive **digital ID cards** from issuers in under 10 seconds, and can leverage those cards to sign up instantly at any relying party. It's as simple as clicking "Continue with 1-Click" and consenting to share the required data... out for a unified ID to consolidate disparate records into one. You have 137 usernames, 3 credit cards, and 4 bank accounts -- but there's only one you. You should have one digital ID. You should have Unum ID. Unum ID is the **digital ID**...
 - ### Assam: AAPP appeals for issue of digital ID cards to pharmacists

The Sentinel | Mar 11, 2024 | 232 words | Sentinel Digital Desk

...Assam: AAPP appeals for issue of **digital ID cards** to pharmacists.
...be issued **digital ID cards**. This measure aims to streamline and modernize the credential application process for pharmacists...
 - ### INTERNATIONAL PATENT: MICROSOFT TECHNOLOGY LICENSING, LLC FILES APPLICATION FOR "SYSTEM FOR CREATING AND ACCESSING DIGITAL CARDS STORED IN DECENTRALIZED CONTENT STORAGE"

US Fed News | Dec 26, 2023 | 337 words

...INTERNATIONAL PATENT: MICROSOFT TECHNOLOGY LICENSING, LLC FILES APPLICATION FOR "SYSTEM FOR CREATING AND ACCESSING **DIGITAL CARDS** STORED IN DECENTRALIZED CONTENT STORAGE".
...card. The **digital card** can also be contained in, and/or refer to, other **digital cards**. The **digital card** can also include properties or attributes that may be added from the digital item that is being referred to. The **digital card** can be stored in a data... GENEVA, Dec. 26 -- MICROSOFT TECHNOLOGY LICENSING, LLC (One Microsoft Way)Redmond, Washington 98052-6399) filed a patent application (PCT/US2023/019591) for "SYSTEM FOR CREATING AND ACCESSING **DIGITAL CARDS** STORED IN DECENTRALIZED CONTENT STORAGE" on... (MICROSOFT TECHNOLOGY LICENSING, LLCOne Microsoft Way)Redmond, Washington 98052-6399), GARARATI, Sarojini (MICROSOFT TECHNOLOGY LICENSING, LLCOne Microsoft Way)Redmond, Washington 98052-6399) Abstract. A reference to a digital item is stored as a **digital**...
 - ### Donald Trump Launches 'Mugshot Edition' Digital Cards With Suit Scraps and Gala Dinner Invitations

News24x7 Blogs | Dec 12, 2023 | 536 words | Crypto Breaking News

...a real physical Trump card. Purchase 47 **digital cards** and we will mail you a beautiful trading card. It is an authentic piece of the suit I wore when I took that now-famous mugshot. He noted that he will be "autographing some of them." Trump already... launched two non-fungible tokens (NFT) collections. In December last year, he launched a **digital card** collection featuring art of his life and career[2]. His second[3] NFT **digital card** collection was launched in April, which was 19 days after he was indicted... with 34 felony counts of allegedly falsifying business records. In August, Trump's mugshot photo[4] sparked a surge in sales for his existing **digital cards**, driving a staggering 42% increase within 24 hours. In July, the former U.S. president revealed... ? Let us know in the comments section below. Source: [Blockchain] com The post Donald Trump Launches 'Mugshot Edition' **Digital Cards** With Suit Scraps and Gala Dinner Invitations[7] appeared first on Crypto Breaking News[8]. [1] <https://truthsocial.com>... collection [4] <https://news.bitcoin.com/trump-mugshot-fuels-nft-sales-as-presidents-digital-cards-jump-42/> [5] <https://news.bitcoin.com/trump-reveals-efi-income-crypto-holdings-in-new-disclosure/> [6] <https://www.cryptobreaking.com/goglobal/> [7]...
 - ### iPhone Welcomes Legal Digital Identification Cards to Apple Wallet

News24x7 Blogs | Mar 14, 2023 | 201 words | LeVar Thomas

...iPhone Welcomes Legal **Digital Identification Cards** to Apple Wallet.
 - ### BankDhofar Taps Entrust Digital Card Solution

Wireless News(Close-up Media) | Aug 31, 2024 | 566 words

...BankDhofar Taps Entrust **Digital Card** Solution.
...BankDhofar, an Omani bank, has selected Entrust, a company delivering identity-centric security solutions for governments and enterprises worldwide, to implement its **Digital Card** Solution (DCS) to provide customers with **digital card** capabilities for... with digital payment capabilities, BankDhofar has implemented the Entrust **Digital Card** Solution for Tap to Pay services and tokenization enablement - making Dhofar the first bank in Oman to enable Tap to Pay services to its customers. According to... allows users to securely add their existing Visa Debit and Credit Card details to their NFC capable Android phones. Once set up, the mobile phone becomes a **digital card**, enabling contactless payment transactions with a simple tap on POS terminals. This... innovative solution eliminates the need to carry physical cards, offering a seamless payment experience for customers. According to the companies, with the Entrust **Digital Card** Solution and the NFC Issuer wallet for Visa VTS and MDES, BankDhofar is now...
 - ### Government Employees Insurance Assigned Patent for Providing Digital Identification Cards

Targeted News Service | May 23, 2019 | 263 words

...Government Employees Insurance Assigned Patent for Providing **Digital Identification Cards**.
...The disclosed embodiments include methods and systems for providing **digital identification cards** are disclosed. In one aspect, the disclosed embodiments may provide **digital identification cards**, such as proof of insurance cards, to mobile devices that... are compliant with one or more standards set by identification-requiring organizations, such as a department of motor vehicles. Certain disclosed embodiments may update **digital identification cards** based on changes to user information or formatting... identification cards for mobile applications." The co-inventors are Peter Mack, Elkridge, Maryland, Matthew Slocum, North Bethesda, Maryland, Anthony James, Galhensborg, Maryland, and Denis Sauter, Chevy Chase, Maryland. The full text of the patent can... ALEXANDRIA, Va. May 23 -- Government Employees Insurance, Chevy Chase, Maryland, has been assigned a patent (No. 10,296,960, initially filed March 28, 2016) developed by four co-inventors for "methods and systems for providing **digital**...

EXHIBIT B

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STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
24CV028888-910

REPUBLICAN NATIONAL
COMMITTEE and NORTH
CAROLINA REPUBLICAN PARTY,

Plaintiffs,

v.

NORTH CAROLINA STATE BOARD
OF ELECTIONS, ALAN HIRSCH,
JEFF CARMON, KEVIN N. LEWIS,
SIOBHAN O'DUFFY MILLEN,
STACY "FOUR" EGGERS IV, in
Official Capacity as Members of
NCSBE, and KAREN BRINSON
BELL, in Official Capacity as
Executive Director of NCSBE,

Defendants.

**AFFIDAVIT OF VIJAYKRISHNA
BAJAJ**

Vijaykrishna Bajaj, being first duly sworn, deposes and says:

1. My name is Vijaykrishna Bajaj. I am over the age of 18 and under no disability. The facts stated in this affidavit are known to me personally, unless otherwise specifically stated, and I am competent to testify to them.
2. I am an undergraduate student at the University of North Carolina at Chapel Hill ("UNC"). This academic year, I am a first-year student.
3. I am a United States citizen.
4. I am not serving a felony sentence, including any period of probation, post-release supervision, or parole.

5. I live in Orange County, North Carolina, and will have resided there for at least 30 days prior to November 5, 2024.

6. I am registered to vote in Orange County, North Carolina for North Carolina's 2024 general election. I submitted a voter registration form this year.

7. After I enrolled at UNC for my first semester, I was instructed to obtain a digital student identification card (the "One Card"). Per university policy, my One Card was made available on my mobile phone.

8. My One Card is my primary source of identification at UNC. It also gives me access to athletic events, university buildings, campus recreation facilities, the libraries, and dining halls.

9. Having my One Card available on my phone is convenient for my day to day activities on campus. I do not have to worry about carrying a physical student-ID, losing it, or having it stolen.

10. My understanding is that UNC's policy is to issue physical identification cards only on a case-by-case basis. I was not encouraged by UNC to get a physical identification card, and UNC did not indicate to me that a physical card would provide any benefits that my One Card does not.

11. I did not obtain a physical identification card. I was informed that if I wanted to obtain a physical card, I would have to pay a fee.

12. In fact, UNC represented to students through its website that the new One Card is approved for use as voter identification card in North Carolina.

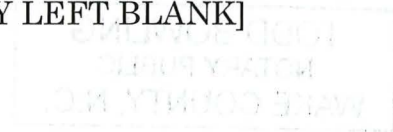
13. I will be voting in the 2024 general election, including for several candidates who are members of the Democratic Party. I am planning to use my One Card as my photo identification when I go to vote.

14. My only other form of state-approved voter ID is my passport. Given the sensitivity and difficulty to replace a passport, I prefer to keep my passport securely stored at my parents' home in Round Rock, TX. I do not expect to have access to my passport during the 2024 election.

15. It would be burdensome for me to obtain a different form of state-approved voter ID in time for the November 2024 election.

16. Preventing me from using my One Card to vote could disenfranchise me in the 2024 general election.

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Further the affiant sayeth naught.

This the 15th day of September, 2024.

Vijay Krishna Bajaj

STATE OF NORTH CAROLINA

ORANGE COUNTY

Subscribed and sworn to (or affirmed) before me this the 15th day of September, 2024 by Vijaykrishna Bajaj, personally known to me or proved to me on the basis of satisfactory evidence to be the person who appeared before me, and executed the foregoing instrument for the purposes set forth therein and in the capacity indicated.

**TODD BOWLING
NOTARY PUBLIC
WAKE COUNTY, N.C.**

[official seal]

Todd Bowling
Notary Public (Signature)

Todd Bowling
Notary Public (Print Name)

My Commission Expires: 03/19/2029

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