

STATE OF SOUTH CAROLINA	)	
	)	IN THE COURT OF COMMON PLEAS
COUNTY OF GREENVILLE	)	THIRTEENTH JUDICIAL CIRCUIT
SULAIMAN AHMAD, BENJAMIN	)	CASE NO.: 2016-CP-23-05477
LONGNECKER and KATHERINE	)	
WEST,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	<u>FIRST AMENDED COMPLAINT</u>
	)	
CONWAY BELANGIA, Director of the	)	
Greenville County Board of Voter	)	
Registration and Elections, in His Official	)	
Capacity; THE GREENVILLE COUNTY	)	
BOARD OF VOTER REGISTRATION	)	
AND ELECTIONS; MARCI ANDINO,	)	
Executive Director of the South Carolina	)	
State Election Commission, in Her Official	)	
Capacity; and THE SOUTH CAROLINA	)	
STATE ELECTION COMMISSION,	)	
	)	
Defendants.	)	

COME NOW the Plaintiffs, Sulaiman Ahmad, Benjamin Longnecker, and Katherine West, by and through their undersigned counsel, and complaining of the above-named Defendants, would respectfully show unto this Honorable Court as follows:

#### INTRODUCTION & NATURE OF THE ACTION

1. The right to vote is among the most sacred and precious rights guaranteed to the People of the State of South Carolina, and therefore, must be jealously guarded against any unlawful or reasonable incursions. In the instant case, the incursion that must be guarded against is the imposition of unreasonable barriers to an individual's ability to participate in voter registration, and even to register to vote.

2. Plaintiffs are students and residents at Furman University. Plaintiffs have brought this lawsuit seeking declaratory and injunctive relief, both immediate and permanent, against

Defendants from imposing unreasonable barriers against Plaintiffs from participating in voter registration, and to compel Defendants to administer voter registration laws toward Plaintiffs consistent with the scope of their statutory authority and as required by law. This action and the relief sought herein arise under the Constitution of the State of South Carolina, Article I, § 3, which guarantees equal protection of the laws, and Article II, § 4, which ensures the right of suffrage to residents who are over 18 years old, as well as South Carolina Code Title 5, Chapter 7, establishing the scope of authority of the Greenville County Board of Voter Registration and Elections, as such authority has been and continues to be exceeded to the detriment of Plaintiffs' fundamental constitutional rights.

3. Time is of the essence. The unreasonable barriers imposed by the Greenville County Board of Voter Registration and Elections are preventing Plaintiffs and otherwise qualified electors from registering to vote in state, federal, and local elections, including the election to occur in November 2016, in the state and county of their legal residency. Specifically, unless the conduct herein alleged is immediately enjoined and Defendants are compelled to abide by the law as it is given to them, Defendants will continue to deny Plaintiffs West and Longnecker the ability to register to vote in Greenville County, and therefore the right to vote in federal, state, and local elections, in the place where they currently call home; Defendants will also continue impair Plaintiff Ahmad's efforts to register students, like Plaintiffs West and Longnecker, who may choose to register to vote in South Carolina, and therefore prevent such similarly situated individuals from registering to vote in South Carolina and from the right to vote in federal, state, and local elections, including the general election in November 2016.

**PARTIES, JURISDICTION & VENUE**

4. Plaintiff Sulaiman Ahmad (“**Ahmad**”) is a citizen of the United States and a resident of Greenville County, South Carolina. Ahmad is a student at Furman University and resides on campus.

5. Plaintiff Benjamin Longnecker (“**Longnecker**”) is a citizen of the United States and a resident of Greenville County, South Carolina. Longnecker is a student at Furman University and resides on campus. Longnecker’s legal residence is located in Greenville County, South Carolina.

6. Plaintiff Katherine West (“**West**”) is a citizen of the United States, and a resident of Greenville County, South Carolina. West is a student at Furman University and resides on campus. West’s legal residence is located in Greenville County, South Carolina.

7. The Greenville Board of Voter Registration and Elections (“**the Board**”) is a political agency of the State of South Carolina, and is organized under the authority of South Carolina Code Title 7, Chapter 5. The Board is responsible for administering elections and providing information regarding voter registration procedures in Greenville County in accordance with state and federal law. Its office is located in Greenville County, South Carolina.

8. Defendant Conway Belangia (“**Belangia**”) is the Director of the Board.

9. Defendant South Carolina State Election Commission (“**the Commission**”) oversees elections and voter registration in the State of South Carolina, and elects an executive director to supervise the conduct of county boards of election and voter registration, such as the Board at issue in this suit, and to ensure their compliance with state and federal law. The Commission’s office is located in Richland County, South Carolina.

10. Defendant Marci Andino (“**Andino**”) is the executive director of the Commission.



11. This Court is vested with subject matter jurisdiction with regard to the matters raised in this pleading by virtue of Article V, § 11, of the South Carolina Constitution, as enabled by South Carolina Code § 14-5-350.

12. This Court has personal jurisdiction with regard to each Defendant.

13. Venue is proper in the Court of Common Pleas of Greenville County, South Carolina, by virtue of South Carolina Code § 15-7-20.

### FACTS

14. Residents of South Carolina may register to vote in two ways. One way is that a registrant may complete and submit the South Carolina Voter Registration Form, prepared and approved by the Commission. A true and accurate copy of this form is attached hereto as Attachment A, is referred to hereinafter as “**the State Form**,” and is incorporated into this pleading for all purposes. The other way is that a registrant may complete and submit the National Voter Registration Form, promulgated by the federal government for mail-in registration. A true and accurate copy of this form is attached hereto as Attachment B, is referred to hereinafter as “**the Federal Form**,” and is incorporated into this pleading for all purposes.

15. A registrant may submit his or her application in a variety of ways. If the registrant completes the Federal Form, it may be mailed in to the Commission. If the registrant completes the State Form, it may also be mailed in to the Commission, or it may be completed and submitted online through the Commission’s website, or it may be delivered in person to the appropriate county board of voter registration and elections. A true and accurate copy of the Commission’s voter registration website is attached hereto as Attachment C, specifically addresses the ability of students who live in on-campus housing to register to vote in the county where they reside, and is incorporated into this pleading for all purposes.



16. Regardless of whether a registrant uses the State Form or the Federal Form, the eligibility requirements are the same, particularly regarding proof of residency. This is because state law determines eligibility requirements, S.C. Code § 7-5-120, and those requirements are incorporated by the State and Federal Forms. In any event, with regard to establishing residency, under the laws of the State of South Carolina, an individual may register to vote if:

- a. The registrant affirms, in writing and subject to penalty of perjury, that the address listed on his or her voter registration form “is [his or her] only legal place of residence, and that [he or she] claims no other place as [his or her] legal residence,” (“**the Affirmation Requirement**”); and,
- b. For first-time registrants in a county, the registrant must provide “a current valid photo ID or a copy of a current utility bill, bank statement, paycheck, or other government document that shows your name and address in [the] county,” (“**the Identification Requirement**”).

17. Notably, it is not fatal to a registrant’s application if he or she fails to satisfy the Identification Requirement at the time his or her form is submitted. It is only necessary that a registrant provide proof of the Identification Requirement at or before the time he or she votes.

18. Other than the Affirmation Requirement and the Identification Requirement, South Carolina law does not impose any other or further burden on a registrant to establish residency for purposes of voter registration.

19. The Board, acting by and through Belangia, has taken a different perspective. Sometime within the last two years, and for reasons unknown, the Board, acting by and through Belangia, began a practice of discriminating against voter registration forms submitted by individuals who listed their residential address at an educational institution which offers on-

campus student housing. These types of forms are referred to hereinafter as “**On-Campus Applications.**” In some cases, On-Campus Applications have been rejected by the Board without further inquiry, even if the Application was delivered in person to the Board. In other cases, the registrant who submitted an On-Campus Application was given or mailed a letter by the Board that required the completion of eleven additional questions before the application would be processed. A copy of the Board’s letter and questionnaire is attached hereto as **Attachment D**, is referred to herein after as “**the Questionnaire**,” and is incorporated herein for all purposes. According to the Questionnaire, the registrant has ten days within which to complete and return the interrogatories propounded therein; failure to do so in a timely fashion would “cause automatic rejection of [the registrant’s] application.” The Questionnaire is sent only to registrants who submit On-Campus Applications, and it is not clear from the Questionnaire how the registrant’s answers will be evaluated.

20. South Carolina election laws establish a uniform system of voter registration. Under this uniform system, there is no need for a registrant to provide other or further proof of his or her residency, other than the Affirmation and Identification Requirements discussed above.

21. In derogation of State law, the Board, acting by and through Belangia, unilaterally and without authority instituted a policy, peculiar to Greenville County, that imposed enhanced proof of residency requirements on residents of Greenville County who reside in on-campus student housing at educational institutions, and further, imposed artificial deadlines on individuals belonging to this class of potential electors. This policy effectively established a dual registration system under which students who live on campus are subject to discriminatory voter registration practices that have the natural and probable consequence of impairing their ability to exercise their right to vote.

22. The registrants who submit an On-Campus Application are treated as a suspect class of potential elector whose sworn statements on their State or Federal Forms are discounted for purposes of voter registration.

23. Plaintiff West has experienced an adverse impact to her ability to participate in voter registration as a direct and proximate consequence of the Board's conduct, which was perpetrated by and through Belangia. In late August or early September 2016, West submitted a State Form application to the Board. During the week prior to September 11, 2016, West received in the mail a copy of the Questionnaire from the Board, directing her to answer 11 additional questions; if West did not answer those questions, if she did not answer them in a timely fashion, or if her answers were not satisfactory to the Board for whatever reason, her registration application would be rejected. If her application is rejected, West will be denied the right to vote in the State and County of her residency. Plaintiff West has executed an affidavit which is attached to this Complaint as Exhibit E, which is incorporated into this pleading for all purposes. West would like to vote in Greenville County in November 2016, but as of the date of this filing, has not received her voter registration.

24. Plaintiff Longnecker has experienced an adverse impact to his ability to participate in voter registration as a direct and proximate consequence of the Board's conduct, which was perpetrated by and through Belangia. On August 22, 2016, Longnecker physically visited the office of the Board to register to vote in person. Longnecker brought with him a completed State Form and information sufficient to satisfy the Identification Requirement. Once the Board's staff learned that Longnecker was a student at Furman and that his parents lived in Tennessee, the Board refused to process Longnecker's voter registration application. Longnecker was instructed by the Board's staff that he had to register where his parents reside. Plaintiff Longnecker has executed



an affidavit which is attached to this Complaint as Exhibit F, which is incorporated into this pleading for all purposes. Longnecker would like to vote in Greenville County in November 2016, but as of the date of this filing, has not received his voter registration.

25. Plaintiff Ahmad has experienced an adverse impact to his ability to participate in voter registration as a direct and proximate consequence of the Board's conduct, which was perpetrated by and through Belangia. Ahmad is the student representative of the Southern Conference Votes Challenge at Furman. The Southern Conference Votes Challenge is a competition among colleges to encourage voter registration and participation. Ahmad made substantial preparations to conduct a voter registration drive on Furman's campus. Ahmad's plan was approved by his faculty advisor who suggested that he meet with Defendant Belangia to make sure that Ahmad had all the logistics in order. Ahmad met with Belangia during the summer of 2016. In that meeting, Belangia told him that students who had moved to Greenville County to attend college had to register in the place where their parents lived, and that they could not register to vote in Greenville County. This advice, which is false, has thwarted Ahmad's plans to register Furman students to vote. Plaintiff Ahmad has executed an affidavit which is attached to this Complaint as Exhibit G, which is incorporated into this pleading for all purposes.

26. Defendant Commission, and specifically Defendant Andino, have been informed of the actions taken by the Board, by and through Belangia, which have the natural and probable tendency—if not the deliberate intention—to thwart the registration of students who may choose their college residence as their legal residence. No Defendant has taken any action to protect the rights of students to register to vote using the same procedures in place for all other registrants.

27. Plaintiffs estimate that, in Greenville County, there are approximately 7000 students whose rights to participate in voter registration and voting are subject to substantial impairment but the legally untenable policies administered by the Board and/or Belangia.

**FOR A FIRST CAUSE OF ACTION**  
**(Violation of South Carolina Election Law)**

28. Plaintiffs hereby incorporate each and every of the foregoing allegations of fact set out in this Complaint into this cause of action, to the extent such allegations are not inconsistent with those that follow.

29. South Carolina election law establishes a uniform system of voter registration. It also provides that any rejection of a voter registration application must be on a form provided by the State Board of Elections. See S.C. Code § 7-5-155 and § 7-5-180.

30. The ad hoc policies of the Board, administered by and through Belangia, are inconsistent with South Carolina's uniform voter registration system. Both the Board and Belangia, therefore, have exceeded their statutory authority and improperly imposed unlawful burdens on a discrete category of residents and potential voter registrants in Greenville County, South Carolina.

31. These matters present a real and justiciable issue which is presently ripe for decision. Therefore, Plaintiff respectfully requests a declaratory judgment that the policies and procedures of the Board, as administered by and through Belangia, are impermissible under the laws of the State of South Carolina, by virtue of the South Carolina Declaratory Judgment Act. S.C. Code § 15-53-10 et seq.

32. Furthermore, Plaintiffs respectfully request the imposition of injunctive relief, on both a temporary and permanent basis, against the policies and procedures herein complained of for the following reasons:

- a. The Board, by and through Belangia, has instituted policies in derogation of state election law that have the natural, probable, and actual consequence of causing irreparable harm to Plaintiffs and those who are similarly situated. The irreparable harm is the imposition of unreasonable barriers to voter registration that will, perhaps by design, prohibit residents of Greenville County from voting in state, local, and federal elections in the state and county of their legal residency;
- b. The unreasonable impairment of a resident's right to vote in an election affecting the state and county of his or her legal residency constitutes irreparable harm; and,
- c. There is no adequate legal remedy available that is capable of making Plaintiffs whole for the violations of their fundamental right to vote.

33. Furthermore, Plaintiffs respectfully request an Order of this Court by writ of mandamus directing the Board and/or Belangia to accept the voter registration applications submitted by Plaintiffs West and Longnecker, and to issue appropriate voter registration credentials to these Plaintiffs. Consistent with South Carolina Code § 7-5-120 and other statutory provisions, the Board and Belangia have a non-discretionary duty to register each and every individual to vote if that individual submits a voting registration application that is complete in all respects required under state election law. Plaintiffs West and Longnecker submitted voter registration applications to the Board that were complete in all respects required under state election law, and would have been sufficient to enroll Plaintiffs West and Longnecker as registered voters in Greenville County, South Carolina but for the Board's and/or Belangia's policy imposing additional, undue, and discriminatory burdens on each Plaintiff by virtue of their status as on-



campus residents of an educational institution. Should the Court determine that the policies and procedures of the Board and/or Belangia are unlawful, and that the applications of Plaintiffs West and Longnecker were in all other respects complete, the Court is requested to issue an Order directing the Board and/or Belangia to perform their statutorily imposed duties and enroll each of these Plaintiffs as electors who are qualified to vote in Greenville County, South Carolina.

**FOR A SECOND CAUSE OF ACTION**  
**(Violation of the Equal Protection Provision of the South Carolina Constitution)**

34. Plaintiffs hereby incorporate each and every of the foregoing allegations of fact set out in this Complaint into this cause of action, to the extent such allegations are not inconsistent with those that follow.

35. Article I, § 3 of the South Carolina Constitution provides: “The privileges and immunities of citizens of this State and of the United States under this Constitution shall not be abridged, nor shall any person be deprived of life, liberty, or property without due process of law, nor shall any person be denied the equal protection of the laws.”

36. The ad hoc registration system adopted and administered by the Board and/or Belangia discriminates against individuals registering to vote according to their reported address or their status as a student, and then imposes artificial barriers against registrants who do submit, or who are likely to submit, On-Campus Applications.

37. Plaintiffs West and Longnecker have submitted all information required by the uniform voter registration form promulgated by the state, are qualified to register to vote in Greenville County, and yet, have been arbitrarily, unreasonably, and illegally denied the opportunity to register to vote, in turn depriving them of their right to vote in state, federal, or local elections affecting the place of their legal residency. Plaintiffs, and others who are similarly situated, are, without rational justification, treated differently from all other qualified registrants—

i.e., persons who swear or affirm their residence to be anywhere in Greenville County other than on a college campus—whose forms for registration are accepted without request for additional information. Registrants in this “suspect class” are required to submit information not required of any other class of registrant, or their application is simply denied. This irrational distinction is an indefensible form of discrimination, and it violates the equal protection guarantees of the South Carolina Constitution.

38. The policies of the Board herein complained of, administered by and through Belangia, are inconsistent with South Carolina’s guarantee of equal protection of the law. Both the Board and Belangia, therefore, have violated the South Carolina Constitution by having improperly imposed unlawful burdens on a discrete category of residents and potential voter registrants in Greenville County, South Carolina.

39. These matters present a real and justiciable issue which is presently ripe for decision. Therefore, Plaintiffs respectfully request a declaratory judgment that the policies and procedures of the Board, as administered by and through Belangia, are impermissible under the equal protection clause of the South Carolina Constitution, by virtue of the South Carolina Declaratory Judgment Act. S.C. Code § 15-53-10 et seq.

40. Furthermore, Plaintiffs respectfully request the imposition of injunctive relief, on both a temporary and permanent basis, for the following reasons:

- a. The Board, by and through Belangia, has instituted policies in derogation of equal protection standards guaranteed by the South Carolina Constitution that have the natural, probable, and actual consequence of causing irreparable harm to Plaintiffs and those who are similarly situated. The irreparable harm is the imposition of unreasonable barriers to voter registration that will, perhaps by design, prohibit

residents of Greenville County from voting in state, local, and federal elections in the state and county of their residency;

- b. The unreasonable impairment of a resident's right to vote in an election affecting the state and county of his or her residency constitutes irreparable harm; and,
- c. There is no adequate legal remedy available that is capable of making Plaintiffs whole for the violations of their fundamental right to vote.

41. Furthermore, Plaintiffs respectfully request an Order of this Court by writ of mandamus directing the Board and/or Belangia to accept the voter registration applications submitted by Plaintiffs West and Longnecker, and to issue appropriate voter registration credentials to these Plaintiffs. Consistent with South Carolina Code § 7-5-120 and other statutory provisions, the Board and Belangia have a non-discretionary duty to register each and every individual to vote if that individual submits a voting registration application that is complete in all respects required under state election law. Plaintiffs West and Longnecker submitted voter registration applications to the Board that were complete in all respects required under state election, and would have been sufficient to enroll Plaintiffs West and Longnecker as registered voters in Greenville County, South Carolina but for the Board's and/or Belangia's policy imposing additional, undue, and discriminatory burdens on each Plaintiff by virtue of nothing but their status as on-campus residents of an educational institution. Should the Court determine that the policies and procedures of the Board and/or Belangia are unlawful, and that the applications of Plaintiffs West and Longnecker were in all other respects complete, the Court is requested to issue an Order directing the Board and/or Belangia to perform their statutorily imposed responsibilities and register each of these Plaintiffs to vote in Greenville County, South Carolina.



**FOR A THIRD CAUSE OF ACTION**  
**(Violation of the Rights of Suffrage Established in the South Carolina Constitution)**

42. Plaintiffs hereby incorporate each and every of the foregoing allegations of fact set out in this Complaint into this cause of action, to the extent such allegations are not inconsistent with those that follow.

43. Article II, § 4 of the South Carolina Constitution establishes, in a section entitled “Voter Qualifications,” the right of suffrage to individuals over the age of eighteen years.

44. The ad hoc registration system adopted and administered by the Board and/or Belangia denies the constitutional rights of suffrage to individuals who do submit, or who are likely to submit, On-Campus Applications.

45. Plaintiffs West and Longnecker are over the age of eighteen, have submitted all information required by the uniform voter registration form promulgated by the state, are qualified to register to vote in Greenville County, and yet, have been arbitrarily, unreasonably, and illegally denied the opportunity to register to vote, in turn depriving them of their right to vote in state, federal, or local elections affecting the place of their legal residency. Plaintiffs, and others who are similarly situated, are, without rational justification, treated differently from all other qualified registrants—i.e., persons who swear or affirm their residence to be anywhere in Greenville County other than on a college campus—whose forms for registration are accepted without request for additional information. Registrants in this “suspect class” are required to submit information not required of any other class of registrant, or their application is simply denied. This irrational distinction is an indefensible form of discrimination, and it violates the right of suffrage established by the South Carolina Constitution.

46. The policies of the Board herein complained of, administered by and through Belangia, are inconsistent with South Carolina’s establishment of the right of suffrage. Both the

Board and Belangia, therefore, have violated the South Carolina Constitution by having unlawfully denied the right of suffrage to a discrete category of residents and potential voter registrants in Greenville County, South Carolina.

47. These matters present a real and justiciable issue which is presently ripe for decision. Therefore, Plaintiffs respectfully request a declaratory judgment that the policies and procedures of the Board, as administered by and through Belangia, are impermissible under the Article II, § 4 of the South Carolina Constitution, by virtue of the South Carolina Declaratory Judgment Act. S.C. Code § 15-53-10 et seq.

48. Furthermore, Plaintiffs respectfully request the imposition of injunctive relief, on both a temporary and permanent basis, for the following reasons:

- a. The Board, by and through Belangia, has instituted policies in derogation of the right of suffrage established by the South Carolina Constitution that have the natural, probable, and actual consequence of causing irreparable harm to Plaintiffs and those who are similarly situated. The irreparable harm is the imposition of unreasonable barriers to voter registration that will, perhaps by design, prohibit residents of Greenville County from voting in state, local, and federal elections in the state and county of their residency;
- b. The unreasonable impairment of a resident's right to vote in an election affecting the state and county of his or her residency constitutes irreparable harm; and,
- c. There is no adequate legal remedy available that is capable of making Plaintiffs whole for the violations of their fundamental right to vote.

49. Furthermore, Plaintiffs respectfully request an Order of this Court by writ of mandamus directing the Board and/or Belangia to accept the voter registration applications

submitted by Plaintiffs West and Longnecker, and to issue appropriate voter registration credentials to these Plaintiffs. Consistent with South Carolina Code § 7-5-120 and other statutory provisions, the Board and Belangia have a non-discretionary duty to register each and every individual to vote if that individual submits a voting registration application that is complete in all respects required under state election law. Plaintiffs West and Longnecker submitted voter registration applications to the Board that were complete in all respects required under state election, and would have been sufficient to enroll Plaintiffs West and Longnecker as registered voters in Greenville County, South Carolina but for the Board's and/or Belangia's policy imposing additional, undue, and discriminatory burdens on each Plaintiff by virtue of nothing but their status as on-campus residents of an educational institution. Should the Court determine that the policies and procedures of the Board and/or Belangia are unlawful, and that the applications of Plaintiffs West and Longnecker were in all other respects complete, the Court is requested to issue an Order directing the Board and/or Belangia to perform their statutorily imposed responsibilities and register each of these Plaintiffs to vote in Greenville County, South Carolina

**FOR A FOURTH CAUSE OF ACTION**  
**(Mandamus)**

50. Plaintiffs hereby incorporate each and every of the foregoing allegations of fact set out in this Complaint into this cause of action, to the extent such allegations are not inconsistent with those that follow.

51. The Commission, and specifically Andino, is under a duty, expressly imposed by the laws of the State of South Carolina, to monitor the policies and procedures regarding voter registration administered by county election boards, such as the Board at issue in this suit. S.C. Code § 7-3-20.



52. When the Commission learns that a county election board has instituted policies and procedures that are violative of state or federal election standards, the Commission, by and through Andino, is under a duty, expressly imposed by the laws of the State of South Carolina, to investigate the allegedly violative policies and procedures, and where a violation exists, to develop a plan to bring the county election board into compliance with state and federal election standards. S.C. Code § 7-3-25. This duty is not discretionary; the Commission, by and through Andino, “must” undertake corrective action when a violation is found to exist.

53. The Commission, and specifically Andino, is and at all relevant times has been aware of the Board’s policy, administered by and through Belangia, regarding registrants who submit On-Campus Applications.

54. The Commission, and specifically Andino, is and at all relevant times has been aware that the Board’s policy, administered by and through Belangia, regarding registrants who submit On-Campus Applications is unlawful under applicable state and federal election laws.

55. The Commission, and specifically Andino, is and at all relevant times has been aware that the Board’s policy, administered by and through Belangia, regarding registrants who submit On-Campus Applications is unlawful under the equal protection clause of the South Carolina Constitution.

56. Despite the knowledge and information that the Commission and Andino have, neither the Commission nor Andino has commenced an intervention with the Board to develop a corrective-action plan or to protect the voting and voter registration rights of Plaintiffs and others who are similarly situated.

57. Plaintiffs are therefore entitled to an Order from this Court in the form of a writ of mandamus directing the Commission, and specifically Andino, to perform their mandatory

function under the laws of the State of South Carolina, to intervene in the business of the Board, and to ensure that the Board develops and implements a corrective-action plan that ensures the voting and voter registration rights of Plaintiff and those similarly situated are not violated.

**PRAYER FOR RELIEF**

WHEREFORE, having fully stated its claim against Defendants, Plaintiffs respectfully request the entry of an Order which provides for the following relief:

- a. Declaring that the Board's policy, administered by and through Belangia, of imposing voter registration requirements on individuals who reside in on-campus housing at educational institutions in addition to those required by the laws of the State of South Carolina is unenforceable because such policies and procedures exceed the scope of authority granted to the Board and/or Belangia;
- b. Declaring that the Board's policy, administered by and through Belangia, of imposing voter registration requirements on individuals who reside in on-campus housing at educational institutions in addition to those required by the laws of the State of South Carolina is unenforceable because such policies and procedures violate the equal protection clause of the South Carolina Constitution;
- c. Declaring that the Board's policy, administered by and through Belangia, of imposing voter registration requirements on individuals who reside in on-campus housing at educational institutions in addition to those required by the laws of the State of South Carolina is unenforceable because such policies and procedures violate the right of suffrage established by the South Carolina Constitution;
- d. Enjoin, both temporarily and permanently, the Board and/or Belangia, as well as Belangia's successors in office, agents, employees, attorneys, and those persons acting

in concert with him or at his direction, from using and/or implementing any policy or procedure, including but not limited to the Questionnaire, that adds to or modifies the qualifications for an individual to register to vote in Greenville County, or which unreasonably discriminates against registrants on the basis of their status as an on-campus resident of an educational institution, or which otherwise delays or discourages registration by persons who complete a State or Federal Form on which the registrant identifies his or her legal address at an on-campus residence;

- e. Order the Board and/or Belangia to employ their full authority to direct all county election officers to immediately cease and desist from the practice of requiring additional information from or discouraging registration of persons using an on-campus address as the legal residence declared on the uniform voter registration form;
- f. Order the Board and/or Belangia to register Plaintiffs West and Longnecker as qualified voters in Greenville County, South Carolina;
- g. Order the Board and/or Belangia to provide accurate information regarding voter registration to all campuses within the Greenville County at which students reside to counteract the chilling effect of the Board's policy of discouraging on-campus students from registering to vote in their legal residence of choice;
- h. Order the Commission and/or Andino to intervene with the Board regarding its voter registration practices, as required by law, and to provide accurate information to all campuses within Greenville County at which students reside to counteract the chilling effect of the Board's policy of discouraging on-campus students from registering to vote in their legal residence of choice;



- i. Retain jurisdiction over this matter until Defendants have complied with all the Orders and Mandates of the Court;
- j. Award attorney's fees and costs under South Carolina Code § 15-77-300 should this Court deem such an award just and proper; and,
- k. For such other and further relief as the Court deems just and proper.

Respectfully submitted,

/s/ Susan K. Dunn

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September 22, 2016  
Greenville, South Carolina

STATE OF SOUTH CAROLINA )  
 ) IN THE COURT OF COMMON PLEAS  
COUNTY OF GREENVILLE ) THIRTEENTH JUDICIAL CIRCUIT  
  
SULAIMAN AHMAD, BENJAMIN ) CASE NO.: 2016-CP-23-\_\_\_\_\_  
LONGNECKER and KATHERINE )  
WEST, )  
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Capacity; and THE SOUTH CAROLINA )  
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 )  
Defendants. )

ATTACHMENT A

# SOUTH CAROLINA VOTER REGISTRATION MAIL APPLICATION

**EVERY VOTE MATTERS.**  
**EVERY VOTE COUNTS.**

Registration Number

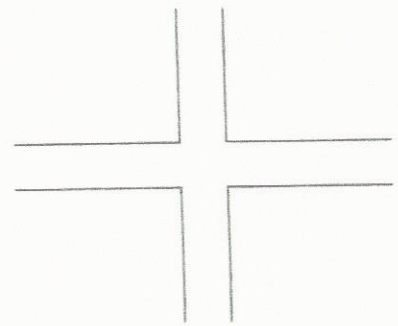
Are you a citizen of the United States of America? Yes <input type="checkbox"/> No <input type="checkbox"/> Will you be 18 years of age on or before election day? Yes <input type="checkbox"/> No <input type="checkbox"/> <b>If you checked 'NO' in response to either of these questions, DO NOT complete this form.</b>				Check One: <input type="checkbox"/> New Registration (Check above if moving from one county to another) <input type="checkbox"/> Address or name change within the same county			
NAME		Last		First		MI	Suffix
SEX	Male <input type="checkbox"/> Female <input type="checkbox"/>	RACE	White <input type="checkbox"/>	Black/African American <input type="checkbox"/>	Asian <input type="checkbox"/>	Hispanic <input type="checkbox"/>	Native American <input type="checkbox"/> Other Specify <input type="checkbox"/> _____
ADDRESS WHERE YOU LIVE (Physical Address)		Street		Apt Number		SOCIAL SECURITY NUMBER **	
		City		State	Zip Code	Inside City Limits Yes <input type="checkbox"/> No <input type="checkbox"/> Would you like to be a poll worker? Yes <input type="checkbox"/> No <input type="checkbox"/>	
MAILING ADDRESS (if different from above)		Street or Post Office Box					
		City		State	Zip Code		
BIRTHDATE		Month	Day	Year	PHONE #	Home ( )	Work ( )
PREVIOUS REGISTRATION		Precinct		County		State	

**Voter Declaration -- (read and sign below)**

I swear or affirm that:

- I am a citizen of the United States of America
- I will be 18 years of age on or before Election day
- I am a resident of South Carolina, this county and precinct
- I am not under a court declaring me mentally incompetent
- I am not confined in any public prison resulting from a conviction of a crime
- I have never been convicted of a felony or offense against the election laws OR if previously convicted, I have served my entire sentence, including probation or parole, or I have received a pardon for the conviction
- the address listed above is my only legal place of residence, and I claim no other place as my legal residence

Draw a diagram of the area in which you live. Show your house in relation to local landmarks such as schools, churches, stores, etc. Be sure to label the streets or roads.



Signature

Date of Application

Whoever shall, willfully and knowingly, swear (or affirm) falsely in taking any oath required by law shall be guilty of perjury and, on conviction, incur the pains and penalties of the offense.

**ID Required:** If you are registering for the first time in this county, you **must** attach a copy of a current valid photo ID **or** a copy of a current utility bill, bank statement, paycheck or other government document that shows your name and address in this county. If you do not provide this identification now, you will be required to provide this information when you vote. Voters who are age 65 and over, voters with disabilities, members of the U.S. Uniformed Services or Merchant Marines and their families, and U.S. Citizens residing outside the U.S. are exempt from this requirement.

\*\* Social Security Number is required by the S.C. Code of Laws 7-5-170. This number is used for internal purposes only and eliminates multiple registrations by a single individual. Your Social Security Number is not released to any unauthorized individual.

**For Voter Registration Board Use Only**

City	Mail City	Mail Co	Township	Precinct	House	Senate	Co Council	School	City Cnel	Cong.	Watershed		

☐ Approved ☐ Disapproved by \_\_\_\_\_ (Member, Voter Registration Board) Date \_\_\_\_\_



STATE OF SOUTH CAROLINA )  
 ) IN THE COURT OF COMMON PLEAS  
COUNTY OF GREENVILLE ) THIRTEENTH JUDICIAL CIRCUIT

SULAIMAN AHMAD, BENJAMIN ) CASE NO.: 2016-CP-23-\_\_\_\_\_  
LONGNECKER and KATHERINE )  
WEST, )  
 )  
 )  
Plaintiffs, )  
 )  
 )  
vs. )  
 )  
 )  
CONWAY BELANGIA, Director of the )  
Greenville County Board of Voter )  
Registration and Elections, in His Official )  
Capacity; THE GREENVILLE COUNTY )  
BOARD OF VOTER REGISTRATION )  
AND ELECTIONS; MARCI ANDINO, )  
Executive Director of the South Carolina )  
State Election Commission, in Her Official )  
Capacity; and THE SOUTH CAROLINA )  
STATE ELECTION COMMISSION, )  
 )  
Defendants. )

ATTACHMENT B

# Voter Registration Application

Before completing this form, review the General, Application, and State specific instructions.

ELECTRONICALLY FILED - 2016 Sep 21 4:10 PM - GREENVILLE - COMMON PLEAS - CASE#2016CP2305477

Are you a citizen of the United States of America? <input type="checkbox"/> Yes <input type="checkbox"/> No		This space for office use only.	
Will you be 18 years old on or before election day? <input type="checkbox"/> Yes <input type="checkbox"/> No			
<b>If you checked "No" in response to either of these questions, do not complete form.</b> (Please see state-specific instructions for rules regarding eligibility to register prior to age 18.)			
1	<input type="checkbox"/> Mr. <input type="checkbox"/> Miss <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms.	Last Name	First Name
			Middle Name(s) <input type="checkbox"/> Jr <input type="checkbox"/> II <input type="checkbox"/> III <input type="checkbox"/> Sr <input type="checkbox"/> IV
2	Home Address		Apt. or Lot # City/Town State Zip Code
3	Address Where You Get Your Mail If Different From Above		City/Town State Zip Code
4	Date of Birth Month Day Year	5 Telephone Number (optional)	6 ID Number - (See item 6 in the instructions for your state)
7	Choice of Party (see item 7 in the instructions for your State)	8 Race or Ethnic Group (see item 8 in the instructions for your State)	
9	<p>I have reviewed my state's instructions and I swear/affirm that:</p> <ul style="list-style-type: none"> <li>I am a United States citizen</li> <li>I meet the eligibility requirements of my state and subscribe to any oath required.</li> <li>The information I have provided is true to the best of my knowledge under penalty of perjury. If I have provided false information, I may be fined, imprisoned, or (if not a U.S. citizen) deported from or refused entry to the United States.</li> </ul> <p>Please sign full name (or put mark) ▲</p> <p>Date: _____ Month Day Year</p>		

If you are registering to vote for the first time: please refer to the application instructions for information on submitting copies of valid identification documents with this form.

## Please fill out the sections below if they apply to you.

If this application is for a **change of name**, what was your name before you changed it?

A	<input type="checkbox"/> Mr. <input type="checkbox"/> Miss <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms.	Last Name	First Name	Middle Name(s) <input type="checkbox"/> Jr <input type="checkbox"/> II <input type="checkbox"/> III <input type="checkbox"/> Sr <input type="checkbox"/> IV
---	--	-----------	------------	---

If you were **registered before** but this is the first time you are registering from the address in Box 2, what was your address where you were registered before?

B	Street (or route and box number)	Apt. or Lot #	City/Town/County	State	Zip Code
---	----------------------------------	---------------	------------------	-------	----------

If you live in a rural area but do not have a street number, or if you have no address, please show on the map where you live.

C	<p>Write in the names of the crossroads (or streets) nearest to where you live.</p> <p>Draw an X to show where you live.</p> <p>Use a dot to show any schools, churches, stores, or other landmarks near where you live, and write the name of the landmark.</p> <p>Example</p> <p>Public School ●</p> <p>Route #2</p> <p>Grocery Store</p> <p>Woodchuck Road</p> <p>X</p>	<p>NORTH ↑</p>
---	--	----------------

If the applicant is unable to sign, who helped the applicant fill out this application? Give name, address and phone number (phone number optional).

D	
---	--

**Mail this application to the address provided for your State.**

STATE OF SOUTH CAROLINA )  
 ) IN THE COURT OF COMMON PLEAS  
COUNTY OF GREENVILLE ) THIRTEENTH JUDICIAL CIRCUIT  
  
SULAIMAN AHMAD, BENJAMIN ) CASE NO.: 2016-CP-23-\_\_\_\_\_  
LONGNECKER and KATHERINE )  
WEST, )  
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Plaintiffs, )  
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CONWAY BELANGIA, Director of the )  
Greenville County Board of Voter )  
Registration and Elections, in His Official )  
Capacity; THE GREENVILLE COUNTY )  
BOARD OF VOTER REGISTRATION )  
AND ELECTIONS; MARCI ANDINO, )  
Executive Director of the South Carolina )  
State Election Commission, in Her Official )  
Capacity; and THE SOUTH CAROLINA )  
STATE ELECTION COMMISSION, )  
 )  
Defendants. )

ATTACHMENT C





## Who Can Register?

In order to vote, South Carolina law requires one must first register to vote at least 30 days prior to the election. To be eligible to register in South Carolina you MUST:

- be a United States citizen -be at least eighteen years old on or before the next election
- be a resident of South Carolina, this county and precinct
- not be under a court order declaring you mentally incompetent
- not be confined in any public prison resulting from a conviction of a crime
- have never been convicted of a felony or offense against the election laws **OR** if previously convicted, have served the entire sentence, including probation or parole, or have received a pardon for the conviction.

There is no length of residency requirement in South Carolina in order to register to vote. You can register at any time.

You must be registered at least 30 days prior to any election in order to vote in that election. Registration by mail applications must be postmarked at least 30 days prior to that particular election to be eligible.

## Check My Voter Registration Information

**Note:** When checking your voter registration information, you must provide your name, county and date of birth as it appears on your voter registration card in order to view your information.

[Check My Voter Registration](#)

## Update My Voter Registration Information

If you have a S.C. Driver's License or DMV ID card, you can update your address using the online voter registration application. If you haven't updated your DMV address, you must do that first:

1. [Update your address with DMV](#)
2. [Update your voter registration address](#)

If your voter registration information has changed (name, address, etc.), and you still live within the same county, you may [update your voter registration information using this form](#). If you have moved to a different county, you will need to re-register in your new county (see How to Register above).

## Students

Students may register to vote where they reside while attending college.



South State Bank | Wells Fargo - Personal... Accounting Software f... Login - QuickBooks Se... Office Depot & Office... HP Connected LawPay - Login HP Officejet 7612

If your voter registration information has changed (name, address, etc.), and you still live within the same county, you may [update your voter registration information using this form](#). If you have moved to a different county, you will need to re-register in your new county (see How to Register above).

## Students

Students may register to vote where they reside while attending college. Many college students who live on campus receive their mail at a campus post office box. These students must register at the physical address of their dormitory. The student's P.O. Box can be provided for mailing and contact purposes.

### [Voter Registration Drives](#)

If you are planning a voter registration drive at an institution of higher learning, please make sure you have the [National Voter Registration Application](#) for students who maintain their residency outside of South Carolina. For a list of addresses of Election Commissions throughout the country please see the [Election Assistance Commission](#) web site.

## Convicted Felons

Any person who is convicted of a felony or an offense against the election laws is not qualified to register or to vote, unless the disqualification has been removed by service of the sentence, or unless sooner pardoned. Service of sentence includes completion of any prison/jail time, probation, parole, and payment of restitution.

Federal and state courts provide the SEC with lists of persons convicted of felonies or crimes against the election laws. Those persons are deleted from the state's list of active, registered voters. The SEC notifies each voter whose name is deleted from the list. Voters have 20 days from the date the notice is mailed to appeal. Appeals must be made to the SEC.

Once a person who was convicted of a felony or offense against the election laws serves his sentence; he may register to vote. To register, the applicant must submit a new voter registration application to his county voter registration office. To participate in any particular election, the applicant must submit the application prior to the 30-day voter registration deadline for that election. In applying, the registrant is swearing under penalty of perjury that he is qualified to register, including having completed his entire sentence. County voter registration boards must be satisfied that the applicant meets the qualifications; and in some cases, could require a person who has lost his voting rights due to conviction to provide some proof that he has completed his sentence.



STATE OF SOUTH CAROLINA )  
 ) IN THE COURT OF COMMON PLEAS  
COUNTY OF GREENVILLE ) THIRTEENTH JUDICIAL CIRCUIT  
  
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LONGNECKER and KATHERINE )  
WEST, )  
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Plaintiffs, )  
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vs. )  
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CONWAY BELANGIA, Director of the )  
Greenville County Board of Voter )  
Registration and Elections, in His Official )  
Capacity; THE GREENVILLE COUNTY )  
BOARD OF VOTER REGISTRATION )  
AND ELECTIONS; MARCI ANDINO, )  
Executive Director of the South Carolina )  
State Election Commission, in Her Official )  
Capacity; and THE SOUTH CAROLINA )  
STATE ELECTION COMMISSION, )  
 )  
Defendants. )

ATTACHMENT D



# County of Greenville

*"... At Your Service"*

Voter Registration & Elections  
Greenville County  
(864) 467-7250

Date:

Dear Applicant,

Your request for voter registration has been received by this office; however the Board of Voter Registration must determine your intention as to your official legal residence. The Federal Court and the State Attorney General have ruled that students, especially those boarded in college facilities, must meet the test of intention to move legal residence to that area. The Federal Court has allowed the following questions to be asked to determine the intention of a student as to legal residence.

Please answer the following questions, where applicable, and return in the envelope provided within ten (10) days. Failure to do so will cause automatic rejection of your application.

1. Have you registered to vote anywhere else? If so, where?
2. If you are married, in what county does your spouse have legal residence?
3. At what address in Greenville County do you keep your personal property?
4. Do you have community ties (off campus) in the area – membership in a local church, social club, service club, etc.? If so, please list.
5. Where do you have your checking or savings accounts, if any? What address do you use?
6. Where do you pay taxes, and what address did you list on your last income tax return? Do your parents claim you as a dependent? If so, in which state do they file their income taxes?

Page 1 of 2

Please initial \_\_\_\_\_

7. What is the address listed on your driver's license? (State law requires a permanent address change within ten (10) days. Sec. 46-170)
8. If you own an automobile, at what address is it registered? (State law allows an owner thirty (30) days within which to notify the State Highway Department of an address change and obtain a corrected registration.)
9. If you are employed, for whom do you work and where is your job located? Is your employment "work-study" on campus?
10. Do you live year-round at this Greenville County claimed domicile, or do you divide it elsewhere? If it is divided, how much time is spent elsewhere and for what reason?
11. What residence do you list on your selective service registration, hunting or fishing licenses, insurance policies, or other official papers and documents which require a statement of residence or address?

Are there any other relevant factors or circumstances which you think should be noted that would affect the Board's decision on your application? If so, please list.

Please answer all questions as applicable.

"Any applicant convicted of fraudulent registration shall incur the penalty for that offense."

Your signature attests that the answers to the above questions are true and accurate.

Signature: \_\_\_\_\_

Please print name here: \_\_\_\_\_

Address: \_\_\_\_\_

Daytime Telephone: \_\_\_\_\_

Thank you for your cooperation. Please call \_ if you have any questions.



STATE OF SOUTH CAROLINA )  
 ) IN THE COURT OF COMMON PLEAS  
COUNTY OF GREENVILLE ) THIRTEENTH JUDICIAL CIRCUIT  
  
SULAIMAN AHMAD, BENJAMIN ) CASE NO.: 2016-CP-23-\_\_\_\_\_  
LONGNECKER and KATHERINE )  
WEST, )  
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Plaintiffs, )  
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vs. )  
 )  
 )  
CONWAY BELANGIA, Director of the )  
Greenville County Board of Voter )  
Registration and Elections, in His Official )  
Capacity; THE GREENVILLE COUNTY )  
BOARD OF VOTER REGISTRATION )  
AND ELECTIONS; MARCI ANDINO, )  
Executive Director of the South Carolina )  
State Election Commission, in Her Official )  
Capacity; and THE SOUTH CAROLINA )  
STATE ELECTION COMMISSION, )  
 )  
Defendants. )

ATTACHMENT E

### AFFIDAVIT OF KATHERINE WEST


My name is Katherine West. I am 19 years old. I moved to South Carolina from Northern Kentucky. Currently, I live in Lakeside Housing at Furman University. I am a sophomore at Furman.

I have always been involved in politics and care deeply about the politics of Greenville and South Carolina. For these reasons – the amount of time annually I reside here and my political efficacy – I wish to register to vote here. I have no intention of ever living in Northern Kentucky again and may live in Greenville for the rest of my life. I call Greenville home, and I want to vote.

As a busy college student, I did not have enough time to go to the voting office to register. Instead, I mailed in my Voter Registration information. Less than a week ago, I received a response letter from the Greenville Election Commission Office with a sheet of questions so they could determine my “intent to register.” I find these questions incredibly invasive. I refuse to answer them. The letter informed me that if I did not answer the questions and resubmit my “application to vote” within 10 days, I would be denied the ability to cast a ballot in my home county. (A copy of the letter I received is attached.)

I am seeking relief from the Courts in hopes of registering in Greenville and voting this fall.

This statement made and sworn to by:



Signature

Katherine West

Printed Name

9/11/16

Date

3300 Poinsett Hwy Greenville, SC 29613 P.O. Box 29538


Address

859-620-1967

Telephone

Sulaiman Ahmad

Witnessed by

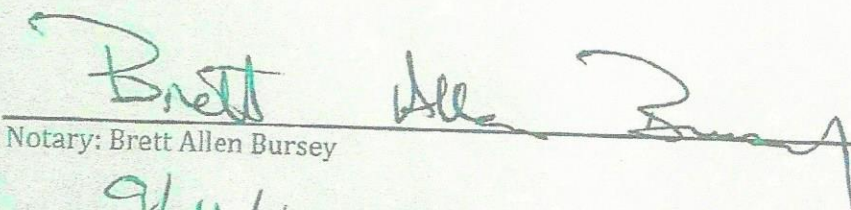


Signature

9/11/16

Sulaiman Ahmad

Witness Printed Name



Notary: Brett Allen Bursey

9/11/16

Date

My Commission Expires February 13, 2018

Sulaiman.ahmad@forman.edu





# County of Greenville

"... At Your Service"

Voter Registration & Elections  
Greenville County  
(864) 467-7250

Date: September 2, 2016

Dear Ms. West,

Your request for voter registration has been received by this office; however the Board of Voter Registration must determine your intention as to your official legal residence. The Federal Court and the State Attorney General have ruled that students, especially those boarded in college facilities, must meet the test of intention to move legal residence to that area. The Federal Court has allowed the following questions to be asked to determine the intention of a student as to legal residence.

Please answer the following questions, where applicable, and return in the envelope provided within ten (10) days. Failure to do so will cause automatic rejection of your application.

1. Have you registered to vote anywhere else? If so, where?
2. If you are married, in what county does your spouse have legal residence?
3. At what address in Greenville County do you keep your personal property?
4. Do you have community ties (off campus) in the area – membership in a local church, social club, service club, etc.? If so, please list.
5. Where do you have your checking or savings accounts, if any? What address do you use?
6. Where do you pay taxes, and what address did you list on your last income tax return? Do your parents claim you as a dependent? If so, in which state do they file their income taxes?

Page 1 of 2

Please initial \_\_\_\_\_

Registration & Elections ♦ 301 University Ridge ♦ Suite 1900 ♦ Greenville, SC 29601-3668

Telephone (864) 467-7250

Fax (864) 467-7256

7. What is the address listed on your driver's license? (State law requires a permanent address change within ten (10) days. Sec. 46-170)
8. If you own an automobile, at what address is it registered? (State law allows an owner thirty (30) days within which to notify the State Highway Department of an address change and obtain a corrected registration.)
9. If you are employed, for whom do you work and where is your job located? Is your employment "work-study" on campus?
10. Do you live year-round at this Greenville County claimed domicile, or do you divide it elsewhere? If it is divided, how much time is spent elsewhere and for what reason?
11. What residence do you list on your selective service registration, hunting or fishing licenses, insurance policies, or other official papers and documents which require a statement of residence or address?

Are there any other relevant factors or circumstances which you think should be noted that would affect the Board's decision on your application? If so, please list.

Please answer all questions as applicable.

"Any applicant convicted of fraudulent registration shall incur the penalty for that offense."

Your signature attests that the answers to the above questions are true and accurate.

Signature: \_\_\_\_\_

Please print name here: \_\_\_\_\_

Address: \_\_\_\_\_

Daytime Telephone: \_\_\_\_\_

Thank you for your cooperation. Please call \_ if you have any questions.

STATE OF SOUTH CAROLINA )  
 ) IN THE COURT OF COMMON PLEAS  
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SULAIMAN AHMAD, BENJAMIN ) CASE NO.: 2016-CP-23-\_\_\_\_\_  
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AND ELECTIONS; MARCI ANDINO, )  
Executive Director of the South Carolina )  
State Election Commission, in Her Official )  
Capacity; and THE SOUTH CAROLINA )  
STATE ELECTION COMMISSION, )  
 )  
Defendants. )

ATTACHMENT F



**AFFIDAVIT OF BENJAMIN LONGNECKER**


My name is Benjamin Longnecker. I currently live at 3300 Poinsett Highway, Greenville, SC 29613. I am a student at Furman University going into my senior year. I am 21 years old.

On Monday, August 22<sup>nd</sup>, 2016, I drove to the Greenville Election Commission Office. In order to register to vote in this upcoming election, I moved here from Knoxville, Tennessee when I started college. I am currently not registered to vote. I had the South Carolina voter registration form with me filled out with all the relevant information needed to register to vote. I want to register to vote in Greenville to vote in this upcoming election. When I walked in, I was greeted by several women in an office. I asked them if I was in the right place and they told me, "Yes, depending on what you need." I told them I needed to register to vote and I had brought along my voter registration form. They asked me, "Do you currently live in Greenville?" I explained to them my situation, but they told me that I would have to drive back to Knoxville to register to vote. I told them I would not be back by the election, and the form I was holding said I could register to vote in South Carolina.

The women in the Election Commission Office said "If you do not pay taxes in Greenville and are listed as a dependent on your parents' tax statement, you must go to that city to register." I asked them, "So, if I cannot afford to go back to Knoxville between now and Election Day, I cannot vote?" They all responded affirmatively, nodding their heads. I asked them if there was anything they could do for me so that I could perform my civic duty and vote, especially since I plan on living in South Carolina after college. The women all shook their heads and said, "No. But have a good day."

I left unable to register. Unless something changes, I will not be able to vote in the election.

This statement made and sworn to by:

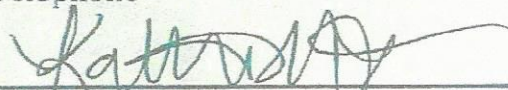
  
Signature

Benjamin Longnecker  
Printed Name

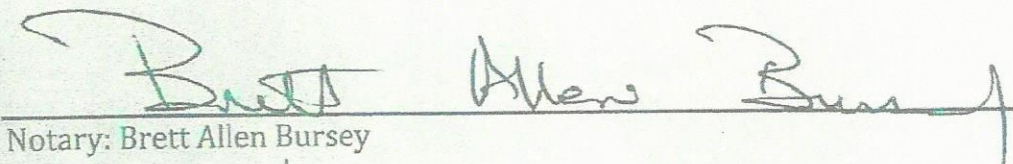
9/11/16  
Date

Box 28801, 3300 Pinckney Highway, Greenville, SC 29615  
Address

865-292-3675  
Telephone

  
Witnessed by Signature

Katherine West  
Witness Printed Name

  
Notary: Brett Allen Bursey

9/11/16  
Date

My Commission Expires February 13, 2018

Benjamin.Longnecker@fuman.edu



STATE OF SOUTH CAROLINA )  
 ) IN THE COURT OF COMMON PLEAS  
COUNTY OF GREENVILLE ) THIRTEENTH JUDICIAL CIRCUIT  
  
SULAIMAN AHMAD, BENJAMIN ) CASE NO.: 2016-CP-23-\_\_\_\_\_  
LONGNECKER and KATHERINE )  
WEST, )  
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CONWAY BELANGIA, Director of the )  
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AND ELECTIONS; MARCI ANDINO, )  
Executive Director of the South Carolina )  
State Election Commission, in Her Official )  
Capacity; and THE SOUTH CAROLINA )  
STATE ELECTION COMMISSION, )  
 )  
Defendants. )

ATTACHMENT G



**AFFADAVIT OF SULAIMAN AHMAD**

My name is Sulaiman Ahmad and I am currently attending Furman University. This year I am the student representative for Furman as part of the "Southern Conference (SOCON) Votes Challenge". The "SOCON Votes Challenge" involves various small liberal arts colleges that are competing against one another to see who can have the highest voter registration and turnout. As part of this project I crafted a plan of operations for Furman to implement as we embark on this competition. Dr. David Fleming, the lead professor of the project, cleared my plan of action and requested that I meet with Conway Belangia, Director of the Greenville count board of Voter Registration and Elections, to clear it with him as well. I met with Mr. Belangia over the summer to discuss the plan of action and the competition. In my discussions with Mr. Belangia, I was told that I should have students at Furman University file absentee ballots instead of registering as Greenville County voters. Mr. Belangia informed me that the State Election Commission was wrong in its interpretation of the law and explained why he does not approve of college students who moved here from out of state registering as Greenville voters. Mr. Belangia told me that this was due to the fact that college students from out of state are listed as dependents on their parents' tax returns. Operating under this notion, Mr. Belangia explained that students listed as dependent do not pay taxes in Greenville, making them ineligible to vote in Greenville. Although I respect Mr. Belangia, I believe that his interpretation of the law is incorrect. The South Carolina Election Commission clearly outlines that college students may register to vote using their dormitories as a place of residency. Because of Mr. Belangia's interpretation of the law, many Furman Students have been unable to register in Greenville. I reluctantly have to tell students who moved to Greenville from out of Greenville Count or out of state that the Greenville Board of Voter Registration and Elections takes the position that they cannot claim their college residence as their legal residence and register as Greenville voters.

This complicates the registration and voting process and makes it difficult for Furman University to compete with colleges that are not limited by this interpretation of the law. In fact, Furman University

ranks in the bottom tier of colleges in terms of voting rate nationally. As part of the "SOCON Votes Challenge", the National Study of Learning, Voting, and Engagement or NSLVE gave each respective school involved in the project statistics listing their school's voting rate. In 2012 Furman University had a voting rate of 24% and in 2014 a voting rate of 8% .The average rate for colleges similar to ours were nearly double that of Furman's.



This statement made and sworn to by:

Sulaiman Ahmad  
Signature

Sulaiman Ahmad  
Printed Name

9/11/16  
Date

5 Andromeda Ct. Greenville, SC 29615  
Address

~~864-354-1007~~ 864-354-1007  
Telephone

~~Katherine West~~ 9/11/16 Katherine West  
Witnessed by Signature

Katherine West  
Witness Printed Name

Brett Allen Bursey  
Notary: Brett Allen Bursey

9/11/16  
Date

My Commission Expires February 13, 2018