

## Preventing Voter Fraud or Encouraging Voter Suppression? Exploring North Carolina’s Controversial Voter ID Law

### Overview

After the Supreme Court’s ruling in *Shelby County v. Holder*, which struck down key provisions of the Voting Rights Act, the North Carolina legislature passed a controversial bill (HB 589, Voter Information and Verification Act, or VIVA) that, among other provisions, mandated that all North Carolinians show a valid photo ID when voting. In August 2016, the 4<sup>th</sup> Circuit Court of Appeals struck down most of VIVA’s provisions. In this lesson, students will explore voting laws in North Carolina and weigh the pros and cons of bills like VIVA. Based on class discussion and the evidence they collect throughout the lesson, students will make an informed decision regarding their opinion about North Carolina’s election laws.

### Grade

10

### North Carolina Essential Standards for Civics and Economics

- CE.C&G.4.3 - Analyze the roles of citizens of North Carolina and the United States in terms of responsibilities, participation, civic life and criteria for membership or admission (e.g., voting, jury duty, lobbying, interacting successfully with government agencies, organizing and working in civic groups, volunteering, petitioning, picketing, running for political office, residency, etc.)
- CE.C&G.5.1 - Analyze the election process at the national, state and local levels in terms of the checks and balances provided by qualifications and procedures for voting (e.g., civic participation, public hearings, forums, at large voting, petition, local initiatives, local referendums, voting amendments, types of elections, etc.)

### Materials

- Hallie Smith’s Election Day Disappointment, scenario attached (to be provided to ½ of the class)
- Jeffrey O’Brien Votes Twice on Election Day, scenario attached (to be provided to ½ of the class)
- Preventing Voter Fraud or Encouraging Voter Suppression? Exploring North Carolina’s Election Changes PowerPoint accompaniment; available in the Database of K-12 Resources (in PDF format):  
[https://k12database.unc.edu/files/2016/09/ExploringNCVoterIDLaw\\_PPT.pdf](https://k12database.unc.edu/files/2016/09/ExploringNCVoterIDLaw_PPT.pdf)
  - To view this PDF as a projectable presentation, save the file, click “View” in the top menu bar of the file, and select “Full Screen Mode”
  - To request an editable PPT version of this presentation, send a request to [CarolinaK12@unc.edu](mailto:CarolinaK12@unc.edu)
  - TEACHER NOTE: In order to include comprehensive information, several slides in the PPT are very text heavy. It is recommended that teachers request an editable version of this presentation to edit slides down to specifically address student level and individual classroom needs.
- Excerpts from the Supreme Court’s Majority and Dissenting Opinions in *Shelby County v. Holder*, attached
- Excerpts with summaries of the Supreme Court’s Majority and Dissenting Opinions in *Shelby County v. Holder*, attached
- Governor McCrory’s Video Statement regarding VIVA. Video is available here:
- <http://www.governor.nc.gov/videos/20130812/governor-mccrory-signs-popular-voter-id-law>
- “In Rural N.C., New Voter ID Law Awakens Some Old Fears” transcript attached; audio and text available at <http://www.npr.org/2013/08/16/212664895/in-rural-n-c-new-voter-id-law-awakens-some-old-fears>
  - If choosing to play the audio for students, teachers will also need access to the internet and speakers
- North Carolina’s Voter ID Bill – Pros and Cons, handout attached

- This handout is three pages. The first page of the handout (containing the pro/con chart) should be copied on a separate sheet of paper and provided to students as a stand-alone piece for the first 5-8 minutes of the activity. The next two pages can be copied front/back and should be provided later in the activity.
- “U.S. Appeals Court Strikes Down North Carolina's Voter ID Law” article, attached
- NC Voter ID Bill Bumper Sticker assignment, attached (optional)

### **Duration**

60 - 90 minutes (time will vary depending on the depth of student discussion and which activities are implemented)

### **Procedure**

#### **Warm Up: Preventing Voter Fraud vs. Securing the Right to Vote**

1. As a warm-up, instruct students to partner up and provide half of the partner groups with the attached “Hallie Smith’s Election Day Disappointment” scenario. Provide the remaining sets of partners with the attached “Jeffrey O’Brien Votes Twice on Election Day” scenario. (Ideally, teachers will copy each scenario on a different color of paper, which will make the second part of this warm-up activity easier.) Instruct students to read the scenario with their partner and to discuss the questions on their handouts together.
2. After it seems that most partner sets are bringing their discussions to a close (likely around 5-8 minutes), bring the class back together and ask for a volunteer to first share a summary of Hallie Smith’s experience on Election Day. Ask additional students who worked with this scenario to summarize some of their thoughts to the questions. Move to slide 2 of the PowerPoint and discuss the following questions as a class:
  - What does it mean to be disenfranchised? Was Hallie disenfranchised? What are the arguments for “yes, she was?” What are the arguments for “no, she was not?” What is your personal opinion?
3. Next, ask a volunteer who read about Jeffrey O’Brien’s Election Day to summarize his scenario. Also ask some of the students to summarize their thoughts to the questions. Move to slide 3 - 5 of the PowerPoint and discuss:
  - Why was what Jeffrey did wrong and illegal?
  - How would you feel if you had spent just as much time as Jeffrey volunteering, but you were instead working for Senator Jones’s opponent?
  - What is the law regarding voter fraud in NC?
    - In North Carolina, there are a number of different acts that might be considered voter fraud, some of which are misdemeanors and other felonies.
    - For example, class 2 misdemeanors include things like taking a ballot out of the voting enclosure or helping someone use a mechanical device to mark a ballot.
    - Crimes such as falsely registering, representing yourself as someone else, voting illegally, paying someone to vote a particular way, falsely swearing to any document (like an absentee ballot application), etc. is considered more serious and deemed a Class I felony. (The principal statutes are GS 163-273, -274, -275.)
  - Based on this information, what is Jeffrey guilty of?
    - A person who fraudulently signs the poll book or impersonates another voter is guilty of a felony.
  - How often do you think this type of voter fraud occurs? (Allow students to discuss their thoughts and tell them you will come back to this point later.)
  - What could have prevented Jeffrey from committing voter fraud?
4. After students have discussed Jeffrey’s scenario move to slide 6, encourage them to compare and weigh the two scenarios together:
  - In what ways are these two scenarios similar? In what ways do they contrast?

- Would Jeffrey have been able to cast Tyrone’s vote at Mrs. Smith’s nursing home? Likewise, would Mrs. Smith have been able to cast her vote at Jeffrey or Tyrone’s polling place?
  - Where is the balance between preventing voter fraud and securing a citizen’s ability and right to vote? How do we ensure both?
5. Let students know that while these scenarios are fictional. Tell students that voting rights and voter ID laws have been a much discussed topic across the United States for the last decade or so. The North Carolina legislature passed a controversial voting law in 2013. The bill’s Republican sponsors say it was passed to fight voter fraud and ensure that every vote is counted. But Democrats opposed the bill, claiming it is a political tactic to keep many of their supporters away from the polls. They also claim it is a regressive measure that will disenfranchise certain voters.
6. Tell students you want them to explore this proposal, but first, give them some background information on the previous ID law in North Carolina:
- Until 2013, new registrants are asked to provide their driver license number or the last four digits of their Social Security number on the registration form. If the applicant is registering by mail or through a voter registration drive and does not provide a license number or the last four digits of the Social Security number, then he or she will be required to present one of the following forms of identification to an election official when voting for the first time:
    - A current and valid photo identification
    - A current utility bill, bank statement, government check or paycheck, or a government document that shows the voter's name and address as it appears on the registration application.
  - When a voter is voting on Election Day he/she is asked to state their name and address to the election official. The voter must then sign the poll book. A person who fraudulently signs the poll book or impersonates another voter is guilty of a felony. (Source: NC Center for Voter Education)

**OPTIONAL: Voting, the Constitution & the Voting Rights Act**

7. Next, explain to students that before they look at NC’s voter ID law, they’re going to learn some background information about laws pertaining to voting. Use [slides 7-10](#) to provide a quick overview of voting and the Constitution, including the Amendments that address voting rights and the Voting Rights Act of 1965. Use the optional discussion questions below to check for student understanding:
- Why do you think there are so many amendments to the Constitution that address voting rights?
  - Why was the Voting Rights Act necessary? Is it necessary today? Why or why not?
  - How can poll taxes and literacy tests be discriminatory? Who do they discriminate against?
  - Is voting a fundamental right? Why or why not?

**OPTIONAL: *Shelby County v. Holder* Jigsaw**

8. Inform students that in 2013, the Supreme Court handed down one of the most important and controversial voting rights cases in years with *Shelby County Alabama v. Holder*. [Slides 11-12](#) list the basic facts of the case, the question at the center of the case, and the Court’s ruling, including an image that shows each Justice’s vote.
9. After reviewing the background of the case, explain to students that they will each receive an excerpt from the majority opinion written by Chief Justice John Roberts or the dissenting opinion written by Justice Ruth Bader Ginsburg. Move to [slide 13](#) and review the jigsaw activity instructions.

Next, divide students into groups of 3 - 5 and provide each student in the group with a different excerpt. There are five total excerpts, three from the majority opinion and two from the dissenting opinion. Teachers should decide which excerpts they would like to use beforehand.

- **Teacher note:** A copy of the excerpts, with a plain language summary, is attached for students who may need extra assistance.

10. Provide students with 5-10 minutes to read their assigned excerpt and answer the questions on [slide 13](#). After the allotted time, instruct students to share their thoughts about their excerpts with their groups. Once students have had a chance to share and discuss their excerpts, discuss the following questions as a class:

- What reasons did the majority agree to strike down parts of the Voting Rights Act? Do you agree with those reasons? Why or why not?
- How do you think *Shelby County* impacted to North Carolina?
  - *Due to a history of discrimination, the Voting Rights Act required 40 counties in North Carolina to obtain preclearance from the DOJ before changing their election laws. After this ruling, none of these counties were required to obtain preclearance.*

#### **VIVA– North Carolina’s Voter ID Law**

11. Inform students that shortly after the Supreme Court’s ruling in *Shelby County* the North Carolina Legislature drafted Voter Information and Verification Act (VIVA), which became known as “North Carolina’s Voter ID Law.” (If teachers are not implementing the above jigsaw activity on *Shelby v. Holder*, a summary of the case should at least be provided.) The bill’s Republican sponsors say it was passed to fight voter fraud and ensure that every vote is counted. But Democrats opposed the bill, claiming it is a political tactic to keep many of their supporters away from the polls. They also claimed it was a regressive measure that will disenfranchise certain voters. The bill was passed and signed into law in 2013.
12. Share [slide 14](#), which contains the major provisions of VIVA. For a more comprehensive look at VIVA, visit WRAL’s election changes site: <http://www.wral.com/election-changes-coming-in-2014-2016/12750290/>
- Why do you think the legislature passed this bill and Governor McCrory signed it into law?
13. Play Governor Pat McCrory’s video statement explaining why he signed VIVA into law. The video is available here: <http://www.governor.nc.gov/videos/20130812/governor-mccrory-signs-popular-voter-id-law>. Discussion questions:
- Why did Governor McCrory sign this bill?
  - How is voting different than cashing a check, boarding an airplane, or buying Sudafed at the drugstore?
  - Do you think that 2016 is enough time to implement a voter ID system? Why or why not?
  - Aside from the cost, what other difficulties might people face trying to get a valid photo ID?
  - Did this response answer all of the questions you have had about VIVA? If not, what areas of the law did he fail to address?
  - Governor McCrory says, “Many of those from the extreme left who have been criticizing photo ID are using scare tactics. They’re more interested in divisive politics than ensuring no one’s vote is disenfranchised by a fraudulent ballot.” What kind of scare tactics do you think opponents of this law are using?
  - Do you agree with Governor McCrory’s decision to sign the bill into law? Why or why not?
  - If you could ask Governor McCrory a question about signing this bill, what would you ask him?
14. Many opponents of the bill claimed that this law discriminated against minority voters, students, and other citizens. Provide students with some background information on the law’s opponents by playing the short audio clip “In Rural N.C., New Voter ID Law Awakens Some Old Fears.” (Teachers may also want to project or handout the transcript for students to follow along.) The transcript is attached, and the transcript and audio is available at <http://www.npr.org/2013/08/16/212664895/in-rural-n-c-new-voter-id-law-awakens-some-old-fears>. (Teachers without access to the internet and speakers in the classroom can also print and

distribute the transcript of the story for students to read.) After students listen to and/or read the story, discuss the following questions:

- How does cutting early voting times impact some people’s ability to vote?
- What are some obstacles that prevent people from obtaining the proper ID needed to vote?
- Using what you’ve learned about VIVA, do you find Mr. Lawrence’s statement that, he “doesn’t know a person that doesn’t have an ID card of some type or another” to be problematic? Why or why not?
- Can you still vote without an ID? What challenges are presented by absentee voting?
- Did you agree with NC Senator Bob Rucho’s statement? Why or why not?
- What did Alisa Chang mean when she said, “These accusations, this kind of suspicion gives some voters in North Carolina the unsettling feeling that history is repeating itself”? Do you agree or disagree with her? Why?
- Did this report answer all of the questions you had about VIVA? If not, what parts of the law did it fail to address?
- If citizens of North Carolina heard this report, do you think they would change their mind about supporting Voter ID laws? Why or why not?
- If you could ask one person from this story a question, who would you choose and what would your question be?

#### **Pros and Cons of Voter ID Laws**

15. Next, tell students that in partners (or small groups of 3-4), they are going to weigh the pros and cons of the NC voter ID law. Give students the attached “North Carolina’s Voter ID Bill – Pros and Cons” handout and go over the instructions. (Teachers should copy the first page of the handout containing the chart on a separate piece of paper. After students have spent 5-6 minutes compiling their own pros/cons into the chart, provide them with the next two pages of the handout. Students should take another 10 minutes to consider these additional arguments as well as note their individual opinions at the end of the activity.) Once discussion has waned within the groups, allow students to share some of their opinions regarding the bill. Encourage students to back their opinions up with evidence that they have learned throughout class.

#### **Fourth Circuit Ruling on VIVA**

16. Inform students that in July 2016, the Fourth Circuit Court of Appeals struck down parts of VIVA. Share slide 15 with the class and discuss:
- The Court’s ruling struck down or reinstated which parts of VIVA?
    - *Overtaken voter ID provisions requiring ID to vote at the polls and reinstated the following: 17-day early voting, preregistration for 16 & 17 year olds, and out-of-precinct voting.*
  - Why do you think the 4<sup>th</sup> Circuit Court of Appeals made this decision? What is your opinion of the Court’s decision?
17. Provide students with the attached NPR Article, “U.S. Appeals Court Strikes Down North Carolina's Voter ID Law.” Read the article aloud as a class and discuss:
- According to the article, why did the 4<sup>th</sup> Circuit Court strike down parts of VIVA?
  - According to the 4<sup>th</sup> Circuit’s opinion, how did VIVA discriminate against African Americans?
  - If the preclearance sections of the Voting Rights Act were still enforceable, do you think the NC legislature would have been able to enact VIVA? Why or why not?
  - After reading this article, do you agree or disagree with the Supreme Court’s reasoning in *Shelby County v. Holder*?
  - Do you believe we need voter ID laws to protect the integrity of our elections? Why or why not?
  - Do you believe there’s a need for a Constitutional Amendment to ensure that everyone has the right to vote? Why or why not?
18. Share with students that in August 2016, the Supreme Court declined to intervene to block the 4<sup>th</sup> Circuit’s ruling:

According to Reuters: "The U.S. Supreme Court on Wednesday rejected a bid by North Carolina to reinstate for November's elections several voting restrictions, including a requirement that people show identification at the polls. The eight-justice court, divided in most part 4-4, rejected a request made by Republican Governor Pat McCrory after an appeals court ruled last month that the 2013 law discriminates against minority voters. Five votes are needed for an emergency request to be granted." *Source:*

<http://www.reuters.com/article/us-usa-court-election-idUSKCN1162RU> Discuss:

- Think back to our discussion about *Shelby County v. Holder* - what was the vote in? (5-4)
- Why was this vote 4-4? (*Justice Antonin Scalia died and his seat on the Supreme Court was unfilled as of September 2016.*)
- What do you think the outcome would have been if Scalia was alive at the time of this vote?
- Does this say anything about our system of government and law?

### Optional Culminating Assignments

19. Optionally, students can be given one of the following culminating assignments for homework:
- Write an e-mail to your NC legislative representatives stating your opinion about voter ID laws, specifically explaining whether you support where things currently stand after the 4<sup>th</sup> Circuits appeal of parts of the Voter ID law in NC. Your e-mail should be at least three paragraphs long and include:
    - Your opinion on voter ID laws
    - Evidence to back up your opinion
    - The action you want the NC General Assembly to take (i.e., respect the Court's decision and refrain from putting forth similar bills, or continue the fight) and why they should do so
  - Create a bumper sticker (see attached assignment sheet)

### Additional Sources/Readings:

- How has voting changed since *Shelby County v. Holder*?: <https://www.washingtonpost.com/news/the-fix/wp/2014/07/07/how-has-voting-changed-since-shelby-county-v-holder/>
- North Carolina Voter ID Bill is a Necessary Evil: <http://www.policymic.com/articles/56901/north-carolina-voter-id-bill-is-a-necessary-evil>
- How voter ID laws violate the NC Constitution: <http://www.newsobserver.com/2013/04/13/2821143/how-voter-id-laws-violate-the.html>
- Voter ID Bill raises controversy in North Carolina: [http://www.cbsnews.com/8301-18563\\_162-57595791/voter-id-bill-raises-controversy-in-north-carolina/](http://www.cbsnews.com/8301-18563_162-57595791/voter-id-bill-raises-controversy-in-north-carolina/)
- What's the Matter With North Carolina? [http://www.slate.com/articles/news\\_and\\_politics/jurisprudence/2013/07/north\\_carolina\\_s\\_voter\\_id\\_law\\_is\\_the\\_worst\\_in\\_the\\_country.html](http://www.slate.com/articles/news_and_politics/jurisprudence/2013/07/north_carolina_s_voter_id_law_is_the_worst_in_the_country.html)
- What to Know About NC Voter ID, Elections Overhaul: [http://ncvoterred.com/research/2013/8\\_14\\_13\\_elections\\_overhaul.php](http://ncvoterred.com/research/2013/8_14_13_elections_overhaul.php)
- NC GOv Pat McCrory Defends New Voter ID Law: <http://hereandnow.wbur.org/2013/08/13/voter-id-mccrory>
- Lawsuits filed after Gov. Pat McCrory signs voter ID bill: <http://www.newsobserver.com/2013/08/12/3102133/mccrory-signs-voter-id-bill.html>
- Lawsuits take aim at North Carolina Voting Law: <http://nation.time.com/2013/08/13/lawsuits-take-aim-at-north-carolinas-voting-law/>
- Is North Carolina's Voter ID Bill Common Sense Policy or Discrimination? [http://www.pbs.org/newshour/bb/politics/july-dec13/voting\\_08-13.html](http://www.pbs.org/newshour/bb/politics/july-dec13/voting_08-13.html)
- NCGOP Chairman Applauds Governor McCrory's Signing of Historic Voter ID Bill: <http://www.ncgop.org/ncgop-chairman-applauds-governor-mccrorys-signing-of-historic-voter-id-bill/>
- North Carolinians Oppose Voter Bill: <http://www.publicpolicypolling.com/main/2013/08/north-carolinians-oppose-voter-bill.html>

- Democracy North Carolina, Voting Rights: <http://www.democracy-nc.org/our-issues/voting-and-elections/voting-rights/>

## Hallie Smith's Election Day Disappointment

On Election Day last November, Hallie Smith, a 78 year-old woman, used her walker to slowly make her way downstairs to the polling station set up in the lobby of her Indianapolis retirement home. Mrs. Smith voted every year and always looked forward to Election Day. An African American woman, she well understood the hard work so many Civil Rights activists had done to ensure she had the right to vote. Even though she was feeling tired that day and her back was bothering her again, she wouldn't miss Election Day for anything in the world.

As soon as she entered the lobby, Mrs. Smith said hello to several of the election officials and volunteers working the polls. She'd known them for years and had watched several of them grow up. Yet, as she stood there at the table prepared to cast her ballot, holding herself up on walker as best she could, she was told that she could not vote. The poll workers said the forms of identification she had with her, which she had always used—a phone bill with her name on it, a Social Security letter with her address on it, and an expired Indiana driver's license—were no longer valid under Indiana's new voter ID law. The new law required a picture ID, such as a valid driver's license or another current state-issued photo identification card.

Ms. Smith cast a provisional ballot that day, but it was never counted. She would have had to go down to the elections office within 10 days to prove her identity with a new photo ID. Mrs. Smith, who has trouble walking, wasn't able to find a ride to the office.

1. In what way did Indianapolis's voter laws change?
2. Although several of the poll workers has known Mrs. Smith their whole life, and even though she had several documents that proved her identity, why was she unable to cast a regular ballot?
3. Why didn't Mrs. Smith have a valid photo ID?
4. In what other situations might someone not have a current state-issues picture ID?
5. How do you think Mrs. Smith felt not having her vote counted?
6. Was what happened to Mrs. Smith at her polling place fair and just? Why or why not?



## Jeffrey O'Brien Votes Twice on Election Day

During the last presidential election, Jeffrey O'Brien spent hundreds of hours volunteering for his presidential candidate of choice. He believed more than anything that Senator Sheila Jones would make the best leader for this country and he was willing to do whatever he could to ensure she won.

He volunteered at the local campaign headquarters, knocked on doors and handed out literature about her, registered voters at several voter registration drives around town, and helped direct traffic at several events that Senator Jones spoke at in his state.

On Election Day, Jeffrey was incredibly excited but equally nervous. After all that work, what if his candidate didn't win? He was first in line at his polling place that morning. As is currently the law in North Carolina, he provided his name and address to the poll worker, who then had him sign the poll book.

After Jeffrey had voted, he called his friend Tyrone who lived one county over. Jeffrey was distraught when Tyrone said he wasn't planning on voting that day. Tyrone explained that he didn't have time, since he was working a 12 hour day. Jeffrey well understood the difference just one vote could make. He decided that he couldn't stand the thought of Sheila Jones losing even one vote.

Jeffrey got in his car and drove to the neighboring county, finding the polling place where Tyrone would have cast his vote were he not working that day. Jeffrey went inside and when the poll worker asked for his name and address, Jeffrey pretended to be Tyrone. He signed the poll book with Tyrone's name and for a second time that day, he cast a vote for Sheila Jones.

1. As a registered voter in North Carolina, what did Jeffrey have to do to be able to cast his ballot at his polling place?
2. Was what Jeffrey did fair and just? Why or why not?
3. In what way did Jeffrey break North Carolina law on Election Day? Do you know what could happen to Jeffrey if he were caught?
4. Was what Jeffrey did fair and just? Why or why not?
5. Is there anything that could have prevented Jeffrey from committing voter fraud?

## Excerpts from the Majority Opinion

### *Shelby County v. Holder Excerpt #1*

At the same time, voting discrimination still exists; no one doubts that. The question is whether the Act's extraordinary measures, including its disparate (different) treatment of the States, continue to satisfy constitutional requirements. As we put it a short time ago, "the Act imposes current burdens and must be justified by current needs."

The Voting Rights Act sharply departs from these basic principles. It suspends "all changes to state election law— however innocuous—until they have been precleared by federal authorities in Washington, D. C." States must beseech the Federal Government for permission to implement laws that they would otherwise have the right to enact and execute on their own, subject of course to any injunction. The Attorney General has 60 days to object to a preclearance request, longer if he requests more information. If a State seeks preclearance from a three-judge court, the process can take years.

And despite the tradition of equal sovereignty [between the states], the Act applies to only nine States (and several additional counties). While one State waits months or years and expends funds to implement a validly enacted law, its neighbor can typically put the same law into effect immediately, through the normal legislative process. Even if a noncovered jurisdiction is sued, there are important differences between those proceedings and preclearance proceedings; the preclearance proceeding "not only switches the burden of proof to the supplicant jurisdiction, but also applies substantive standards quite different from those governing the rest of the nation."

### *Shelby County v. Holder Excerpt #2*

But history did not end in 1965. By the time the Act was reauthorized in 2006, there had been 40 more years of it. In assessing the "current need[]" for a preclearance system that treats States differently from one another today, that history cannot be ignored. During that time, largely because of the Voting Rights Act, voting tests were abolished, disparities in voter registration and turnout due to race were erased, and African-Americans attained political office in record numbers. And yet the coverage formula that Congress reauthorized in 2006 ignores these developments, keeping the focus on decades-old data relevant to decades-old problems, rather than current data reflecting current needs.

The Fifteenth Amendment commands that the right to vote shall not be denied or abridged on account of race or color, and it gives Congress the power to enforce that command. The Amendment is not designed to punish for the past; its purpose is to ensure a better future.

### *Shelby County v. Holder Excerpt #3*

Our decision in no way affects the permanent, nationwide ban on racial discrimination in voting found in Section 2. We issue no holding on Section 5 itself, only on the coverage formula. Congress may draft another formula based on current conditions. Such a formula is an initial prerequisite to a determination that exceptional conditions still exist justifying such an "extraordinary departure from the traditional course of relations between the States and the Federal Government." Our country has changed, and while any racial discrimination in voting is too much, Congress must ensure that the legislation it passes to remedy that problem speaks to current conditions.

## Excerpts from the Dissenting Opinion

### *Shelby County v. Holder Excerpt #4*

With overwhelming support in both Houses, Congress concluded that, for two prime reasons, Section 5 should continue in force, unabated. First, continuance would facilitate completion of the impressive gains thus far made; and second, continuance would guard against back sliding. Those assessments were well within Congress' province to make and should elicit this Court's unstinting approbation.

The stated purpose of the Civil War Amendments was to arm Congress with the power and authority to protect all persons within the Nation from violations of their rights by the States. In exercising that power, then, Congress may use "all means which are appropriate, which are plainly adapted" to the constitutional ends declared by these Amendments. *McCulloch*, 4 Wheat., at 421. So when Congress acts to enforce the right to vote free from racial discrimination, we ask not whether Congress has chosen the means most wise, but whether Congress has rationally selected means appropriate to a legitimate end. "It is not for us to review the congressional resolution of [the need for its chosen remedy]. It is enough that we be able to perceive a basis upon which the Congress might resolve the conflict as it did." *Katzenbach v. Morgan*, 384 U. S. 641, 653 (1966).

Until today, in considering the constitutionality of the VRA, the Court has accorded Congress the full measure of respect its judgments in this domain should garner.

### *Shelby County v. Holder Excerpt #5*

The Court holds §4(b) invalid on the ground that it is "irrational to base coverage on the use of voting tests 40 years ago, when such tests have been illegal since that time." *Ante*, at 23. But the Court disregards what Congress set about to do in enacting the VRA. That extraordinary legislation scarcely stopped at the particular tests and devices that happened to exist in 1965. The grand aim of the Act is to secure to all in our polity equal citizen ship stature, a voice in our democracy undiluted by race. As the record for the 2006 reauthorization makes abundantly clear, second-generation barriers to minority voting rights have emerged in the covered jurisdictions as attempted *substitutes* for the first-generation barriers that originally triggered preclearance in those jurisdictions. See *supra*, at 5–6, 8, 15–17. The sad irony of today's decision lies in its utter failure to grasp why the VRA has proven effective. The Court appears to believe that the VRA's success in eliminating the specific devices extant in 1965 means that preclearance is no longer needed. *Ante*, at 21–22, 23–24. With that belief, and the argument derived from it, history repeats itself.

*Excerpts edited by Carolina K-12 from the following source:*

<http://www.nytimes.com/interactive/2013/06/25/us/annotated-supreme-court-decision-on-voting-rights-act.html>

## Excerpts & Summaries from the Majority Opinion

### ***Shelby County v. Holder Excerpt #1***

At the same time, voting discrimination still exists; no one doubts that. The question is whether the Act's extraordinary measures, including its disparate (different) treatment of the States, continue to satisfy constitutional requirements. As we put it a short time ago, "the Act imposes current burdens and must be justified by current needs." [...]

The Voting Rights Act sharply departs from these basic principles. It suspends "all changes to state election law— however innocuous—until they have been precleared by federal authorities in Washington, D. C." States must beseech the Federal Government for permission to implement laws that they would otherwise have the right to enact and execute on their own, subject of course to any injunction. The Attorney General has 60 days to object to a preclearance request, longer if he requests more information. If a State seeks preclearance from a three-judge court, the process can take years.

And despite the tradition of equal sovereignty [between the states], the Act applies to only nine States (and several additional counties). While one State waits months or years and expends funds to implement a validly enacted law, its neighbor can typically put the same law into effect immediately, through the normal legislative process. Even if a noncovered jurisdiction is sued, there are important differences between those proceedings and preclearance proceedings; the preclearance proceeding "not only switches the burden of proof to the supplicant jurisdiction, but also applies substantive standards quite different from those governing the rest of the nation."

*Chief Justice Roberts opens his opinion by stating that "the Voting Rights Act of 1965 employed extraordinary measures to address an extraordinary problem," using the "strong medicine" of applying heavy requirements on some states and not others to fight suppression of voting rights. He then suggests that those rules have outlived their usefulness.*

*Invoking the 10th Amendment, which reserves powers to the states that are not specifically granted to the federal government, and citing doctrines claiming that states should be treated equally, Chief Justice Roberts argues that the Voting Rights Act "sharply departs" from these principles of states' rights.*

### ***Shelby County v. Holder Excerpt #2***

But history did not end in 1965. By the time the Act was reauthorized in 2006, there had been 40 more years of it. In assessing the "current need[]" for a preclearance system that treats States differently from one another today, that history cannot be ignored. During that time, largely because of the Voting Rights Act, voting tests were abolished, disparities in voter registration and turnout due to race were erased, and African-Americans attained political office in record numbers. And yet the coverage formula that Congress reauthorized in 2006 ignores these developments, keeping the focus on decades-old data relevant to decades-old problems, rather than current data reflecting current needs.

The Fifteenth Amendment commands that the right to vote shall not be denied or abridged on account of race or color, and it gives Congress the power to enforce that command. The Amendment is not designed to punish for the past; its purpose is to ensure a better future.

*The chief justice concludes that times have changed: the formulas that govern singling out one state from another for different treatment, which once "made sense," have lost their relevance, and "nearly 50 years later, things have changed dramatically." But the rules governing which jurisdictions must be overseen have been repeatedly passed by Congress without change.*

### ***Shelby County v. Holder Excerpt #3***

Our decision in no way affects the permanent, nationwide ban on racial discrimination in voting found in Section 2. We issue no holding on Section 5 itself, only on the coverage formula. Congress may draft another formula based on current conditions. Such a formula is an initial prerequisite to a determination that exceptional conditions still exist justifying such an “extraordinary departure from the traditional course of relations between the States and the Federal Government.” Our country has changed, and while any racial discrimination in voting is too much, Congress must ensure that the legislation it passes to remedy that problem speaks to current conditions.

*Chief Justice Roberts closes his opinion by explaining what the decision does not do. It does not overturn the Voting Rights Act's ban on discriminatory voting rules. Furthermore, it does not directly affect the preclearance requirement in Section 5, which leaves Congress the opportunity to draft new rules -- based on current conditions -- to determine which states or local governments should be subject to preclearance. The decision allows those affected by voting rule changes to sue under Section 2 of the act, but that is a longer and more expensive process that places the burden of proof on those challenging the changes.*

### **Summary of Excerpts from the Dissenting Opinion**

#### ***Shelby County v. Holder Excerpt #4***

With overwhelming support in both Houses, Congress concluded that, for two prime reasons, Section 5 should continue in force, unabated. First, continuance would facilitate completion of the impressive gains thus far made; and second, continuance would guard against back sliding. Those assessments were well within Congress' province to make and should elicit this Court's unstinting approbation.

The stated purpose of the Civil War Amendments was to arm Congress with the power and authority to protect all persons within the Nation from violations of their rights by the States. In exercising that power, then, Congress may use “all means which are appropriate, which are plainly adapted” to the constitutional ends declared by these Amendments. *McCulloch*, 4 Wheat., at 421. So when Congress acts to enforce the right to vote free from racial discrimination, we ask not whether Congress has chosen the means most wise, but whether Congress has rationally selected means appropriate to a legitimate end. “It is not for us to review the congressional resolution of [the need for its chosen remedy]. It is enough that we be able to perceive a basis upon which the Congress might resolve the conflict as it did.” *Katzenbach v. Morgan*, 384 U. S. 641, 653 (1966).

Until today, in considering the constitutionality of the VRA, the Court has accorded Congress the full measure of respect its judgments in this domain should garner.

*Justice Ginsburg, who was a civil rights lawyer specializing in gender issues before joining the Supreme Court, writes a strongly worded dissent. While her fellow justices believe the “very success” of the act “demands its dormancy,” she notes that Congress “was of another mind” and had reauthorized the act repeatedly.*

*In voting rights cases, she wrote, the court should defer to Congress, which has been given sweeping powers under the Constitution, and especially in amendments passed after the Civil War, to protect such rights. Applying different rules to different states is nothing so unusual, she wrote, and the court should only ask if the methods used by Congress to address the problem are rational, and not subject them to a tougher test. “Congress approached the 2006 reauthorization of the VRA with great care and seriousness,” she said. “The same cannot be said of the court’s opinion today.”*

### ***Shelby County v. Holder Excerpt #5***

The Court holds §4(b) invalid on the ground that it is “irrational to base coverage on the use of voting tests 40 years ago, when such tests have been illegal since that time.” *Ante*, at 23. But the Court disregards what Congress set about to do in enacting the VRA. That extraordinary legislation scarcely stopped at the particular tests and devices that happened to exist in 1965. The grand aim of the Act is to secure to all in our polity equal citizenship stature, a voice in our democracy undiluted by race. As the record for the 2006 reauthorization makes abundantly clear, second-generation barriers to minority voting rights have emerged in the covered jurisdictions as attempted *substitutes* for the first-generation barriers that originally triggered preclearance in those jurisdictions. See *supra*, at 5–6, 8, 15–17. The sad irony of today’s decision lies in its utter failure to grasp why the VRA has proven effective. The Court appears to believe that the VRA’s success in eliminating the specific devices extant in 1965 means that preclearance is no longer needed. *Ante*, at 21–22, 23–24. With that belief, and the argument derived from it, history repeats itself.

*The struggle for fairness in elections, she argues, is not over, though the tactics of those who would suppress voting have changed. The court, she said, “errs egregiously by overriding Congress's decision.”*

*Excerpts edited by Carolina K-12 from the following source:*

<http://www.nytimes.com/interactive/2013/06/25/us/annotated-supreme-court-decision-on-voting-rights-act.html>

## In Rural N.C., New Voter ID Law Awakens Some Old Fears

By Alisa Chang

This week, North Carolina adopted new rules for elections. The state now requires a photo ID to vote and early voting will be shortened by one week. Those measures come on the heels of the Supreme Court's ruling that invalidated a key provision of the Voting Rights Act. Critics say the new rules reversed crucial reforms. Those reforms, they say, helped to protect the rights of African-Americans, young people and the poor. NPR's Ailsa Chang went to North Carolina to explore the new law's possible effects.

AILSA CHANG, BYLINE: Sometimes you can tell how hard voting can be just by looking at a place. Drive through a rural pocket of northeastern North Carolina called Bertie County, and all you'll see for miles and miles are tobacco and soybean fields. You'll see large families crammed into small trailer homes propped up on cinder blocks. And you'll see not many of those homes have cars sitting outside.

REVEREND VONNER HORTON: Many of these persons don't have cars. They can't afford automobiles.

CHANG: So years ago, Reverend Vonner Horton and her church used the early voting system to make sure as many people as possible could vote. Here's what they do: They send vans across the county, door to door, to pick people up and take them to the polls. But they're always short on time. Do the math, she says. One church van holds about 10 people. Gathering them up can take more than an hour. Then you got to drive to different polling places long distances apart. Repeat all of this a few more times in one day and you've only got 50 ballots in the box. And this new law has now cut early voting from 17 days to 10.

HORTON: Losing that week is also going to put challenges on us on how we're going to move across a county that's two hours wide to get people to voting polls.

CHANG: There's a big demand to vote early in Bertie County. Last year, about 6,000 people did it, more than half of all voters here. And even if all those voters did get back to polling places again, there's another hurdle with the new rules: You need a government-issued photo ID to vote in person.

A lot of residents applaud this new rule requiring picture IDs, like Mac Lawrence. He's supervising big machines cropping leaves in his tobacco field.

MAC LAWRENCE: I think there's a lot of folks voting in more than one place. If you can't prove who you are, then you ought not be able to vote.

CHANG: Actually, evidence of voter fraud in North Carolina is pretty minimal. The State Board of Elections has reported only two cases of voter impersonation fraud in the last 10 years. Still, Lawrence says, presenting an ID is hardly a burden.

LAWRENCE: I don't know a person in Bertie County that doesn't have an ID card of some type or another.

CHANG: Well, more than 300,000 registered voters in North Carolina lack either a driver's license or a state ID. That's what records from the State Board of Elections show. And in Bertie County, according to a voting rights group, almost 10 percent of all voters fall into that category, most of them poor African-Americans. I met some of them at a local church.

TERESA VALENTINE: My name is Teresa Valentine.

CHANG: And, Teresa, do you have a state ID or a driver's license?

VALENTINE: No, no.

SUDIE SUTTON: My name is Sudie Sutton. I don't have a driving license or a state ID card.

CHANG: Then I caught Eddie Winborne pulling weeds outside his trailer home. He let his driver's license expire when he was in his 40s. Now, he's thumbing through his wallet to look for some other ID.

EDDIE WINBORNE: Got one of them.

CHANG: Well, that's your Medicare card.

WINBORNE: Mm-hmm.

CHANG: Anything with your picture on it?

WINBORNE: No, don't have nothing else with my picture on it.

CHANG: Many residents showed me photo identification for food stamps, but that ID doesn't qualify under the new law. Supporters of the legislation say even if you don't have a valid photo ID, you can still vote absentee. But you need two witnesses to sign your ballot and you have to fill out a county elections form. That might not sound like a big deal, but Reverend Horton says that can be a real obstacle for poor people. You're talking about voters who don't have Internet access in their homes, who will need hand-holding to get a ballot. She remembers a large tornado that hit two years ago.

HORTON: We had people from the storm, these same seniors that had damages and all, and could apply for FEMA. But because they could not read or write, they didn't want to be bothered with the application process.

CHANG: So Horton says she expects a lot of people just won't bother to vote absentee, and they certainly won't bother applying for a North Carolina state ID just to vote. So they might never cast a ballot again. Voting rights advocates have worked more than 10 years fighting for reforms like longer early voting periods, same-day registration and pre-registration of 17-year-olds. All of that vanished this week. Bob Phillips of Common Cause says he finds it astonishing how far backwards North Carolina has gone with this new law.

BOB PHILLIPS: It's interesting how in 2008, we led the country in having the largest percentage increase in voter turnout. Interesting that when we have a record turnout - a record turnout of young people, a record turnout of African-Americans, suddenly we are passing laws that are hitting harder those populations. Why is that?

CHANG: Supporters of the legislation, like Republican State Senator Bob Rucho, say such talk is nothing more than what he calls liberal rhetoric from people who don't care about voter fraud.

SENATOR BOB RUCHO: When changes are made, and people are so adamantly opposed to those changes, in my judgment, they're trying to hide something or they're trying - they're having something taken away from them, in essence, that may allow them to cheat.

CHANG: These accusations, this kind of suspicion gives some voters in North Carolina the unsettling feeling that history is repeating itself. Telling Alberta Currie, the great-granddaughter of a slave, that she is no longer welcome at a polling place takes her back to an ugly time in North Carolina, a time she thought had



disappeared. She remembers voting in 1956 in Robeson County, right when she became eligible to vote. Because she was black, she had to spend all day at the polling place.

ALBERTA CURRIE: The white people went ahead of us. That meant the black people would be last. And if we got home at dusk-dark, we was home at dusk-dark. We weren't home at light.

CHANG: Currie has consistently voted at polling places ever since that first time. But now, she won't be able to. She can't get a state photo ID without a birth certificate. She doesn't have one because she was born with a midwife on a farm. Currie says she's endured plenty of racism in her rural corner of the South, like the time she was hired to clean a high school and white students splashed cans of urine on her when she walked home from work. The new voting law in North Carolina means Alberta Currie will now have to vote absentee. But she says that's not really voting. You need to show up in person to vote with dignity.

CURRIE: I want to see my vote counted. Let me be there. I want to be there. I want to see that.

CHANG: Currie has joined a lawsuit against the state hoping to stop the new law from going into effect because, she says, missing a day at the polling place is like missing church. It's as if there's an empty spot inside yourself you feel all day long. Ailsa Chang, NPR News.

Transcript edited for formatting by the NC Civic Education Consortium from the following source:  
<http://www.npr.org/2013/08/16/212664895/in-rural-n-c-new-voter-id-law-awakens-some-old-fears>

## North Carolina's Voter ID Law – Pros and Cons

*In your small group, discuss the various arguments for supporting and opposing NC's voter ID law. Come up with as many legitimate pros and cons as you can and note them in the chart below. Consider what we have discussed in class as well as your own new ideas.*

<b>PRO</b> <b>Arguments in Support of the Bill</b>	<b>CON</b> <b>Arguments in Opposition to the Bill</b>

## North Carolina's Voter ID Bill – Pros and Cons

Has your group considered all the arguments in your pro/con chart? Read through the information below and determine whether each statement works in support of the bill (pro) or opposes the voter ID bill (con). Some statements may work for both.

- If the statement works in favor of voter ID laws (**PRO**), write a **P** in the blank.
  - If the statement works in opposition of voter ID laws (**CON**), write a **C** in the blank.
  - Place both letters in any blank for which the statement could work for either side.
  - If you already considered the statement in your group's chart, place  **check** in the blank along with the P or C.
- 
- \_\_\_\_ North Carolina is not the only state where increased identification requirements are under consideration. There is a nationwide push to increase identification requirements.
  - \_\_\_\_ There is a growing consensus that requiring photo ID to vote may raise barriers to voting for traditionally disadvantaged groups (i.e. students, the elderly, low wealth communities and others who do not possess the most common form of photo ID, a driver's license).
  - \_\_\_\_ Adding a photo ID requirement is not of concern to many voters and when asked in public opinion surveys, many are inclined to support adding a photo ID requirement.
  - \_\_\_\_ The registration policies already in place in North Carolina and in many other states make photo ID laws redundant and hardly justifiable in light of their projected negative and undemocratic consequences.
  - \_\_\_\_ Even one fraudulent vote is one vote too many. It undermines confidence in our election system and our state should do anything possible to ensure voter fraud doesn't take place.
  - \_\_\_\_ Voter turnout in the United States is already low. This bill will add yet another inconvenience, thus resulting in even less people voting.
  - \_\_\_\_ The \$834,000 it would take to implement the bill is not a lot of money in comparison to other state expenditures. Thus, if it becomes law, instituting the voter ID requirement will not be a financial burden.
  - \_\_\_\_ In this tough economy, the \$834,000 it would take to implement the bill should be allocated to more pressing needs in our state, such as education or jobs creation.
  - \_\_\_\_ It is easy to get a state-issued photo I.D. There is no reason every person eligible to vote can't easily get such an ID and most will already have one.
  - \_\_\_\_ If passed into law, the ID requirement can cause discrepancies when IDs are checked. It can be difficult for poll workers compare ID photos with actual faces. Drivers' licenses and US Passports are valid for a number of years, so some people won't look all that much like their photos.
  - \_\_\_\_ The 1965 Voting Rights Act outlawed literacy tests and poll taxes as a way of assessing whether anyone was fit or unfit to vote. The legislation determined that all an individual needed to vote was American citizenship and the registration of their name on an electoral list. No form of hindrance to this would be tolerated by the law courts.

- \_\_\_\_\_Amendment XIV - Section. 1. Of the US Constitution states that “All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.”
- \_\_\_\_\_Crawford v. Marion County Election Board, 553 U.S. 181 (2008) was a United States Supreme Court case holding that an Indiana law requiring voters to provide photo IDs did not violate the Constitution of the United States. A 2005 Indiana law required all voters casting a ballot in person to present a United States or Indiana photo ID. Under the Indiana law, voters who do not have a photo ID may cast a provisional ballot. To have their votes counted, they must visit a designated government office within 10 days and either bring a photo ID or sign a statement saying they can't afford one. The District Court and 7th Circuit Court of Appeals both upheld the law. The circuit court was deeply divided, with the dissent characterizing the law as a thinly-veiled attempt to disenfranchise low-income Democratic Party voters. The US Supreme Court also upheld the voter ID law.

**Your final opinions (answer individually):**

- Is requiring a photo ID an undue burden upon voting? Why or why not?
- In your opinion, would this bill disenfranchise certain voters, or make it more difficult for particular groups of people to cast a ballot?
- Would the bill ensure less instances of voter fraud, in your opinion?
- If you were the governor, would you have signed this bill? Why or why not?

**U.S. Appeals Court Strikes Down North Carolina's Voter ID Law**  
By Camila Domonoske for *The Two-Way: Breaking News from NPR*

A federal appeals court has overturned North Carolina's sweeping voter ID law, ruling that the law was passed with "discriminatory intent" and was designed to impose barriers to block African-Americans from voting.

The ruling came from a three-judge panel of the 4th U.S. Circuit Court of Appeals. The state is "almost certain" to appeal to the full court or to the U.S. Supreme Court, NPR's Pam Fessler reports.

The law has been controversial ever since it was enacted in 2013 — "right after the Supreme Court struck down a provision of the Voting Rights Act that might have prevented the law from taking effect," as Pam has reported.

"The U.S. Justice Department, the state NAACP and other advocacy groups have been fighting the changes ever since," Pam says. "They say the law discriminates against minorities and is unconstitutional. Among other things, it requires voters to show a photo ID, unless they swear they faced a 'reasonable impediment' trying to get one."

But it did more than just require photo IDs. Michael Tomsic of member station WFAE explained last summer that the law rolled back a series of changes that advocates say expanded African-American voter participation:

"For decades in the state, black voter turnout lagged far behind white turnout. Then, in 2000, state lawmakers opened up an early voting period. In 2005, they said voters could cast ballots outside their assigned precinct. And in 2007, they enabled same-day registration.

"After those changes, attorney Allison Riggs says, black voter registration and turnout surged.

"They had their intended effect of evening the playing field in the state, and the Legislature yanked that away,' she says."

The 2013 law cuts early voting by a week, requires voters to vote in their assigned precinct and stops voters from registering and voting on the same day.

This April, a federal judge ruled that the law served a "legitimate state interest" and concluded there was not sufficient evidence of discriminatory intent.

That judge's opinion was hefty — 485 pages, packed with factual findings.

The 4th Circuit wasn't impressed.

"We appreciate and commend the [lower] court on its thoroughness," the panel wrote, but "the court seems to have missed the forest in carefully surveying the many trees."

The appeals court noted that the North Carolina Legislature "requested data on the use, by race, of a number of voting practices" — then, data in hand, "enacted legislation that restricted voting and registration in five different ways, all of which disproportionately affected African Americans."

The changes to the voting process "target African Americans with almost surgical precision," the circuit court wrote, and "impose cures for problems that did not exist."

The appeals court suggested that the motivation was fundamentally political — a Republican legislature attempting to secure its power by blocking votes from a population likely to vote for Democrats.

"Our conclusion does not mean, and we do not suggest, that any member of the General Assembly harbored racial hatred or animosity toward any minority group," the ruling reads. It adds:

"But the totality of the circumstances — North Carolina's history of voting discrimination; the surge in African American voting; the legislature's knowledge that African Americans voting translated into support for one party; and the swift elimination of the tools African Americans had used to vote and imposition of a new barrier at the first opportunity to do so — cumulatively and unmistakably reveal that the General Assembly used [the 2013 law] to entrench itself. It did so by targeting voters who, based on race, were unlikely to vote for the majority party. Even if done for partisan ends, that constituted racial discrimination."

As Tomsic wrote last year, what ultimately happens with this case might have implications for voting rights across the country.

Earlier this summer, the 5th Circuit Court of Appeals ruled that a voter ID law in Texas had a discriminatory effect — although the judges did not rule on the question of discriminatory intent, returning the case to a lower court for reconsideration of that point.

Source: <http://www.npr.org/sections/thetwo-way/2016/07/29/487935700/u-s-appeals-court-strikes-down-north-carolinas-voter-id-law>

## North Carolina's VIVA Bumper Sticker

Create a bumper sticker expressing your personal opinion on North Carolina's VIVA. You should also include a written paragraph explaining the different aspects of your bumper sticker.

### The Bumper Sticker

#### *Possible Points*

- / 15 Points The bumper sticker must contain an original slogan, word, or phrase that expresses an attitude about voter ID laws.
- / 15 Points The bumper sticker should be artistically designed (i.e., contain drawings, symbols, etc.) with a thoughtful color scheme
- / 10 Points The overall work should be creative and must clearly show to its viewer that great effort was put forth in creating and completing the bumper sticker.
- / 10 Points The bumper sticker should be appropriate for its intended audience.

### The Paragraph

#### *Possible Points*

- / 15 Points The paragraph should explain why you chose the expression you did and exactly what it means.
  - / 15 Points The paragraph should also explain the target audience. (Example: Republican or Democratic leaders, general citizens, civil rights activists, etc.)
  - / 10 Points The paragraph should include an explanation of the artistic qualities of the bumper sticker. (Example: Why did you choose the colors that you did?)
  - / 10 Points The paragraph needs to be written in legible pen or typed. You must use complete sentences that connect ideas to receive full credit for the assignment.
- / 100 Points **Total Points for this Assignment**