

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
No. 24CV028888-910

REPUBLICAN NATIONAL)
COMMITTEE, and NORTH CAROLINA)
REPUBLICAN PARTY,)
Plaintiffs,)

v.)

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

**AFFIDAVIT OF
JEFFREY MOORE**

I, Jeffrey Pearson Moore, being duly sworn, depose and say as follows:

1. I am 22 years old and suffer from no legal disability. I am competent to testify concerning the matters stated herein, and the statements contained in this Affidavit are based upon my personal knowledge.

2. I have no specialized background or expertise in digital photo editing.

3. For demonstrative purposes in relation to the above titled action and with no fraudulent intention, I used readily available and accessible mobile applications to alter a UNC student electronic identification.

4. For demonstrative purposes in relation to the above entitled action and with no fraudulent intention, I took the provided photograph of the UNC student

electronic identification found on onecard.unc.edu (see Exhibit 1) and used readily available and accessible mobile apps to alter the UNC student electronic identification.

5. I used an editing app called “Superimpose+: Background Eraser” (Version 3.8.5, Developer: KALEIDOSCOPE Inc.), (the “Editing App”). See Exhibit 2. The Editing App is publicly available on the Apple App Store. Many other similar mobile apps that allow for digital photo editing are publicly available on the Apple App Store.

6. Using the Editing App, I replaced the student’s picture with a picture of myself. See Exhibit 3.

7. With a second publicly accessible mobile app from the Apple IOS App Store, entitled “Walletsmith - Wallet creator” (Version 1.4.15, Developer: Juan Rodriguez) (the “Wallet App”) (see Exhibit 4), I created a new credential, with my picture and a fictitious name, and added it to the Apple Wallet app on my phone. See Exhibit 5.

8. The Editing App and Wallet App are fairly representative of standard, readily available photo editing technology available to anyone who can access Apple products.

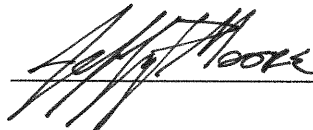
9. The modified UNC student electronic identification that I added to my Apple Wallet app on my phone mirrors the original UNC student electronic identification.

10. I also took a screenshot of the UNC student electronic identification from my Apple Wallet on my phone and further edited the UNC student electronic identification. See Exhibit 6.

11. This process took approximately one (1) hour, but now that I know how to do it, I could accomplish the task much quicker.

12. I have a valid photo identification card that I intend to use to vote legally in November's election. I have no intention of using this modified UNC student electronic identification to vote illegally in any election.

This the 19th day of September, 2024.

A handwritten signature in black ink, appearing to read "Jeffrey P. Moore", is written over a horizontal line.

Jeffrey P. Moore

NORTH CAROLINA

WAKE COUNTY

I, GREGORY M. FORNSHELL, a Notary Public of the County and State aforesaid, certify that Jeffrey Pearson Moore, as affiant, personally appeared before me this day and acknowledged the execution of the foregoing instrument.

Witness my hand and official stamp or seal, this 19TH day of SEPTEMBER 2020.

Gregory M. Fornshell
Notary Public

My commission expires: 12/6/27

