

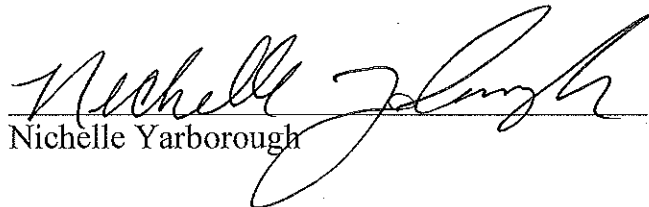
DECLARATION OF NICHELLE YARBOROUGH

1. My name is Nichelle Yarborough, and I reside in Wake County, North Carolina. I am competent to give this Declaration and have personal knowledge of the following facts.
2. I am a single mother, raising four young children. My youngest child is nine months old. She was born premature, at five months, and has serious medical needs. Both my baby and my five-year-old daughter have intellectual disabilities. My baby has to go to the doctor approximately three to four times a month. Her doctors' offices and the nearest hospital are approximately 30 miles away from my home. My children's school is approximately ten miles away from my home, and the closest grocery store is approximately seven miles away.
3. My driver's license is currently revoked because I am unable to pay the fines, penalties and court costs for a traffic ticket from 2008.
4. I live in a rural area, and my home has very limited cell phone service. There is no public transportation available within walking distance of my home. I do not have family members to help take my daughters to their medical appointments or my older children to school. I have one friend who I can rely on sometimes to help take my children to their doctor's appointments or school. I often face the choice of not taking my baby to her necessary medical appointments or driving on a revoked driver's license and risking more tickets and fines.
5. I am currently unemployed and have struggled to find work. My daughters receive Medicaid, and I get food stamps and inconsistent child support payments for my two older children. In July 2018, I filed for bankruptcy because I cannot afford my house payments.
6. In 2008, I was issued a traffic ticket for "Operating a Vehicle With No Insurance." I do not remember getting this ticket.
7. I do not remember receiving a notice from the North Carolina Department of Motor Vehicles ("DMV") that my driver's license was going to be revoked for failure to pay traffic ticket fines and court costs in Wake County, North Carolina. I have since seen a copy of the notice. A true and correct copy of the notice is attached, as Attachment A.
8. The notice only said that I must "comply" with my citation. I understand "comply" to mean that I have to pay the full amount of my citation to avoid having my license suspended. The notice did not tell me how to avoid revocation or how to get my driver's license back if I was unable to pay.

9. The DMV never told me that I had any option to keep my license other than paying off the ticket.
10. On May 23, 2018, I received a ticket for "Driving While License Revoked – Non Impaired." This ticket is currently pending before the Wake County District Court. If found guilty, I will not be able to pay the fines and court costs associated with the ticket.
11. I currently owe \$221 in court fines, penalties and costs for the 2008 traffic ticket. I would pay my traffic fines, penalties, and court costs if I could, but I do not have the money to do so. As the sole caretaker of my four children, two with intellectual disabilities, I spend my limited resources on trying to meet their needs. I am currently enrolled in community college with the hopes that an education will give me better career opportunities. The community college is not within a walking distance of my home.
12. I am participating in this lawsuit to prevent my driver's license from being revoked solely because I cannot pay my fine and court costs. It is unfair for the DMV to revoke people's driver's licenses because they do not have enough money to pay a traffic ticket.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 6th day of August, 2018.


Nichelle Yarborough