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Attorneys for Plaintiffs Felisa Wilson, George Martinez, and Yarrow Silvers

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
THIRD JUDICIAL DISTRICT AT ANCHORAGE

In the Matter of the  
2021 REDISTRICTING PLAN.

Case No. 3AN-21-08869CI

**AFFIDAVIT OF KEVIN DAVID MCGEE**

STATE OF ALASKA       )  
                                  ) ss:  
Third Judicial District   )

I, Kevin David McGee, being first duly sworn on oath, depose and state as follows:

1. I am the President of the National Association for the Advancement of Colored People Anchorage, Alaska Branch #1000 ("NAACP Anchorage").

2. I make this Affidavit based upon my knowledge and in my capacity as the President of NAACP Anchorage and in support of the East Anchorage Plaintiffs and the East Anchorage racial and language minority residents.

3. I am currently in my third two-year term of office as President of the NAACP Anchorage Branch. My prior position was First Vice President for six years. I was also the Standing Committee Chair for the NAACP Political Action Committee for six years.

4. The mission of the NAACP Anchorage is "to secure the political, educational, social, and economic equality of rights in order to eliminate race-based discrimination and ensure the health and well-being of all Alaskans."

5. The emphasis of this mission statement is the need to strengthen all institutions in such a way that they contribute to the creation of an ideal American society.

The following components elucidate this statement:

- A. Upholding individual rights; and
- B. Improving communities.

6. The persistence of NAACP Anchorage is clear especially in its campaigns against any form of personal rights violations. Just as it was initially founded to protect the people of color, NAACP Anchorage continues to advance this fight to include even the finest of their rights.

7. The NAACP particularly focuses on their civil rights engagement, including in the legislative and electoral processes. Success in this endeavor directly leads to the improvement of communities in Alaska, as represented by the second component.

8. The absence of discrimination of all magnitude is the primary goal for the NAACP.

9. The vision statement of the NAACP Anchorage is "to ensure a society in which all individual Alaskans have equal rights without discrimination based on race."

10. This vision statement represents the leadership vow of NAACP Anchorage and its determination to emerge victoriously. It can be divided into:

- A. Promote an inclusive society; and
- B. Uphold equal rights for all.

11. Making Alaska home for everyone remains the primary objective of NAACP Anchorage. That is why the organization is actively involved in exposing any social evils targeted at races wherever they are.

12. Such a commitment relates to the duty of upholding the rights of all the citizens. Today, NAACP Alaska – composed of NAACP Anchorage and a branch in Fairbanks – has achieved significant milestones in kicking racial discrimination out of some parts of Alaska.

13. The stated “core values” of NAACP Anchorage include “equality, inclusiveness, respect for all, and integrity.” This organization is all about the rights of the people of color. To ensure it succeeds in this role, NAACP Anchorage is organized to have a strong foundation where its stakeholders are seen as role models.

14. The organization considers its core values crucial as they create an institutional culture that promotes the rights of everyone and considers all people equal. This is the image that NAACP Anchorage values and strives to spread similar perspectives across the United States.

15. The result of this redistricting has been to create a high potential for the reduction in the number of legislators who have traditionally supported issues consistent with the goals and objectives of the NAACP nationally and our local branch and the needs and interests of the East Anchorage residents and Alaskans as a whole.

16. At the heart of it, the proposed districts have combined historically conservative districts with those who vote for more progressive candidates. There have been statements made by majority members of the Alaska Redistricting Board adopting the senate pairings directly supporting that the results of this process will potentially eliminate and/or reduce the number of legislators that are dedicated to serving and seeing the needs of minority groups.

17. Given that our entire legislature (both the Alaska Senate and the House of Representatives) have a total of 60 individuals, every position is critical. This matter has been discussed at the NAACP Anchorage general membership meeting on December 20, 2021, and received Board approval.

18. It was not until 1965, after years of intimidation, murders, and advocacy that the path to the voting booth was cleared for Black people with the federal Voting Rights Act of 1965. The Act is a bedrock law protecting every American's right to register to vote and cast their ballot. It remains one of the hardest-fought safeguards for Black Americans and other minority groups.

19. The NAACP Anchorage branch was chartered in 1951. Founders such as John W. Thomas, Blanch McSmith, Clarence and Flossie Coleman, Joseph M. Jackson, John S. Parks, and Mr. and Mrs. Richard Watts were spurred into action when the dream home of an African American was burned to the ground before he could move into an all-white neighborhood.

20. Redistricting, poll location changes and closures, and limited access to convenient early voting are current attempts to disenfranchise Black voters.

21. If 2020 has done anything, it served as a reminder that when society suffers, communities of color suffer worse. Even during times of national stress – whether that's COVID infection rates, police brutality, or unemployment numbers – America's structural shortcomings have a disproportionate impact on populations of color.

22. And while the former administration, aided by the Supreme Court, ended the 2020 Census prematurely last Fall, the ripple effects of COVID-19's disruption and political interference are signaling unique challenges for historically undercounted communities of color.

23. The ultimate final decision made by the Alaska Redistricting Board established a clear disadvantage to the Northeast Anchorage community of color by the senate pairings of the Muldoon community with that of Eagle River.

24. In my testimony submitted on November 8, 2021 at 6:14 a.m., I commended the Board for carefully considering public comments on draft plans, civil rights considerations, including the impact of minority voters in East Anchorage, and adopting the most constitutional house districts before the Board.

25. In that testimony, I urged the Board to continue keeping civil rights considerations in mind as the Board paired East Anchorage, JBER, Mt. View, Russian Jack, Government Hill, and downtown; Anchorage's most diverse neighborhoods.

26. I, on behalf of the NAACP Anchorage, proposed two pairing configurations that would protect East Anchorage residents from the dilution of their vote and their voice. The first pairing took House Districts 18, 19, 20, and 21 (UMED, Mt. View/Airport Heights, North Muldoon, and South Muldoon) and paired them into two senate districts and paired

downtown with Government Hill/JBER (House Districts 17 and 23), which unites downtown into a senate seat.

27. Alternatively, and less visibly obvious, we recommended pairing House District 23 with 19 (Government Hill/JBER with Mt. View/Airport Heights), District 12 with 19 (UMED with Far North Bicentennial Park), and District 20 with 21 (North with South Muldoon). This pairing ensures that our most diverse neighborhoods have a real voice in three senate seats and fully comply with the contiguity requirements under the Alaska Constitution.

28. My public testimony respectfully requested that the Board continue to listen to public input and reject pairings of the Anchorage/JBER with Eagle River to form senate districts.

29. The house district numbers in this Affidavit have been revised from my original public testimony to reflect the corresponding promulgated house district numbers.

30. Despite our request, the Board inexplicably selected not to have public testimony before adopting the senate pairings proposed by Board members Marcum, Simpson, and Chair Binkley.

31. The Board did not acknowledge the testimony and recommended pairings by NAACP Anchorage or address the concerns raised by our organization regarding the dilution of minority voting representation.

32. NAACP Anchorage is actively engaged in providing resources and advocacy to East Anchorage and its community members and has observed first-hand the detrimental impact of fragmenting East Anchorage communities without regard for the

cohesive yet diverse minority majority population that exists in East Anchorage when its neighborhoods remain united.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE  
Alaska Branch #1000

By:



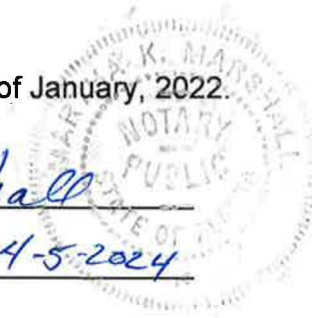
Kevin David McGee, President

SUBSCRIBED AND SWORN TO before me this 4<sup>th</sup> day of January, 2022.



Notary Public for Alaska

My Commission expires: 4-5-2024



CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 5<sup>th</sup> day of January, 2022, a true and correct copy of the foregoing document was served electronically on the following:

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