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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 FELISA WILSON

STATE OF ALASKA)
) ss:
Third Judicial District)

I, Felisa Wilson, being first duly sworn on oath, depose and state as follows:

1. I filed, with Yarrow Silvers and George Martinez, an Application to Compel the Alaska Redistricting Board to Correct Its Senate District Pairings in Anchorage and am one of the Plaintiffs in the above-captioned case.

2. I have personal knowledge of the facts stated below and make this affidavit in support of the Application.

3. I live on Joint Base Elmendorf-Richardson ("JBER") in Alaska.

4. I am a recently retired Major as a U.S. Air Force medical officer and physician with 24 years, 4 months and 19 days of military service.

5. I am fully retired and spend my time pursuing endeavors of volunteer community service with my church in Government Hill, my sorority, and various community organizations that serve the underserved population in Alaska.

6. I consider myself a part of the East Anchorage community and engage in numerous activities in service to that community.

7. My community activities include or have included, but are not limited to, volunteering on projects with the Food Bank of Alaska; managing the Emergency Cold Weather Shelter created and operated by my church for residents experiencing homelessness, coordinating school supply and clothing donation drives for residents of Mountain View and Northeast Anchorage.

8. I have lived in Alaska since coming to JBER as a permanent change of station in 2015. I lived in Eagle River from 2015 to 2018 and moved to officer housing on JBER in 2018.

9. I filed the Application with my fellow plaintiffs because I believe that the senate pairings of Eagle River house districts with JBER Government Hill and South Muldoon districts is a travesty that detracts from the rich diversity of culture, thought and socioeconomics of the majority minority populations in those Anchorage districts.

10. My church is in Government Hill and runs a food bank for the residents of the community. Based upon my observations and experience as a resident and active community participant and the management of organizations created and dedicated to serving the needs of community members, most of the residents of Government Hill are

low income and reside in the low-income housing in the area, which comprises almost 75 percent of the housing in this community.

11. Pairing this community of mostly low-income housing and high minority diversity with North Eagle River in which the houses are all single-family homes ranging from \$500,000 to over \$1 million and homogenous ethnicity of mostly affluent Caucasian residents is an incongruous pairing and diminishes the collective voting voices of the JBER Government Hill residents.

12. The same is true for pairing the south Eagle River house district with Northeast Muldoon house district.

13. The residents in South Eagle River are predominately homogenous affluent Caucasian voters that have very closely aligned needs with their Eagle River counterparts. Instead, these voters are paired with a majority minority population that is one of the most ethnically and socioeconomically diverse neighborhoods in the country.

14. From my observations and experience in both Eagle River and Government Hill, many of Eagle River's residents live in single-family residences or longer-term rentals while the residents in Muldoon and other sections of East Anchorage including Government Hill have much more housing situations, ranging from homeless camps to single-family homes and everything in between.

15. I have volunteered for the past three years in the Muldoon community and witnessed the astounding diversity of ethnicities present in the area. It has such a rich multicultural heritage that is celebrated and in stark contrast to Eagle River. When I lived in Eagle River, it was apparent to me that my family was one of few minorities in the homogenous area.

16. I testified in person at the Redistricting Board hearings and work sessions more than six times and sent in written testimony as well. My testimony included the fact that when I lived in Eagle River, I never left the community except to drive to JBER for work. Eagle River had everything from my church, shopping, farmer's markets, recreation, restaurants and friends. I volunteered, attended church, and recreated solely in Eagle River.

17. A strong sense of community exists in Eagle River and I testified to the Redistricting Board that Eagle River house districts should remain a single senate district for this very reason.

18. I further testified that I now live on base and am now, as a result, connected with the Government Hill/East Anchorage community. As I stated in my testimony, I have joined a church in Government Hill and volunteer in the East and Northeast Anchorage communities, which has allowed me the opportunity to witness the richness of diversity of thought, culture, and socioeconomic diversity of these communities and how their collective voices are stronger together.

19. During the deliberation of the senate pairings by the Redistricting Board, Board member Bethany Marcum deliberately misconstrued the words of my testimony to misrepresent it as in favor of pairing Eagle River house districts with JBER or Northeast Anchorage districts. I could not believe what I was hearing on the video zoom livestream of this deliberation.

20. This was especially disturbing and frustrating because I did not have the ability to even comment on Board member Marcum's misrepresentation of my testimony.

21. There was no opportunity for the public to rectify this misrepresentation of my testimony, nor to give further comment on the senate pairings as selected by the Board.

22. From my observations, it was clear the majority of the Board members intended to adopt whatever senate pairings Board member Marcum proposed and that they were not considering or even hearing any public testimony or comment on those pairings.

23. I was alarmed and blindsided by this turn of events and these decisions by the Board. The Board's failure to discuss the pairings and let the public weigh in on those pairings was especially unexpected given the Board's process regarding the adoption of the house districts.

24. The majority of the Board members' entire discussion of the senate pairings in Anchorage appeared to me to be capricious in nature, especially given Board member Marcum's use of my testimony to support pairings that were exactly the pairings I testified against adopting both in person and in writing.

25. The irrational decision-making of the other majority Board members, Board member Simpson and Board member Binkley was also clear as neither corrected Board member Marcum regarding the manipulation and mischaracterization of my testimony to silence me and the community members I spoke to support.

26. Neither Board member Binkley nor Board member Simpson gave any reason for supporting Board member Marcum's pairings.

27. Perhaps even more disturbing, the Board adopted Board member Marcum's proposed Anchorage senate pairings on November 9, 2021 without any

discussion and once again without offering me an opportunity to correct the record or the public a chance to participate in that hearing.

28. The Census and the Redistricting apportionment has a profound impact on our communities for an entire decade. I have worked side by side with people in the communities of JBER, Government Hill, and Northeast Anchorage and know that our vote is better represented if we remain together in the same senate districts. Our vote as minorities and our cohesive diversity in income, housing, and economics is properly represented when we are paired with house districts that reflect our shared interests as residents of East and Northeast Anchorage, including JBER and Government Hill.

29. Pairing these districts with Eagle River, where voters have extremely different needs and fight for strong representation of those needs with a monolithic unwavering voice, will drown out the voices of the East Anchorage district residents who have totally different needs and interests from Eagle River that these communities express cohesively but often on an issue-by-issue basis.

I hereby attest that the statements made in this Affidavit are true and correct to the best of my knowledge.



Felisa Wilson

SUBSCRIBED AND SWORN TO before me this 4th day of January, 2022.



Notary Public in and for Alaska

My Commission expires: 4-5-2024

CERTIFICATE OF SERVICE

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

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