

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA

EVAN MILLIGAN, SHALELA DOWDY, LETETIA JACKSON, KHADIDAH STONE, ADIA WINFREY, GREATER BIRMINGHAM MINISTRIES, and the ALABAMA STATE CONFERENCE OF THE NAACP,

Civil Case No. 2:21-CV-01530-amm

Plaintiffs,

v.

JOHN H. MERRILL, in his official capacity as SECRETARY OF STATE OF ALABAMA, and JIM MCCLENDON AND CHRIS PRINGLE, in their official capacities as CO-CHAIRS OF THE ALABAMA PERMANENT LEGISLATIVE COMMITTEE ON REAPPORTIONMENT

DECLARATION OF LETETIA JACKSON

I, Letetia Jackson, declare as follows based on my personal knowledge:

1. I am a resident of Dothan, Alabama and I am registered voter in the City of Dothan, Alabama. I thus reside and vote in elections for Alabama U.S. Congressional District 2.
2. I identify as Black or African American.
3. I am the Convener of the South Alabama chapter of the Black Women's Roundtable (BWR). The BWR serves as the National Coalition on Black Civic Participation's (NCBCP) intergenerational leadership development, mentoring, empowerment and power building arm for Black women and girls. The BWR is at the forefront of championing just and equitable public policies

that center racial, economic and gender justice to promote health and wellness, economic security and prosperity, education, and global empowerment as key elements of success.

4. I am also an active member of the following organizations: Les Vingt Socialete Club, a civic and social organization that offers mentoring, voter education, get out the vote efforts, and community service; the Dothan Chapter of the Alabama NAACP; Dothan Community Church; and the Dothan Association of Women's Clubs, an umbrella organization of women's clubs around the state of Alabama.

5. For the purposes of its work, the South Alabama chapter of BWR draws an invisible line through Montgomery County and identifies everything below Montgomery County as South Alabama. As a result, the membership of the South Alabama chapter of BWR is concentrated below Montgomery County.

6. Specific issues affecting BWR's members that the organization has embarked upon to address are: Alabama's restrictive legislation on reproductive rights; access to healthcare and expansion of Medicaid; criminal justice reform (particularly, advocating for the ability for incarcerated persons to vote prior to conviction and restoring the voting rights of the previously incarcerated); outreach around Covid, providing PPE to families with no disposable income, and vaccination; raising awareness around redistricting, gerrymandering, and vote dilution.

7. We have worked tirelessly to engage and encourage our Black voters to participate. However, with little chance of electing the Black candidate of their choice, Black voters in South Alabama are discouraged and disenfranchised by the gerrymandering of congressional districts.

8. At least two Black candidates have sought to be elected in Congressional District 2 in recent elections, but have been unsuccessful due to how diluted the Black voting population is in the gerrymandered congressional districts. Black voters are not being afforded the opportunity to elect a representative who reflects our policy priorities. We are experiencing taxation without representation.

9. With the exception of Terri Sewell, Alabama's congressional leaders do not engage the Black community and are not concerned about Black issues. Black voters are primarily invisible. Our issues are not currently at the forefront of any policy effort, which is why it is important for us to have our fair share of elected leaders to understand and advocate for our issues. Even though I do not live in Congresswoman Sewell's district, I look to her as my Congressperson because, when I am seeking access to resources or information relevant to the Black community, her office will have those answers as opposed to the office of my district's representative.

10. My district's representative is Barry Moore. I am a highly active citizen of my community. Since he has been my representative, I have not had a meeting with him or heard of any outreach that he has held with the Black community attempting to understand our concerns and issues. When he does hold meetings with constituents, they are typically at country clubs and restaurants frequented by white voters. He does not visit the restaurants, neighborhoods, and churches where Black people live. Additionally, his district office is on the predominantly white, west side of town, which is not accessible to the average Black voter in the district. A large population of Black people in Congressional District 2 live below the poverty line and do not own or have access to a car. While there is one public transportation service, which requires advanced scheduling at least 24 hours in advance, there is no public transportation system. In my experience, Congressman Moore is not interested in being accessible to his Black constituents. In fact, a simple view of his Congressional website list several meetings Congressman Moore has held that are at venues primarily frequented by white constituents, with many not accessible to his Black constituents without personal transportation or access to broadband for virtual meetings. Not a single meeting appears to be held in or accessible to his Black constituents' communities.

11. The Black voting population should have at least two Congressional districts where we are the majority. The way congressional district lines are currently drawn, they dilute the Black vote

and deny us an opportunity to elect representatives who will support and advance policies that improve our lives and communities.

12. In the most recent elections in Congressional District 2, police presence has been increased and, at any given time of the day, I have seen police cars stationed at polling places, especially those with a heavy Black voting population. I believe these actions are designed to intimidate and discourage voters from exercising their enfranchisement.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Sworn to this 15 day of December, 2021.



[SIGNATURE]

[PRINTED NAME]

Letetia Jackson