

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

EVAN MILLIGAN, et al.,

*Plaintiffs,*

vs.

JOHN H. MERRILL, et al.,

*Defendants.*

No. 2:21-cv-01530-AMM

**DECLARATION OF SHALELA DOWDY**

I, Shalela Dowdy, declare as follows based on my personal knowledge:

1. I am a resident of Mobile, Alabama and I am registered voter in the City of Mobile, Alabama. I thus reside and vote in elections for U.S. Congressional District 1.
2. I identify as Black or African-American.
3. I was born and raised in Mobile, Alabama which has allowed me to have a vested interest in the city and the state that I call home.
4. I earned my Bachelor's Degree from the United States Military at West Point. Following that, I served on active duty for 6 years. While attending college and serving on active duty, I lived in 5 different states and was deployed to the Middle East. I always remained a resident of Alabama and continued to vote in Alabama. Upon returning to Alabama, I immediately noticed the lack of representation in many areas of leadership and elected position in particularly at the Congressional Level.
5. For several years, I have been actively engaged in Voter Outreach where I have focused on educating voters in my local community about the importance of participating in every

election, helping with registering Alabamians to vote, and assisting with the mobilizing voters by providing those without transportation with the means to access the polls to vote on election day.

6. For the past 6 months, I have participated in the CROWD (Community Redistricting Organizations Working for Democracy) Fellowship sponsored by the Southern Coalition of Social Justice, where I am assigned to Lower Alabama which consists of counties in Congressional District 1. The redistricting work that I do is centered around educating the community on the process, how it impacts them, and why they should be actively involved in the process.

7. I, along with other Black people in both the City of Mobile and Mobile County, can trace our family roots back to the Black Belt areas of Alabama such as Montgomery County, Dallas County, Lowndes County, Wilcox County and other counties in the area.

8. With many Black people in the Mobile area having family ties to the Black Belt, it is a clear indication that both areas are a community of interest and should be kept whole in one district. Black people in Mobile and Black people in the Black Belt share history and similar struggles when it comes to combating adversity and fighting inequality in the state of Alabama.

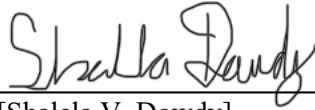
9. The issues of education, healthcare, and the equitably distribution of infrastructure have been devastating to the Black communities residing in the Black Belt and Mobile. All of this, in addition to not being able to elect someone who will fight for the things that Black people in the Black Belt and Mobile find important, results in the demographic that I belong to being helpless and disempowered.

10. I spoke at the public hearing that the State Reapportionment Committee held in Mobile in September 2021. My comments were about the packing and diluting of the Black vote in the Congressional District 7 and the need for an effort to be made for a second majoring minority Congressional District.

11. I virtually attended about twenty other public hearings that were held around the state and heard the same concerns mentioned by numerous other Black Alabamians. We made our issues known to the Committee leaders to no avail. Having a second Congressional District where a Black candidate of choice could be elected would allow for proper representation of what the demographics of Alabama truly look like. It will give a voice and hope to a group of people who have always had to fight for their voice to be heard.

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 14 day of December, 2021.

  
\_\_\_\_\_  
[Shalela V. Dowdy]