

**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 EVAN MILLIGAN**

I, Evan Milligan, declare as follows based on my personal knowledge:

1. I am a resident of Montgomery, Alabama and I am registered voter in the City of Montgomery. I thus reside and vote in elections for U.S. Congressional District 7.
2. I identify as Black or African-American.
3. I grew up in Birmingham and Montgomery, Alabama. While in Birmingham, I lived in the College Hills neighborhood, which is located across the street from Birmingham-Southern College. While in Montgomery, I primarily lived in predominately African-American communities located in the downtown and southwestern areas of the city, particularly Centennial Hill, Rosa Parks Combined Communities, Haardt Estates, and South Hull. Over my lifetime, these areas have been associated with Congressional Districts 2 and 7.
4. I am the Executive Director of Alabama Forward. Alabama Forward is a state-based 501(c)(3) civic engagement coordinating table committed to advancing movement towards greater freedom and progressive, solution-oriented policy among a diverse coalition of Alabama-based

partner organizations, so that every Alabamian can engage in the democratic process. In pursuit of this mission Alabama Forward prioritizes race and gender equity to engage every Alabamian in all aspects of our democracy.

5. The vision of the Alabama Forward 501(c)3 Network is to boost civic and political participation through collaborative voter engagement and election reform efforts while building the capacity of participating organizations to more effectively communicate about and engage in their work. Alabama Forward also prioritizes supporting compelling emerging leaders and organizations who have not historically received more traditional forms of support.

6. The Black community dispersed throughout Montgomery is a community of interest. While segregation and redlining policies initially concentrated the bulk of Montgomery's Black communities downtown, and immediately north, west, and south of there, as economic and residential opportunities have become more accessible, Black residents have settled in every zip code associated with Montgomery. Today, in addition to West and North Montgomery neighborhoods that have been predominately Black for all their existence, there are large pools of Black residents dispersed throughout the city in non-contiguous locations.

7. Black Montgomerians are often deeply connected to many of the military, government, educational, civic, and cultural institutions located in inner-city Montgomery, particularly in the downtown area. Black families gather at the downtown Crampton Bowl for Friday Night football, assorted sports championships, and multi-generational tailgating prior to big games. This community of interest educates their children at Valiant Cross Academy, a private Christian boy's academy located directly across the street from the Alabama Supreme Court and state appellate courts. Black Montgomerians have multigenerational and diverse ties to Alabama State University

(“ASU”) an HBCU, where they work, attend school, send their children to the Headstart and pre-kindergarten programs at Zeilia Stephens Early Childhood Center, enjoy football classics, and utilize the Dunn-Oliver Acadome and other campus venues for assorted cultural events including concerts, fraternity/sorority galas, high-school graduations, theater, and hosting notable public speakers. Social service providers and community development agencies pivotal to many Black Montgomery families are located in the downtown area, including the Community Action Agency that coordinates the Headstart programs located throughout the city; the Montgomery Public School Board offices; municipal government offices. Downtown Montgomery and the immediately adjacent areas also feature some of Montgomery’s oldest and most vibrant Black faith communities, including Pilgrim Rest Baptist, First Avenue Baptist Church, Freewill Baptist Church, Dexter Avenue Baptist, St. John’s AME Church, and Resurrection Catholic Church. Immediately west and east of downtown are Gunter and Maxwell Air Force Base where kids like me chose to serve their country in service of a brighter future for their country and themselves. These military installations provide considerable employment, educational, and recreational opportunities to Montgomery’s Black servicemembers and civilians.

8. In addition, downtown Montgomery also features numerous civil rights museums and institutions, including the Dexter Avenue King Memorial Legacy Center and Parsonage, the Rosa Parks Museum and Library, the EJI Legacy Museum, and the National Memorial for Peace and Justice. These sites provide historical information that is important to the identities of Black Montgomerians and many family reunions organized by Black residents routinely feature trips to these sites. These sites recognize the profound consequences for both Black and white people of chattel slavery, racial terror lynchings, and racial segregation. Irrespective of what part of town people are sleeping in Montgomery, these are the places where the majority of Black residents are

educating their children, worshiping, working, recreating, and seeking cultural enrichment.

9. When I was a child, Representative Earl Hillard became the first Black congressperson to represent an Alabama district since Reconstruction and I recognized his importance in the creation of District 7. The subsequent election of Representative Artur Davis was also impactful due to his unique staff of diverse, passionate, and inspiring younger people.

10. I've experienced an intimate bond between Black communities in Montgomery and those based throughout the Black Belt. My first exposure to this connection was my own family. Our family routinely returned to our family cemetery in Lowndes County as a way of maintaining our connection to our origins. My wife and I chose to get married in the Lowndes County Courthouse due to our sense of cultural connection to this area. Our relationship with Lowndes County is not unique. Most Black families in Montgomery who are originally from this area have similar stories.

11. There are also civil rights and advocacy connections between Montgomery and the rural Black Belt communities. There are generations of connections between communities in Dallas, Wilcox, Hale, Greene, Choctaw, Lowndes, Marengo, and Perry counties; and institutions in Montgomery. For example, the Federation of Childcare Centers of Alabama was headquartered in Montgomery, but founded by childcare center program leaders based throughout the Black Belt; and the connections between civil rights advocates in Dallas, Wilcox, and Hale counties and Black churches based in Montgomery.

12. Montgomery's demographics are also shaped by the same legacy of plantation slavery that shapes the rural Black Belt. Black communities in the Black Belt have all experienced uniquely high rates of poverty, and poor health outcomes. These communities have relied on similar cultural and religious institutions for inspiration and resiliency. For many, Alabama State University has

served as a multigenerational transition space for people emerging from Black families in the Black Belt who are interested in gaining skills and overcoming historic barriers.

13. In August and September of 2021, I participated in several media forums with the League of Women Voters to discuss redistricting.

14. As Executive Director of Alabama Forward, I participated in bi-weekly briefing on the redistricting process beginning on April 30, 2021 to discuss public outreach and education around redistricting.

15. Between September 1 and 16, long before the Committee released any draft maps or proposals, the Legislative Reapportionment Office held 28 public hearings across the state. All but one hearing—held at 6:00 pm at the Statehouse in Montgomery—was held between the normal workday hours of 9:00 am to 5:00 pm, i.e., times when the general public was least able to attend.

16. Khadidah Stone and I submitted email testimony to the Reapportionment committee on Thursday, September 16, 2021, the last Thursday of the hearings.

17. After submitting a request for a public hearing to the Senate Finance and Taxation General Fund Committee, I arrived to testify before that committee when it met on Tuesday, November 2, but they were not taking public testimony.

18. On October 29, 2021, the Alabama House State Government Committee met to discuss the Reapportionment Committee's proposed districting plan for Alabama's U.S. House delegation.

19. During the hearing on the bill, I asked Representative Chris Pringle whether the Reapportionment Committee conducted racial polarization studies on any of the maps. Representative Chris Pringle said "some of the districts that we were concerned about," but that

they “were still working on it.”

20. In November, I testified in person at the House hearing on how the Committee assessed and utilized the feedback from the public listening sessions. I asked if the Committee considered community maps and when the public could receive the results of the RPV research.

21. When I asked whether the Committee lacked sufficient data to determine whether the map they introduced would violate federal law, Representative Pringle did not answer.

22. Alabama’s 2021 special redistricting legislative session began on October 28, 2021. By November 3, 2021, bills redistricting the Alabama U.S. Congressional map, Alabama Senate map and Alabama House of Representatives map were passed by both houses of the Alabama legislature and sent to Governor Kay Ivey’s office for approval and signing.

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 14th day of December, 2021.

A handwritten signature in black ink, appearing to read "Evan Milligan", with a long horizontal flourish extending to the right.

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Evan Milligan