

**DECLARATION OF REP. SAMUEL JONES**

I, Samuel Jones, hereby declare as follows:

1. I am over the age of 21 and the testimony set forth in this Declaration is based on firsthand knowledge, about which I could and would testify competently in open court if called upon to do so.

2. I have served as a member of the Alabama State Legislature's House of Representatives representing House District 99 since 2018. My district is located in both portions of the City of Mobile and parts of Mobile County outside of the City.

3. Before becoming a member of the Alabama State Legislature, I served as the City of Mobile's Mayor from 2005 until 2013, and was the first Black individual to ever hold that position. Prior to that, the people also elected me as a Mobile County Commissioner to Northern Mobile County's District One for four consecutive terms—from 1987 until 2005—which consists of seven municipalities. I also spent approximately 15 years chairing the South Alabama Regional Planning Commission. Prior to holding political office, I served in the United States Navy for nine years.

4. I was born in Mobile County in 1947. Other than my time in the United States Navy from 1967–1976, I have always lived in Mobile.

City of Mobile, the Black Belt, and Baldwin County

5. Based on my experience in local and state level elected office and other positions in Mobile as well my lived experiences, the City of Mobile and other nearby communities in Northern Mobile County such as Prichard, Chickasaw, and Mount Vernon, have more similarities and closer ties to much of Alabama's Black Belt than these communities do with Baldwin County.

6. Mobile is the economic hub of South Alabama, in large part because of the Port of Mobile. Timber processing, shipbuilding, aerospace engineering, manufacturing, chemical developers, and companies from other industries all operate within Mobile County.

7. Mobile County's industrial identity has attracted job seekers from Alabama's Black Belt for decades. The Black Belt's limited employment opportunities, coinciding with Mobile County's need for workers in its diverse industries, has created a regular migration from the Black Belt to Mobile. Many intra-state migrants from the Black Belt permanently moved to Mobile. Others commute from the Black Belt to work in Mobile County.

8. Companies operating in Mobile actively recruit talent from the Black Belt. For example, one such shipbuilding company is Austal USA, which recruits and attracts prospective employees from the Black Belt to build ships in Mobile and across the state line in Pascagoula, Mississippi. The need for longshoremen and

workers in the Port of Mobile has also attracted prospective employees from the Black Belt to Mobile for those jobs.

9. Mobile has highest level trauma center in the region, at the University of South Alabama hospital. When individuals in much of the Black Belt need specialized healthcare or high-level treatment, they usually travel either to Mobile or Montgomery.

10. I can't think of a single family who lives on my street who don't have origins or relatives in Alabama's Black Belt, places like Wilcox, Lowndes, and Marengo Counties, as do many others I know who live in Mobile.

11. Migration from the Black Belt to Mobile has also deepened cultural ties between the two areas. I know of many ministers based in Mobile who have sister churches in the Black Belt. Many of Mobile's pastors are graduates of Selma University. Some Sundays, they travel for congregations at those sister churches. Faith leaders in the Black Belt likewise travel to Mobile for congregations at sister houses of worship there.

12. Events like Mardi Gras and college football games have strengthened the bonds that the City of Mobile shares with the Black Belt. Families from across the Black Belt convene in the City of Mobile to celebrate Mardi Gras, which has the feel of a family reunion, particularly for Black families. While Baldwin hosts its own Mardi Gras celebration, I know of very few people in Mobile who attend it. Baldwin



County's Mardi Gras celebration lacks the shared family reunion dynamic that the City of Mobile's celebration has.

13. The City of Mobile also hosts football matchups between Historically Black Colleges and Universities ("HBCUs") every year, such as the Gulf Coast Challenge match up, and the Senior Bowl, which serves as college football's all-star game and annual beginning of the NFL Draft process. Both games in the City of Mobile attract fans and family from both Mobile County and from across the Black Belt.

14. Mobile and Baldwin have their own community colleges: Bishop State in Mobile and Coastal Alabama in Baldwin.

15. Baldwin County shares little of these cultural or community ties that the City of Mobile and Northern Mobile County share with the Black Belt.

16. Part of the reason these cultural ties are lacking between Mobile and Baldwin County are because of the two areas' different histories and development. Whereas the City of Mobile is Southern Alabama's industrial center, Baldwin County's economy is driven by tourism. The County's beaches along the Gulf of Mexico have attracted a wealthier demographic than the industrial workers who migrated to the City of Mobile. Industrial companies did not recruit talent from the Black Belt to Baldwin County—those companies recruited that talent to work in the

City of Mobile. As a result, few majority Black communities now exist within Baldwin County. In contrast, the City of Mobile is a majority-Black city.

17. I cannot think of a major economic development project in Mobile that I was not a part of in the last 24 years. For fifteen years I chaired the Regional Planning Commission. During that time, I cannot think of any economic development ventures where we had to provide incentives in which Baldwin participated. Baldwin's economic base is fundamentally different from Mobile's economy.

#### Reapportionment Committee Experience

18. As a member of the Alabama State Legislature, I was first appointed to the Joint Committee on Reapportionment in 2018. I was reappointed in advance of the Special Session in July 2023.

19. During the 2023 special session, the Co-Chairs of the Reapportionment Committee had difficulty answering my basic questions about how they chose what plans to prioritize, when they would provide data supporting their own plans, and how they arrived on those plans. For example, out of about 100 congressional plans submitted to the Committee Co-Chairs, maybe 15–20 were shared with other members and myself. No one explained to me how those 15–20 plans were selected from the other plans submitted. I asked who selected the 15–20 plans chosen by the



“Committee.” Co-Chair Representative Pringle responded: “We did.” When I asked him to define “we,” Representative Pringle said “me and my Co-Chair.”

20. This lack of transparency continued throughout the 2023 special session. I requested the different plans by July 7, 2023, but only received them on July 14, 2023. Even then, we only saw the maps the Co-Chairs selected. On July 17, 2023, one map introduced as “Opportunity Plan” had no one available to answer questions about it at that Reapportionment Committee meeting. I later learned that Senator Livingston introduced that plan, and that he was present at the hearing. To my knowledge, no one explained how under the “Opportunity Plan,” Black Alabamians could elect a representative of their choice. None of the maps introduced by Committee Co-Chairs were vetted at the public hearing. Even after requesting responses from the Committee lawyer—Dorman Walker—I understand that he only shared information with the Committee’s Co-Chairs. At the July 13, 2023 hearing, Mr. Walker brought a number of documents concerning Mobile to enter into the record. I had not seen these documents before and he did not explain why he was entering them into the hearing record.

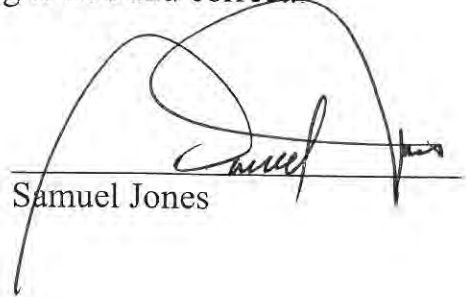
21. I did not see nor have the opportunity to review the final plan passed in S.B. 5 until the day it passed.

22. I am concerned that the plan passed as a result of S.B. 5 cannot result in a second Black preferred candidate being elected to Congress from Alabama.

S.B. 5 separates Mobile from the Black Belt, despite their shared history, culture, and institutions. Moreover, Mobile County would be better served by having two Congressional representatives rather than one. A reapportionment plan connecting Mobile to the Black Belt will serve the interests not only of Mobile's residents, but also Alabamians across the state as well.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 27, 2023, in Mobile, Alabama.



Samuel Jones