

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

BOBBY SINGLETON, *et al.*,

*Plaintiffs,*

v.

WES ALLEN, in his official capacity  
as Alabama Secretary of State, *et al.*,

*Defendants.*

Case No. 2:21-cv-01291-AMM

THREE-JUDGE COURT

EVAN MILLIGAN, *et al.*,

*Plaintiffs,*

v.

WES ALLEN, in his official  
capacity as Alabama Secretary of State,  
*et al.*,

*Defendants.*

Case No. 2:21-cv-1530-AMM

THREE-JUDGE COURT

MARCUS CASTER, *et al.*,

*Plaintiffs,*

v.

WES ALLEN, in his official  
capacity as Alabama Secretary of State,

*Defendant.*

Case No. 2:21-cv-01536-AMM

**DECLARATION OF BRAD KIMBRO**

I, Brad Kimbro, declare as follows:

1. I am over the age of 19, and the testimony I have set out below is based upon my personal knowledge, which I could testify competently about in court if requested to do so.

2. I was born in Montgomery, Alabama in 1969. In the early 1970s, my family moved to Brantley, Alabama in Crenshaw County. I lived in Brantley until I left for college. I attended Troy University, which was then known as Troy State, and graduated in 1991 with a major in Business Administration and Marketing. After college, I worked in Dothan, Alabama, then Mobile, Alabama, and then Baldwin County, Alabama, where I started my career in the electric cooperative industry. In 2004, I moved to Tampa, Florida and then, in 2006, I returned to Alabama to work for the Wiregrass Electric Cooperative, where I remain employed today. I currently live in Ashford, Alabama, which is east of Dothan in Houston County. All in all, I have lived more than 50 years in Alabama, and the great majority of that time has been in the Wiregrass.

3. The Wiregrass Electric Cooperative primarily serves Houston County, Geneva County, Coffee County, Dale County, and Covington County. I am the Chief Operating Officer, and, in this role, I am responsible for a number of different functions including communications, public relations, member relations, and economic and community development.

4. Additionally, I am the Immediate Past Chairman of the Dothan Area Chamber of Commerce and a current member of the Executive Committee of the Board of Directors for the Chamber of Commerce. I have served on the Chamber's Board of Directors for more than a decade. The Chamber operates as more of an area Chamber than one dedicated solely to Dothan, and I have commented over the years that the name should be changed to the Wiregrass Chamber of Commerce. Though Dothan is in Houston County, we have Board members from Henry County



and Geneva County, as well as members who live in smaller communities in Houston County but outside of Dothan. I also serve as the Chairman for the Dothan-Houston County Library Association, another organization in our community that understands the importance of community education and community development.

5. I have gotten to know the Wiregrass, particularly the counties served by Wiregrass Electric Cooperative, and to see their similarities. In my experience, the Wiregrass is a rural area in the southeastern corner of the State populated by proud and hardworking people who have learned that we need to work together and speak with one voice at the State and federal level to move the area forward. Essentially, the Wiregrass is a community of small communities. By working collaboratively, we have accomplished more than we could accomplish alone, and we have seen successes for one county benefit other counties.

6. For example, a coalition of officials and community leaders from around the Wiregrass were instrumental in getting I.S.A. Corporation, which is based in Portland, Oregon, to announce earlier this year that it will open a latex factory at the Geneva County Industrial Park. This was a joint effort with PowerSouth Energy Cooperative (Wiregrass Electric Cooperative's wholesale power supplier) and the Geneva County Commission, led by the Commission Chairman and Probate Judge for Geneva County, Toby Seay. This recruitment effort included building a spec building because Matt Parker, who is the President of the Dothan Area Chamber of Commerce and was heavily involved in the effort, believed that a lack of building inventory was hampering recruiting efforts. Dothan's Mayor, Mark Saliba, was also involved and supported the project, and the Houston County Commission Chairman also supported the project. The Industrial Board Association, comprised of Houston County, Henry County and Geneva County contributed \$300,000 to the project. This project is expected to initially bring 80 jobs to the Wiregrass region.

Those jobs are anticipated to pay an average of \$20 per hour plus benefits. There is also some reason to believe that the Wiregrass may be able to lure an additional 200 jobs with I.S.A. Corporation to the region. That is a large number of jobs for this area, given the population.

7. A coalition of officials and community leaders were also involved in bringing HudsonAlpha Institute for Biotechnology, a company involved in genomic research, to Dothan and the Wiregrass for the creation of HudsonAlpha Wiregrass. Mayor Saliba, Dothan Area Chamber President Parker, State Senator Chesteen, State Rep. Lee, State Rep. Sorrells, former Dothan Mayor Mike Schmitz, Henry County Commission Chairman David Money, Houston County Commission Chairman Brandon Shoupe, and others, including the Wiregrass Foundation, were involved in recruiting and convincing HudsonAlpha to invest in the Wiregrass region.

8. The Wiregrass works collaboratively on workforce development for our entire Wiregrass Community.

9. As I mentioned earlier, I attended what is now Troy University for college. Many of my classmates were from the Wiregrass area, and, indeed, a number of my high school classmates attended Troy. Following our college graduation, many of my Troy classmates remained in the Wiregrass. Troy University, in my mind, is integral to economic efforts in the Wiregrass area, due to helping our Wiregrass community have an educated workforce.

10. Troy University and Wallace Community College in Dothan participate in quarterly meetings that Wiregrass Electric Cooperative hosts. Our next meeting is next week, Monday, August the 7th, and the meetings typically draw about sixty attendees. Attendees include various elected leaders from Houston County and Geneva County, and sometimes other counties, as well as representatives of Alabama's U.S. Senators and Congressional delegation and career counselors from local high schools.



11. The G-Tech career tech center was discussed at these meetings, as well as highspeed broadband initiatives that helped lead to Wiregrass Electric Cooperative's partnership with Troy Cable, now know as C-Spire, to deploy high speed broadband internet to the rural areas of the Wiregrass. When C-Spire needed employees, Wallace College designed and offered a specific course to train students to install fiber cables. Wallace College has also designed a course for linemen in response to an identified need.

12. These meetings have also led to the collaboration and team building for other infrastructure needs for the Wiregrass area, like the development of four-lane roads, such as highway 52 from Malvern to Hartford, and a study of the feasibility of making highway 167 four lanes from Enterprise, Alabama to the Florida/Alabama state line. Expanding highway 167 will likely require federal funding. I believe we will be more likely to receive funding working together. When Sen. Katie Britt, who is from the Wiregrass, worked for Sen. Richard Shelby, she pointed out that he would look for signs that people were working together when they independently sought his help for the same projects.

13. Fort Novosel, formerly Fort Rucker, is also of great importance to the Wiregrass region. I know from my involvement with the Dothan Area Chamber of Commerce that it has a large economic impact across the region. The Wiregrass would suffer if it were to leave the area. While the helicopters at the training facility can be noisy, our Wiregrass community clearly understands the economic impact for the Wiregrass area as well as the importance of national defense.

14. In terms of media, WTVY, WDHN, Dothan Eagle, and NPR's Troy affiliate broadcast throughout the Wiregrass.

15. Culturally, small communities in the Wiregrass have annual festivals and traditions that draw folks from all around the region. For instance, Slocum has the Tomato Festival and Opp has the Rattlesnake Rodeo. Dothan's Peanut Festival is a large regional event, that some see as their primary vacation or entertainment destination for the year. These are cultural touchpoints, as well as important economic events for the region.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 3, 2023.

  
Brad Kimbro