

Exhibit A

Declaration of Sen. Jim McClendon

1 **DECLARATION OF SEN. JIM MCCLENDON**

2 Pursuant to 28 U.S.C. §1746, I hereby declare under penalty of perjury that
3 the following is true and correct:

4 1. My name is Jim McClendon. I am over the age of 21 and competent to make
5 this declaration. The facts in this declaration are based on my personal knowledge.

6 2. I am the Senate Chair of the Alabama Legislature's Permanent Legislative
7 Committee on Reapportionment, more often known simply as "the Redistricting
8 Committee." The Legislature created the Redistricting Committee by enacting Ala.
9 Code §§ 29-2-50 to -53. The purposes of the Redistricting Committee include
10 making "a continuous study of the reapportionment problems in Alabama and
11 seeking solutions thereto," and engaging "in such activities as it deems necessary for
12 the preparation and formulation of a reapportionment plan for the next ensuing
13 reapportionment [sic] and each reapportionment thereafter, and readjustment or
14 alteration of Senate and House districts and of congressional districts of the state."
15 *Id.* § 29-2-52(a) and (c).

16 3. The Redistricting Office and its staff, directed by Donna Overton Loftin, assist
17 the Committee in the performance of its duties.

1 4. The purpose of this statement is to explain the long-running and significant
2 efforts the Legislature, acting through the Redistricting Committee, has taken, is
3 taking, and will be taking to enact a new redistricting plan for Congressional
4 districts, as well as for State Board of Education, Alabama Senate, and Alabama
5 House districts.

6 5. I expect that the Legislature will enact the new district plans in the special
7 session that Governor Ivey has indicated will begin October 28, 2021. The original,
8 statutory deadline for delivering redistricting data to Senatethe States—April 1,
9 2021—probably would have required a special legislative session for redistricting,
10 because the Legislature would not have gotten redistricting data until the 2021
11 regular session was already well underway. However, delaying the release of
12 redistricting data until August 12, 2021 necessitated a special session, because the
13 Legislature’s 2021 regular session was long over by that date. A special session for
14 redistricting is made necessary by the delay in releasing the 2020 Census
15 redistricting data, not because of any lack of preparation for the Legislature.

16 6. The August 12, 2021 release of the 2020 Census’s redistricting data triggered
17 a flurry of activities needed to complete redistricting, but preparations for these
18 redistricting activities began long before the Census Bureau belatedly made
19 redistricting data available to the states. Throughout 2016 and 2017, Ms. Loftin and

1 her staff worked with the Census Bureau and Alabama county officials to confirm
2 the exact shape and location of every one of 1,000s of census blocs that collectively
3 cover every square inch of Alabama. During 2018, the Redistricting Office similarly
4 worked with county and Census officials to ensure that collections of census blocks,
5 known as Voting Tabulation Districts (VTDs, or more commonly, “voting
6 precincts”) were correctly located in their respective data bases. These substantial
7 tasks were necessary for the Census to produce redistricting data.

8 7. At about the same time, and continuing to early 2021, Ms. Loftin, the House
9 Chair of the Committee, Rep. Chris Pringle, and I reviewed the Redistricting
10 Office’s facilities. We worked with the Legislature to acquire new and expanded
11 office space for the Redistricting Office, and to equip it with new software and
12 hardware upgrades necessary to conduct redistricting. These acquisitions included
13 purchasing the newest version of the Maptitude redistricting software, a new large-
14 format color map plotter, a large-capacity color copier/scanner/printer, new laptops
15 for Redistricting Office staff, and a new auditorium with a large high-definition
16 screen dedicated to redistricting activities.

17 8. In addition, in August 2021, Redistricting Committee personnel attended a
18 three-day conference on redistricting held by the National Conference of State
19 Legislatures in Salt Lake City, Utah. The purpose of the conference was to allow

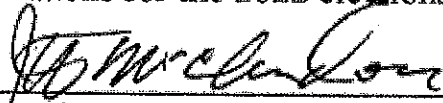
1 redistricters from across the country to meet with each other and national experts to
2 discuss redistricting issues, case law, methods, and similar matters.

3 9. In the year leading up to Census Day, April 1, 2020, Rep. Pringle, Ms. Loftin,
4 and I received reports and communications about the status of preparations by the
5 Census Bureau, litigation affecting the 2020 Census, problems with conducting the
6 census and reporting redistricting data, the oft-changed deadlines for completing the
7 2020 Census and reporting redistricting data, and related matters, including a review
8 of the traditional race-neutral redistricting guidelines of the other 49 states and
9 proposed revised redistricting guidelines. The Committee adopted the revised
10 guidelines at a meeting on May 5, 2021.

11 10. Starting September 1, 2021 and continuing through September 16, 2021, the
12 Redistricting Committee conducted hearings at 28 locations across the State for the
13 purpose of receiving testimony for local officials and members of the public about
14 how new districts should be redrawn.

15 11. While the above activities were underway, Randolph Hinaman, the
16 cartographer retained to assist with drawing new district plans, was meeting with
17 members of Congress or their delegates, members of the State Board of Education,
18 and members of the Alabama Legislature to discuss their new districts with them
19 and to begin drawing new maps.

1 12. To summarize the above, the Legislature has been working diligently to
2 prepare for redistricting, and these efforts - far more extensive that plaintiffs
3 probably realize - remain on track. Consequently, I have every reason to believe that
4 when the redistricting special session opens, the Redistricting Committee will
5 present to the Legislature redistricting plans, including a plan for Congressional
6 districts, that comply with federal and Alabama constitutional and statutory
7 requirements, and further that these plans will be adopted by the Legislature and
8 enacted into law in time for orderly preparations for the 2022 elections.

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11 Sen. Jim McClendon
12 Senate Chair, Redistricting Committee
October 21, 2021