

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

EAST ST. LOUIS BRANCH NAACP,  
ILLINOIS STATE CONFERENCE OF THE  
NAACP, and UNITED CONGRESS OF  
COMMUNITY AND RELIGIOUS  
ORGANIZATIONS,

Plaintiffs,

v.

ILLINOIS STATE  
BOARD OF ELECTIONS, *et al.*,

Defendants.

**Civil Action No. 1:21-cv-03091**

**Circuit Judge Michael B. Brennan  
Chief District Judge Jon E. DeGuilio  
District Judge Robert M. Dow, Jr.**

**Three-Judge Court  
Pursuant to 28 U.S.C. § 2284(a)**

**DECLARATION OF TERESA HALEY**

I, Teresa Haley, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, as follows. I am over 18 years of age, I have personal knowledge of the matters set forth below, and if called to testify, I am willing and able to do so.

**Personal Background**

1. I am currently the President of the Illinois State Conference of the National Association for the Advancement of Colored People (NAACP). I am also the President of the Springfield Branch of the NAACP.

2. I was born in Springfield, Illinois and currently reside there. I received my bachelor's degree in Communications from Sangamon State University, now known as the University of Illinois Springfield. Subsequently, I received my master's degree in Public Administration from the University of Illinois Springfield.

3. My stepfather moved to East St. Louis, IL from Cairo, IL at age five with his mom and siblings because East St. Louis was booming with jobs. As a result, I spent a lot of time in my formative years there. I have fond memories of time spent with family and friends in East St. Louis dating back to when I was four years old. Because of my personal connections to East St. Louis, I continue to regularly travel and visit there, independent of my professional and volunteer work.

4. I recall East St. Louis being a prosperous and thriving city as I was growing up. However, in or around the late 1980s, I began to see the city gradually suffer from disinvestment and lack of community resources. I witnessed public parks like Jones Park closing, homes being boarded up, and residents having to travel further and further outside of their community to obtain basic necessities such as groceries. The school-to-prison pipeline in East St. Louis is a real problem. In fact, Assumption High School, where many of my childhood friends and family went, is now an actual prison. There were four high schools in 1980's. Eastside High is the only high school left in East St. Louis.

5. One specific example that I recall is the construction of the St. Louis MetroLink light-rail system in the 1990s that connected St. Louis, MO, to St. Clair County, IL, where East St. Louis is located. I recall how construction of the MetroLink system physically displaced the East St. Louis residents who lived in the transit system's planned path. The MetroLink was designed for white people to get from St. Louis to Belleville with very few stops in East St. Louis. The goal was to bypass East St. Louis and buy up everything because it's prime property and it's close to the Riverfront in St. Louis.

6. These changes and their cascading effects are just some of the challenges that East St. Louis residents, and particularly Black residents, continue to face today. Many Black

residents have left the community because they are being pushed out, and more will continue to be pushed out if the community does not have representation that reflects the community.

### **My Work with the NAACP**

7. The NAACP was founded in 1909 by a coalition of community members, including Black, white, and Jewish allies, in the wake of the 1908 Springfield race riots. The NAACP's mission is to advance justice for Blacks and communities of color.

8. I was motivated to get involved with the NAACP, particularly on the leadership level, because of my lived experiences as a Black woman who has seen racial discrimination. Later in life, I realized that I was passed over for jobs because of my race and/or hairstyle. I recall showing up for a job interview, signing in and being told by the receptionist to have a seat and someone would call me back for the interview. I watched other white individuals come in to be interviewed for the same position and were called back right away. I was told that "you didn't sound black on the phone when the interview was scheduled." I said to myself, this is bull and made them interview me knowing that I wasn't going to get the job. Lesson learned.

9. As a young child, I was part of the first class of students to be bused to an integrated school in Springfield, Illinois. I will never forget arriving at school and being met by anti-integration protestors telling me and other innocent Black school children that we belonged in a zoo, and not in a desegregated classroom. I was too young at the time to understand what that insult meant.

10. Unfortunately, I have seen countless examples of racism and race-based discrimination over the years. These lived experiences (among many others) have taught me to speak up against unfairness and injustice in all forms, particularly on behalf of members of the Black community, who have acutely endured such discrimination.

**Voting, Black Representation, and the NAACP**

11. Black people have fought and died so that we would have the right to vote. We need people who look like us to speak to and work on our behalf. In part because of this, showing up to vote on election day – and having the chance to vote for our candidates of choice – is extremely important. Having Black leadership and representation gives the community a voice. A lot of heroes are from East St. Louis: Jackie Joyner Kersee, Warrington Hudlin, Al Joyner, Miles Davis, Senator Dick Durbin, Senator Kenneth Hall, Jeff Thomas, Archie Lawrence, Ike Turner, and Marcia Anderson.

12. As I have learned through my personal experiences, communities of color need to be represented in government by people who look like them and who have “walked a mile in their shoes” – in other words, political representatives who can truly relate to their constituents by virtue of having gone through those same hardships themselves.

13. The NAACP does not advise anyone to vote for specific candidates or political parties. Rather, we simply urge community members to exercise their right to vote – which is a right that the Black community has long been fighting for in the United States. I believe, as does the NAACP, that every community deserves to be adequately represented by the candidate of their choice, and to have their voices heard in their government.

14. With respect to East St. Louis, which is home to a strong, vibrant, and cohesive Black community, that means being able to elect a representative who comes from the community and who can fully advocate for the community’s interests in the legislature.

**NAACP Work in East St. Louis**

15. The Illinois State Conference of the NAACP (Illinois State Conference) has members across the state. Some of its members reside or were born in East St. Louis, including

some who are Black voters in House District 114.

16. The Illinois State Conference also works closely with the East St. Louis Branch of the NAACP, as it is part of the Illinois State Conference. The Illinois State Conference of the NAACP provides leadership for youth councils, college chapters, and local branches, including the East St. Louis Branch of NAACP. NAACP members affiliate with a local unit, and all local units in Illinois are members of the Illinois State Conference. The Illinois State Conference of the NAACP supports the civic engagement work of local units, including their voter education and outreach and communicates regularly with our local units about their voter registration and education activities. Stanley Franklin is the 2<sup>nd</sup> Vice President of the Illinois State Conference in addition to serving as the President of the East St. Louis Branch of the NAACP (“East St. Louis Branch”).

17. In partnership with the East St. Louis Branch, I personally and as part of my role as President of the Illinois State Conference have worked to foster civic engagement in East St. Louis over the last thirty years. Among other initiatives, we visit individual East St. Louis neighborhoods and work with residents to register to vote, participate in the decennial Census, and, more recently, encourage Black people to get the COVID-19 vaccine.

18. With respect to voting, the Illinois State Conference works with the East St. Louis Branch to ensure community members exercise their right to vote. Specifically, we send non-partisan poll watchers to monitor individual precincts on election day, and we send volunteers to knock on the doors of voters who have not yet voted and urge them, on a personal level, to fulfill their civic duty to vote. We also regularly work with the St. Clair County Clerk to track voter registration and participation information.

19. In addition, the NAACP regularly organizes “Souls to the Polls” initiatives at East

St. Louis area churches. We work with Black Greek organizations such as Sororities and Fraternities, clergy and church members to encourage congregants and their families to register to vote and actually vote on Election Day or in early voting. The Black community would be less excited about going to the polls if they don't see people who look like them representing their needs and issues at the same level. They don't share common interest.

**East St. Louis Branch of the NAACP**

20. The duty and mission of the East St. Louis Branch of the NAACP is to carry out the vision of the NAACP. The vision of the NAACP is to ensure the political, educational, social, and economic equality of all citizens and to eliminate racial hatred and discrimination. Our branch presidents, like Stanley Franklin, are voices for Black people and people of color in calling out and standing up to the discrimination they face in the community. This discrimination manifests in many aspects of society, including education, employment, housing, and the criminal justice system. Community members of East St. Louis bring their complaints of discrimination to the NAACP, and the chapter assists on those complaints that fall within its mission.

21. The East St. Louis Branch has Black members (who are also members of the State Conference) who are voters in House District 114 because it has members who are voters who reside within the city of East St. Louis, which I understand is located entirely in District 114. Some members of the East St. Louis Branch reside in areas that were previously in House District 114 but are now in House District 113.

22. The East St. Louis Branch hosts many community programs including those to encourage civic engagement among community members. For example, the Branch hosts forums with candidates running for office to allow citizens to pose questions to candidates and

feel involved in the political process. The NAACP feels it is of the utmost importance for the community to see the candidates and be able to vet those candidates based on their responses to community concerns. The East St. Louis Branch also hosts town hall meetings for the community to voice concerns about topics ranging from education to environmental and climate justice.

23. The East St. Louis Branch also prioritizes engaging young people in the community and in politics. High school seniors are encouraged to be involved in the candidates' forum by drafting questions for candidates. The NAACP also offers the Afro-Academic, Cultural, Technology and Scientific Olympics (ACT-SO) to challenge students academically and assist them in perfecting their skills.

24. The East St. Louis Branch also sponsors and works on various community programs related to criminal justice reform in East St. Louis. For example, the Illinois chiefs of police and the Illinois Conference for the NAACP reached an agreement on ten principles for law enforcement that each police chief could implement in their municipality. These principles seek to help officers identify and understand issues of race and treat Black people with respect.

25. East St. Louis is a community deeply burdened by racism. In Branch President Franklin's speech at the East St. Louis NAACP 66th Annual Freedom Fund Awards Ceremony in October 2020, he stated that the Black community of East St. Louis suffered from a pandemic long before coronavirus: the pandemic of racism. He stated that the pandemic of racism not only threatens our livelihood, but our very lives. At the same event, I listened to and identified with the statement of Representative LaToya Greenwood of the 114th district describing the "ever-present seas of racism" both in Illinois and the nation. I fully embrace the statement of my colleague and East St. Louis NAACP 1st Vice President Andrew Bailey that "[w]e at the East St.

Louis Branch of the NAACP call for an end to systematic racism and we fight for justice and equality.” In support of this effort, the East St. Louis Branch hosted a series of town hall meetings last year under the theme, “Call for Change: Eliminating Systematic Racism in Pursuit of Justice and Equity.”

26. The East St. Louis Branch also coordinated a protest march in July 2020 to protest the disproportionate effects of coronavirus on Black people and the overwhelming injustices experienced by the Black community. Branch members and the community marched from Belleville School District 201 to the district office to the St. Clair County Courthouse. The community around East St. Louis needs leaders who understand and care about the injustices they face – whether in housing, in public health, in employment, or in any number of other ways.

### **2021 Redistricting in Illinois**

27. I have over twenty years of experience with Illinois redistricting matters through my professional and volunteer work with the NAACP.

28. In that time, I have seen the decennial redistricting process gradually dilute the voting power of Black East St. Louis residents. Since the 2011 Illinois legislative redistricting plan was signed into law, House District 114 has been the only state House district in the East St. Louis area with a Black representative.

29. The Illinois legislative redistricting map that was signed into law by Governor Pritzker in September 2021 (“September map”) would greatly weaken the political power of Black voters in East St. Louis by moving a significant portion of Black voters from House District 114 into neighboring House District 113, the latter of which is a district that is predominantly white and is currently represented in the Illinois House by a white representative.

30. If the September map were to stand, the social, political, and economic interests

of these former House District 114 voters would not be adequately represented in House District 113, and it may be all but impossible for these voters to elect Black representatives who would best represent their interests in the legislature. At the same time, the diminished group of Black voters who would remain in House District 114 would face a steep uphill climb, at best, in maintaining House District 114's status as the only East St. Louis area district to be represented by a Black House member. To see this happening today and to see our right to vote being diluted is truly unfortunate.

31. The September map expands House District 114 to include some communities that are completely disconnected from East St. Louis. This is problematic because, in my experience, those communities have a history of racial discrimination. For example, as I understand it, the community of Dupo was until very recently even considered a "sundown town." These communities will now be voting in the same districts for state representation. This is a significant problem, and we could see future elections result in a loss of representation for the East St. Louis community because of this.

32. I have also personally heard from Black voters in East St. Louis who have expressed shock upon learning that they had been moved from House District 114 into House District 113. As this litigation continues to unfold and more people learn about the September map, it is very likely more Black members of the East St. Louis community will express similar frustration and outrage at the dilution of their voting power due to the September map.

33. House District 114 has elected a Black democrat since 1971. The community feels that Black representatives are especially able to represent this particular community. But unfortunately, by removing some Black voters from House District 114 and adding thousands of white voters to House District 114, the redistricting plan makes it much more difficult to elect a

Black candidate of choice in House District 114. The plan weakens the base of Black voters in House District 114, making it harder for them to elect their candidate of choice now and in the future. There were other options that could have been added to House District 114 to make up for the population loss that would not have diluted the Black voters. For instance, Washington Park, the Centreville area and western Belleville have a more balanced population than the areas that were added to House District 114 under the approved plan.

34. The plan also makes it so the Black voters who were previously in House District 114 but are now in House District 113 will not have the ability to elect a candidate of their choice. Many residents of the area are going to find out that they can no longer vote in House District 114, and instead will be voting in 113. Many of the people in the area have not necessarily seen the map and they are not yet aware that they will be voting in a different district. When they find out that they have been moved, they will be wondering: “Why can’t I vote for a candidate of my choice? Why can’t I vote for the representative I voted for last time?”

35. It is very important for the people of the East St. Louis area and its closely related communities to have a Black representative. The people of East St. Louis want a representative who understands the challenges and issues of people who live in the community. Because East St. Louis has a large community of Black people, the community has repeatedly selected a Black candidate of choice because of this feeling of increased understanding.

36. The community of the East St. Louis area is very close and tight knit, meaning that in House District 114, elected representatives have been people known by voters. This personal connection made voters feel like their voices and concerns were heard by their representatives, and that they had an advocate in debates happening at the State Capitol in Springfield.

37. But they also ask their representatives to help with local issues. Because of this it is particularly important for Black communities to have elected officials who are Black and have a personal understanding of what the community is facing. Community members often turn to their state representative for many of their calls and requests. They feel a connection with their state representative and know that they can share their issues with a state representative that understands the community – and be comfortable asking for help.

38. By dividing the East St. Louis area among House Districts 113 and 114, the redistricting plan eviscerates the capacity of Black voters in the East St. Louis area to elect a Black candidate of choice. Removing Black votes from House District 114 and spreading the East St. Louis area community across two districts that are populated by other communities with different socio-economic statuses also means that East St. Louis area voters will be represented by people who are not from the East St. Louis area and do not know the particular needs of the community.

39. One example of a part of the East St. Louis area particularly affected by the September 2021 redistricting plan is Washington Park. Washington Park is a poverty-stricken community that struggles with the interconnected problems of unemployment, lack of education, and a higher-than-normal crime rate. This community would and has greatly benefited from a Black representative who understands its needs, but it will now be split by the redistricting plan into different House Districts. I can only imagine how everyone will react when the people in those areas realize what happened. It's a small community – and now a smaller number of people there will get to vote for a candidate of their choice.

40. There are countless examples of how significant Black representation has been for Black communities in and around East St. Louis. For example, Black representatives understand

the importance of recognizing and investing in Black culture, including music and the arts, both as a way to celebrate American history and as a way to engage people, especially youth. A Black state representative provided resources to the House of Miles Davis program to involve students in music and teach them about the history of jazz. East St. Louis's Black representative also helped to obtain funding and resources to keep the Katherine Dunham Museum open in the East St. Louis, which demonstrated a concerted effort to preserve Black history in East St. Louis.

41. As another example, the state representative once worked with government and the community members to add bus service to an area where children were struggling to get to school and community members were struggling to get to work because of a lack of transportation options. And the local tax base is not where it should be to help address the situation. Local community members turned to their state representatives for solutions. In working through this issue, it was necessary and important to have representatives with experience in neighborhoods like East St. Louis, as they understood the necessity of having reliable and affordable public transportation.

42. Based on my observations over the years and in conjunction with my work as President of the Illinois State Conference, I can strongly say that other officials in the region are not reflective of the East St. Louis community. This is particularly true in the rural areas of St. Clair County, the county where East St. Louis is located.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is all true and correct.

Signed this 10<sup>th</sup> day of November 2021 in Springfield, Illinois



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Teresa Haley