

**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 , *et al.*,

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 RODERICK WILSON

I, Roderick Wilson, 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 Interim Executive Director of United Congress of Community and Religious Organizations (UCCRO). I am also the Executive Director at the Lugenia Burns Hope Center.
2. I was born in East St. Louis, IL. I currently reside in Chicago, IL
3. I went to elementary school in Alorton, IL, I went to Martin Luther King Junior

High School and East St. Louis Senior High School in East St. Louis, IL. I attended University of IL Urbana/Champaign, Parkland Community College in Champaign, Northeastern Illinois University in Chicago (where I graduated), and Loyola University in Chicago (where I took graduate classes).

4. I have family in the East St. Louis area (2 sisters, a niece, 2 aunts, and many cousins). I have many friends in East St. Louis. One of my oldest friends is the counselor at our old High School, East St. Louis Sr. High. In 2005, I began to partner with the East St. Louis School District 189 to bring a program called the Grow Your Own Teacher program to the district to recruit and train non-traditional students to become teachers. I worked closely with their program until 2013. I retained a good relationship with the former coordinator of the program, who is now the current State Representative LaToya Greenwood.

5. The region is segregated due to white flight in the 1970s. Even before then, East St. Louis had segregated communities and high schools. In the 1980s, East St. Louis became a nearly all Black city.

6. Growing up in East St. Louis, there were times when I would drive into predominately white areas (such as Fairview Heights and Belleville) and I would be followed by white police officers. Right before I would cross into East St. Louis or Washington Park I would get pulled over for no reason.

My work with UCCRO

7. I am currently the Interim Executive Director of UCCRO. I have been a volunteer leader and a contractor with UCCRO in the past.

8. UCCRO was founded in 2005 to bring organizations working in communities of

color led by people of color together. The purpose was for communities of color to see that they can make sustainable change for their community. UCCRO is a non-partisan grassroots-led multiethnic and multi-faith human rights alliance mobilizing people, policy and ideals to drive societal transformation and forge unity for the equitable advancement of marginalized communities. UCCRO believes that all Illinoisans have the right to be healthy, wealthy, safe, educated and employed regardless of race, ethnicity, religion, age, income or citizenship status.

9. UCCRO's work has included registering and mobilizing voters, ending prison-based gerrymandering, advocating for driver's license access for undocumented community members, conducting racial equity training, and lifting up members' lived experiences to bridge divides among diverse communities of color, including Black and Brown communities.

UCCRO's Unity Map

10. During the 2011 and 2021 redistricting cycles, UCCRO created "Unity Map" redistricting proposals that included input from Black, Latino, Asian American, and Arab American communities. In creating the Unity Map and in advocating for revisions to proposed redistricting plans, UCCRO takes into consideration what groups and constituents want to have in a map to best represent them. The Unity Map was designed to bring communities of color together to draw a map that all parties could agree on and also to avoid fighting amongst communities of color. UCCRO's 2021 Unity Map coalition and advocacy efforts included districts across the state, including HD 114 and the East St. Louis area.

2021 Redistricting in Illinois

11. In the 2021 Redistricting cycle, UCCRO worked with different constituencies to

identify their priorities and then draw a map that reflects those priorities. We also held virtual forums and press conferences and testified at nearly all hearings held by the Illinois General Assembly.

12. It is important for voters' rights to be respected in the drawing of districts because communities of color should be able to have the representation they choose. We live in a society that is inequitable and is built on a foundation of racism – be it overt, subtle, institutional, or structural. Black people deserve to be able to elect representation that looks like them if they so choose. They deserve to have representation that actually reflects and represents them.

East St. Louis September 2021 Map

13. The Illinois legislative redistricting map that was signed into law by Governor Pritzker in September 2021 (“September map”) will dilute the Black vote significantly enough that the Black residents in House District 114 may not be able to elect a representative of their choice in future elections. I am also concerned about the future effects of this lack of Black-preferred representation in all of East St. Louis and the surrounding towns of Centreville and Washington Park. I am concerned about the September map including the communities of Dupo, Bluffside, New Athens, and Fayetteville in HD 114.

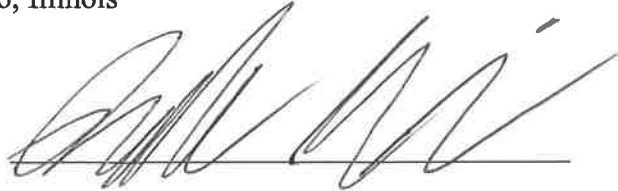
Conclusion

14. As Executive Director of UCCRO, I am extremely concerned about the effects of the September 2021 redistricting plan on the East St. Louis Black community. I believe this map will disenfranchise the Black voters of House District 114. I believe the Black voters of East St. Louis will not be able to elect officials of their choice in upcoming years unless this map is

redrawn.

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

Dated this 9th of November 2021 in Chicago, Illinois

A handwritten signature in black ink, appearing to read 'Roderick Wilson', is written over a horizontal line.

Roderick Wilson