

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

MISSISSIPPI STATE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE; DR.
ANDREA WESLEY; DR. JOSEPH WESLEY;
ROBERT EVANS; GARY FREDERICKS; PAMELA
HAMNER; BARBARA FINN; OTHO BARNES;
SHIRLINDA ROBERTSON; SANDRA SMITH;
DEBORAH HULITT; RODESTA TUMBLIN; DR.
KIA JONES; MARCELEAN ARRINGTON;
VICTORIA ROBERTSON,

Plaintiffs,

vs.

STATE BOARD OF ELECTION COMMISSIONERS;
TATE REEVES, *in his official capacity as Governor of
Mississippi*; LYNN FITCH, *in her official capacity as
Attorney General of Mississippi*; MICHAEL WATSON,
*in his official capacity as Secretary of State of
Mississippi*,

Defendants,

AND

MISSISSIPPI REPUBLICAN EXECUTIVE
COMMITTEE,

Intervenor-Defendant.

**CIVIL ACTION NO.
3:22-cv-734-DPJ-HSO-LHS**

DECLARATION OF MAMIE CUNNINGHAM

Pursuant to 28 U.S.C. § 1746, I, Mamie Cunningham, declare as follows:

1. I am over the age of eighteen, and I am competent to make this declaration. I provide this declaration based upon my personal knowledge. I would testify to the facts in this declaration under oath if called upon to do so.

2. I previously testified at trial in this matter.
3. I am 86 years old, an African-American woman, and a lifelong resident of Chickasaw County, MS.
4. I am a retired public-school teacher, with a master's degree in education from Mississippi State. I taught high school students in Monroe County, in the Aberdeen School District.
5. I am an active member of the Mississippi State Conference of the National Association for the Advancement of Colored People.
6. I have been an advocate for voting rights and racial and social justice in Mississippi ever since I was a college student during the Civil Rights Movement in the 1960s. Ever since I was 19 years old, I have been active in helping to register voters and advocating for civil rights in Mississippi.
7. Based on my work helping people register and vote, I am aware that one can contact the circuit clerk to identify the districts to which a voter is assigned.
8. Prior to Mississippi enacting new district lines in 2025, I was assigned to House District 36.
9. Under the districts enacted in 2025, I am assigned to House District 22, which held a special election in November 2025.
10. I am aware of recent news reports that circuit clerks may be re-implementing the pre-2025 districts.
11. On August 14, 2026, I contacted the Chickasaw County Circuit Clerk, Cassandra Pulliam to determine whether the district lines are in fact being changed. I asked the Clerk whether the changes are voluntary, and the Clerk stated that the changes are mandatory, because they have been ordered by the Secretary of State. I asked the Clerk what legal

authority the Secretary had to order those changes, and the Clerk responded that she was following orders.

12. Earlier today, August 18, 2026, I contacted the Chickasaw County Circuit Clerk to determine whether I have been re-assigned to my former house district, House District 36. The Clerk informed me that, as of today, I am in House District 22, but that the district assignments are being changed as we speak because of the Secretary's order and that I will be assigned to House District 36 sometime before November 2026.

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

Executed this 18th day of August, 2026, in Okolona, Mississippi.


Mamie Cunningham (Aug 18, 2026 11:05:25 CDT)

Mamie Cunningham