

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his
official capacity as Chair of the House Standing
Committee on Redistricting, et al.,

Defendants.

Civil Action No. 23 CV 1057

NORTH CAROLINA STATE CONFERENCE OF
THE NAACP, et al.,

Plaintiffs,

v.

PHILIP BERGER, in his official capacity as the
President Pro Tempore of the North Carolina
Senate, et al.,

Defendants.

Civil Action No. 23 CV 1104

SECOND DECLARATION OF DAWN DALY-MACK

October 31, 2025

I, Dawn Daly-Mack, swear under penalty of perjury that the following information is true to the best of my knowledge and state as follows:

1. I am a Plaintiff in this lawsuit. I previously provided a standing affidavit on May 21, 2025, in this lawsuit. I also testified during the trial on June 17, 2025. All of my previous testimony remains true and correct to the best of my knowledge.

2. I am registered to vote in Northampton County. I voted for Congressman Don Davis and presidential candidate Kamala Harris in 2024. I intend to vote here in the future.

3. After the trial in this lawsuit, the North Carolina General Assembly passed Senate Bill 249, which redrew the boundaries of Congressional District 1 and Congressional District 3. As before SB 249, I continue to reside in Congressional District 1.

4. I opposed SB 249 because it will break up longstanding community ties within the Black Belt and imposes a direct threat to the voting power of Black communities. I would have liked to speak out against the Bill in-person, but I was unable to make it to the Capitol for the few public hearings that were held. I live several hours away and have a full-time job as a care manager and registered nurse.

5. I submitted a public comment online expressing strong opposition to SB 249. I shared that as a Northampton County resident, healthcare professional, advocate, community organizer, and a Black woman and proud voter who believes in the power of representative democracy, this Bill erases representation for Black communities and undermines democracy. If you live in North Carolina, you do not need to look at data to know that this Bill targets Black voters.

6. As Branch President of the Northampton NAACP, I have spent extensive time organizing with my community. This has included registering voters, helping with get-out-the-vote phone banking, door knocking, giving rides to the polls, and organizing the Party at the Polls event, including for congressional elections. I am also passionate

about improving health equity in my community, including by addressing poor access to health care, mental health services, and healthy foods.

7. I know the current representative for Congressional District 1, Congressman Don Davis, personally. I have advocated to him on issues affecting my community, including about health inequities, which I know he is working on addressing.

8. Congressman Davis has roots in our community and shows up to make sure he is accessible to constituents in the District. He frequently attends events in Northampton County and other areas of the Black Belt in the northeastern part of North Carolina. For example, he recently attended a Deacon's 100th birthday at the church where I am a minister. Like many other constituents, I can contact Congressman Davis by phone, email, and at his Rocky Mount office. I often contact his assistant for this area who used to work at a local community college, and she puts me in touch with the Congressman. As the President of the Northampton Chapter of the NAACP, minister at my church, and community organizer, I know that many other people in my community can advocate to Congressman Davis, and he is similarly responsive to them.

9. I am aware that Congressional District 1 now includes counties on the eastern edge of the State, including Carteret, Hyde, and Dare counties. Communities in that part of the state have little in common with communities in the Black Belt where I live. People in my community are extremely concerned about losing their SNAP benefits and addressing the day-to-day needs of lower- to middle-class folks. Many areas in my part of the State are predominantly Black.

10. In contrast, the counties that were added to Congressional District 1 in 2025 are mostly White and more affluent. Voters in those newly added counties generally do not share the same concerns as people in the Black Belt, which is reflected in who they have voted for in past elections.

11. I fear that with the district changes in SB 249, Black voters in Congressional District 1 don't stand a chance of electing someone responsive to us. I expect that under this new map, Congressional District 1 will be represented by someone like Bobby Hanig, who is my current State Senator. I know that Senator Hanig is not responsive to the needs of our community because I have not seen him at events or candidate forums; I have only seen his postcards in my mail.

12. The congressional map enacted in 2023 already made it more difficult for Black voters to elect a candidate responsive to us. I fear the new districts drawn in 2025 now make that impossible.

13. I believe SB 249 is an attempt to punish voters like me in Congressional District 1 for daring to file a lawsuit against the map passed in 2023. This sets an ugly precedent by silencing Black voters through discriminatory maps and punishing us for speaking out against them.

14. SB 249 makes it harder to organize and advocate for Black communities by moving the district lines again and depriving us of a chance to elect a candidate responsive to our needs. Redrawing district lines every two years and punishing voters who challenge those new maps prevents Black communities from organizing together to build power, because any connections we form might be split by a new district within months.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on: 10/31/25

Dawn Daly-Mack
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