

**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 SYENE JASMIN

October 31, 2025

I, Syene Jasmin, swear under penalty of perjury that the following information is true to the best of my knowledge and state as follows:

1. I previously provided a standing affidavit on May 21, 2025 in this matter. I also testified during the trial in this matter, on June 18, 2025. All of my previous testimony is still true and correct to the best of my knowledge.

2. Since testifying at trial, the North Carolina General Assembly has passed SB 249, redrawing the lines of Congressional Districts 1 and 3. Under this new map, I still reside in Congressional District 3.

3. I was opposed to the 2025 redraw of Congressional Districts 1 and 3, and I wanted to voice my concerns publicly. No community hearings were held, and due to the rushed process I was not able to travel from Winterville in Pitt County to speak out against the maps in person as I would have preferred. Instead, I submitted a comment through the public comment portal provided.

4. In my public comment I expressed my view that that the process was rushed and inadequate to capture community input. I also shared my belief that the new maps further dilute Black voting power by depriving Black voters like myself of the opportunity to elect candidates that reflect our values. Finally, I shared that, as a Plaintiff in this litigation, I felt that the targeting of Districts 1 and 3 while challenges against them are still pending in court was designed to undermine our litigation and waste the valuable time and resources of our communities. I do not feel that my comments or the comments of my community members were considered in the process

5. Much like the 2023 maps, this 2025 redraw sends the message to my community that we do not really matter. It further divides communities that I knew to be aligned when I was a member of Congressional District 1, and it seems mathematically impossible for Black voters like me in Congressional District 3 to elect a candidate of our choice.

6. I participated in non-partisan Get-Out-the-Vote (“GOTV”) efforts previously in elections where Representative Don Davis was a candidate. I did so in 2022 when I was in

CD 1, and then also in 2024 when I was no longer in CD 1. It was much easier to do that work when I was still in CD 1 – voters I spoke to felt confident they could elect somebody who they knew from our community and were motivated to turn out. Despite being in CD 3, I still tried to do GOTV work in parts of CD 1 in 2024, but I felt it was more difficult. Because of the way the structure the district had changed, Black voters felt it would be harder for the district to elect him, and that as a result Rep. Davis could no longer be as forceful an advocate for Black voters. Under the new changes from the 2025 map drawing, I fear this will become even worse. Additionally, I do not think it will be feasible for me to continue engaging in GOTV efforts in all of the counties that now make up CD 1, given that I am no longer in that district and now how to focus on building power in my own.

7. As an organizer in my community, I know that it will be even more difficult to convince people to engage in the political process after this mid-decade redistricting. The decision to undertake mid-decade redistricting to further weaken my community's political power instead of taking on critical issues like Medicaid services or access to food vouchers is incredibly disingenuous, insensitive, and demoralizing. Voters are unable to focus on these and other core issues while their district lines are constantly changing and they are so overwhelmed by these political games that they do not even see the point of trying to meaningfully engage in the process.

8. As the lines keep changing, it is hard to know which representatives to contact and which communities to work with when seeking to organize and build power around environmental and other issues. For example, it will be more difficult to combat the environmental issues that new data centers pose to our community without knowing who to approach. I used to be able to go directly to Rep. Davis to speak on these issues, and I could raise these concerns through community meetings as well. In my new district, I no longer have that ability.

9. Another issue that is important to me is gun violence and advocacy for community bound intervention funding. Through our discussions I understood that Rep. Davis, like me, viewed gun violence as a public health issue and was more likely to work on these

issues in his community. I do not feel confident that I can approach my new representative related to these issues either.

10. As an Eastern Carolina voter who chose to step forward to represent my community, I feel that my entire Eastern Carolina community is being retaliated against through the enactment of these maps for trying to stand up for our right to elect accountable and representative candidates of our choice. If the General Assembly is allowed to change our congressional district lines mid-decade without any court order or other rational justification, it completely undermines the ability of concerned community members like myself to bring a lawsuit and seek relief from the harm done when my community is discriminatorily carved and our voting strength diluted. It makes me ask myself: if they are allowed to do this, why did I bring a lawsuit? Will we ever have a chance to really challenge maps in federal court before they are used in an election?

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: 10/30/25



Syene Jasmin