

**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 CALVIN JONES

October 31, 2025

I, Calvin Jones, 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 19, 2025, in this case. I also testified at 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 and in Warren County and intend to vote here in the future.
3. In 2024, I voted for Congressman Don Davis and Vice President Kamala Harris.
4. After a trial in this case, the North Carolina General Assembly passed SB 249, which moves the boundaries of Congressional District 1 (CD 1) and Congressional District 3 (CD 3) again. I continue to reside in Warren County, which remains in CD 1.
5. I would have liked to attend the public hearings for SB 249, but I was not able to because I work a full-time job. I would have been able to use vacation time to attend the hearings if I learned about them with enough advanced notice. I also live several hours from Raleigh. I believe that holding few public hearings only on weekdays with little notice deters working people from participating in the legislative process.
6. I have lived in Warren County for most of my life. Advocating for my community is important to me to carry on the legacy of my parents, grandparents, and great-grandparents who advocated for Black Americans' civil rights.
7. I know Congressman Davis, who represents CD 1, because he consistently attends community events in the district. Congressman Davis is well known by other constituents in communities in the Black Belt, and he knows constituents by their first name. I have attended many events with Congressman Davis, including a town hall in Warren County in February 2024 and a Juneteenth Celebration this year at the Warren County Courthouse. At these events, he has addressed constituents' concerns and I have formed connections with other community members who share some of my concerns about resources for farmers and local schools.

8. I have advocated to Congressman Davis about devoting federal resources to my community. For example, I have received funding from the U.S. Department of Agriculture (USDA) to build hoop houses on my farm. For a while, the federal reimbursement rate for hoop houses lagged behind the market rate, which meant I had to cover the difference, which was about \$2,000. I had conversations with other farmers in my community who experienced the same problem. We organized together and I brought these concerns to the attention of Congressman Davis several times at different town halls and community events. After we brought this issue to his attention, the reimbursement rate for hoop houses increased so we were not forced to cover the difference. I have since been reimbursed for the out-of-pocket expenses I paid for hoop houses, which has helped keep my farm afloat.
9. I also helped recruit people in my community to lobby Congressman Davis for funding to improve our community center in Warrenton. During Jim Crow, Black people went to Warrenton to shop but were not allowed by White store owners to use the bathrooms. This is why there is a community center in Warrenton today, and it remains a central meeting place for people in Warren County. Along with other community members, we successfully obtained funding to rehabilitate the community center after raising the issue with Congressman Davis.
10. Farmers in my community are now facing another issue with funding from the USDA. Because of the federal government shutdown, I have not received the second installment payment for a hoop house that I recently hired a contractor to install. I have taken out a personal loan to pay the contractor and will pay interest on the loan until I receive the second payment from the USDA. I fear that I will not have a representative who would be responsive to these issues if SB 249 remains in place.
11. I have longstanding connections with NAACP members and other community members in parts of the Black Belt that were removed from CD 1. I worked with leaders from Greene County when I served as the President of the North Carolina Black Caucus of School Board Members. Greene County is about a one-and-a-half-

hour drive from where I live and is a core part of the Black Belt. Congressman Davis has held regional meetings in Greene County, and I have formed connections with other community advocates and organizers at those events. I have also built business relationships with people from Greene County. I have drawn on this network across the Black Belt, including in Greene County, to advocate for funding for farmers and schools. After SB 249, I cannot effectively rely on this network in Greene County to organize and advocate for CD 1 constituents, because Greene County is now in CD 3.

12. I am aware that CD 1 now includes counties on the eastern coast of North Carolina with communities that have little in common with mine and others nearby in the Black Belt. It is at least a three-hour drive from my home to counties added to CD 1, such as Carteret and Hyde counties. Those communities have different priorities, as they are generally more well-resourced and less focused on farming than those near me in the Black Belt.
13. SB 249 makes it harder to recruit new NAACP members and engage with communities in CD 1. It took years to build connections with people in Greene County and other areas of the Black Belt to advocate for our communities' needs. To build relationships in the counties that were just added to CD 1 will take time, especially given the distance it takes to travel across the state to those new parts of the District. I expect that I will be treated like a telemarketer if I try to make inroads in those eastern counties, because I have no existing ties there. Even the most effective communicator would struggle to form new ties to advocate for communities and build power when facing new maps every year or two.
14. It is also harder to recruit NAACP members and organize people to register and educate voters if people know their vote won't matter. I have encountered an apathetic attitude towards voting before, and SB 249 will make it worse because it is clear our voice in the democratic process is being silenced.

15. We don't have a fighting chance for fair representation under SB 249. If we can't band together for a representative who will speak for us in Congress, then our views won't get to committee, much less be voted on.

16. I view SB 249 as retaliation for speaking out and filing a lawsuit against the maps passed in 2023. I expect this will deter others in my community from advocating for our civil rights.

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: 10-31-2025


Calvin Jones