

**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

DECLARATION OF ARTHUR LEE JOHNSON

October 30, 2025

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

1. My name is Arthur Lee Johnson, and I reside at 3101 Plum Drive North, Wilson NC, 27896 in Wilson County. I have resided at this residence for approximately thirty years. I reside in current Congressional District 3.

2. I identify as Black.

3. I have been registered to vote and regularly voting in the state of North Carolina for more than thirty-five years. I vote in nearly every election and believe there is no such thing as an “off year” for voting.

4. Voting is critical to me because I believe that our vote is our voice. It took so much for Black people to secure the right to vote, and it is a right we must continue to exercise. I encourage others in my community to vote to honor that history and because it is our only choice to make sure that our representatives are actually representative of our community.

5. In the 2024 General Election, I voted in Congressional District 1. I cast my votes in that Election for Representative Don Davis and former Vice President Kamala Harris. Prior to 2024, I had been in Congressional District 1 for as long as I can remember. Before voting for Representative Don Davis to serve his first congressional term, I voted for many years for former CD 1 Representative G.K. Butterfield.

6. I have been a member of the NAACP for about 18 years. Currently I am the Wilson Branch President. From 2021 to 2023, I was the NC NAACP District Director for a Northeastern region of the state branch, serving Wilson, Edgecombe, Halifax, Bertie, Northampton and Hertford counties.

7. In my various roles with the NAACP I have worked on a variety of issues for my community including, for example, healthcare and drug rehabilitation, domestic violence awareness, gun violence awareness for young adults, and education equity. I have also from time to time voiced my opinion through actions at the North Carolina General Assembly.

Because of the critical importance of voting, one constant focus of my work with the NAACP over the years has been voter registration and Get Out the Vote (“GOTV”) work.

8. My NAACP branch has engaged in GOTV work during elections involving Rep. Davis. For example, in 2024 we ran a five-to-six-week GOTV campaign in Wilson and Wayne counties that included door-to-door canvassing, phone calls aimed at turning community members out to vote, and voter registration drives. Though I remain non-partisan in my GOTV work associated with the NAACP, I certainly noted for community members the issues on which Rep. Davis’s stances aligned more closely with NAACP stances.

9. While I have not agreed with Rep. Davis on every stance that he has taken, I have always felt that he is accessible and willing to listen to the voices of his constituents. This accessibility is important to me and my community to ensure that our interest are actually represented in Congress.

10. In the past I have been able to meet with Rep. Davis at town halls and in various zoom calls through which community members have been able to voice their concerns on issues important to our area of the state, such as gerrymandering and the SAVE Act (a piece of federal legislation that would make voting more difficult). In these calls I have been able to pass along concerns and perspectives of our membership and other community leaders with whom I am in contact. In certain circumstances, like with the SAVE Act, he has been open to changing his mind after hearing from his constituents. I appreciate that he seems to try to be responsive to the needs of the Black community and his district as a whole.

11. Just prior to the 2025 mid-decade redistricting, I had been coordinating with Rep. Davis’s office to set up a town hall in Wilson at one of our local NAACP Wilson Branch meetings. Now that we have been removed from his district, it is no longer clear to me if Rep. Davis will continue to be accessible to us, or if it is still worthwhile to set up this town hall. I have put these plans on hold indefinitely.

12. In my many years living, working, and organizing in CD 1, and especially through my time as District Director, I developed a large network of NAACP leaders and community members in counties like Edgecombe, Martin, Bertie, and others, with whom I share common interests, needs, and priorities, and with whom I could work toward common goals in our advocacy. I felt that together we were able to make our voice heard by our elected representatives and make change in our community.

13. Now that I have been moved to CD 3, I have been removed from that network and community that I have spent years helping to build. I have never voted in CD 3 before. I do not know whether I share any common interests or needs with Jones, Onslow, Duplin, Sampson or the other counties in CD 3 because I simply do not know them. They are not my community, and my impression is that they do not care about my issues.

14. Organizing in CD 1, in the community I spent so long building, no longer seems feasible to me now that I have been removed. In order to build up the type of community I had cultivated in CD 1 in CD 3, I feel that I would have to build it from the ground up. At this point, I do not even know who will be running in this district. The community members I speak to who have also been moved out of CD 1 are overwhelmed and confused by the sudden change and about who represents them. Though I will try my best, these challenges feel insurmountable for my future organizing efforts in this moment.

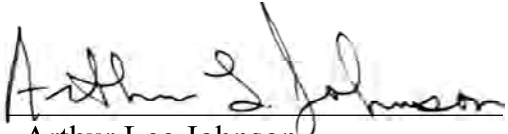
15. I have no relationship with Rep. Greg Murphy and based on my knowledge of his positions, I have concerns that he would not be responsive to my needs or the needs of the other Wilson County voters who share my interests and have been moved out of CD 3. From my perspective, the new makeup of CD 3 encourages Rep. Murphy to be more responsive to those constituents whose interests are more similar to those of his current constituents, and our differing needs will go unheard.

16. Before the 2025 mid-decade redistricting, I felt that I had built power in my community and could ensure that – even if our representative did not always agree with or vote consistent with our position – our concerns could be expressed, our perspectives were

considered, our voices were heard. Now we feel our voice is silenced. It has been taken from us.

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: October 30, 2025



Arthur Lee Johnson