

**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

**FOURTH DECLARATION OF DEBORAH DICKS MAXWELL
PRESIDENT OF THE NORTH CAROLINA STATE
CONFERENCE OF THE NAACP**

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

1. I am the President of the North Carolina State Conference of the NAACP, which is a Plaintiff in this lawsuit. I previously provided declarations on September 23, 2024, October 2, 2024, and January 7, 2025, in this matter. I also testified at trial on June 16, 2025. All of my previous testimony remains true and correct to the best of my knowledge.
2. I am aware that SB 249, enacted by the General Assembly this month, changes the district lines for Congressional District 1 (CD 1) and Congressional District 3 (CD 3). I am opposed to this Bill because it splits apart communities in the Black Belt and destroys any opportunity for Black voters to elect a candidate responsive to their needs in CD 1.
3. I was unable to attend any hearings at the Capitol for SB 249 because they were announced at the last minute, and I live about two hours away from Raleigh. I am a retired public health social worker and community activist in addition to my duties as the President of the North Carolina Chapter of the NAACP.
4. The NAACP promotes the message that Black voters and other people of color should have an equal opportunity to choose a representative responsive to their communities. This message is crucial for educating, registering, and turning out voters.
5. The NAACP and our members have referenced the success of Black voters in electing responsive representatives in CD 1 as a way to motivate voter registration and voter turnout. It has long been a point of pride for communities in the Black Belt that they have elected Congresspeople they support and who are responsive to them, including Congresswoman Eva Clayton and other trailblazing Black representatives such as Congressmen Frank Ballance and G.K. Butterfield.

6. I personally know Congressman Don Davis, the current Representative for CD 1. Congressman Davis is highly visible in communities in the Black Belt and frequently attends events, including those organized by the NAACP. For example, recently, Congressman Davis attended the funeral of Fred Yates, the former President of the Perquimans County Branch of the NAACP. Congressman Davis is a minister in Snow Hill and ministers in other parts of the District, providing constituents with opportunities to convey their needs to him.
7. Beginning with Congresswoman Eva Clayton, CD 1 has, for decades, elected representatives supported by and responsive to Black communities. This is one of the reasons that the North Carolina State Conference of the NAACP has invested resources in registering, educating, and activating voters in that part of the State. For example, we have made sure there are active NAACP chapters in every county that used to comprise CD 1 to elevate voices of people living in the Black Belt. We have been able to keep those chapters active with the support of local members because there are substantial Black populations in that part of the State. We have relied on leaders and members of local NAACP chapters to engage in voter registration, education, and turnout efforts each election, which is core to the NAACP's mission.
8. I am aware that SB 249 moves several counties with large Black populations from CD 1 into CD 3, and several counties with large White populations from CD 3 into CD 1. Anyone who is familiar with North Carolina knows that the areas moved out of CD 1, such as Wayne, Wilson, and Lenoir Counties, include substantial Black populations, and that relatively few Black people live in counties on the eastern coast.
9. SB 249 added counties to CD 1 that have not historically been a part of this District and communities that have not joined the coalitional advocacy efforts of the NAACP in the Black Belt. Because of this, it will be an uphill battle to establish

voter registration, education, and advocacy efforts spanning CD 1, that the NAACP had before SB 249.

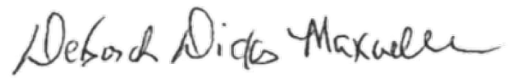
10. The NAACP does not have active branches in several counties that are now part of CD 1, including Hyde and Dare counties. SB 249 has harmed the ability of the NAACP and its members to organize and advocate in CD 1 by moving the district lines again. If SB 249 stays in place, the NAACP will try to establish active chapters in Hyde and Dare counties, which will involve some members and leaders of the North Carolina State Conference traveling to these counties. It is about a three-hour drive from the NAACP State Conference headquarters in Raleigh to Hyde and Dare counties, so it will require substantial effort and time for us to accomplish this. It is a much shorter trip from Raleigh to the counties that were taken out of CD 1 by SB 249.
11. Additionally, it will be harder to register and activate voters who believe, understandably, that the deck is stacked against them. If SB 249 stands, the NAACP can no longer credibly tell their members and other Black voters that they have a chance of electing a representative who is responsive to their communities. Instead, they will have to change how they communicate with prospective voters who are skeptical that their vote will matter and will have to spend more time educating voters as to which district they might be voting in during any given election cycle.
12. The NAACP chapter presidents in Lenoir, Greene, Wayne, and Wilson counties have been effective advocates for their communities, including by organizing members to register voters and get out the vote. They work with neighboring chapters across the Black Belt in CD 1. They have also conveyed the concerns of NAACP members and other community members to Representative Davis, who is receptive to hearing them.
13. These NAACP chapters in Lenoir, Greene, Wayne, and Wilson counties are now in CD 3. This harms the ability for chapter presidents and members in those counties

to advocate for their communities, because they have never voted in CD 3 and have not built ties with communities in other parts of the District. These chapters are now cut off from other chapters with whom they have long had ties.

14. I believe SB 249 was passed to punish Black voters in CD 1 for making their voices heard, and for suing to strike down the previous congressional map in 2023. I am aware that a lead sponsor of SB 249 used the phrase “sue until blue” to characterize voters exercising their rights to challenge unlawful maps in North Carolina. That phrase is abhorrent and inaccurate. The NAACP and its members sued against the 2023 map and SB 249 to make sure all voters, including Black voters, have a fair chance to participate in the democratic process.

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

A handwritten signature in cursive script that reads "Deborah Dicks Maxwell".

Deborah Dicks Maxwell