

**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 JACKSON SAILOR JONES  
DEPUTY DIRECTOR OF COMMON CAUSE NORTH CAROLINA**

I, Jackson Sailor 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 resident of Alamance County, where I have lived since July of 2022. I am a native of Warren County, North Carolina, and have lived in North Carolina for 50 years.
2. Warren County is the home of Congresswoman Eva Clayton, the first Black woman to represent North Carolina in the U.S. Congress. When she was elected in 1992, Congresswoman Clayton was the first Black member of the North Carolina Congressional delegation since 1901.
3. I have worked at Common Cause North Carolina since 2022, first as Associate Director and then as Deputy Director.
4. Common Cause is a 501(c)(4) nonpartisan, nonprofit organization dedicated to upholding the core values of democracy. Common Cause is a Plaintiff in this matter, and I am authorized to speak for Common Cause in this case.
5. I am aware that earlier this month the General Assembly enacted SB 249, which changed the district lines for Congressional District 1 (CD 1) and Congressional District 3 (CD 3) for the second time in two years. I have lived or worked in the northeastern part of North Carolina that CD 1 encompasses for 50 years. A core part of my job is organizing and educating voters in CD 1. Anyone who is remotely familiar with the people and geography of this State knows that the Black Belt region, including the counties that were moved out of CD 1, includes substantial Black populations.
6. Since Congresswoman Eva Clayton was elected to CD 1 in 1992, the District has been represented by a Black member of Congress responsive to Black voters.
7. SB 249 was introduced and enacted following a trial on legal challenges to the 2023 maps. The General Assembly only allowed limited public comment for SB 249 and

allowed members of the public to speak only for one minute, whereas they usually have two minutes. Public comment was tacked on to the normal committee meetings rather than held as separate sessions. There were about 60 public comments across the in-person hearings; every member of the public who gave testimony at the hearings opposed SB 249. Many of the people SB 249 impacts, who live in CD 1 and CD 3, live over 200 miles away, making it difficult to attend a weekday hearing with short notice.

8. From my research, I know that over 12,400 public comments were submitted online, which is many times more than past redistricting bills. Fewer than 20 of those comments expressed support for SB 249.
9. Based on my work in CD 1, I know that Congressman Davis is responsive to constituents. Not everyone agrees with him on all issues, but people go to him in droves to advocate for their communities' needs, and he seeks to learn about and be responsive to them. Congressman Davis used to serve in the State Senate and represented Lenoir County, so constituents there have even deeper connections to him.
10. SB 249 directly harms Common Cause's work in the Black Belt region of the State. A core part of our work is educating voters on how to exercise their right to vote and building networks to inform and empower voters. The northeast part of the state is a media desert, especially when it comes to voter education and changes to voting laws.
11. This succession of redrawn districts in the Black Belt makes it difficult to present a consistent message to prospective voters about the candidates they can choose from and who they are represented by in Congress. SB 249 hampers an already resource-starved voter advocacy and education structure in the part of the State that CD 1 encompasses. When voters aren't familiar with who is on their ballot because the district lines continue to change, it is difficult for us to educate and motivate voters.

12. I have worked directly with community leaders in the Black Belt who used to be in CD 1 and are now in CD 3. SB 249 directly harms the coalitional organizing work we do together, because it breaks apart longstanding communities of interest and thereby increases the burdens on advocates to educate and empower voters. Leaders and organizers have spent years working together to advocate for their communities in CD 1, and many are now severed from those networks after being moved into CD 3. As a result, voters in these new districts will face additional challenges both in overcoming barriers to voting access and making informed choices at the polls.
13. A poll conducted by Opinion Diagnostics commissioned by Common Cause North Carolina in 2025 found that North Carolinians overwhelmingly believe voting districts should provide fair representation for all communities and viewpoints. This, and my longstanding advocacy experience, lead me to believe that since voters have been told CD 1 was changed so that the result of any election is essentially preordained, it will be significantly harder for Common Cause to successfully encourage people to register and vote in CD 1.
14. I am aware that a lead proponent of SB 249 described lawsuits challenging unlawful district maps as a “sue until blue” strategy. The Executive Director of Common Cause North Carolina, Bob Phillips, was called the “President of the sue until blue club” when Common Cause challenged redistricting previously. It is clear that SB 249 was passed to bring the hammer down on voters, communities, and organizations that advocated against past districting maps, including plaintiffs for challenging the 2023 maps.
15. SB 249 is an unprecedented, targeted attempt to retaliate against voters for advocacy in public and in the courts. As an organization, SB 249 chills our work. We will have to consider whether our members will be punished by targeted line drawing if we choose to advocate for maps that are lawful. It is antithetical to Common Cause’s mission to be involved in litigation that could prompt the General Assembly to target marginalized communities through redistricting.

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 31, 2025\_\_

A handwritten signature in black ink, appearing to read "J. Jones", written above a horizontal line.

Jackson Sailor Jones