

# EXHIBIT 1

## **DECLARATION OF THEODORE MCNEAL JR.**

I, Theodore McNeal, hereby declare as follows:

1. I have personal knowledge of the facts set forth herein. If called to testify before this Court, I would do so to the same effect.

2. I am not disqualified from voting due to felony conviction, and I otherwise meet the qualifications for eligibility to register to vote and vote in North Carolina.

3. I am 72 years old. I have lived in Kinston, North Carolina (in Lenoir County) all of my life, with the exception of the time I served away in the military. I worked on a aircrafts as a civilian in the Navy/Marine Corps for 33 years. My father was a WWII and Korean War veteran who used his GI bill to buy a home in Kinston.

4. I registered to vote in Kinston for the first time in 1984 when Jesse Jackson came to Lenoir Community College to deliver his campaign speech. I remember him being highly motivating and said to myself "I am going to vote" because he convinced me that my vote matters. This redistricting is going to do the opposite and discourage people because the map is telling black people, there votes don't matter.

5. Before hearing Rev. Jackson speak, I was not involved with voting. After the speech, I realized politics affects everything in your life. Even today, I could retire and enjoy my satellite television, but there are too many people in CD1 struggling to meet their basic needs, so I continue to work as an Organizer. I fear the people of CD1 are going to struggle and suffer even more if the maps are implemented.

6. Although Kinston was predominately located in CD1, there was a time after the election of President Obama that we were also moved into CD3, before being moved back into

CD1. They bounced us between CD1 and CD3 through redistricting to break up the Black vote before and now they have done it again. These 2025 maps have now once again moved my home county of Lenoir from CD1 to CD3, splitting us up from our neighboring counties in the Black Belt.

7. My connections to CD1 are deep. I am familiar with the historical elections and service of Representatives Eva Clayton, Frank Ballance, GK Butterfield, and currently Don Davis, but this redistricting will prevent us from electing the people of our choice. What legislators are doing now is unfair to me and all the people who are satisfied with our representatives. Even if you were not satisfied with your elected official, it felt better knowing we at least had the right to elect our officials fairly.

8. People in CD1 have been coming together. Rep. Davis even gained support from unlikely people like farmers and poor white people and who united and established relationships with black voters. Our ability to come together and vote collectively for our interest will end as counties are moved from CD1 into CD3 and vice versa.

9. This redistricting shows they don't want the collective map in CD1 because it gives black people too much collective voting power to elect candidates that cares about their issues. Elections are sometimes won by a single vote and with them breaking up the black vote and moving many of us into CD3, the elections with small margins in CD1 will be hard, if not impossible to win.

10. I am an Organizer with the North Carolina A. Philip Randolph Institute (NCAPRI). NCAPRI is a 501(c)3 nonprofit organization with the mission to improve the quality of life for economically disadvantaged families by providing the necessary resources that improve their

standard of living, foster self-improvement, self-empowerment, and self-sufficiency. The agency is dedicated to those disenfranchised by situation, circumstance, or indifference.

11. At NCAPRI, we believe voting is not only our civil duty but also impacts our community in a variety of ways. Our vote has an effect on stabilizing the business cycle, our social freedoms, and even our natural born rights as Humans. It is always important to make sure that you use your voice to help uplift others within our community.

12. At our training center and at other locations throughout the state we teach canvassing, letter writing, and the use of new information technology such as the Voter Activation Network (VAN) to reach out and educate other voters in their communities, register voters, and increase voter participation. We locate and work with people from the communities that we serve to participate in our get-out-the-vote work.

13. Through our NCAPRI Youth Chapters, we accomplish leadership development for our youth. The strategy is to create an atmosphere where the youth can come with their peers and accomplish work to help out their communities. We teach them canvassing, phone banking, and letter writing. We want our youth to be involved at a young age so they understand how the political process and advocacy should work.

14. I know how redistricting is supposed to work, and this is not the way. We should only draw maps around the census, not at random times. The redistricting is racist and people in CD1 will be sacrificed just to take us out of the district. Legislators seem to engage in this behavior believing the Courts will not intervene in the process.

15. If the 2025 maps are not overturned, Black and White low-income voters in eastern North Carolina will suffer. Without representation in Congress, advocacy around various policy issues that impact CD1 greatly – such as health care, education, and transportation difficulties –

will become difficult. There is no longer a guarantee that the priorities of Black voters will be lifted to a federal level by a representative elected by the people; ultimately the maps dilute black people's ability to have their concerns heard.

16. I am a benefiter of the Affordable Care Act. It has been a blessing for me, my family, and my mother. I am currently enrolled to receive Medicare. It has been a true blessing for me to not have to pay for necessary tests and doctors visits in the last two years.

17. Here in Kinston, we are concerned with the lack of resources and funding for our hospitals, nursing homes, and other local medical facilities. The redistricting will cause even more of these facilities to be underfunded or shut down as we become unable to elect representatives who care about things such as affordable healthcare or poor people who cannot afford healthcare. These entities are funded heavily with federal funds. Without proper representation in Congress, our community needs will not be addressed, and we will not receive the federal funds needed to support our medical facilities. The end result, if people in eastern North Carolina cannot receive medical care and their basic needs, is death.

I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct. Executed on November 14, 2025.

*Theodore McNeal, Jr.*

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