

# **EXHIBIT 8**

**DECLARATION OF REV. DR. WILLIAM BARBER II**  
**PRESIDENT OF REPAIRERS OF THE BREACH**

I, Rev. Dr. William Barber II, swear under penalty of perjury that the following information is true to the best of my knowledge and state the following:

1. I have personal knowledge of the facts set forth herein, except for those matters identified as based on information and belief, and if called upon to do so, could and would competently testify thereto.
2. I am 62 years old. I was born in Indianapolis, IN and have lived in North Carolina since 1965. I grew up in Roper, in CD1 and Free Union – a free Black community in Martin County. I currently reside in Zebulon, North Carolina. My mother still resides in CD1.
3. I earned my bachelor's degree from North Carolina Central University, a Master of Divinity from Duke University, and a doctorate from Drew University with a concentration in Public Policy and Pastoral Care.
4. I also serve as a Professor in the Practice of Public Theology and Public Policy and Founding Director of the Center for Public Theology and Public Policy at Yale Divinity School; Co-Chair of the Poor People's Campaign: A National Call For Moral Revival and Bishop with The Fellowship of Affirming Ministries.
5. I am the author of five books – *We Are Called To Be A Movement*; *Revive Us Again: Vision and Action in Moral Organizing*; *The Third Reconstruction: Moral Mondays, Fusion Politics, and The Rise of a New Justice Movement*; *Forward Together: A Moral Message For The Nation*, and *White Poverty: How Exposing Myths About Race and Class Can Reconstruct American Democracy*.

6. I served as the Pastor of Greenleaf Christian Church in Goldsboro, NC (CD1) for thirty years. I served as the President of the North Carolina NAACP from 2006-2017, and on the National NAACP Board of Directors from 2008-2020.
7. I am the President and Senior Lecturer of Repairers of the Breach (ROTB). ROTB is a nonpartisan 501c3 tax exempt, not-for-profit national organization that seeks to build a moral agenda rooted in a framework that uplifts deep moral and constitutional values to redeem the heart and soul of the country. ROTB is committed to building and supporting moral movements for social change and training moral, fusion leaders, including activists, artists, and people of faith, who organize and mobilize around a moral agenda that lifts from the bottom so that everybody rises. Headquartered in North Carolina, ROTB has a national team, which includes organizers, religious leaders, artists, strategists, and advocates.
8. ROTB was born out of the North Carolina Forward Together Moral Movement, which built grassroots power to combat immoral and illegal policies on labor rights, voting rights, LGBTQ+ rights, healthcare, criminal justice, and other policies that negatively impacted poor and marginalized communities in the state. Today, ROTB sustains a national moral movement united across race, class, gender identity, sexuality, ethnicity, faith, and other divisions, with the goal of repairing the breaches caused by centuries of systemic oppression and injustice in our country. In all of the work, ROTB centers and elevates leaders who have been directly impacted by systemic injustice, including those affected by voter suppression and racist gerrymandered maps.
9. I have been voting since I was eighteen years old and actively engaged in the electoral process since I served as a teenage leader in the NC NAACP. I voted in CD1 when I first

registered to vote and when I would return home during my college years. I have been through the era of second primaries in North Carolina and witnessed those working to keep Black candidates from having the opportunity to win. I remember the days before Eva Clayton, when North Carolina had to create special elections and districts to get African-Americans elected to the courts.

10. I come from a family that fought for fairness over a span of decades in CD1. My father was a pastor, and both of my parents were activists who organized in Eastern NC. My parents fought for the integration and full funding of public schools, organized to elect candidates of the people's choice and fought to gain and protect the voting rights of North Carolinians. My family was present in CD1 when Walter B. Jones served as a Representative for the district and my father did a lot of work with Eva Clayton.
11. This has been a long fight for the residents of CD1 who have been looking to restore the position that was lost in the 1900s when George White left. We've had to battle and fight to create opportunity districts for Black voters and for Black and White people to vote together to elect candidates of their choice.
12. While I served as the NC NAACP President, we engaged in the North Carolina redistricting battles from 2005 – 2017. In 2007, the NC NAACP fought and won an expansion of same day voting registration and early voting periods, which increased the turnout of black voters in Eastern NC and across the state. The NC General Assembly was led by Democrats at this time. We pushed the Democrats to finally expand the franchise in 2007, as activists had been fighting for same day registration and extended early voting periods for 15 years.

13. In 2010, legislators passed a regressive redistricting plan. We mobilized against the plan, as this redistricting enabled an unconstitutional supermajority in 2012. In April 2013, Republicans brought forth the monster voter suppression bill that came out right after the *Shelby* decision and sought to implement an avalanche of restrictions to suppress the Black vote.
14. ROTB has been engaged in advocacy and political education around redistricting in North Carolina since its inception and more recently, around the redistricting of CD1. ROTB has been diligently working to keep North Carolinians and CD1 residents informed about the most recent redistricting of CD1 through a mass moral meeting in Wilson County on November 4, 2025, press conferences, media and regular, mass email and text communication. In 2022, ROTB conducted a “Get Out The Vote Tour” across North Carolina, with stops in Wilson County and Elizabeth City, in CD1, where they registered voters and held mass meetings to encourage voter mobilization for the midterm elections and sought to reengage voters who had become disengaged in the electoral process due to the constant changes and redistricting.
15. Not only does ROTB engage the most impacted leaders, but we also recognize it is increasingly imperative that those in ministry be prepared and trained to be engaged in their communities. Through the Poor People’s Campaign: A National Call for Moral Revival and ROTB, I work regularly with faith leaders and constituencies in the Black Belt seeking to have their voices heard at the ballot box, who will be deeply impacted by this Dissolution of CD1.
16. I believe faith communities have the power to shift the moral narrative in this country by *centering* messages of love, truth, liberation, and justice for all and by *challenging* the

distorted false moral narrative of religious nationalism and how it is used in defense of regressive public policies. We work to create spaces in which interfaith leaders can come together to commune, learn, and act together through the work of their Prophetic Council, seminary tours, Justice Love Action Ministries, or by participating in a variety of local and national actions. CD1 is in what is known as the “Southern Bible Belt” where people depend heavily on their faith. ROTB has worked to organize clergy and faith leaders across the Southern Bible who can develop generations of faith leaders who are committed to addressing systemic injustices through a moral framework that centers the desire for peace within and among nations, the dignity and wellness of all people, equal protection under the law, and the responsibility to care for our common home.

17. ROTB dedicates its organizational resources to restore, protect and advance equal voting rights for black people, poor whites, farmers, and the rural population of CD1, and remains committed to this work in eastern North Carolina and across the state. ROTB uplifts the voices of thousands of voters across the state who have faced direct harm and policy violence caused by racial gerrymandering and unjust redistricting and therefore has a vested interest in this case.

18. CD1 is a place you could historically look to see the building of fusion power, but that will be gone if these new maps go into effect. It took Eastern NC over ninety years to get another Black representative elected (Eva Clayton). Now, the reality of being able to elect Black officials in CD1 – that has existed now for three decades – will be taken away from the people.

19. The eastern part of the state has the largest percentage of African Americans who the legislators are trying to keep from having too much representation in the electoral body.

The district lines are being drawn to prevent Black voters from electing candidates of their choice – candidates who align with their priorities to combat poverty and other inequities they face. When legislators shift districts and remove the power of people to elect people of their choice, you end up with people who may not care about issues of poverty and matters that hurt their constituents and you lose the power of responsive. Eastern NC has been the place with constant fighting to keep the people from having responsive representation.


20. Because the redistricting plan will dilute and divert the power that has been built in CD 1, we believe the plan is illegal, unconstitutional and immoral. Because of racially polarized voting this plan makes it most likely that a candidate will win in CD1 who has no accountability to Black voters.
21. If these new maps go into effect, our communities will be deprived of the opportunity to elect someone in CD1 who will advocate for living wages, universal healthcare, fully funded public education and to fully protect the Affordable Care Act – this could all be gone. CD1 residents need an advocate with a voice and a vote to combat poverty, and who is responsive to Black voters, and this will be lost in the redistricting plan.
22. CD1 is an extremely high poverty district – and political actors have always had a fear of coalitions forming between Black and White voters who were both seeking better economic opportunities. This redistricting is about diluting the Black vote and breaking up the affinity between Black, brown, low-wage, and White residents of CD1. The redistricting is racist, which not only hurts Black and brown people, but creates a diminished democracy, while breaking the heart and core of what democracy can be.

23. CD1 is a jewel that the NC General Assembly is now trying to take. It used to be a constant for Black voters. As an organization, ROTB will now have to obtain additional resources to organize and mobilize the people in this area. We will now lose valuable allies and have to work much harder to find allies and partners to help the communities in CD1 survive. The implementation of this redistricting plan will lead to more policy violence such as hospitals closing (when many in CD1 must already drive an hour to reach a hospital) and will leave people without basic needs, which forces organizations to pick up the slack. ROTB will have to fundraise for additional money that we don't have because we must find alternative ways to help the people of CD1 now.
24. The redistricting plan is not healthy for democracy. The legislators operated in stealth mode; they did this redistricting silently, as quickly as possible because they know this redistricting is not popular amongst CD1 voters and North Carolinians and they wanted to keep the people from being able to effectively seek justice against this unconstitutional racial gerrymander. In fact, over 11,000 public comments were received against the redistricting despite them moving so fast.
25. I have received multiple death threats for my work against voter suppression, but I am most fearful when meanness and racism begin to win. People think if you challenge the racism, you are challenging their world because they are still fighting history. I've heard of people who live in Wilson who have been told "Get out of here, we don't want you here" – they are facing vitriolic threats by the community. People must now deal with the hate of being moved into a district where they are not wanted and the violence of the policies and race-based gerrymandering that caused them to be moved.



26. Every piece of regressive policy has death involved in it. The death of representation in CD1 likely means actual death for the people who live in CD1. What they are doing in this district will take us back over 100 years.

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

 Rev. Dr. William Barber II (Nov 14, 2025 18:00:23 EST)

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