

# **EXHIBIT 2**

**DECLARATION OF DANIELLE BROWN**  
**NATIONAL FIELD CO-DIRECTOR OF THE BLACK VOTERS MATTER FUND**

I, Danielle Brown, 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 United States citizen and over the age of eighteen.
2. I have personal knowledge of the matters set forth in this declaration, except for those matters identified as based on information and belief, and if called upon to do so, could and would competently testify thereto.
3. I was born in Maryland and raised in Georgia. I have lived in North Carolina for the past 19 years. I have been a resident of Kannapolis located in Cabarrus County, North Carolina, for the past 10 years. I am a registered voter at my current address.
4. Since 2022 I have served as the National Field Co-Director of Black Voters Matter Fund (“Black Voters Matter”), a nonpartisan organization organized under 501(c)4 of the Internal Revenue Code. Its goal is to increase power in marginalized, predominantly Black communities.
5. As the National Field Co-Director of Black Voters Matter, my responsibilities include managing 14 staff members and leading the day-to-day work in each of the five states I am assigned: North Carolina, Florida, Ohio, Pennsylvania, and Michigan. I manage statewide campaigns and participate in advocacy and election protection regarding the rights of Black voters in each state.
6. I am authorized to speak for Black Voters Matter in this matter.
7. The mission of Black Voters Matter is to empower voters and improve voting efficacy in marginalized communities of color. Black Voters Matter works primarily in Black communities and other communities of color that face unique barriers to voting. Black Voters Matter focuses on removing those barriers and increasing voter registration and turnout by

providing voter education and encouragement, advocating for policies to expand voting rights and access, and providing assistance and financial grants that enable its partner organizations to engage in on-the-ground efforts to mobilize voters.

8. In conducting this work, Black Voters Matter's guiding principles include understanding, respecting, and supporting local infrastructure in pursuing civic engagement and community power; supporting individuals and organizations that strive for social justice throughout the year and not just on Election Day; and ensuring that Black voters and communities of color in rural counties and smaller cities and towns, who are often ignored, have their voices heard.

9. Black Voters Matter understands the importance of voter education and utilizes authentic messaging which speaks to the issues of Black voters, connects with their hopes, and affirms their humanity. The organization participates in voter registration and Get Out the Vote ("GOTV") campaigns. Additionally, Black Voters Matter advocates for policies to expand voting rights/access, including expanded early voting, resisting voter ID requirements, re-entry restoration of rights and strengthening the Voting Rights Act.

10. Black Voters Matter also takes pride in our development and enrichment programs. We help develop infrastructure in communities where little to none exists. This includes staff training, candidate development, and network development.

11. Voting should allow communities to determine their own destinies, but communities of color often face barriers to voting that other communities do not. Black Voters Matter focuses on removing those barriers. It does so by engaging in get-out the-vote activities, educating voters on how to vote, and advocating for policies to expand voting rights, and access to the ballots thus creating more political representation for Marginalized communities. In the 2024

general election, Black Voters Matter was on the ground working to turn out the vote in North Carolina, particularly in communities that tend to have less access to national, state, and local resources and that have low-income and working-class populations.

12. While Black Voters Matter seeks to improve the voting efficacy of Black communities nationally, it focuses most of its work on a handful of states, including North Carolina because NC contains some of the most under-resourced and neglected communities in the country.

13. Black Voters Matter does not have a formal membership structure, but it does have a significant constituency of individuals and organizations in North Carolina's Black communities who are the primary beneficiaries of Black Voters Matter's activities. Black Voters Matter's constituents include Black voters in many CD1 counties, including those that were recently moved to Congressional District 3 ("CD3") – Wilson, Lenoir, Greene, and Wayne Counties. Black Voters Matter's constituents and supporters, and Black Voters Matter's community partners and their members, include registered voters in North Carolina who plan to vote in future federal Congressional races, including the 2026 primary election.

14. Black Voters Matter has focused on rural CD1 because it is home to many of the Black Belt counties that possess higher populations of Black voters. Historically, it has been difficult to gain support for eastern North Carolina Black voters. Since my time with Black Voters Matter, there has been a major change in voting within eastern North Carolina. More organizations and groups are seeing how fruitful and impactful Black voters in CD1 are, and the political power that they hold. As a result, there has been greater investment in voter support and resources in the area. Because of this newfound support, Black voters in CD1 have been showing out in record numbers at the polls which ultimately made them a target of the state's legislature. The intentional

attacks by our state's legislators will have a negative impact on the ability of Black voters to elect the candidates of their choice.

15. Black Voters Matter carries out much of its work through and in coordination with community partners in CD1. We believe it is more effective and efficient to invest in and partner with community groups that engage in voter education and turnout efforts because those groups are familiar to and trusted by local voters.

16. Black Voters Matter partners with local organizations across CD1. Black Voters Matter regularly provides mini-grants to its partners who engage in voter education and on-the-ground efforts to increase voter participation. Providing grants to partner organizations helps increase partner organizations' long-term capacity to serve their communities in the region. Many of our partners are membership organizations comprised of individuals residing in parishes across the State who are directly affected by North Carolina's proposed maps for the election of members of Congress.

17. In addition to providing grants, Black Voters Matter regularly communicates with its community partners to coordinate with and train their leadership and members. Specifically, in North Carolina, we have provided trainings for partners on redistricting, digital organizing, and other capacity-building tools. Black Voters Matter also operates a regular bus tour to help its constituents and partners raise awareness about voting issues. In the last two years, the Black Voters Matter bus held six tours that included stops in North Carolina. Black Voters Matter also provides technical support, including with social media, and other support to community partners on an as-needed basis.

18. Black Voters Matter works on behalf of its constituents and partners. These individuals and organizations help inform the issues Black Voters Matter seeks to address, assist

with local organizational strategy, participate in Black Voters Matter organized efforts like text-message voter mobilization, and volunteer at voting events.

19. If this redistricting measure is not overturned, it will adversely affect our ability to organize in CD1 and Eastern NC as a whole. By redrawing congressional districts that dilute the votes of Black voters in North Carolina and decrease representation for Black voters, our mission to increase voter participation and electoral representation for Black and marginalized communities will be greatly impacted. Black Voters Matter will have to divert scarce resources away from other policy priorities towards efforts that give Black voters other avenues to make their voices heard where they no longer have effective representation.

20. The new 2025 maps will harm Black Voters Matter because we will be forced to divert resources, including staff time and communication support resources, from our broader voter registration and community empowerment initiatives to the affected districts to protect the representation and interests of partners and constituencies and try to counteract the negative effects of vote dilution. In these unlawfully drawn districts, more resources will now be required to encourage and promote voter participation when voters know the challenges that Black candidates of choice face in the unlawful districts. Additionally, more resources will be required when advocating for our constituents' and supporters' preferred positions with elected officials who are not the Black candidate of choice. If this redistricting measure remains in place, it may affect the stability of Black Voters Matter's funding. In 2026, there are very important federal congressional races that will be directly impacted by North Carolina's redrawing of its federal district maps. Black Voters Matter is currently fundraising to ensure our partner organizations have the resources needed to educate voters on important election dates and issues. Large and small donors and Foundations have prioritized funding the upcoming federal elections, not efforts to fight against or

combat redrawing of congressional districts. Because of this, Black Voters Matter will have to deplete its internal reserve resources to support challenges to the unconstitutional map in North Carolina.

21. If this redistricting map is not overturned, the ability for Black voters in CD1 to elect an official who adequately represents their communities and who can relate to and understand their concerns, issues, and needs will be greatly diminished. Due to the foregoing reasons, Black Voters Matter joins this Amicus Brief in support of the 2025 maps being overturned.

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

*Danielle Brown*

[Danielle Brown \(Nov 14, 2025 16:38:08 EST\)](#)

---

Danielle Brown, National Field Co-Director