

EXHIBIT 3

**DECLARATION OF WESLEY STOKES
PRESIDENT OF THE EASTERN NORTH CAROLINA CIVIC GROUP**

I, Wesley Stokes, hereby declare 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 and raised in Washington County, North Carolina, where I have lived for 65 years. I am a current resident of Roper, North Carolina located in Washington County. I am a registered voter at my current address.
4. I graduated from Washington County Public School System and later earned my Bachelor's degree from Elizabeth City State University, the only Historically Black University located in Congressional District 1 ("CD1").
5. I was elected two years ago to serve as President of the Eastern North Carolina Civic Group ("ENCCG"), a 501(c)3 nonprofit organization founded for the purpose of providing equal opportunities for Black Americans, minorities, and poor people to participate in the political, social, and economic processes of government.
6. ENCCG was founded in the late 1970s to support historically underserved Black communities that were struggling to find ways to obtain economic and political power. It is a longstanding organization that fiercely defends equitable access to the ballot box and the protection of voting rights.
7. As President of ENCCG, my responsibilities include building partnerships with local and statewide organizations and entities to assist in providing the Black voters of eastern NC

resources and opportunities to participate in the election process. In addition, I support ENCCG leadership in the development of programs and fundraising for the organization.

8. I am authorized to speak for the Eastern North Carolina Civic Group in this matter.

9. ENCCG works to provide an organizational structure for Black Americans, minorities, and poor people; encourage, promote, and involve members in all facets of government; provide a district forum associated with issues and concerns that affect members; create a communication network with existing human rights and civil rights organizations; assist counties within the district structure with their plans, strategies, and programs; and create a monitoring system at the local, state, national, and international levels of government.

10. ENCCG takes pride in representing the residents of CD1 and the constituents of the counties we serve. Many of them have lived in the state long enough to be affected by gerrymandering based on race and party for most or all of their lives.

11. ENCCG has twenty-three counties that we target: Beaufort, Bertie, Camden, Carteret, Chowan, Craven, Currituck, Dare, Edgecombe, Gates, Greene, Halifax, Hertford, Hyde, Lenoir, Martin, Northampton, Pamlico, Pasquotank, Perquimans, Pitt, Tyrrell, and Washington counties.

12. Many of ENCCG's listed target counties were originally a part of CD1. However, over the past few years, there have been almost yearly changes to the makeup of CD1 due to gerrymandering by our state's legislature.

13. Many of these changes do not make sense, nor do they help many of the communities that originally make up CD1. For example, recent changes to the congressional maps in this area have added Currituck and Dare counties—beach counties who have very little in common with the much more rural and agriculture-based counties that have historically made up

CD1. These counties intrinsically have different concerns and policy priorities than the counties typically associated with CD1.

14. CD1 encompasses several counties with a majority Black population (such as Bertie, Halifax, Washington), and many of these counties are home to farmers—specifically Black farmers. Under the 2025 maps, many counties with a majority Black population and a rich history of agricultural development, such as Lenoir, are now being moved from CD1 to Congressional District 3 (“CD3”), despite sharing many more similarities with the core counties of CD1.

15. SB 249 places residents of CD1 in the position of potentially being represented by individuals who have no connection to the lifestyles, livelihoods, and policy concerns that they live with daily. For example, one of the potential candidates for the Republican party in CD1 under the 2025 maps is from Currituck, a beach county extremely different in makeup from Washington County and others similarly situated.

16. If the 2025 maps are upheld it will make it much more difficult for Black voters in Washington County and CD1 to elect a candidate of their choice because it is hard to find good candidates when the sentiment is that they will not be able to win, no matter how good they are. Under CD1’s pre-2025 configuration, it often felt like a 50/50 toss-up between the candidates up for election. Elections felt winnable because the Black community was putting forth good candidates and running strong campaigns. When we are outnumbered tremendously due to the rearranging of the counties making up the district, it becomes extremely difficult to win.

17. ENCCG has been a vocal advocate for maps that represent and give voice to Black voters and against legislative policies that negatively impact Black communities and political power.

18. On October 27, 2023, ENCCG submitted a letter to our state’s legislative leaders speaking against the 2023 maps that took representation from seven-Republican districts and seven-Democrat districts to eleven-Republican and just three-Democrat districts. In their letter, the organization stated, “[t]he actions of the General Assembly reveal a troubling reality – they have succeeded in denying African Americans proper representation, undermining democracy and social justice. Through the intentional redrawing of district lines, African American voters’ influence has been weakened, silencing our voices and minimizing the importance of our concerns.”

19. On October 17, 2025, only two years after submitting the public comments in 2023, ENCCG submitted another letter to North Carolina legislative leaders expressing anguish once again over the legislature’s direct gerrymandering attack on Black voters, this time specifically in CD1. As was stated in our submitted comment, “the proposed map threatens to significantly reduce political power and representation for Black communities by cracking the district to dilute the current population”.

20. If this redistricting measure is not overturned, it will adversely affect ENCCG’s ability to organize around issues unique to the Black Belt and Black rural voters. The Black communities throughout the various counties of CD1 have a lot in common with each other and have many of the same systemic issues including lack of local funding, internet access issues, transportation barriers, economic difficulties, and are impacted by media/news deserts. By taking out central counties with a higher Black population and replacing it with counties on the coast with a higher White population, it will be harder for Black communities to address these issues in a collective, united way.

21. Over the past few years, CD1 has changed several times. These changes make it difficult to determine who actually falls within our area of focus. When counties are added to our

district, we are forced to expand our reach and spend more time and resources in these counties. This can be more difficult when most of a particular county does not fall within the purview of issues and needs historically associated with the type of advocacy ENCCG provides. When a county we serve is removed from a district, we try to remain in relationship with that county because of our dedication to our voters and the communities we serve (such as Pitt County which was originally partially in CD1 and placed entirely in CD3 in 2023). Now, in 2025 several of our target communities are being moved to CD3 including communities in Greene and Lenoir counties.

22. Without representation in Congress, advocacy around various policies necessary for the advancement of Black communities in CD1 may be 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, so ultimately it dilutes Black CD1 voters' ability to have their concerns heard.

23. 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 significantly reduced which will effectively weaken their voice on issues that directly impact them most (such as education, funding, criminal justice reform, health care access, etc). Without representation in Congress, 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. Because of the reasons listed above, ENCCG implores the Court to refrain from enforcing the 2025 map and joins this Amicus Brief in support of the map 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.

A handwritten signature in black ink, reading "Wesley H. Stokes". The signature is written in a cursive style with a horizontal line extending from the end of the name.

Wesley Stokes, President, ENCCG