UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

THE SOUTH CAROLINA STATE CONFERENCE OF THE NAACP,

and

TAIWAN SCOTT, on behalf of himself and all other similarly situated persons,

Plaintiffs,

v.

HENRY D. MCMASTER, in his official capacity as Governor of South Carolina; HARVEY PEELER, in his official capacity as President of the Senate; LUKE A. RANKIN, in his official capacity as Chairman of the Senate Judiciary Committee; JAMES H. LUCAS, in his official capacity as Speaker of the House of Representatives; CHRIS MURPHY, in his official capacity as Chairman of the House of Representatives Judiciary Committee; WALLACE H. JORDAN, in his official capacity as Chairman of the House of Representatives Elections Law Subcommittee; HOWARD KNAPP, in his official capacity as interim Executive Director of the South Carolina State Election Commission; JOHN WELLS, Chair, JOANNE DAY, CLIFFORD J. ELDER, LINDA MCCALL, and SCOTT MOSELEY, in their official capacities as members of the South Carolina State Election Commission,

Defendants.

Case No.: 3:21-cv-03302-JMC

DECLARATION OF TAIWAN SCOTT IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

My name is Taiwan Scott and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I declare the following:

1. I am a 45-year old Black man and registered voter in Hilton Head, South Carolina.
2. Specifically, I am a seventh generation Hilton Head resident. My family can trace our ancestry to the Gullah people, descendants of enslaved West African people forcibly brought to America's southeastern coast, including South Carolina's coastal plain and Beaufort Sea Island regions. Today, many Gullah people continue to live in these areas of South Carolina.
3. Black South Carolinians, including Gullah community members in Hilton Head, have endured a myriad of discrimination and other harmful treatment relating to voting rights and access to representation, heirs' property, selective zoning ordinances that make land retention difficult, land seizures, highway construction, taxation, lack of business and development opportunities, among other issues.
4. For example, right now members of the Gullah community and other community members are very concerned about the harms that are likely to flow to residents of the Stoney community in Hilton Head because of a proposal involving federal, state, and local resources to expand the highway in their area. We are also concerned about the expansion of the Hilton Head Island Airport, which will be funded through federal, state, and potentially county funds. This expansion will negatively impact historical Gullah designated landmarks, structures, and other locations in the town of Mitchelville, which is considered the first Black freedman's town in America after the Civil War ended. In

addition to these issues, there are several other structural issues relating to zoning ordinances, infrastructure, and affordable housing that inhibit economic empowerment and opportunities for Black communities in Hilton Head. As one example, community members are desperately awaiting federal and state funding to address the lack of affordable and low-incoming housing and to prevent increases in homelessness and other negative consequences that occur to individuals and families without stable housing.

5. These issues are incredibly important to me, my family, and other Gullah community members in Hilton Head. I have raised the ongoing impact of these issues and solutions to address them with current state and local representatives, as well as previous representatives and candidates. I plan to continue raising these issues with candidates ahead of upcoming key election deadlines and the 2022 elections.

6. However, I cannot raise these issues with candidates or prepare to hold current representatives accountable yet. I am a registered voter in U.S. Congressional District 1, state House District 123, and state Senate District 46. But I am not sure who may represent me in upcoming 2022 Congressional and state House contests because the South Carolina Legislature has not proposed or adopted new district boundaries for Congressional districts, nor have it adopted new boundaries for House districts. I understand that new district boundaries for Congressional District 1 and Senate District 46 must be developed because they have too many people in them.

7. Without knowing the contours of the districts where I live for upcoming elections, I do not know which candidates may represent me. I cannot engage with or learn more about their platforms and policy priorities. I cannot advocate or give money to candidates. And I

cannot educate myself and other community members about potential candidates and strategize on how to effectively raise issues with them.

8. Nor can I effectively associate with other community members, including Gullah people in Hilton Head. They, like me, also do not know the contours of their Congressional districts for upcoming elections. As a result, the uncertainty prevents me from associating with community members who share preferred candidates, as well as from organizing people within my district to advocate for those candidates. Coming together with community members, especially Gullah people, is critical to addressing urgent needs that impact Black South Carolinians. As described above, we are advocating and organizing around necessary increases to funding for affordable housing and infrastructure, while also opposing efforts that seek to diminish our economic opportunities and ability to retain our properties. At the same time, it is also equally important to be able to appeal to current representatives and be prepared to hold them accountable in upcoming elections.

9. I plan to vote in the upcoming 2022 primary and general elections. But I also plan to participate in the full election process, including communicating pressing needs impacting Black South Carolinians and holding candidates and current representatives accountable. To do so, I need to know the contours of the Congressional and state House districts where I will reside for these elections and ahead of other key election dates. South Carolinians, including myself, need equal electoral access and representation so that we can make demands of and hold accountable appropriate candidates and representatives, especially those who will be responsive to the needs of Black communities, both throughout the state and in Hilton Head. Until then, the uncertainty and prolonged delay prevents me and South Carolinians from effectively participating in our democracy.

I, Taiwan Scott, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and recollection.

Dated: November _9_, 2021

Taiwan Scott