

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION

**The Arkansas State  
Conference NAACP, et al.,**

Plaintiffs,

vs.

**The Arkansas Board of  
Apportionment, et al.,**

Defendants

Case No. 4:21-cv-1239-LPR

**Declaration of Barry Jefferson  
on behalf of  
The Arkansas State  
Conference  
NAACP**

The declarant, Barry Jefferson, of sufficient legal and mental capacity,  
states as follows under oath and penalty of perjury:

1. I am the Political Action Chair of The Arkansas State Conference NAACP.
2. The Arkansas State Conference NAACP is challenging the following Board of Apportionment House Districts as either packed

or cracked: 34, 37, 61, 64, 65, 74, 75, 76, 77, 79, 80, 90, 93, 94, 95, 96, 97, 98, and 99.

3. I have personally confirmed that the Arkansas State Conference NAACP has African-American members who are registered voters living in *at least* the following districts: 64, 65, 74, 75, 76, 77, 79, 80, 93, 94, 96, 98, and 99.
4. To do so, I first obtained names of NAACP members living in the challenged districts from counsel at the national NAACP. Next, I checked the voter registration file that counsel obtained from the Arkansas Secretary of State's Office (updated within the last 10 days) to verify those members' voter registration statuses. Finally, I was able to identify the race of those members in the districts above based on my personal knowledge.
5. I stopped the review process once I was informed by counsel that the plaintiffs together had identified at least one member in each of the challenged districts who is an African-American registered voter. I believe, however, that the Arkansas State Conference NAACP likely has such members in all the challenged districts and could confirm that, if necessary, with additional time.

FURTHER THE DECLARANT SAYS NAUGHT.

Pursuant to 28 U.S.C. § 1746, I declare that the foregoing is true  
and correct.

*Barry Jefferson*  
\_\_\_\_\_  
BARRY JEFFERSON

January 20, 2022  
DATE