

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ALPHA PHI ALPHA FRATERNITY
INC., a nonprofit organization on
behalf of members residing in Georgia;
SIXTH DISTRICT OF THE
AFRICAN METHODIST
EPISCOPAL CHURCH, a Georgia
nonprofit organization; ERIC T.
WOODS; KATIE BAILEY GLENN;
PHIL BROWN; JANICE STEWART,

Plaintiffs,

vs.

BRAD RAFFENSPERGER, in his
official capacity as Secretary of State
of Georgia.

Defendant.

Case No. 1:21-CV-05337-SCJ

PLAINTIFFS' EXHIBIT LIST

<u>Exhibit No.</u>	<u>Description</u>	<u>Dkt. Citation</u>
<u>A1</u>	Declaration of William S. Cooper (“Cooper Report”) dated January 7, 2022	Dkt. 39-3 - 39-6
<u>A2</u>	Rebuttal Declaration of William S. Cooper (“Cooper Rebuttal”) dated January 20, 2022	Dkt. 59-2 - 59-6
<u>A3</u>	Declaration of Lisa Handley (“Handley Report”) dated January 7, 2022	Dkt. 39-7
<u>A4</u>	Rebuttal Declaration of Lisa Handley (“Handley Rebuttal”) dated January 20, 2022	Dkt. 59-7
<u>A5</u>	Declaration of Dr. Adrienne Jones Preliminary Report (“Jones Report”) dated January 13, 2022	Dkt. 39-8
<u>A6</u>	Declaration of Traci Burch (“Burch Report”) dated January 3, 2022	Dkt. 39-9
<u>A7</u>	Declaration of Jason Ward (“Ward Report”) dated January 6, 2022	Dkt. 39-10
<u>A8</u>	Declaration of Katie Bailey Glenn dated December 22, 2021	Dkt. 39-11
<u>A9</u>	Declaration of Phil S. Brown dated December 28, 2021	Dkt. 39-12
<u>A10</u>	Declaration of Janice Stewart dated December 29, 2021	Dkt. 39-13
<u>A11</u>	Declaration of Eric T. Woods dated December 29, 2021	Dkt. 39-14
<u>A12</u>	Declaration of Sherman Lofton, Jr. dated December 28, 2021	Dkt. 39-15
<u>A13</u>	Declaration of Bishop Reginald T. Jackson dated December 31, 2021	Dkt. 39-16
<u>A14</u>	2021 House Redistricting Guidelines	Dkt. 39-17
<u>A15</u>	2021 Senate Redistricting Guidelines	Dkt. 39-18
<u>A16</u>	Georgia General Assembly, Meeting Archives, Senate Committee on Reapportionment and Redistricting, https://www.legis.ga.gov/committees/senate/140	
<u>A17</u>	Georgia General Assembly, Votes on S.B. 1EX, https://www.legis.ga.gov/legislation/60894	
<u>A18</u>	Georgia General Assembly, Votes on H.B. 1EX, https://www.legis.ga.gov/legislation/60897	
<u>A19</u>	Cleve R. Wootson Jr., <i>Racist ‘magical Negro’ robo-call from ‘Oprah’ targets Stacey Abrams in Georgia governor’s race</i> , Wash. Post. (Nov. 5, 2018), https://www.washingtonpost.com/politics/2018/11/04/racist-magical-negro-robo-call-oprah-targets-stacey-abrams-georgia-governors-race/	
<u>A20</u>	Anderson Cooper 360, <i>Hear racist robocall targeting Abrams, Oprah</i> , CNN, (Nov. 6, 2018) https://www.cnn.com/videos/politics/2018/11/06/stacey-abrams-racist-robocall-oprah-response-ac360-sot-vpx.cnn	
<u>A21</u>	Greg Bluestein (@bluestein), https://twitter.com/bluestein/status/1332722393509400578	

<u>A22</u>	Edward-Isaac Dove ((@IsaacDovere), https://twitter.com/IsaacDovere/status/1317239483197173763	
<u>A23</u>	Roger Sollenberger, <i>Kelly Loeffler's New Facebook Ad Darkens Skin of Raphael Warnock, Her Black Opponent</i> , Salon, (Jan. 4, 2021), https://www.salon.com/2021/01/04/kelly-loefflers-new-facebook-ad-darkens-skin-of-raphael-warnock-her-black-opponent/	
<u>A24</u>	Manthan Chheda, <i>Kelly Loeffler Campaign Caught Darkening Skin of Opponent Raphael Warnock in Facebook Ad</i> , International Business Times (Jan. 5, 2021), https://www.ibtimes.sg/kelly-loefflers-campaign-caught-darkening-skin-opponent-raphael-warnock-facebook-ad-54651 .	
<u>A25</u>	Greg Bluestein, <i>Loeffler's Campaign Takes Aim at Warnock in First TV BroadSides</i> , The Atlanta Journal-Constitution (Nov. 12, 2020), https://www.ajc.com/politics/politics-blog/loefflers-campaign-takes-aim-at-warnock-in-first-tv-broadSides/ZAM5Y4NEQ5CCLALS7T6KKKN5YI/	
<u>A26</u>	PickRick Ad, Atlanta Constitution, February 13, 1965	
<u>A27</u>	Lestor Maddox Ad, Atlanta Constitution, August 31, 1963	
<u>A28</u>	Ally Mutnick & Melanie Zanona, <i>House Republican leaders condemn GOP candidate who made racist videos</i> , Politico (June 18, 2020), https://www.politico.com/news/2020/06/17/house-republicans-condemn-gop-candidate-racist-videos-325579	
<u>A29</u>	Danielle Zoellner, <i>Marjorie Taylor Greene tried to force Ilhan Omar and Rashida Tlaib to retake their oaths on a Bible in a resurfaced video</i> (Jan. 27, 2021), https://www.independent.co.uk/news/world/americas/us-politics/marjorie-taylor-greene-omar-tlaib-bible-b1793806.html	
<u>A30</u>	Sophia Tesfaye. <i>"Karen Handel's Husband Shares Meme Urging Voters to 'Free the Black Slaves from the Democratic Plantation,'"</i> Salon (May 3, 2017), https://www.salon.com/2017/05/03/karen-handels-husband-shares-meme-urging-voters-to-free-the-black-slaves-from-the-democratic-plantation/	
<u>A31</u>	Kristal Dixon, <i>"Candidates Drag Atlanta Crime into Suburban Elections,"</i> Axios, (October 28, 2021), https://www.axios.com/local/atlanta/2021/10/28/candidates-drag-atlanta-crime-into-suburban-elections	
<u>A32</u>	Chris Joyner, <i>Why does a longtime white supremacist think he can win an election?</i> The Atlanta Journal-Constitution (Jan 27, 2022), https://www.ajc.com/news/investigations/why-does-a-longtime-white-supremacist-think-he-can-win-an-election/MGQLKWO2DND7NBAS2P35R5REBM/	

<u>A33</u>	Jaelyn Diaz, “ <i>Georgia Lawmaker Arrested As Governor Signs Law Overhauling Elections</i> ,” NPR, March 26, 2021, sec. Politics. https://www.npr.org/2021/03/26/981471672/police-arrest-georgia-lawmaker-as-governor-signslaw-overhauling-elections	
<u>A34</u>	April Glaser, “It Was Too Easy for Brian Kemp’s Last-Minute Dog Whistle About Stacey Abrams to Go Viral.” Slate, (November 7, 2018), https://slate.com/technology/2018/11/brian-kemp-stacey-abrams-dog-whistle-blackpanthers-facebook.html .	
<u>A35</u>	Jason Szep and Linda So, “ <i>Trump Campaign Demonized Two Georgia Election Workers—And Death Threats Followed</i> ,” Reuters, (December 1 2021), https://www.reuters.com/investigates/special-report/usa-election-threats-georgia/	
<u>A36</u>	Joe Hoft, <i>Fulton County 2020 Election Case’s Request is Granted – Election Workers Ruby Freeman, Wandrea Moss, and Happy Faces Personnel Group Are Added to the Case</i> , Gateway Pundit (Aug. 14, 2021), https://www.thegatewaypundit.com/2021/08/fulton-county-2020-election-cases-request-add-ruby-freeman-wandrea-moss-happy-faces-personnel-group-case-granted/	
<u>A37</u>	U.S. Census, Voting and Registration in the Election of November 2020, Table 4b (April 2021), https://www.census.gov/data/tables/time-series/demo/voting-and-registration/p20-585.html	
<u>A38</u>	<i>Georgia Moves to Bar Negroes At Ballot Box</i> , N.Y. Amsterdam News, Dec. 25, 1948, at 26, http://ezproxy.nypl.org/login?url=https://www.proquest.com/historical-newspapers/georgia-moves-bar-negroes-at-ballot-box/docview/225927745/se-2?accountid=35635 .	
<u>A39</u>	Robert Beriman et al., Section 5 Recommendation Memorandum Re: Act No. 53 (H.B. 244) (Aug. 25, 2005), https://www.brennancenter.org/sites/default/files/analysis/08-25-05%20Georgia%20ID%20Preclearance%20Memo%20-%20DOJ%20Staff.pdf	
<u>A40</u>	Aaron Gould Sheinin, <i>Deal Apologizes for ‘Ghetto’ Remark</i> , The Atlanta Journal-Constitution (Oct. 6, 2009), https://www.ajc.com/news/local-govt--politics/deal-apologizes-for-ghetto-remark/IIVxhtBanWHbRGgpAHFNKJ/ .	

<u>A41</u>	Hunter Schwarz, <i>Georgia State Senator Upset Over Efforts to Increase Voter Turnout in Black, Democratic Area</i> , Wash. Post (Sept. 10, 2014), https://www.washingtonpost.com/blogs/govbeat/wp/2014/09/10/georgia-state-senator-upset-over-efforts-to-increase-black-voter-turnout-says-he-wants-more-educated-voters/	
<u>A42</u>	Molly Olmstead, <i>Georgia Gubernatorial Candidate Begins “Deportation Bus” Tour With Promise to “Fill This Bus With Illegals,”</i> Slate (May 16, 2018), https://slate.com/news-and-politics/2018/05/georgia-state-sen-michael-williams-launches-deportation-bus.html	
<u>A43</u>	Mark Niese, <i>Georgia Buys New Voter Registration System After Long Lines in 2020</i> , The Atlanta Journal-Constitution (Jan. 19, 2022), https://www.ajc.com/politics/georgia-buys-new-voter-registration-system-after-long-lines-in-2020/O3DBSB64QBH5ZJKCVXR3RFC4S4/	
<u>A44</u>	<i>Brad Raffensperger Continues to Secure the Vote; Announces Partnership with Salesforce and MTX to Modernize Georgia’s Voter Registration System</i> , Ga. Sec’y of State (Jan. 19, 2022), https://tinyurl.com/2p8z2933	
<u>A45</u>	Georgia secretary of state announces new voter registration system (Jan. 19, 2022), https://www.youtube.com/watch?v=CC71MTSyca8	
<u>A46</u>	Map of Milledgeville Boundaries	
<u>A47</u>	Cooper Declaration Exhibit AE-2	
<u>A48</u>	Map of 2000-2020 NH White Population Change by County	
<u>A49</u>	Map of 2000-2020 Black Population Change by County	
<u>A50</u>	Measures of Compactness Report for Georgia VTDs	
<u>A51</u>	Measures of Compactness Report for Georgia Municipalities	

Plaintiffs reserve the right to use exhibits listed by plaintiffs in the *Pendergrass* and *Grant* cases. Plaintiffs reattach the corrected versions of the previously-filed declarations of Sherman Lofton dated December 28, 2021 (Dkt. 39-15) and Bishop Reginald T. Jackson dated December 31, 2021 (Dkt. 39-16) with appropriate signature pages, which were previously inadvertently transposed.

Plaintiffs have conferred with counsel for the State, who represented that the previously filed declarations for the organizational plaintiffs and expert reports for Drs. Ward and Burch will be admitted as evidence whether or not those witnesses are called to testify live.

Respectfully submitted this 31st day of January, 2022.

/s/ Rahul Garabadu

Sean J. Young (Bar 790399)
syoung@acluga.org
Rahul Garabadu (Bar 553777)
rgarabadu@acluga.org
ACLU FOUNDATION OF
GEORGIA, INC.
P.O. Box 77208
Atlanta, Georgia 30357
Telephone: (678) 981-5295
Facsimile: (770) 303-0060

/s/ Debo P. Adegbile

Debo P. Adegbile
debo.adegbile@wilmerhale.com
Robert L. Boone
robert.boone@wilmerhale.com
Abigail Shaw
abby.shaw@wilmerhale.com
Alex W. Miller
alex.miller@wilmerhale.com
Cassandra Mitchell
Cassie.mitchell@wilmerhale.com
Maura Douglas
maura.douglas@wilmerhale.com
Eliot Kim

/s/ Sophia Lin Lakin

Sophia Lin Lakin
slakin@aclu.org
Ari J. Savitzky
asavitzky@aclu.org
Jennesa Calvo-Friedman
jcalvo-friedman@aclu.org
ACLU FOUNDATION
125 Broad Street, 18th Floor
New York, New York 10004
Telephone: (212) 519-7836
Facsimile: (212) 549-2539

/s/ George P. Varghese

George P. Varghese
george.varghese@wilmerhale.com
Denise Tsai
denise.tsai@wilmerhale.com
Tae Kim**
tae.kim@wilmerhale.com
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, Massachusetts 02109
Telephone: (617) 526-6000
Facsimile: (617) 526-5000

eliot.kim@wilmerhale.com
WILMER CUTLER PICKERING
HALE AND DORR LLP
250 Greenwich Street
New York, New York 10007
Telephone: (212) 230-8800
Facsimile: (212) 230-8888

/s/ Edward Williams
Anuradha Sivaram
anuradha.sivaram@wilmerhale.com
Edward Williams
ed.williams@wilmerhale.com
De'Ericka Aiken
ericka.aiken@wilmerhale.com
Ayana Williams
ayana.williams@wilmerhale.com
WILMER CUTLER PICKERING
HALE AND DORR LLP
1875 Pennsylvania Ave. NW
Washington, D.C. 20006
Telephone: (202) 663-6000
Facsimile: (202) 663-6363

/s/ Charlotte Geaghan-Breiner
Charlotte Geaghan-Breiner
charlotte.geaghan-
breiner@wilmerhale.com
WILMER CUTLER PICKERING
HALE AND DORR LLP
2600 El Camino Real
Suite 400
Palo Alto, CA 94306
(650) 858-6000 (t)
(650) 858-6100 (f)

Counsel for the Alpha Phi Alpha Plaintiffs

**** Pro hac vice pending**

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused to be served the foregoing *Plaintiffs' Exhibit List* with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all counsel or parties of record on the service list:

This 31st day of January, 2022.

/s/ Rahul Garabadu

EXHIBIT K

ALPHA PHI ALPHA FRATERNITY
INC., *et al.*,

Plaintiffs,

vs.

BRAD RAFFENSPERGER, in his
official capacity as Secretary of State
of Georgia.

Defendant.

**DECLARATION OF BISHOP REGINALD T. JACKSON, ON BEHALF OF
THE SIXTH DISTRICT OF THE AFRICAN METHODIST EPISCOPAL
CHURCH**

My name is Reginald T. Jackson. I am over the age of twenty-one (21) years of age and am fully competent to execute this Declaration. I have knowledge of the facts recited here, which are true and correct, and are based on my personal knowledge. Under penalty of perjury, I state the following:

1. I am the presiding prelate of the Sixth Episcopal District of the African Methodist Episcopal Church (“AME Church”). The Sixth District is one of twenty districts of the AME Church and covers the entirety of the State of Georgia. The Sixth District of the AME Church is a Plaintiff in this action.

2. I was elected and consecrated the 132nd bishop of the AME Church in 2012, and have served in this position for nine years. I have served as the chairman of the Social Action Commission of the AME Church and am the current chairman of the Commission on Colleges, Universities and Seminaries.

3. The AME Church traces its roots to 1816 as the first independent Protestant denomination founded by Black people in response to segregation and discrimination in the Methodist Episcopal Church.

4. The AME Church places a strong emphasis on social service. In addition to its primary mission of religious education, AME Church has a secondary mission of service to the homeless, the imprisoned, the poor, and other needy persons.

5. Encouraging and supporting civic participation among its members is a core aspect of the AME Church's work. Advocating for the right to vote, regardless of candidate or party, and encouraging the AME Church's eligible members to vote have been priorities of the Church.

6. AME Church's activities in support of voter participation reflect the history of the civil rights march from Selma to Montgomery in Alabama. The march was organized in and began at the steps of Brown Chapel AME Church in Selma. After they were beaten by Alabama State Troopers on the Edmund

Pettus Bridge on “Bloody Sunday,” the wounded marchers fled back to the sanctuary of Brown Chapel.

7. The AME Church continues to encourage civic participation by holding “Souls to the Polls” events to transport churchgoers to polling locations during advance voting periods, registering voters for elections, hosting “Get Out the Vote” efforts to increase voter turnout, and providing food, water, encouragement, and assistance to voters waiting in lines at polling locations. Advancing voting rights and eliminating barriers to political participation that have plagued the promise of full citizenship for Black Americans since this country’s founding is a core issue that ties our members—and the communities in which they live—together.

8. There are more than 500 member-churches that are part of the Sixth District of the AME Church in Georgia. There are 36 congregations in Atlanta alone. The AME Church, the District, and our individual congregations serve as key community institutions, connecting members locally and throughout the State and its regions, fostering dialogue and fellowship, and maintaining the vibrancy and interconnectedness of our communities.

9. AME Church’s membership includes tens of thousands of Black Georgians who are registered voters, including in Metro Atlanta, Augusta and the surrounding counties, Southwestern Georgia (including the counties in and

around Columbus and Albany), and other counties across the state. Several congregants are named Plaintiffs in this case.

10. There are approximately 60 congregations located in and around the areas that comprise new Georgia Senate Districts 16 and 17 (as well as the new House Districts drawn in and/or around the same areas, such as House Districts 74, 114, 117, and 134), including, without limitation, in Fayette County, Spalding County, Henry County, Newton County, and other counties in the area. Many, if not all, of these churches have congregants who identify as Black and who are residents and registered voters in or around Georgia Senate Districts 16 and 17 (as well as the new House Districts drawn in and/or around the same areas, such as House Districts 74, 114, 117, and 134).

- a. For example, Cleveland Chapel AME Church, located in new Senate District 17, is one of our member congregations in Hampton, Georgia. Cleveland Chapel AME is in southwestern Henry County, in the Metro Atlanta area, where the population of Black Georgians has grown significantly over the past decade.
- b. For another example, Rising Star Missionary Baptist Church, located in Senate District 16, is one of our member congregations in Griffin, Georgia. Rising Star Missionary Baptist is in southwestern Spalding

County, just on the outskirts of Metro Atlanta, where the population of Black Georgians has also grown since 2010.

11. Numerous AME churches are also located in and around the area that comprises new Georgia Senate District 23 (as well as the new House Districts drawn in and/or around the same area, such as House Districts 128 and 133), including, without limitation, in Richmond County (which includes Augusta) as well as various nearby counties, such as Burke County, Jefferson County, and Baldwin County. These churches also have congregants who identify as Black and who are residents and registered voters in or around Georgia Senate Districts 23 (as well as the new House Districts drawn in and/or around the same areas, such as House Districts 128 and 133).

a. For example, Spring Bethel AME Church, located in Senate District 23, is one of our member congregations in Louisville, Georgia.

Spring Bethel AME Church is located in Jefferson County.

b. Flipper Chapel AME Church, located in House District 133, is one of our member congregations in Milledgeville, Georgia. Flipper Chapel AME is in central Baldwin County.

12. There are also numerous AME churches established in and around the area that comprises new Georgia House Districts 171 and 173 (as well as other new House Districts drawn in and/or around the same area), including, without

limitation, in Dougherty County (which includes Albany) as well as various nearby counties, including, among a number of others, Mitchell County and Thomas County. These churches also have congregants who identify as Black and who are residents and registered voters in or around Georgia House Districts 171 and 173.

- a. For example, St. Peter AME Church, located in House District 171, is one of our member congregations in Camilla, Georgia. St. Peter AME is in Mitchell County, a part of southwest Georgia.

13. Members of AME Church include Black registered voters who I understand reside in the new State Senate and State House districts discussed above , but who would reside in the illustrative additional majority-Black State Senate and State House districts presented by Plaintiffs in this case that could have and should have been drawn in the above-discussed areas .

14. The new maps directly affect AME Church's advocacy efforts by undermining the ability of Black Georgians, including the Church's members, to elect representatives of their choice.

15. AME Church will be forced to divert resources from its broader voter registration and community empowerment initiatives to areas where Black voting strength has been unlawfully watered down in order to protect the representation and interests of its members.

16. I declare under penalty of perjury that the foregoing is true and correct.

Dated this 28th day of December, 2021,

By: /s/ Reginald T. Jackson

Reginald T. Jackson

EXHIBIT J

ALPHA PHI ALPHA FRATERNITY
INC., *et al.*,

Plaintiffs,

vs.

BRAD RAFFENSPERGER, in his
official capacity as Secretary of State
of Georgia.

Defendant.

**DECLARATION OF SHERMAN LOFTON, JR., ON BEHALF OF ALPHA
PHI ALPHA FRATERNITY INC.**

My name is Sherman Lofton, Jr. I am over the age of twenty-one (21) years of age and am fully competent to execute this Declaration. I have knowledge of the facts recited here, which are true and correct, and are based on my personal knowledge. Under penalty of perjury, I state the following:

1. I am the Georgia District Director of Alpha Phi Alpha Fraternity Inc. (“Alpha Phi Alpha”), the Nation’s oldest Black fraternity. Alpha Phi Alpha is a Plaintiff in this action.

2. Alpha Phi Alpha is the first intercollegiate Greek-letter fraternity established for Black Men. The organization was founded in 1906 at Cornell University in Ithaca, New York.

3. I have been involved with Alpha Phi Alpha since 1995, and served in various leadership roles prior to serving as Georgia District Director beginning in 2019. I have served on the Georgia District Board of Directors since 1996. Through my prior leadership positions in Alpha Phi Alpha, I supervised our programming and chapters in the metro Atlanta region, including Cobb, Henry, Spalding, and Coweta counties.

4. As Georgia District Director, I support the initiatives and programming of the Regional Vice President with Alpha Phi Alpha's Georgia chapters. In addition to overseeing initiatives, programs, projects, and intakes, I am the lead representative for the Georgia District Association and serve as a spokesperson for the fraternity in the State.

5. Alpha Phi Alpha has over 3,000 members across Georgia. Many of these members are Black Georgians who are registered voters. Members of our organization live in every region of the State, including in Metro Atlanta, Augusta and the surrounding counties, Southwestern Georgia (including the counties around Columbus and Albany), and other counties across the state.

6. Specifically, members of our organization live in and around new Georgia Senate Districts 16 and 17 and the newly-drawn House Districts drawn in those same areas, including House Districts 74, 114, 117, and 134, including, without limitation, in Fayette County, Spalding County, Henry County, Newton County, and other counties in the area. For example, one of our members, Brother Harry Mays, resides in House District 117.

7. Our members also live in and/or around the area that comprises new Georgia Senate District 23 (as well as the new House Districts drawn in and/or around the same area, such as House Districts 128 and 133), including, without limitation, in Richmond County (which includes Augusta) as well as various nearby counties, such as Burke County, Jefferson County, and Baldwin County.

8. Alpha Phi Alpha also has members living in and/or around the area that comprises new Georgia House Districts 171 and 173 (as well as other new House Districts drawn in and/or around the same area), including, without limitation, in Dougherty County (which includes Albany) as well as various nearby counties, including, among a number of others, Mitchell County and Thomas County.

9. Members of Alpha Phi Alpha in the Georgia District include Black registered voters who I understand reside in the new State Senate and State House districts discussed above, but who would reside in the illustrative

additional majority-Black State Senate and State House districts presented by Plaintiffs in this case that could have and should have been drawn in the above-discussed areas.

10. Alpha Phi Alpha has historically made raising the civic participation of its members and Black Americans an organizational priority. Beginning in the 1930s, Alpha Phi Alpha created a National Program called “A Voteless People is a Hopeless People,” which seeks to enhance Black civic participation and voting. Through the “A Voteless People is a Hopeless People” National Program, Alpha Phi Alpha focuses on voter education, registration, civic awareness, and empowerment.

11. The Georgia District is one of the most active segments of the fraternity in community engagement. The District prioritizes social justice, voter enfranchisement, criminal justice, education, and anti-poverty initiatives in its activities. With additional representation in the State legislature, Black voters in Georgia could exert more political pressure on our state government to address systemic inequality and continuing discrimination in these areas, particularly when it comes to voting rights, criminal justice, the school-to-prison pipeline, and educational resources.

12. Alpha Phi Alpha actively registers voters through its “First of All, We Vote” initiative, holds events to raise political awareness and empower Black

communities, and fights efforts to diminish Black political power. The Georgia District of Alpha Phi Alpha has advocated at the state capitol for legislation that expands voting rights for all Georgians and regularly works in local communities to register voters and educate them on their rights.

13. The new maps directly affect those efforts by undermining the ability of Black Georgians, including members of Alpha Phi Alpha, to elect representatives of their choice.

14. On August 11, 2021, I provided public comments on behalf of Georgia members of Alpha Phi Alpha at a redistricting town hall convened by members of the Georgia legislature in Augusta, Georgia. At the town hall, I asked the Chairs of the Redistricting Committees in the House and Senate to make sure that people of color had a voice in the redistricting process. I also asked that the legislature draw maps in a way that is fair and transparent, because the redistricting process would affect the lives of so many Georgians.

15. Georgia's minority population, especially among Black Georgians, has grown over the past decade and drives Georgia's economic growth and national prominence. I have observed this growth and change firsthand as a resident of Henry County, which has both grown in population and become increasingly diverse over the past decade. In my observation, this growth is being driven in part by Black citizens from the larger Atlanta metro, as well as

from around the country, moving to Henry County, deepening the ties of the County's growing Black community to that of the broader region.

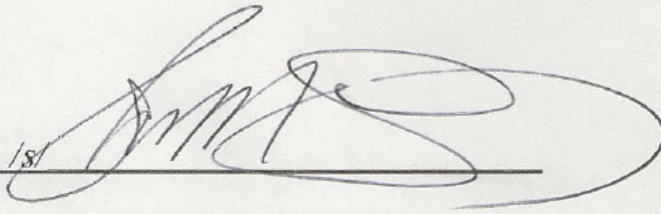
16. The proposed Georgia State and House maps do not reflect the growth of the State's minority population, especially in the metro Atlanta area.

17. If the new maps take effect, Alpha Phi Alpha will be forced to divert resources from its voter education and registration programming to the affected districts in order to protect the representation and interests of its members in the community.

18. I declare under the penalty of perjury that the foregoing is true and correct.

Dated this 31st day of December, 2021,

By: /s/

A handwritten signature in dark ink, appearing to be "S. Lofton", written over a horizontal line. The signature is stylized with a large, looping flourish at the end.

Sherman Lofton, Jr.