

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

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**EVAN MILLIGAN, *et al.*,**

**Plaintiffs,**

**v.**

**WES ALLEN, in his official  
capacity as Alabama Secretary of  
State,**

**Defendant.**

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**Case No. 2:21-cv-01530-AMM**

**THREE-JUDGE COURT**

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**MARCUS CASTER, *et al.*,**

**Plaintiffs,**

**v.**

**WES ALLEN, in his official  
capacity as Alabama Secretary of  
State,**

**Defendant.**

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**Case No.: 2:21-cv-1536-AMM**

**DEFENDANTS' JOINT MOTION TO SUBSTITUTE EXHIBIT S**

As part of their Joint Response to *Milligan* and *Caster* Plaintiffs' Objections (doc. 220), Defendants filed Exhibit S (doc. 220-19), which was intended to be a Declaration from Jeffrey V. Williams. Defendants learned today that an incorrect

document was inadvertently filed as Exhibit S. Thus, Defendants move this Court to substitute Exhibit S with the correct document, which is attached to this Motion as an exhibit.

Respectfully Submitted,

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*Attorney General*

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 7, 2023, I filed the foregoing using the Court's CM/ECF system, which will serve all counsel of record.

/s/ Edmund G. LaCour Jr.  
*Counsel for Secretary Allen*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

BOBBY SINGLETON, *et al.*, )  
)  
*Plaintiffs,* )

v. )

Case No. 2:21-cv-01291-AMM

WES ALLEN, in his official capacity )  
as Alabama Secretary of State, *et al.*, )  
)  
*Defendants.* )

THREE-JUDGE COURT

EVAN MILLIGAN, *et al.*, )  
)  
*Plaintiffs,* )

v. )

Case No. 2:21-cv-1530-AMM

WES ALLEN, in his official )  
capacity as Alabama Secretary of State, )  
*et al.*, )  
)  
*Defendants.* )

THREE-JUDGE COURT

MARCUS CASTER, *et al.*, )  
)  
*Plaintiffs,* )

v. )

Case No. 2:21-cv-01536-AMM

WES ALLEN, in his official )  
capacity as Alabama Secretary of State, )  
)  
*Defendant.* )

**DECLARATION OF JEFFREY V. WILLIAMS**

I, Jeffrey V. Williams, declare as follows:

1. I am over the age of 19, and the testimony I have set out below is based upon my personal knowledge, which I could testify competently about in court if requested to do so.

**Introduction and Background**

2. I have lived in Dothan, which is the heart of the Wiregrass, since February 2008. I grew up in Birmingham and Tuscaloosa. I graduated with a B.A. from The University of Alabama in 1992. I served in the U.S. Army and U.S. Army Reserves for a total of seven years as a 1st Lieutenant / Armor Officer. I was stationed at Fort Hood, Texas, Fort Polk, Louisiana, Fort Knox, Kentucky, Fort Jackson, South Carolina, and Fort Riley, Kansas at various points in my tenure. I have worked in the financial services and commercial banking field since 1992. At one point in my career, I moved six times over about a six-year timeframe with the same employer (Birmingham, Gadsden, and Montgomery, Alabama; Memphis and Jackson, Tennessee; and back to Birmingham) due to various promotions and positions with greater responsibility. Because I have lived in several other cities and have now spent over fifteen years in the Wiregrass, I feel I have a unique perspective on the culture and geography of the region.

3. I moved to Dothan in February 2008 to accept the position of Corporate Relationship Manager with BBVA Compass. The Market President had announced his retirement plans and this move would give time for him to mentor me into the role of Market President. From February 2008 to May 2013, I worked in the role of Corporate Relationship Manager. From May 2013 to September 2021, I was the Dothan Market President for BBVA. In those roles, I was either the banker or supervised the bankers for relationships such as Southeast Health (formerly Southeast Alabama Medical Center), George C. Wallace Community College (now Wallace

Community College), Construction Partners, Inc. (the Alabama subsidiary operates as Wiregrass Construction Company), the Houston County Commission, the City of Dothan, Bondy's Automotive, A&D Automotive, Action Automotive, Southern Bone & Joint, Dothan Surgery Center, Digestive Health Specialists, Dothan City Schools, Southeast Alabama Regional Planning & Development Commission, Boyd Brothers Transportation, Timberland Harvesters, and Lewis M. Carter Manufacturing.

4. In September 2021, I accepted the position I currently hold as Regional President for South Alabama for SmartBank, overseeing the Auburn, Dothan, and Montgomery markets. SmartBank is an almost \$5 billion commercial bank headquartered in Tennessee with 42 locations across Alabama, Florida, and Tennessee.

5. As a commercial banker dealing with large businesses and government entities, to be successful, you must understand your client's businesses to a high degree. Given the large companies and government entities I have been involved with banking, I feel that I have a unique perspective on industry in the Wiregrass. As an example of this, as the banker for Southeast Health, I made the first commercial loan to assist with the opening of Alabama College of Osteopathic Medicine (ACOM). The loan was \$20 million to create an escrow account lasting until accreditation to ensure that, should ACOM not achieve accreditation, ACOM's students could continue their education at other medical schools. Underwriting a loan such as this requires a deep understanding of the client's business, the business plan for the new venture, and what about the Wiregrass area will ensure its success.

### **Community Service**

6. I have served as a commissioner with Dothan Housing Authority (DHA) since June 2017 with the last five years in the role of Vice Chairman. The CEO, team, and commission at

DHA have transformed the agency from simply overseeing public housing and the Section 8 program, or Housing Choice Voucher program as it's known today, in Houston County to the innovative and expanded agency it is today. In the last five years, DHA has become regional, taking on management of housing vouchers for a total of five counties in the Wiregrass (Coffee, Dale, Henry, Houston, & Geneva). The agency manages 1,421 total affordable housing units in the City of Dothan alone. The U.S. Department of Housing and Urban Development is pushing for more consolidation and a regional approach to housing authorities to create more efficiency and, with DHA being the largest in the Wiregrass, it makes sense for DHA to take on more responsibility. During the previous five years, DHA has been able to work with developers to create additional housing opportunities and has created multiple resident service programs to enhance quality of life, improve family self-sufficiency, and increase employment opportunities for residents. Further, DHA has rolled out landlord financial incentives and guarantees to entice landlords to come into the voucher program, which further increases the availability of affordable housing.

7. In my fifteen years in Dothan, I have been involved to some degree with the Dothan Area Chamber of Commerce. In October 2022, I joined the executive board of the Chamber, and I was recently elected to the role of Vice Chairman beginning October 2023. The Chamber's President, Matt Parker, has a reputation as a premier economic developer for the region, consistently working with leaders throughout the Wiregrass, not just Dothan. He and the Chamber always take a regional approach to economic development, believing industry created in surrounding communities will benefit us all.

8. In addition, I was a Rotary Club member in Dothan from 2008 to June 2023. Rotary further provides perspective on the region, given my interaction with members in numerous



different professions from both Dothan clubs and the weekly speakers, who provided information on their industry and what is occurring in the community.

### **Wiregrass Area**

9. The counties of Coffee, Dale, Henry, Houston, and Geneva have a long history of working together and are inter-dependent for the good of the region. These counties share similar culture, interests, geography, industries, and economics. The area is not served by interstate access or a major airport, which provides for a significant economic disadvantage compared to Alabama's major population centers. This may be the reason the region works so well together; we are all in similar positions, so we work together to overcome these concerns, rather than competing.

10. Similarly, with the recent exception of Wiregrass-native Senator Katie Britt, the area has been disadvantaged from a state and federal representation standpoint, as the major population centers of Birmingham, Huntsville, and Mobile have tended to elect the state's political leadership.

11. Should the Wiregrass be split from a representation standpoint, this will further disadvantage the region by creating one more obstacle to efficiently work together. It's important that the region be generally on the same page with our approach to issues such as economic development, housing, education, and workforce development.

### **Wiregrass Major Economic Drivers and Industry**

12. Fort Novosel is the home of Army aviation and has a \$1 billion annual economic impact on the Wiregrass, from what I understand from my interaction with the Chamber. Due to my time as an armor officer in the U.S. Army and as the Army's armor forces worked very closely with Army aviation, I have some perspective on the importance of a military fort to a community and Army aviation's important role in our national defense. Fort Novosel impacts the entire region

through its 63,000-acre footprint and soldiers accessing housing, healthcare, retail shopping, and services. Further, various industries are located throughout the region to support the Fort and its soldiers. The perspective I have is that it would be very expensive and difficult to replace Fort Novosel. Army aviation requires an extensive amount of acreage as the helicopters need multiple landing zones over a large area for training. In addition, the Wiregrass communities understand and embrace the need for helicopters flying over our homes and businesses constantly. We can tell this story with one voice as Fort Novosel touches the entire Wiregrass whether it be the base actually being adjacent to communities or helicopters flying over other areas.

13. Due to serving the banking needs of Southeast Health, the area's largest regional hospital, and several large medical practices in the region, I have a strong understanding of what a major economic driver healthcare is for the Wiregrass. Dothan is the largest city for approximately 100 miles in each direction, making it a hub for healthcare services for the region. Dothan's hospitals and medical practices serve the population of the entire Wiregrass and even out-of-state patients. In addition, the region's only medical school, Alabama College of Osteopathic Medicine, is located in Dothan.

14. My time with the Chamber and as a commercial banker has allowed me to understand that one of the area's largest industries is agriculture. Due to the surrounding counties having similar geography, this is the case for all counties in the Wiregrass. While I have not provided banking services to individual farmers, I have provided banking services to or been exposed to ancillary businesses which produce agricultural equipment or provide services for this industry. I believe the area needs to speak with one voice given the significance that agriculture plays in all Wiregrass counties.

15. The area's higher education providers, such as Troy University, Troy University Dothan, Wallace Community College, and Enterprise State Community College and agencies such as Southeast Alabama Works, which covers the region, work very well together to provide the education opportunities that industry and political leadership require. Again, speaking as one voice creates more efficiency in providing secondary education and workforce development.

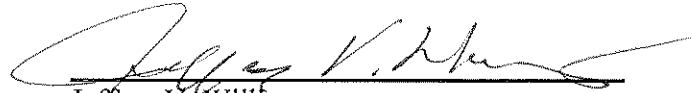
16. As an entrepreneurship mentor for HudsonAlpha Wiregrass' Navigate program, I understand that HudsonAlpha's recent announcement that it will move its plant genome research to a new facility in Dothan could be a game changer for the region. The scientists at HudsonAlpha will work with Wiregrass area farmers to develop new varieties of plants which may be more immune to disease and drought. This research should create a number of businesses or entrepreneurs seeking to be a part of HudsonAlpha Wiregrass' sphere of influence. It will take the region working together to make the very most of the significant economic development opportunities which will be created.

### **Congressional Representation for the Wiregrass**

17. The Wiregrass region does not have the same advantages as the major population centers such as Birmingham, Huntsville, or Mobile. Therefore, dividing an area which shares similar geography, economic issues, and concerns will create even more of a disadvantage to a region which is already working hard, together, to overcome major obstacles to creating economic prosperity for all its citizens.

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

Executed on August 2, 2023.

  
Jeffrey V. Williams