IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CIVIL ACTION No. 1:15-CV-559

THE CITY OF GREENSBORO, LEWIS A. BRANDON III, JOYCE JOHNSON, NELSON JOHNSON, RICHARD ALAN KORITZ, SANDRA SELF KORITZ, AND CHARLI MAE SYKES, Plaintiffs, v. THE GUILFORD COUNTY BOARD OF ELECTIONS, Defendant.	**DECLARATION OF LEWIS A. BRANDON III**

I, Lewis A. Brandon III, declare as follows:

1. My name is Lewis A. Brandon III. I am 76 years old and under no mental disability or impairment.

2. I currently reside at 2308 Zornbrook Drive in Greensboro, North Carolina. My residence is located in District 1 of the new Greensboro City Council districts established by the North Carolina General Assembly through the implementation of North Carolina Session Law 2015-138.

3. I am a citizen, resident, and registered voter in the City of Greensboro. I regularly vote and participate in the political process. I have been active in voter education since the 1960s, both in Greensboro and across North Carolina. I am a retired public school teacher, and I now work as director of the Grassroots History Project at

Beloved Community Center, which works to support and organize Greensboro's African-American community. Through my role at Beloved Community Center, I have sustained my longstanding interest in ensuring that the city government supports the African-American community through infrastructure improvements, economic development, police accountability, economic and social programs to improve residents' quality of life, and wise allocation of my tax dollars.

4. I am very concerned that District 1 residents' votes will be devalued pursuant to Session Law 2015-138. The Greensboro City Council makes many decisions important to my quality of life as well as the quality of life of District 1 residents. It is fundamentally unfair that three largely African-American city council districts are overpopulated under Session Law 2015-138, diminishing the value of each resident's vote, while other districts are underpopulated. It is clear that residents of the three overpopulated districts will have a more difficult time getting their interests met by the Greensboro City Council than residents elsewhere in the city. As a result, residents who live outside the three overpopulated districts will have greater influence over policy discussions on issues that I have been involved in and impacted by, including economic development, community policing, and access to quality education. That is unfair, undemocratic, and goes against the voter participation work I have been committed to doing since the 1960s.

5. It is very important that residents of District 1 have an equal voice in electing a representative committed to ensuring that the interests of all District 1 residents

are met. That residents of my district, particularly members of the African-American community, would have our votes devalued under Session Law 2015-138 is very alarming, would harm the quality of my political representation, and would harm my quality of life.

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

Executed this 13th day of July, 2015.

Lewis A. Brandon III