

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

BEAUMONT BRANCH OF THE NAACP and  
JESSICA DAYE,

Plaintiffs,

v.

JEFFERSON COUNTY, TEXAS, JEFFERSON  
COUNTY COMMISSIONERS COURT, LAURIE  
LEISTER, in her official capacity as the JEFFERSON  
COUNTY CLERK, and MARY BETH BOWLING, in  
her official capacity as the PRESIDING JUDGE OF  
THE JOHN PAUL DAVIS COMMUNITY CENTER,

Defendants.

Civil Action No. 22 Civ. 488

**DECLARATION OF AIRON REYNOLDS, JR. IN SUPPORT OF PLAINTIFF'S  
EMERGENCY MOTION FOR A TEMPORARY RESTRAINING ORDER**

I, Airon Reynolds, Jr., upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746. I declare under penalty of perjury that the below is true and correct:

***My Background in Beaumont***

1. I have lived in Jefferson County all my life. I have lived in the North End of Beaumont for the past 15 years. Before that, I lived in Port Arthur for more than 48 years. I am 63 years old. I am a citizen and eligible to vote in Texas.

2. I am registered to vote in Jefferson County. I have been registered to vote since I was 18 years old.

3. I am also a member of the Beaumont NAACP. I have been a member of the NAACP for at least 35 years and a member of the Beaumont NAACP for the past 25 years.

4. I identify as a Black man.

5. I try to vote in every single election. I have voted at the John Paul Davis Community Center (the “Community Center”) located at 3580 E. Lucas Drive, Beaumont, Texas 77701, at least twenty times.

6. I usually vote at the Community Center because it is close to my church, the Borden Chapel Missionary Baptist Church, where I have served as a pastor since 1997. My church is located at 3495 Roland Road Beaumont, TX 77706, just 1.5 miles and a four-minute drive from the Community Center.

7. My church welcomes all. Most of my congregants are African American. I am very well known in my community and throughout Beaumont. When people are in trouble, they come to me. When other pastors have questions, they ask me. This includes issues that arise concerning voting.

8. I have congregants call me and tell me about their voting experiences, so that I may provide assistance. My community looks to me to take action and to help them when a need arises.

9. I have never before gotten so many complaints about how uncomfortable and difficult it has been for my congregants to vote at the Community Center. In the past, this polling place has been welcoming. The poll workers felt like family, regardless of which party they serve. Everyone has worked together to make sure that voters have a good experience and can cast their ballots. I know many of the poll workers who serve at these locations, and I know many voters who vote at these locations as they are my congregants.

10. The Community Center is a central meeting place for the Black community in Beaumont. The North End of Beaumont consists of about 5,000 residents, ninety percent of whom are Black. Many of my congregants and community members vote at the Community Center. Our

congregation also holds “Pews to the Polls” events every Sunday that run from the Borden Chapel to the Community Center during early voting.

***Thursday, October 27***

11. On the evening of October 27, I received a text from Katherine Campbell, a poll worker who serves at the Community Center, informing me that during her poll worker shifts at the Community Center she had observed a White poll worker, Mary Beth Bowling, engaging in intimidating practices against Black voters. Ms. Campbell’s text said that Ms. Bowling was requiring Black voters to recite, out loud and publicly, various pieces of information for her when they were being checked in to vote. Ms. Campbell said that when Ms. Bowling would ask these questions in a very public manner, she used an aggressive tone.

12. After hearing this account, I immediately sent a text message to County Judge Jeff Branick to alert him to the issue. Judge Branick told me that he did not have supervisory authority over the poll workers, so he could not assist with this issue. But my understanding is that Judge Branick has supervisory authority over the County Clerk, who supervises the poll workers in Jefferson County.

***Friday, October 28***

13. The next day, October 28, I went to the Community Center to meet with Ms. Bowling and tell her to stop doing what she was doing because I knew it would be intimidating to my fellow community members who vote there. I wanted to make sure that my community could go to this polling place and feel comfortable voting there on that day and for the rest of the early voting period and on Election Day.

14. I arrived before 8 a.m. when the polls opened because I did not want to disturb the voting process. I did not enter the polling place, but instead stood at the door and asked the poll

worker there to get Ms. Bowling to come to the door to speak with me. Ms. Bowling asked me to come inside the Community Center and directed me towards the kitchen area. I followed her inside.

15. In the kitchen area of the Community Center, I explained my concerns to Ms. Bowling. I said that I had heard she was asking Black voters to recite their addresses out loud and publicly instead of simply asking for them to confirm whether the address on her official list matched the address on their voter identifications. She acknowledged that she was asking voters to recite their addresses out loud. She said asking voters to recite their addresses in the polling place was within her rights. I told her that her method of asking voters for this information – by drilling them and demeaning them – was intimidating and violated their privacy. I asked Ms. Bowling to adjust her behavior when speaking with voters. She refused to do so. I then exited the polling place and returned to my car.

16. Once in my car, I called Laurie Leister, the County Clerk for Jefferson County. She informed me that she was on her way to the polling place at that time. When Ms. Leister arrived, she invited me to come sit in her car and speak with her. I got into her vehicle and left the door open. I told her what happened. I asked Ms. Leister to remove Ms. Bowling from the Community Center. She told me that she had known Ms. Bowling for many years. I then got out of the car and waited outside.

17. I then saw Ms. Leister go inside the polling place and bring Ms. Bowling outside. They did not ask me to come over. I saw them go over to the side of the Community Center. They talked for about thirty to forty-five minutes. I saw them smiling, laughing, and chatting. They did not seem to be talking about anything serious. During this time, they did not even look at me or acknowledge my presence, even though I was standing outside the polling place waiting to hear

what happened. I was worried that Ms. Leister would not address the issue, so I waited until they were finished to find out what had happened.

18. When Ms. Leister walked back over to talk to me after she had finished her conversation with Ms. Bowling, she told me she would not be removing Ms. Bowling. We continued to discuss the issue for approximately fifteen minutes. I understood Ms. Leister would not direct Ms. Bowling to stop intimidating and harassing voters and other Black poll workers like Katherine Campbell.

19. I then continued to stay around the polling place to see what would happen. I saw Ms. Leister go into the polling place and bring Ms. Campbell outside. They spoke for about twenty minutes outside the Community Center. I waited for their conversation to finish so I could make sure that Ms. Campbell felt comfortable and safe resuming her duties in the polling place.

20. I re-entered the Community Center once more before leaving for an appointment at my office scheduled for 11 a.m. I had seen two people I knew, both Black voters, heading into the polling place. I wanted to make sure they were able to vote without feeling intimidated.

21. When I exited the Community Center a minute later, Ms. Leister walked out alongside me. As we were exiting, a White poll watcher at the site aggressively told me that I could not have my phone near the polling place. I gestured to Ms. Leister about the aggressive behavior and asked her to intervene. Ms. Leister said nothing. I then saw the same poll watcher standing about forty feet away from me and taking a photo of me. A campaign worker who was sitting a little further away but nearby enough to see what was happening, also pointed out to me, and said that she was taking a photo of me. I asked the poll watcher why she was taking a photo. She did not respond. By the time I left the Community Center, I had already been there for about three hours.

22. These interactions worried me very much. And I felt that I needed to go back to the Community Center just to keep watch.

23. I returned to the Community Center two other times that day to check in with community members who were there to vote, to campaign, or to work the polls. I spoke with an election judge who informed me that Ms. Bowling had been questioning and scrutinizing voters all week.

***Monday, October 31***

24. On Monday, I drove to the John Paul Davis Community Center mid-morning to vote my own ballot. I decided to vote at the Community Center because it is in the heart of my community and close to my church. I wanted to show the poll workers and the poll watchers that were causing problems that I would not be intimidated. The north end of Beaumont is my community – if something is happening in my community, I want to be there.

25. When I walked into the Community Center, there were two white poll workers standing and looking at me suspiciously. They watched every step I took. When I went to the voting booth, they came closer, walking toward me. They both stood about five feet behind me and watched me like I was getting ready to steal something. After I voted, they stared at me as I put my ballot into the scanning machine and as I walked outside. I saw them do the same to a handful of other Black voters who were in the polling place at the same time as me.

26. After I voted, I stood around the polling place and watched folks trickle in to vote for about 30 minutes. I encouraged Black voters to not feel uncomfortable and tried to serve as support for them outside the polls. I returned to the John Paul Davis Community Center two more times that day to provide support and encouragement to Black voters.

***Tuesday, November 1***

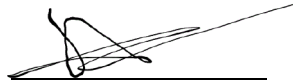
27. On Tuesday, I decided to go to the Commissioner's Court to present these issues to them and urge them to act. In my presentation before the Court, I told them I experienced intimidation at the Community Center and that many ~~people~~ within my community had experienced the same. I specifically outlined the behavior that was most concerning to me, especially the pattern of White poll workers requiring Black voters to recite their addresses out loud in the middle of a busy polling place and White poll workers hovering over Black voters while voting.

28. In the middle of my presentation, County Judge Jeff Branick interrupted me, smirking, and said he "had no jurisdiction over the county clerks."

29. In preparing to talk with the Commissioner's Court, several Black voters requested that I not use names in my description of these issues because they did not want anybody to hurt them; I complied with that request.

Executed on November 6, 2022 in the City of Beaumont, Jefferson County, Texas

BY:

  
Airon Reynolds Jr.