

**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 KATHERINE CAMPBELL IN SUPPORT OF PLAINTIFF'S  
EMERGENCY MOTION FOR A TEMPORARY RESTRAINING ORDER**

I, KATHERINE CAMPBELL, 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:

1. I am 58 years old. I have lived in Beaumont in Jefferson County my whole life. I am a citizen and eligible to vote in Texas. I identify as a Black woman.
2. I am registered to vote in Jefferson County. I have been registered to vote since I was 18 years old.
3. Voting is important to me, and I try to vote in every election.
4. I served as a poll worker in Jefferson County since 2003 at multiple locations.

5. I have most frequently served as a poll worker at the John Paul Davis Community Center, located at 3580 E. Lucas Drive, Beaumont, Texas 77701 (“Community Center”).

6. During the early voting period in Jefferson County, which ran from October 24 to November 4, for the 2022 November 8 general election, I served as a poll worker at the Community Center during every day of early voting. During the first week of early voting, I worked the morning shift from approximately 7:30AM to 12:30PM. On Friday, October 28, I also worked the afternoon shift until approximately 5:20PM. During the second week of early voting, I worked the morning shift from approximately 6:30AM to 1:00PM.

7. I will be serving as the alternate presiding judge appointed by the Democratic Party at Sterling Pruitt Center located at 2930 Gulf St., Beaumont, Texas 77703 on Election Day.

8. The Community Center is located in a predominantly Black neighborhood in the North End of Beaumont. In past elections we have endeavored to create a welcoming and encouraging environment for our voters and fellow community members

9. Based on my past experience serving as a poll worker at the Community Center, voting there myself, and being a resident of the North End neighborhood, I estimate that more than ninety percent of the voters who vote at this location are Black.

10. During the early voting period, I personally witnessed my fellow election workers questioning Black voters aggressively on where they lived, making them recite their addresses out loud so everyone in the room could hear; and hovering very closely over Black voters while they voted. In my observation, my fellow election workers did not behave this way toward White voters who voted at the Community Center during early voting.

11. I have been a poll worker since 2003 and have never witnessed this type of intimidating and hostile behavior before at a polling place in which I was serving. I have never

seen it. It has been conducted by three individuals, a poll worker and two poll watchers. The poll worker's name is Mary Beth Bowling. Ms. Bowling is White. My understanding is that she has never served as a judge before.

12. During the first week of early voting, two of the White poll watchers were at the polling place during my shifts at the Community Center approximately three times. My recollection is that they were at the Community Center on Monday, Tuesday, and Thursday during my shifts during the first week of early voting. I do not know if they served during other shifts when I was not present at the Community Center.

13. From the first day of early voting, whenever Ms. Bowling and other White election workers checked in Black voters, they demanded that they confirm their address out loud. The area where voters check in to vote has many people sitting and standing close by to overhear this information. The voting machines are also only about three to four feet away from the check-in table. In one incident, after Ms. Bowling demanded that a voter who was voting for the first time in Beaumont state his address again after it had already been verified, the voter told me that this had never happened to him before and said he found Ms. Bowling's actions "creepy." He said this after Ms. Bowling had walked away. The voter was a Black man.

14. I also witnessed the White election workers intently watching every Black voter from the moment the voter entered the main room where voting is conducted. Many Black voters who were treated this way were visibly uncomfortable, and many asked me if they were doing something wrong, and ask me why they were being watched so suspiciously. Other Black voters tried to get through the voting process as quickly as they could. This type of behavior took place during every day of early voting. But Ms. Bowling and other White poll workers did not behave this way toward White voters.

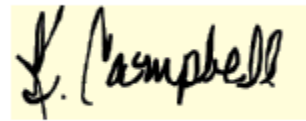
15. Last week, one voter came into the Community Center to vote with her son, who needed assistance. I saw her complete the appropriate voter assistance paperwork with another Black poll worker. I then observed that the voter went with her son to assist him at the voting machine, and she was standing far away from him and occasionally walking over to help him fill out his ballot. I observed that she looked afraid to help her son. I walked over to her and told the voter that she had the right to help her son and could stand with him as he completed his ballot. The voter thanked me. She commented that “all those white people standing there” and watching her intently made her feel like she was doing “something wrong.”

16. Sometimes when taking a short break during my shift, I walked outside of the Community Center. One time when I was walking outside, I overheard some Black voters talking about the polling place. They expressed that they felt like they were being stalked. I heard one voter say words to the effect of “What do they want to do, come to my house?” I understood their comments to relate to Ms. Bowling and other White poll workers inspecting their identifications and addresses.

17. On or around Tuesday, October 25, I sent a text message to Commissioner Michael Senegal that expressed my concerns with Ms. Bowling’s behavior. I texted Pastor Airon Reynolds on or around Thursday, October 27 as well to inform him of my concerns.

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

BY:

A handwritten signature in black ink on a yellow rectangular background. The signature appears to read "K. Campbell".

Katherine Campbell