

**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 MICHAEL COOPER ON BEHALF OF PLAINTIFF BEAUMONT
NAACP IN SUPPORT OF PLAINTIFF'S EMERGENCY MOTION FOR A
TEMPORARY RESTRAINING ORDER**

I, MICHAEL COOPER, 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 serve as president of the Beaumont Chapter of the NAACP ("Beaumont NAACP"). The Beaumont NAACP is a local branch of the Texas State Conference of the NAACP, which is an arm of the National NAACP.

2. Our Beaumont Branch has 600 registered members, including a youth group and a college group. The Beaumont NAACP's membership is more than ninety percent Black.

3. Many of Beaumont NAACP's members vote at the Community Center because it is close to where they live.

4. The Beaumont NAACP has many members who plan to vote at the Community

Center on November 8. The Community Center is one of the polling sites we strongly urge voters to go to since it is located in our community. Our members have always felt safe and comfortable going to the Community Center to vote.

5. The Beaumont NAACP is concerned that the intimidating conduct of the Presiding Judge and other white election workers assisting the Presiding Judge at the Community Center will dissuade its predominantly Black membership from being able to vote on Election Day.

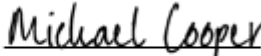
6. Many in the membership work and will be taking off work to vote. Those who go to vote at the Community Center may not cast their ballot at all or may experience unwanted intimidating conduct when the vote.

7. In addition, many Beaumont NAACP members who may feel intimidated and unsafe voting at the Community Center may need to travel after to a less convenient location to cast their ballots.

8. The Beaumont NAACP does everything it can to make sure its members get out to vote. The Beaumont NAACP wants to ensure that its members are not harmed this election.

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

BY:


Michael Cooper