

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

ROBERT FOSTER; KATIE LIGON; KIRBY
CARTER; JOHN T. WILLIAMS,

Plaintiffs,

vs.

THE STATE OF MISSISSIPPI; THE STATE
BOARD OF ELECTION COMMISSIONERS;
TATE REEVES, in his official capacities as
Governor of the State of Mississippi and a
Member of the State Board of Election
Commissioners; LYNN FITCH, in her official
capacities as the Mississippi Attorney General
and a Member of the State Board of Election
Commissioners; and MICHAEL WATSON, in
his official capacities as the Mississippi Secretary
of State and a Member of the State Board of
Election Commissioners,

Defendants.

**CIVIL ACTION NO.
3:26-CV-00181-MPM-JMV**

DECLARATION OF ROBERT TIPTON, JR.

I, Robert Tipton, Jr., declare as follows:

1. I am a U.S. citizen, over the age of 18, and am competent to testify. I have personal knowledge of the facts and information set forth in this declaration.
2. I have resided in DeSoto County, Mississippi since 2013; I also previously resided in DeSoto County from 1963 to 1979. I am registered to vote in DeSoto County. My racial identity is Black or African American.

3. I currently serve as President of the DeSoto County unit of the National Association for the Advancement of Colored People (“NAACP”), specifically DeSoto MS Branch Unit 5574-B (“DeSoto Branch”).

4. At the national level, the NAACP’s organizational objectives include working to ensure the political, educational, social, and economic equality of all citizens; to achieve equality of rights and eliminate race prejudice among the citizens of the United States; to remove all barriers of racial discrimination through democratic processes; to seek enactment and enforcement of federal, state, and local laws securing civil rights; to inform the public of the adverse effects of racial discrimination and to seek its elimination; and to educate persons as to their constitutional rights to take all lawful action to secure the exercise thereof; and to take any other lawful action in furtherance of these objectives, consistent with the NAACP’s Articles of Incorporation and its Constitution.

5. The purpose of units within the NAACP, including the DeSoto Branch, is to support the national NAACP’s policies and objectives. Branches of the NAACP work to, among other objectives, eliminate racial prejudice; to keep the public aware of the adverse effects of discrimination; to take lawful action to secure the elimination of racial discrimination; and to improve the political, educational, social, and economic status of African Americans and other racial and ethnic minorities.

6. The DeSoto Branch is responsible for the NAACP’s activities in all of DeSoto County, Mississippi.

7. The DeSoto Branch has members who reside throughout the county, including Horn Lake and Southaven. The DeSoto Branch encourages its members to participate in

elections and to encourage others to vote. Members of the DeSoto Branch also assist interested individuals with voter registration in DeSoto County.

8. As of the date of this declaration, the DeSoto Branch has 142 members; the number fluctuates daily as members join or as memberships expire.

9. I have reviewed a map of the subdistrict in DeSoto County that was created by the Mississippi Legislature to elect a circuit court judge and a chancery court judge. I understand that subdistrict includes several precincts in the Horn Lake and Southaven area in DeSoto County.

10. I am personally aware of three members of the DeSoto County NAACP who reside within the subdistrict; there may be additional members of the DeSoto County NAACP who reside in the subdistrict but whose residential address I do not have direct knowledge of without a full review of membership records.

11. I understand that Plaintiffs seek to prevent the subdistrict from being used to elect judges to the circuit and chancery court in DeSoto County. I am concerned that doing so will deny the residents of the subdistrict, including members of the DeSoto Branch, a fair opportunity to elect candidates of their choice.

I declare under penalty of perjury that the foregoing is true and correct.

Executed July 16, 2026, in Chicago, Illinois.


Robert Tipton, Jr. (Jul 16, 2026 10:37:08 CDT)

Robert Tipton, Jr.

2026.07.15 Tipton NAACP Declaration - For Signature

Final Audit Report

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