



LOUDOUN COUNTY NAACP BRANCH
P. O. Box 2439 • Leesburg, VA 20177

Rev. Michelle C. Thomas
Branch President

March 17, 2022

Re: Motion to Join or intervene in CIVIL 3:21-cv-420 (DJN) PAUL GOLDMAN, Pro se Plaintiff, v. RALPH NORTHAM, et ai, Defendants.

To whom it may concern:

The NAACP Loudoun Branch, do hereby request to immediately join or intervene in the CIVIL 3:21-cv-420 (DJN) PAUL GOLDMAN, Pro se Plaintiff, v. RALPH NORTHAM, et ai, Defendants case, as an affected party. The 2021 Virginia House of Delegates elections suppressed the votes, diluted the voices and diminished the representation of our 637 branch members due to the use of outdated maps in the 2021 House of Delegates election. Loudoun County has a population of 437,586 with 35% of all residents being people of color. African American residents make up 7% of the population in Loudoun and live in 2 of the most overpopulated senate districts, and 4 of the top 10 most populated house districts in Virginia. The most populated district (house district 87) is comprised predominantly of people of color. Loudoun's African American residents and people of color living in disproportionate districts continue to face election discrimination, voter disenfranchisement, while being denied their constitutional rights to fair elections, and adequate legislative representation, based on the current population distribution.

For the re-enfranchisement of African American voters, and the equal protection representation of all Virginians, the NAACP Loudoun Branch urge the court to order a Virginia House of Delegates election in 2022, under the newly re-district maps. African American and people of color residents in Loudoun County seek the protection of our constitutional right to elect the candidate of our choice, proportionate to our district population. The NAACP Loudoun Branch respectfully ask that the court grant the request to intervene on behalf of its 637 members, and in consideration of the 29,906 African American residents, whose voting rights and ability to obtain fair representation were denied in the 2021 House of Delegates election.

Sincerely,

Rev. Michelle C. Thomas
NAACP Loudoun Branch, President