

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

TATI ABU KING and TONI HEATH JOHNSON,

Plaintiffs,

v.

JOHN O'BANNON, *in his official capacity as Chairman of the State Board of Elections for the Commonwealth of Virginia*; ROSALYN R. DANCE, *in her official capacity as Vice Chair of the State Board of Elections for the Commonwealth of Virginia*; GEORGIA ALVIS-LONG, *in her official capacity as Secretary of the State Board of Elections for the Commonwealth of Virginia*; DONALD W. MERRICKS, *in his official capacity as a member of the State Board of Elections for the Commonwealth of Virginia*; MATTHEW WEINSTEIN, *in his official capacity as a member of the State Board of Elections for the Commonwealth of Virginia*; SUSAN BEALS, *in her official capacity as Commissioner of the Department of Elections for the Commonwealth of Virginia*; ERIC SPICER, *in his official capacity as the General Registrar of Fairfax County, Virginia*; and SANDY C. ELSWICK, *in her official capacity as the General Registrar of Smyth County, Virginia*,

Defendants.

Case No. 3:23-cv-00408 (JAG)

**SECOND DECLARATION OF BRITTANY BLUEITT AMADI IN SUPPORT OF  
PLAINTIFFS' BRIEF IN OPPOSITION TO DEFENDANTS'  
MOTION FOR SUMMARY JUDGMENT**

I, Brittany Blueitt Amadi, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner at Wilmer Cutler Pickering Hale and Dorr LLP. I represent Plaintiffs Tati Abu King and Toni Johnson in the above-captioned action. I am familiar with the facts set forth in this declaration. I am competent and willing to testify to the matters contained in this declaration.

2. I submit this declaration in support of Plaintiffs' Brief in Opposition to Defendants' Motion for Summary Judgment.

3. Attached as Exhibit Q is a true and correct copy of excerpts of Joseph Story's *Commentaries On The Constitution* (1st ed. 1833).

4. Attached as Exhibit R is a true and correct copy of excerpts of Joel Prentiss Bishop's *Commentaries on the Criminal Law* (Little, Brown, and Co., 4th ed. 1868).

5. Attached as Exhibit S is a true and correct copy of excerpts of Alexander Burrill's *A New Law Dictionary And Glossary* (1850).

6. Attached as Exhibit T is a true and correct copy of excerpts of Francis Wharton's *A Treatise On The Criminal Law Of The United States* (Kay & Brother, 6th ed. 1868).

7. Attached as Exhibit U is a true and correct copy of Title 54 of the 1860 Code of Virginia.

8. Attached as Exhibit V is a true and correct copy of excerpts of Charles E. Wynes' *Race Relations in Virginia 1870-1902* (Rowman & Littlefield 1st ed. 1971).

9. Attached as Exhibit W is a true and correct copy of excerpts of Tera W. Hunter's *Bound in Wedlock: Slave and Free Black Marriage in the Nineteenth Century* (Harvard University 2017).

10. Attached as Exhibit X is a true and correct copy of excerpts of Will Tress' *Unintended Collateral Consequences: Defining Felony in the Early American Republic*, 57 Clev. St. L. Rev. 461 (2009).

11. Attached as Exhibit Y is a true and correct copy of the Virginia Readmission Act, available at <https://www.govinfo.gov/content/pkg/STATUTE-16/pdf/STATUTE-16-Pg62-3.pdf>.

12. Attached as Exhibit Z is a true and correct copy of the first Military Reconstruction Act, available at <https://www.govinfo.gov/content/pkg/STATUTE-14/pdf/STATUTE-14-Pg428-2.pdf>.

13. Attached as Exhibit AA is a true and correct copy of the Virginia Constitution of 1869.

14. Attached as Exhibit AB is a true and correct copy of Article II, Section 23 of the Virginia Constitution of 1902.

15. Attached as Exhibit AC is a true and correct copy of Article II, Section 23 of the Virginia Constitution of 1928.

16. Attached as Exhibit AD is a true and correct copy of Article II, Section 1 of the Virginia Constitution of 1971.

I declare under penalty of perjury that the following is true and correct to the best of my knowledge and belief.

Dated: August 8, 2025

/s/ Brittany Blueitt Amadi  
Brittany Blueitt Amadi (VSB No. 80078)

*Counsel for Plaintiff*