

IN THE CIRCUIT COURT, FOURTH
JUDICIAL CIRCUIT, IN AND FOR
DUVAL COUNTY, FLORIDA

CASE NO.: 16-1974-CF-004139-A
DIVISION: CR-E

STATE OF FLORIDA

vs.

JACOB JOHN DOUGAN, JR.
_____ /

Declaration of Dr. Kimberly Allen

Pursuant to Fl. Stat. Ann § 92.525 and 28 U.S.C. § 1746

1. My name is Dr. Kimberly A. Allen.
2. I am currently the Chief Executive Officer of 904WARD and have been in that role with the organization since 2021.
3. While I was born in Virginia Beach, VA, my family moved to Jacksonville, Florida when I was two. I have lived in this community ever since with the only exception being my higher education. Both of my parents were from Jacksonville, and I feel that I have a deep connection to this community.
4. While attending Florida State University, I earned a Bachelor of Science degree in Psychology and Family and Child Sciences in 2009; and a Master of Science in Family and Child Sciences in 2011. I began studies for a Ph.D. at the University of Georgia but transferred to Florida State University and earned a Ph. D in Human Sciences and Family Relations in 2015.
5. While at Florida State University from 2009 to 2011, I was a graduate teaching assistant and instructor of record for Stress and Resilience in Individuals and Families.
6. From 2013 to 2014, I was a graduate research assistant and focused mainly on research for publication. From 2014 to 2015, I was a graduate teaching assistant and was the instructor of record for Stress and Resilience in Individuals and Families and was the assistant teacher in three courses: Child Development, Pre-Professional Development, and Practicum in Family and Consumer Sciences. I also assisted with the management of data collection for a study funded by the National Institute on Drug Abuse.
7. I am a member of several professional organizations, including, but not limited to, Leadership Jacksonville, Nonprofit Center of Northeast Florida (Board of Directors), National Association of the Advancement of Colored People (NAACP), and Jacksonville Urban League of Young Professionals. I am deeply involved in the community.
8. I have co-authored eleven (11) publications and have given well over twenty (20) presentations, including *Visioning an approach to improve Black male literacy rates in Jacksonville, Florida*, presented at Niagra University in 2018.

9. From 2015 to 2017, I was a research analyst with the Jacksonville Public Education Fund. I managed the evaluation of mental health placement of therapists in Duval County public schools. I also collaborated with city agencies on student programs. I was then promoted to the Director of Data and Research, from 2017 to 2019.
10. I began volunteering at 904WARD in 2016 and became a board member in. I became Chief Executive Officer in 2021 and am such today.
11. Attorneys have asked me to provide information on 904WARD's efforts to create an inclusive community in Jacksonville and the impact of historic and current events on the Black community in Jacksonville.
12. 904WARD is a non-partisan, non-profit organization. The mission is to create racial healing and equity through deep conversations and learning; building trusting relationships; and collective action. 904WARD promotes three steps that are necessary to end racism in Jacksonville so all people can thrive: (1) acknowledge history; (2) be willing to have conversations about the past and present; and (3) address persistent systemic inequities through advocacy at the local and state level.
13. Understanding our history helps explain the transformation of overt racism to covert racism; sheds a light on how systemic and structural racism unfolded over time; and lays bare the patterns of racial injustice and inequities that persist today. 904WARD hopes to educate the community and advocate for change.
 - a. In 2018, 904WARD partnered on an examination of lynching data in Duval County with the Equal Justice Initiative (EJI), a civil rights organization in Alabama that has tracked lynchings across the United States and created memorials to lynching victims, both in Alabama and at the sites of lynchings. EJI had identified eight (8) victims of lynching in Duval County and gave us a folder of information for each person. We then created the Jacksonville Community Remembrance Project Committee that was responsible for going through the process to memorialize each victim. We had a separate subcommittee responsible for gathering data, pictures, oral histories, newspaper clippings and other research. In doing that research, we identified nineteen (19) more victims that may fit the EJI definition of lynching for consideration. We also found upwards of 50 more instances of racial terror.
 - b. Through these joint efforts, we placed a historical marker at the Evergreen Cemetery that memorializes Bowman Cook and John Morine, two Black WWI veterans who were lynched during the summer of 1919. Currently, there is only one historical marker installed, but 904WARD is in the process of putting another historical marker up for Benjamin Hart and, eventually, all of the lynching victims.
 - c. 904WARD has organized trips to the EJI's National Memorial for Peace and Justice and Legacy Museum in Montgomery, Alabama. Each trip includes 25-30 Duval and surrounding county citizens (offered on a first come first serve basis). We organized two in 2019, one in 2021, five in 2022, with plans for four in 2023.
14. When we have conversations about race, we confront uncomfortable issues. Many people do not want to have conversations about race because it can be traumatic or people are fearful of being misunderstood, but that can lead to a dangerous willful ignorance.

However, conversations are important because, as Ade Olonoh stated, “awareness and understanding needs to precede change.” In other words, you cannot advocate for change, heal yourself, modify offensive behavior, or empathize with others without understanding the underlying problem. 904WARD initiates conversations to educate, reconcile, and ultimately advocate.

- a. After Breonna Taylor and Ahmaud Arbery were killed, 904WARD organized virtual forums that were safe spaces for people to talk about race. We believe it takes people getting outside of their comfort zone to make progress. We had a city council member, a school board member and other community leaders involved.
 - b. In 2022, there were more than 200 community discussions representing 200 years for Jacksonville’s Bicentennial. During these community discussions, we engaged with over 10,000 people.
 - c. We are hired by organizations to help them navigate how to have tough conversations about race in the workplace. In these spaces, we provide educational opportunities for people to become more informed about how to engage in racial justice work and provide tools and training to them navigate conversations about race in a healthy way. In our two-part Intro to Racial Discussions course, we start by norming on definitions, understanding how to take accountability, and give practical steps and practice for how to navigate the conversations.
15. Discussions about race are one part of an iterative process. Once an open and honest discussion takes place and people become informed, it is time to move for political, economic and social change. 904WARD aims to provide policy makers with information to influence legislation that actually hears the voices of the diverse communities. 904WARD seeks to build a more inclusive Jacksonville.
- a. 904WARD is involved in local policy decisions that may affect the community. For example, the Individual Freedom Bill was a policy that was going to, among other things, change how diversity, equity, and inclusion lessons, activities and trainings were presented in schools and workspaces. 904WARD organized letter writing campaigns and outreach to current elected officials and sent information to the public so they could get involved.
 - b. 904WARD advocated for a bill to make sure the prosecutors were not the only ones that have a final say in children being prosecuted as adults. This fits into 904WARD’s mission with respect to ending racism because there is a historic link between slavery and mass incarceration of Black people. Black children are not immune from discrimination. We have a system where Black children, in particular, are treated as if they were older than they actually are. We advocated for the bill to add a layer of protection for our children who end up in the justice system.
 - c. Jacksonville was the home of Nathan Bedford Forrest High School until 2014 when activists were finally successful in removing the name of one of the founding members of the KKK from our public-school facilities. In 2021, 904WARD was involved with changing the names of six (6) more schools. Although nine (9) were identified, three (3) remained the same despite our efforts.

16. Injustices have happened in the United States, and Florida, throughout history. This is not just a current issue. It is not even just a decades old issue. This is an issue that extends back hundreds of years.
17. Historic racism has lingering effects in the Black community. Lynchings and racial terror were a part of a system of disruption that was intended to terrorize Black people, their families, and their communities. To understand the humanity in these stories is to memorialize the individual and look at the impact these many deaths had on individuals living in that space. For example, Black children experienced trauma when a lynching occurred where White children may not have even known it happened. There is a generational traumatic effect. I have experience speaking directly to Black individuals about trauma handed down through generations.
18. Racism and discrimination are not confined to our past.
 - a. Distrust in the legal system has deep roots. Historically, Black members of the community were convicted by all White juries. At first this was by design. Although I understand that courts are not permitted to discriminate based on a person's race, there does not appear to be much measurable improvement in fair representation of the Black community in the resulting juries. The mechanisms in place to ensure Black defendants get a jury representative of their community seem to be broken.
 - b. The War on Drugs affected communities of color by manifestly unjust means, including the discriminatory enforcement of drug laws and higher arrest and incarceration rates for communities of color. Many people believe the criminalization of people of color is a system of racial control as pernicious as Jim Crow. The effect of the War on Drugs is a profound distrust of the police.
 - c. Black members of the community feel targeted by law enforcement. The very establishment that is purported to keep the community safe creates fear. What follows are the names of only a few men, women, and children that have died at the hands of law enforcement. Notably, all are people of color.
 - i. 1925 Willie Washington
 - ii. 2014 Tamir Rice
 - iii. 2016 Philando Castile
 - iv. 2020 Breonna Taylor
 - v. 2020 George Floyd
 - vi. 2020 Devon Gregory
 - vii. 2023 Tyre Nichols
 - d. For the Black community there are unwritten rules to follow to be out of harm's way—even then, their safety is not a guarantee. Black parents must teach kids how to engage with White people, so they do not end up having law enforcement called on them. Black parents also teach their kids how to engage with law enforcement. It is a process of putting up walls around your children. Black parents don't have the luxury to *not* talk about these things.
 - e. As recently as 2022, a group called Save Southern Heritage flew a confederate flag over the city of Jacksonville. Whatever may be claimed about that flag merely having represented a group of states during the Civil War, it has since

served as a symbol of White supremacy and slavery. A symbol derives meaning from its uses and perceptions of those uses. For the Black community, it is a symbol of oppression. To have that flag flying overhead endorses the fact that racism still exists. Discrimination still exists. Hatred against non-White communities still exists. And that racism, discrimination and hate manifests itself to this day.

19. It is not lost on me that I wake up every day in a town named after Andrew Jackson, who owned hundreds of enslaved people; he worked actively to censor anti-slavery mailings from northern abolitionists; and had a policy of ethnic cleansing, removing Indigenous American tribes from their historical territories. And it is the right time to look at history, discuss the effects on our community and enact changes for a better community.
20. While there have been positive changes in history, discrimination still exists. Racism still exists. Racial terror still exists. We are talking about a system that enables perpetual discrimination unless we acknowledge it, discuss it and change it.
21. Our work remains incomplete. The distrust of the police, the criminal justice system and other public institutions remain in our community. Just as that distrust and vigilance requires us to have “the talk” with our Black children, it keeps us on guard whenever these institutions are purporting to act in the community’s interest, including when the State asks Black potential jurors to consider certain types of punishments with historical ties to lynching, such as the death penalty. Until we are willing to acknowledge racism and terror, past and present, and reaching a state of reconciliation and healing, this distrust will remain.

Under penalties of perjury, I declare that the facts stated in the foregoing document are true.



Dr. Kimberly Allen

2/23/2023

Date