

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA**

PRESS ROBINSON, EDGAR CAGE,
DOROTHY NAIRNE, EDWIN RENÉ SOULÉ,
ALICE WASHINGTON, CLEE EARNEST
LOWE, DAVANTE LEWIS, MARTHA DAVIS,
AMBROSE SIMS, NATIONAL ASSOCIATION
FOR THE ADVANCEMENT OF COLORED
PEOPLE (“NAACP”) LOUISIANA STATE
CONFERENCE, and POWER COALITION FOR
EQUITY AND JUSTICE,

Plaintiffs,

v.

KYLE ARDOIN, in his official capacity as
Secretary of State for Louisiana,

Defendant.

Case No. 3:22-cv-00211-SDD-SDJ c/w

EDWARD GALMON, SR., CIARA HART,
NORRIS HENDERSON, and TRAMELLE
HOWARD,

Plaintiffs,

v.

R. KYLE ARDOIN, in his official capacity as
Louisiana Secretary of State,

Defendant.

Case No. 3:22-cv-00214-SDD-SDJ

**JOINT NOTICE OF PROPOSED REMEDIAL PLAN AND MEMORANDUM IN
SUPPORT**

Pursuant to the Court’s order dated June 17, 2022, *see* Rec. Doc. No. 206, Plaintiffs, by and through undersigned counsel, submit the joint remedial plan attached as Exhibit A (the “Remedial Plan”).

Having found that Plaintiffs are likely to prove that Louisiana’s enacted congressional plan violates Section 2 of the Voting Rights Act of 1965, *see generally* Rec. Doc. No. 173, the Court appropriately gave the Louisiana Legislature the first opportunity to cure the violation by adopting a lawful plan, *see id.* at 152. The Legislature failed to do so. Accordingly, this Court must now remedy the Section 2 violation by ordering a redistricting plan that complies with the Voting Rights Act and the U.S. Constitution. *See Connor v. Finch*, 431 U.S. 407, 415 (1977).

The Remedial Plan that Plaintiffs now submit complies with Section 2 and adheres to the state’s districting principles and the requirements of the U.S. Constitution. It maintains the core of the illustrative Congressional District (“CD”) 5 as it appeared in Anthony Fairfax’s Illustrative Plan 2A. The adjustments made to CD 5 in the Remedial Plan have the effect of rendering the state’s other Black-opportunity district, CD 2, more compact and superior in its preservation of political-subdivision boundaries than in Mr. Fairfax’s Illustrative Plan 2A. The Remedial Plan also performs equal to or better than the state’s enacted plan, House Bill 1 (“HB 1”), in its adherence to traditional and state redistricting criteria, including those embodied in Joint Rule No. 21, by ensuring that the districts are comparably or more compact, split fewer political subdivisions—including parishes and voting districts (“VTDs”)—and better preserve communities of interest.

I. This Court must ensure that the Section 2 violation is properly remedied.

The Court’s preliminary-injunction order gave the Legislature until June 20, 2022, to enact a new map. *See* Rec. Doc. No. 173 at 2. The Legislative Intervenors waited seven days after the Court’s order, until the eve of the extraordinary legislative session, to file a motion to extend that deadline to June 30. *See* Rec Doc. No. 188. In making this request, the Legislative Intervenors did not point to *any* efforts by legislators to take the preparatory steps needed to timely adopt a remedial plan. Nor could they: the Legislature neither scheduled nor held any committee hearings before the extraordinary session commenced, and bills proposing remedial plans were only pre-

filed by Republican lawmakers *after* the Legislative Intervenors filed their extension request. *See* Rec. Doc. No. 190 at 7–8. Meanwhile, public statements by legislators indicated that they had little intention of passing a compliant map. *See* Rec. Doc. No. 192 at 2 n.1.

After hearing from the Legislative Intervenors—Speaker of the Louisiana House of Representatives Clay Schexnayder and President of the Louisiana Senate Patrick Page Cortez—the Court properly denied their motion. *See* June 16 Hr’g Tr. 81–84. The Court noted that legislators had the ability to suspend rules to allow the process to move expeditiously and that there was ample public input from the legislative record in the previous redistricting session. *Id.* The Court further found the request for additional time to be “disingenuous” and “insincere” given the limited activity that had taken place in the House; for example, the Court noted that the House met for only 90 minutes on the first day of the extraordinary session and waited almost 48 hours to refer proposed maps to committee. *Id.* The Court also took judicial notice of the fact that the redistricting process took place in only six days in 1994 and that the Legislature passed a budget in only four days in 2017. *Id.*

Ultimately, the events of the extraordinary legislative session that occurred *after* the Court’s June 16 ruling confirmed that the Legislature’s failure to pass a remedial map was a matter of will, not time. Legislators were unable to reach consensus on a map and, on the fourth day of the five-day session, adjourned early without passing a remedial plan.¹

Because the Legislature has not cured the Section 2 violation with a lawful map, it is “the unwelcome obligation” of this Court to fashion a remedy. *Wise v. Lipscomb*, 437 U.S. 535, 540 (1978) (plurality opinion) (quoting *Connor*, 431 U.S. at 415); *see also Miss. State Chapter*,

¹ *See* Greg LaRose, *Louisiana Legislature Adjourns Without Approving New Congressional Map*, La. Illuminator (June 18, 2022), <https://lailluminator.com/2022/06/18/louisiana-legislature-adjourns-without-approving-new-map-for-congress-seats>.

Operation Push, Inc. v. Mabus, 932 F.2d 400, 406 (5th Cir. 1991) (“Judicial authority to fashion a plan of reapportionment arises only after the state legislature is given an opportunity to enact a constitutionally acceptable plan and does not do so.” (citing *White v. Weiser*, 412 U.S. 783, 794 (1973))); *Ramos v. Koebig*, 638 F.2d 838, 843 (5th Cir. Unit A 1981) (“[C]ircumstances will arise when, because of the imminence of upcoming elections or some other exigency, a district court will be required to order into effect its own plan.”).

Having found a likely violation of federal law, the Court’s “first and foremost obligation is to correct the Section 2 violation.” *Veasey v. Abbott*, 830 F.3d 216, 269 (5th Cir. 2016) (en banc) (cleaned up), *cert. denied*, 137 S. Ct. 612 (2017). Indeed, “the Senate Report accompanying the 1982 amendments to § 2 of the Voting Rights Act . . . describes the district court’s remedial duty as follows”: “The court should exercise its traditional equitable powers to fashion the relief so that it completely remedies the prior dilution of minority voting strength and fully provides equal opportunity for minority citizens to participate and to elect candidates of their choice.” *Miss. State Chapter*, 932 F.2d at 406 (quoting S. Rep. No. 97-417, at 31 (1982)); *see also United States v. Brown*, 561 F.3d 420, 435–38 (5th Cir. 2009) (district court did not abuse its discretion when it issued remedial order to remedy Section 2 violation after requesting that each party submit proposed remedy and considering testimony at two evidentiary hearings).

Any remedy “should be sufficiently tailored to the circumstances giving rise to the § 2 violation.” *Brown*, 561 F.3d at 435. Because “relief in redistricting cases is fashioned in the light of well-known principles of equity,” the Court “must undertake an equitable weighing process to select a fitting remedy for the legal violations it has identified, taking account of what is necessary, what is fair, and what is workable.” *North Carolina v. Covington*, 137 S. Ct. 1624, 1625 (2017) (per curiam) (cleaned up). Courts are “held to stricter standards” than state legislatures when

crafting a remedy to a voting rights violation. *Connor*, 431 U.S. at 414. Because federal courts “lack[] the political authoritativeness that the legislature can bring to the task,” the Court should enact a remedial plan “circumspectly, and in a manner ‘free from any taint of arbitrariness or discrimination.’” *Id.* at 415 (quoting from *Roman v. Sincock*, 377 U.S. 695, 710 (1964)).

The U.S. Supreme Court has instructed that, “[w]hen faced with the necessity of drawing district lines by judicial order, a court, as a general rule, should be guided by the legislative policies underlying the existing plan, to the extent those policies do not lead to violations of the Constitution or the Voting Rights Act.” *Abrams v. Johnson*, 521 U.S. 74, 79 (1997) (holding that district court properly declined to defer to precleared plan that used race as predominant factor). A judicially crafted remedy should also comply with the constitutional one-person, one-vote requirement and honor traditional redistricting principles like respecting the boundaries of political subdivisions, maintaining communities of interest, contiguity, compactness, and non-dilution of minority voting strength. *See generally, e.g., LULAC v. Perry*, 457 F. Supp. 2d 716 (E.D. Tex. 2006) (three-judge court) (adhering to traditional redistricting principles while crafting remedy for Section 2 violation); *United States v. Charleston County*, Nos. 2:01-0155-23, 2:01-562-23, 2003 WL 23525360 (D.S.C. Aug. 14, 2003) (same).

The Remedial Plan complies with these standards because it remedies the Voting Rights Act violation this Court identified in its preliminary-injunction order and is otherwise guided by the traditional redistricting principles articulated by the Legislature in Joint Rule No. 21.

II. The Remedial Plan provides Black voters with an opportunity to elect their candidates of choice in an additional congressional district and respects traditional redistricting principles.

Under the Remedial Plan, Black voters will have the opportunity to elect their candidates of choice in two of Louisiana’s six congressional districts: CD 2 and CD 5. CD 5 is centered around Baton Rouge and the Delta Parishes; CD 2 is based in New Orleans and the River Parishes. The

Remedial Plan also adheres to the Legislature’s policy objectives codified in Joint Rule No. 21. Indeed, in many instances, the Remedial Plan’s compliance with these traditional redistricting principles is comparable to or even better than the enacted plan. *See infra* Tables 1–3.

A. The Remedial Plan adheres to the state’s redistricting principles.

By adhering to neutral redistricting criteria—in particular those enumerated by the Legislature in Joint Rule No. 21—the Remedial Plan reflects “the legislative policies underlying” HB 1. *Abrams*, 521 U.S. at 79. Indeed, overall, the Remedial Plan respects the state’s traditional boundaries (specifically parishes, census places like cities, landmarks, and communities of interest) *better* than HB 1. And the Remedial Plan splits no VTDs and splits fewer or comparable census places and landmarks. *See infra* Tables 1–3.

As described in his affidavit accompanying the Remedial Plan, Mr. Fairfax maintained the configuration of CD 5 from his Illustrative Plan 2A, which included the Delta Parishes in the north and Baton Rouge in the south. *See* Ex. A. ¶ 11; Rec. Doc. No. 173 at 109. At the preliminary-injunction hearing and in his expert report, Mr. Fairfax explained his process for drawing this and his other illustrative plans:

Fairfax testified that he started with the enacted plan as a baseline. . . . Fairfax testified that he looked at equal population, contiguity, compactness, splits, communities of interest, and cracking when drawing his maps. Consideration of Legislature’s Joint Rule 21 was paramount in his process, but his overall strategy was to balance all of the relevant districting principles without allowing any single factor to predominate.

Rec. Doc. No. 173 at 31. Having heard this testimony, the Court concluded that Mr. Fairfax’s

thirty years of experience in preparing redistricting plans make him well-qualified, in the Court’s view, and his report and supplemental reports are extremely thorough and methodologically sound. . . . The Court credits in particular Fairfax’s testimony where he discussed how race contributed to the illustrative plans that he drew. Fairfax did not deny that he used his mapping software to assess the location of [Black voting-age population] in Louisiana initially, but he was adamant and credible in his testimony that race did not predominate in his mapping process.

Rather, he testified that he only considered race to the extent necessary to test for numerosity and compactness as required by *Gingles I*.

Id. at 98–99. Mr. Fairfax “explicitly and credibly testified that [he] did not allow race to predominate over traditional districting principles as [he] developed [his] illustrative plans.” *Id.* at 116. As for “identifying communities of interests and considering them in [his] illustrative maps,” Mr. Fairfax “used census places and landmark areas to gauge how often his maps split communities of interest, as well as socioeconomic data and roadshow testimony from community members for insight into local ideas about communities of interest.” *Id.* at 101; *see also id.* at 34–36 (describing Mr. Fairfax’s use of socioeconomic data). Ultimately, the Court concluded that “the illustrative plans developed by [Mr. Fairfax] satisfy the reasonable compactness requirement of *Gingles I*,” *id.* at 106—a conclusion further supported by his affidavit accompanying this motion, which confirms that the Remedial Plan satisfies traditional redistricting principles.

Compactness. As a consequence of Louisiana’s natural geography—specifically, because the district stretches along the state’s eastern border, which follows the Mississippi River—CD 5 is less compact than other districts in both the Remedial Plan and HB 1. Ex. A. ¶ 11.² Nevertheless, the Remedial Plan’s CD 5 is comparable in its geographic compactness to HB 1’s CD 5 and *more* compact than HB 1’s CD 2. *See infra* Tables 2–3. The Remedial Plan’s CD 2 is likewise significantly more compact than HB 1’s CD 2. *See id.*

Parish Splits. “[T]here is no more fundamental unit of societal organization in the history of Louisiana than the parish.” *Hays v. Louisiana*, 839 F. Supp. 1188, 1200 (W.D. La. 1993) (three-judge court), *vacated on other grounds*, 512 U.S. 1230 (1994). While the Remedial Plan splits four

² Because the Remedial Plan’s CD 5 contains less than half the population of HB 1’s CD 5—as Defendants’ “own expert Dr. Hood testified, core retention does not trump the Voting Rights Act,” Rec. Doc. No. 173 at 105—it is appropriate to compare the Remedial Plan’s CD 5 with all of the districts in HB 1, Ex. A ¶ 16.

parishes in CD 2 and five parishes in CD 5, *see infra* Table 2, HB 1 splits nine parishes in CD 2, two parishes in CD 5, and 11 parishes in CD 6.

Preservation of Communities of Interest. The Court previously concluded that “Plaintiffs made a strong showing that their maps respect [communities of interest] and even unite communities of interest that are not drawn together in the enacted map.” Rec. Doc. No. 173 at 103. Indeed, extensive testimony on the communities of interest in the area that “stretches from Louisiana’s northern border down to Baton Rouge and Lafayette” was introduced at the preliminary-injunction hearing and credited by the Court. *Id.* at 31. The Remedial Plan, like the illustrative plans, better maintains communities of interest in both CD 5 (including the communities in and around East Baton Rouge and the Delta Parishes) and CD 2 (including New Orleans and the River Parishes). *See* Ex. C at 184:14–190:23 (testimony of Charles Cravins discussing connections between St. Landry Parish and Baton Rouge); *id.* at 216:21–219:19 (testimony of Christopher Tyson discussing connections between Baton Rouge and Delta Parishes); Ex. D at 68:3–70:3 (testimony of Dr. Dorothy Nairne discussing connections between New Orleans and River Parishes); *id.* at 202:24–203:7 (testimony of Ashley Shelton discussing the communities of Baton Rouge); *see also* Ex. C at 49:23–50:9 (testimony of Michael McClanahan discussing the distinctions between New Orleans and Baton Rouge)³.

Other Criteria. As outlined in the charts below, the Remedial Plan performs well across a range of traditional redistricting criteria.

³ The Remedial Plan also avoids grouping dissimilar communities in the same districts. *See* Ex. D at 202:1–16, 202:24–203:7 (testimony of Ashley Shelton discussing differences between North and South Baton Rouge); Ex. C. at 206:23–207:2 (testimony of Mr. Cravins discussing lack of connections between St. Landry Parish and Shreveport and New Orleans); *id.* at 220:5–13; 223:4–10 (testimony of Mr. Tyson discussing differences between New Orleans and Baton Rouge); Ex. D at 66:15–23 (testimony of Dr. Nairne discussing lack of connections between her community and her district).

Table 1: Comparison of Remedial Plan and HB 1⁴

Criteria	Remedial Plan	HB1 Plan
Population Deviation ⁵	61	65
Contiguity	Y	Y
Parish Splits	11	15
VTD Splits	0	0
COI Census Places Splits	27	32
COI Landmark Splits	58	58
Compactness (mean) Roeck, Polsby-Popper, Convex Hull	.40, .20, 70	.37, .14, and .62
Fracking (Total Pieces)	12	17

Table 2: Remedial Plan Redistricting Criteria

District	Contiguity	Pop. Dev.	Compactness (R-PP-CH)	Parish Splits	VTD Splits	COI Splits Places	COI Landmark Splits	Fracking (pieces)
1	Y	3	0.37 0.22 0.72	3	0	7	27	4
2	Y	27	0.27 0.17 0.66	4	0	11	26	4
3	Y	-34	0.48 0.21 0.75	4	0	9	30	0
4	Y	-26	0.56 0.28 0.84	2	0	6	37	0
5	Y	27	0.34 0.10 0.56	5	0	13	33	4
6	Y	18	0.36 0.21 0.74	4	0	6	11	0

Table 3: HB 1 Redistricting Criteria

District	Contiguity	Pop. Dev.	Compactness (R-PP-CH)	Parish Splits	VTD Splits	COI Splits Places	COI Landmark Splits	Fracking (pieces)
1	Y	-25	0.50 0.16 0.71	5	0	14	15	4
2	Y	24	0.18 0.06 0.38	9	0	17	31	5
3	Y	-18	0.37 0.29 0.79	2	0	5	30	0
4	Y	40	0.33 0.16 0.61	1	0	3	28	0
5	Y	-16	0.37 0.12 0.60	2	0	3	40	4
6	Y	-6	0.45 0.07 0.64	11	0	19	14	4

⁴ These tables can be found in Exhibit A.⁵ No precincts are split in the remedial plan, HB1, or the state's prior congressional plan. Keeping precincts whole—an articulated policy preference as adopted in Joint Rule No. 21—results in minor population deviations between districts.

In short, the Remedial Plan adheres to traditional redistricting principles to the same degree as or better than the enacted congressional map—particularly those criteria the Legislature adopted in Joint Rule No. 21.

B. The Remedial Plan will reliably provide Black voters with an opportunity to elect their candidates of choice in two congressional districts.

The Remedial Plan will remedy the Section 2 violation by providing Black voters with an opportunity to elect their candidates of choice in an additional congressional district. As Dr. Lisa Handley’s analysis demonstrates, Black-preferred candidates will generally be able to win elections in both CD 5 and CD 2 in the Remedial Plan. *See generally* Ex. B. Dr. Handley performed a functional analysis by looking at recompiled results from 15 past elections within the boundaries of the districts in the Remedial Plan.⁶ She found that the Black-preferred candidate in the Remedial Plan’s CD 5 is likely to win or advance to the runoff 86.7% of the time, and is likely to win in two-candidate contests 77.8% of the time. *See id.* at Table 1. In the Remedial Plan’s CD 2, Dr. Handley found that the Black-preferred candidate is likely to win 100% of the time. *See id.* at Table 1.

The Remedial Plan’s CD 5 has a Black voting-age population (“BVAP”) of 51.98%, *see* Ex. A at 20, and, as such, is a majority-Black district, consistent with the Court’s preliminary-injunction order, *see* Rec. Doc. No. 173 at 2. Although it is not the case that a district drawn to remedy a Section 2 violation must *always* be a majority-minority district, *see Bartlett v. Strickland*, 556 U.S. 1, 23 (2009) (plurality opinion), Dr. Handley has also conducted an analysis showing that, under these circumstances, it is necessary for CD 5 to be a majority-Black district for the Black-preferred candidate to have an opportunity to win. *See* Ex. B at 2–7. First, Dr. Handley

⁶ This analysis was conducted using the same methodology that Dr. Handley used for similar effectiveness evaluations in previous reports in this matter. *See, e.g.*, Rec. Doc. No. 41-3 at 2–45. The Court previously “credit[ed] the testimony and conclusions of Dr. [] Handley.” Rec. Doc. No. 173 at 121.

conducted a racial bloc voting analysis of the voting patterns in the Remedial Plan's CD 5 and found that the voting in that geographic area is consistently and starkly polarized. *See id.* App. A.⁷ Dr. Handley then conducted an additional analysis using the results of her racially polarized voting analysis to calculate the percentage of the vote that each Black-preferred candidate would receive in 13 of the 15 analyzed elections⁸ if the BVAP of the district were 55%, 50%, 45% and 40%. *See id.* at 5–6. A comparison of the vote share that the Black-preferred candidate would receive in each of these scenarios makes clear that the Black-preferred candidate would only prevail the majority of the time if the BVAP for a congressional district in this area is at least 50%. *See id.* If the Remedial Map for CD 5 had a BVAP of 45%, then the Black-preferred candidate would win only three out of the 13 analyzed contests but if its BVAP were 50%, then the Black-preferred candidate would win seven out of the 13 contests. Accordingly, while the Remedial Plan's CD 5 would be an opportunity district as required by Section 2, it would still be a competitive district.

Dr. Handley's performance analysis of the Remedial Plan's CD 5 demonstrates that a majority-Black district is needed to provide Black Louisianians with an opportunity to elect their candidates of choice and thus remedy the dilution of their electoral strength. With a BVAP of 51.98%, the Remedial Plan's CD 5 provides that opportunity.

* * *

In closing, the Remedial Plan remedies the Section 2 violation the Court identified in its preliminary-injunction order because it will provide Black voters with the opportunity to elect candidates of their choice in an additional congressional district that adheres to both traditional

⁷ This racially polarized voting analysis was also conducted using the same methodology that Dr. Handley employed earlier in this litigation. *See supra* note 5.

⁸ As Dr. Handley's report explains, while Black voters almost always vote cohesively in this area of Louisiana, in two of the 15 contests included in her analysis Black voters did not have a clear candidate of choice. *See Ex. B* at 5. She therefore did not include those two contests in her subsequent analysis. *Id.*

redistricting principles and the State of Louisiana's articulated policy preferences. Indeed, the Remedial Plan in many instances *better* adheres to these principles than HB 1. The Remedial Plan's CD 5 will perform for Black-preferred candidates, while its CD 2 is more compact than HB 1's, better preserves traditional boundaries and communities of interest, and avoids placing the two distinct Black communities in Baton Rouge and New Orleans in a single congressional district.

Having properly given the Legislature the first opportunity to cure the violation of federal law and fulfill its legislative duties, it is now the necessary obligation of this Court to employ its equitable powers to fashion a proper remedy. The Remedial Plan does just that.

Dated: June 22, 2022

Respectfully submitted,

By: /s/John Adcock

John Adcock
Adcock Law LLC
L.A. Bar No. 30372
3110 Canal Street
New Orleans, LA 70119
Tel: (504) 233-3125
Fax: (504) 308-1266
jnadcock@gmail.com

Leah Aden (admitted *pro hac vice*)
Stuart Naifeh (admitted *pro hac vice*)
Kathryn Sadasivan (admitted *pro hac vice*)
Victoria Wenger (admitted *pro hac vice*)
NAACP Legal Defense and Educational
Fund, Inc.
40 Rector Street, 5th Floor
New York, NY 10006
Tel: (212) 965-2200
laden@naacplef.org
snaifeh@naacpldf.org
ksadasivan@naacpldf.org
vwenger@naacpldf.org

R. Jared Evans (admitted *pro hac vice*)
Sara Rohani (admitted *pro hac vice*)[†]
NAACP Legal Defense and Educational
Fund, Inc.
700 14th Street N.W. Ste. 600
Washington, DC 20005
Tel: (202) 682-1300
jevans@naacpldf.org
srohani@naacpldf.org

Robert A. Atkins (admitted *pro hac vice*)
Yahonnes Cleary (admitted *pro hac vice*)
Jonathan H. Hurwitz (admitted *pro hac*
vice)
Amitav Chakraborty (admitted *pro hac*
vice)
Adam P. Savitt (admitted *pro hac vice*)
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
1285 Avenue Of The Americas, New York,
NY 10019
Tel.: (212) 373-3000
Fax: (212) 757-3990
ratkins@paulweiss.com
ycleary@paulweiss.com
jhurwitz@paulweiss.com
achakraborty@paulweiss.com
asavitt@paulweiss.com

Nora Ahmed (admitted *pro hac vice*)
Stephanie Willis
LA. Bar No. 31384
ACLU Foundation of Louisiana
1340 Poydras St, Ste. 2160
New Orleans, LA 70112
Tel: (504) 522-0628
nahmed@laaclu.org
swillis@laaclu.org

Tracie Washington
LA. Bar No. 25925
Louisiana Justice Institute
Suite 132
3157 Gentilly Blvd
New Orleans LA, 70122
Tel: (504) 872-9134
tracie.washington.esq@gmail.com

T. Alora Thomas (admitted *pro hac vice*)
Sophia Lin Lakin (admitted *pro hac vice*)
Samantha Osaki (admitted *pro hac vice*)
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004
athomas@aclu.org
slakin@aclu.org
sosaki@aclu.org

Sarah Brannon (admitted *pro hac vice*)
American Civil Liberties Union Foundation
915 15th St., NW
Washington, DC 20005
sbrannon@aclu.org

† Admitted in California only. Practice limited to matters in United States federal courts.

Counsel for the Robinson Plaintiffs

By /s/ Darrel Papillion

Darrel J. Papillion (Bar Roll No. 23243)

Renee C. Crasto (Bar Roll No. 31657)

Jennifer Wise Moroux (Bar Roll No. 31368)

WALTERS, PAPILLION,

THOMAS, CULLENS, LLC

12345 Perkins Road, Building One

Baton Rouge, Louisiana 70810

Phone: (225) 236-3636

Fax: (225) 236-3650

Email: papillion@lawbr.net

Email: crasto@lawbr.net

Email: jmoroux@lawbr.net

Abha Khanna*

Jonathan P. Hawley*

ELIAS LAW GROUP LLP

1700 Seventh Avenue, Suite 2100

Seattle, Washington 98101

Phone: (206) 656-0177

Facsimile: (206) 656-0180

Email: akhanna@elias.law

Email: jhawley@elias.law

Lalitha D. Madduri*

Olivia N. Sedwick*

Jacob D. Shelly*

ELIAS LAW GROUP LLP

10 G Street NE, Suite 600

Washington, D.C. 20002

Phone: (202) 968-4490

Facsimile: (202) 968-4498

Email: lmadduri@elias.law

Email: osedwick@elias.law

Email: jshelly@elias.law

Counsel for the Galmon Plaintiffs

*Admitted *pro hac vice*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have electronically filed a copy of the foregoing with the Clerk of Court using the CM/ECF system which provides electronic notice of filing to all counsel of record, on this 22nd Day of June, 2022.

By: /s/ John Adcock

John Adcock

Adcock Law LLC

L.A. Bar No. 30372

3110 Canal Street

New Orleans, LA 70119

Tel: (504) 233-3125

Fax: (504) 308-1266

jnadcock@gmail.com

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA**

PRESS ROBINSON, EDGAR CAGE,
DOROTHY NAIRNE, EDWIN RENÉ SOULÉ,
ALICE WASHINGTON, CLEE EARNEST
LOWE, DAVANTE LEWIS, MARTHA DAVIS,
AMBROSE SIMS, NATIONAL ASSOCIATION
FOR THE ADVANCEMENT OF COLORED
PEOPLE (“NAACP”) LOUISIANA STATE
CONFERENCE, and POWER COALITION FOR
EQUITY AND JUSTICE,

Plaintiffs,

v.

KYLE ARDOIN, in his official capacity as
Secretary of State for Louisiana,

Defendant.

Case No. 3:22-cv-00211-SDD-SDJ c/w

EDWARD GALMON, SR., CIARA HART,
NORRIS HENDERSON, and TRAMELLE
HOWARD,

Plaintiffs,

v.

R. KYLE ARDOIN, in his official capacity as
Louisiana Secretary of State,

Defendant.

Case No. 3:22-cv-00214-SDD-SDJ

Pursuant to 28 U.S.C. § 1746, I, Anthony Fairfax, declare as follows:

1. My name is Anthony E. Fairfax, I am over 18 years of age, and I have personal knowledge of the statements made in this affidavit, and each is true and correct.

I. Introduction

2. I was asked to create maps for submission to the Court in connection with a remedial proceeding. In particular, I was asked to start with my Illustrative Plan 2A previously submitted in this matter and to make certain changes to CD2, including adding Assumption Parish into the district, modifying as necessary to maintain population equality, and making any other appropriate changes in light of traditional redistricting criteria. To assess reasonable compactness, I ensured my remedial plan performs equal to or better than the state's enacted plan (either HB 1 or the 2011 plan) at adhering to traditional and state redistricting criteria, including those embodied in Joint Rule 21 (see Figure 1).

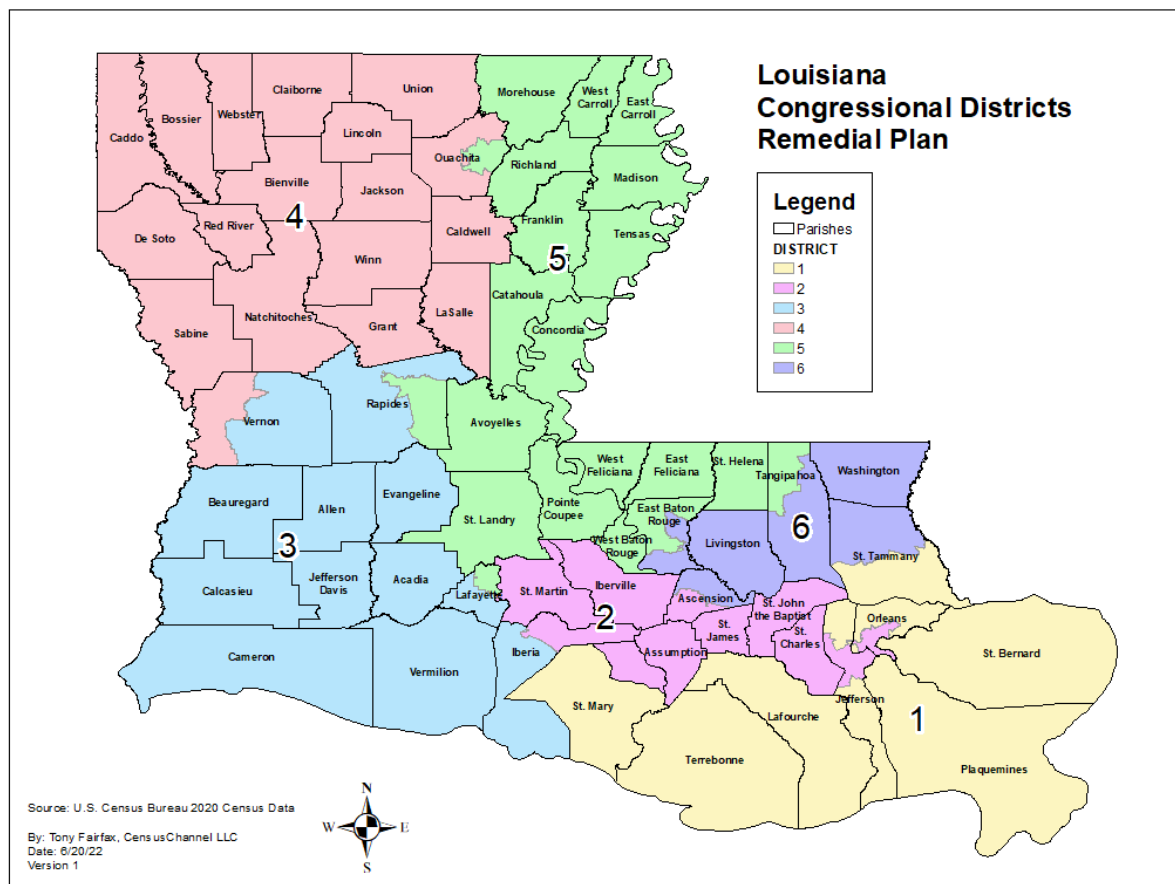


Figure 1 – Louisiana Congressional District Remedial Plan

3. My remedial map maintains the core of Illustrative District 5 in *Robinson* Illustrative Plans 1, 2, and 2A while seeking to ensure that the other majority-minority district, Congressional District 2 (“CD”), is more compact. I also sought to incorporate the testimony regarding communities of interest identified in the preliminary injunction hearing by maintaining the River Parishes in CD 2, and adding Assumption Parish into CD 2.

II. Background

4. In my expert report dated April 15, 2022, I found it was possible to draw an Illustrative Plan that adheres to state and federal redistricting criteria and creates two reasonably compact, majority-Black¹ districts in Louisiana’s six-district Congressional map, satisfying the first precondition of *Thornburg v. Gingles*, 478 U.S. 30 (1986).
5. In its opinion dated June 6, 2022, this Court credited the above testimony in a decision in which the district court ordered the Louisiana Legislature to add a second majority-minority district by June 20, 2022. *Robinson v. Ardoin*, No. 22-211-SDD-SDJ, 2022 WL 2012389 (M.D. La. June 6, 2022).
6. On June 17, 2022, this Court issued an order requiring the parties to jointly submit a remedial map in the event the Louisiana legislature fails to do so. Thereafter, the Plaintiffs’ counsel asked that I prepare a remedial congressional districting plan based on Illustrative Plan 2A that made the majority-Black districts more compact, minimized political boundary splits, particularly parishes, and incorporated testimony on communities of

¹ Using voting age population (“VAP”) and citizen voting age population (“CVAP”).

interest identified at the Preliminary Injunction hearing, specifically the community of interest among Assumption Parish and the other River Parishes.

III. Qualifications

7. My qualifications and expertise are described fully in my expert report, submitted on April 15, 2022, to this Court and available at ECF No. 41-2, 3:22-cv-00211-SDD-SDJ. This Court credited my testimony, in this case, *Robinson v. Ardoin*, in its opinion, dated June 6, 2022, as did a panel of the Fifth Circuit considering this case on June 12, 2022.

IV. Software and Data

8. I used Maptitude for Redistricting (“Maptitude”) by Caliper Corporation to develop the Remedial Plan in this report. Maptitude for Redistricting is one of the leading redistricting software applications that is utilized by state and city governments, major nonprofit groups, and consultants to develop redistricting plans.²
9. I previously acquired, processed, and utilized the following data:
 - a. The 2010 and 2020 census data for the total population were obtained from Caliper Corporation’s datasets³ for the state of Louisiana.
 - b. The geographic boundaries for the 2011 congressional districts⁴, 2010 and 2020 parishes, and Voting Districts (“VTDs”) were also obtained from Caliper Corporation’s datasets for the state of Louisiana. An updated shapefile version of

² See <https://www.caliper.com/mtrnews/clients.htm> for Maptitude for Redistricting’s client list.

³ Caliper Corporation provides 2020 Census Data (PL94-171 data) in a format readable for their software, Maptitude for Redistricting. The population data are identical to the data provided by the Census Bureau.

⁴ I reviewed the 2011 congressional districts using 2010 Census data in Maptitude. The results in Maptitude generated the same population size and deviation as the Louisiana legislature’s reports. The state’s congressional district reports are located at the Louisiana Redistricting website: <https://redist.legis.la.gov/CurrentDistricts>.

the Louisiana VTDs was also downloaded from the Legislature's Redistricting website.⁵

V. Methodology

10. To prepare my remedial plan, I first began with Illustrative plan 2A, which, like HB 1, used as its basis Louisiana's 2011 enacted Congressional plan. In the development of plan 2A, I began with the majority-Black district, CD 2, and sought to make the district more compact. I removed the cities of Baton Rouge and parts of East Baton Rouge Parish from CD 2 and as I expected, the district became more compact.
11. I also sought to incorporate fewer political subdivision splits for CD 2, including parishes and census places. In the HB 1 plan, CD 2 included a significant number of split parishes and census places (see Table 1 below), including a number of split River Parishes. While keeping as a priority making the district more compact, I reduced the parish splits, particularly River Parishes, in CD 2.
12. Two additional changes were made to Plan 2A. One included configuring the parish split of Iberia to be more compact by following mostly a major road in the remedial plan. The second was to modify and match HB1 and the 2011 plan's border for CD 2 near the Lake Pontchartrain area. Following the older border configuration reduces the number of areas that the remedial plan changes in the New Orleans parish HB1 and the 2011 plan's to two common areas.

⁵ https://redist.legis.la.gov/default_ShapeFiles2020. I analyzed the 2020 VTD splits using the 2020 Census VTDs available in Maptitude and the VTD shapefile on the state legislature's website and the results were the same.

13. In creating the remedial plan, I maintained CD 5 as I had drawn it in Illustrative Plan 2A, ensuring that CD 5 includes the Delta parishes in the north and Baton Rouge in the south. By its nature, CD 5 in the remedial plan, as well as the HB 1 plan, the 2011 plan, and Illustrative plans, are less compact than other districts because the district stretches along Louisiana's eastern border, which follows the bends and turns of the Mississippi River and then extends along the Florida parishes to the east. Such geographic features inherently impose a substantial penalty in the calculation of the Polsby-Popper compactness metric in particular and also negatively impact other measures as well.
14. I then sought to ensure that in every other district, I prioritized making the districts more compact, minimized political subdivision splits for parishes and VTDs, preserved communities of interest for census places, landmark areas, and communities identified in public testimony, and reduced fracking in each district and the plan overall.

VI. Plan Performance Comparison

15. The following tables include redistricting criteria and major race/ethnicity data of the Remedial and HB 1 plans.
16. In my practice, it is appropriate to compare the metrics of CD 5 in the Remedial Plan with all the congressional districts in HB 1 because both high and low metrics reflect the range of acceptability for the state of Louisiana for any particular metric. In addition, in many instances, you are comparing different geographical areas between maps with similar district numbers. This is why I assessed the performance of the Illustrative Plans overall, as well as district by district, including looking to the mean compactness scores of the various plans as compared to HB 1.

17. Table 1 contains a plan-level comparison of the Remedial and HB 1 plans using the eight redistricting criteria that were followed during plan development.

Table 1 – Remedial and HB 1 Plan Criteria Comparison

Criteria	Remedial Plan	HB1 Plan
Population Deviation	61	65
Contiguity	Y	Y
Parish Splits	11	15
VTD Splits	0	0
COI Census Places Splits	27	32
COI Landmark Splits	58	58
Compactness (mean) Roock, Polsby-Popper, Convex Hull	.40, .20, 70	.37, .14, and .62
Fracking (Total Pieces)	12	17

Source: Remedial and HB1 Plans extracted from Maptitude for Redistricting reports

18. Table 2 contains district-level data of the Remedial plan using the eight redistricting criteria that were followed during plan development.

Table 2 – Remedial Plan Redistricting Criteria

Plan	Contiguity	Equal Pop	Compactness (R-PP-CH)	Parish Splits	VTD Splits	COI Splits Places	COI Landmark Splits	Fracking (pieces)
1	Y	3	0.37 0.22 0.72	3	0	7	27	4
2	Y	27	0.27 0.17 0.66	4	0	11	26	4
3	Y	-34	0.48 0.21 0.75	4	0	9	30	0
4	Y	-26	0.56 0.28 0.84	2	0	6	37	0
5	Y	27	0.34 0.10 0.56	5	0	13	33	4
6	Y	18	0.36 0.21 0.74	4	0	6	11	0

Source: Maptitude for Redistricting Reports from Remedial developed plan using 2020 Census Data

Note: All districts include incumbents; R-Reock, P-Polsby Popper, CH-Convex Hull

19. Table 3 contains a district-level data of the HB 1 plan using the eight redistricting criteria.

Table 3 – HB 1 Plan Redistricting Criteria

Plan	Contiguity	Equal Pop	Compactness (R-PP-CH)	Parish Splits	VTD Splits	COI Splits Places	COI Landmark Splits	Fracking (pieces)
1	Y	-25	0.50 0.16 0.71	5	0	14	15	4
2	Y	24	0.18 0.06 0.38	9	0	17	31	5
3	Y	-18	0.37 0.29 0.79	2	0	5	30	0
4	Y	40	0.33 0.16 0.61	1	0	3	28	0
5	Y	-16	0.37 0.12 0.60	2	0	3	40	4
6	Y	-6	0.45 0.07 0.64	11	0	19	14	4

Source: Maptitude for Redistricting Reports from HB 1 LA legislature's Shapefile Plans using 2020 Census Data

Note: All districts include incumbents; R-Reock, P-Polsby Popper, CH-Convex Hull

20. Table 4 contains a district-level comparison of the Remedial and HB 1 plans using the voting age population ("VAP") of major race/ethnicity of the plans.

Table 4 – Major Race/Ethnicity VAP of the Remedial and HB 1 Plans

Plan	Remedial Hisp VAP	Remedial NHWhit VAP	Remedial DOJBlk VAP	Remedial APBlk VAP	HB 1 Hisp VAP	HB 1 NHWhit VAP	HB 1 DOJBlk VAP	HB 1 APBlk VAP
1	10.95%	66.23%	15.97%	17.05%	10.94%	69.86%	12.49%	13.48%
2	7.73%	37.26%	49.66%	51.16%	7.84%	29.84%	57.03%	58.65%
3	4.94%	72.22%	17.93%	18.57%	4.69%	67.01%	23.94%	24.63%
4	4.02%	59.9%	31.25%	31.9%	4.07%	58.12%	33.09%	33.82%
5	3.46%	42.22%	51.15%	51.98%	3.61%	60.29%	32.33%	32.91%
6	6.37%	72.12%	16.39%	16.91%	6.35%	65.01%	23.27%	23.86%

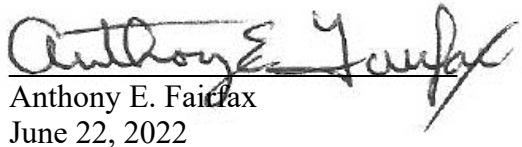
Source: Maptitude for Redistricting Reports from Remedial developed plan using 2020 Census Data

Note: NH – Not Hispanic, AP – Any Parts, DOJ Blk – NH Black plus NH Black/White combined race

VII. Summary

21. The Remedial Plan adheres to federal, state, and commonly used traditional redistricting principles such as equal population, contiguity, compactness, minimizing political subdivision splits, and preserving communities of interest. In fact, the Remedial plan performs equal to or better than HB 1 Plan on eight of eight redistricting criteria. Therefore, the Remedial Plan is more than acceptable in adhering to the state of Louisiana's traditional redistricting principles while also being fair to Louisiana voters.

Per 28 U.S. Code 1746, I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

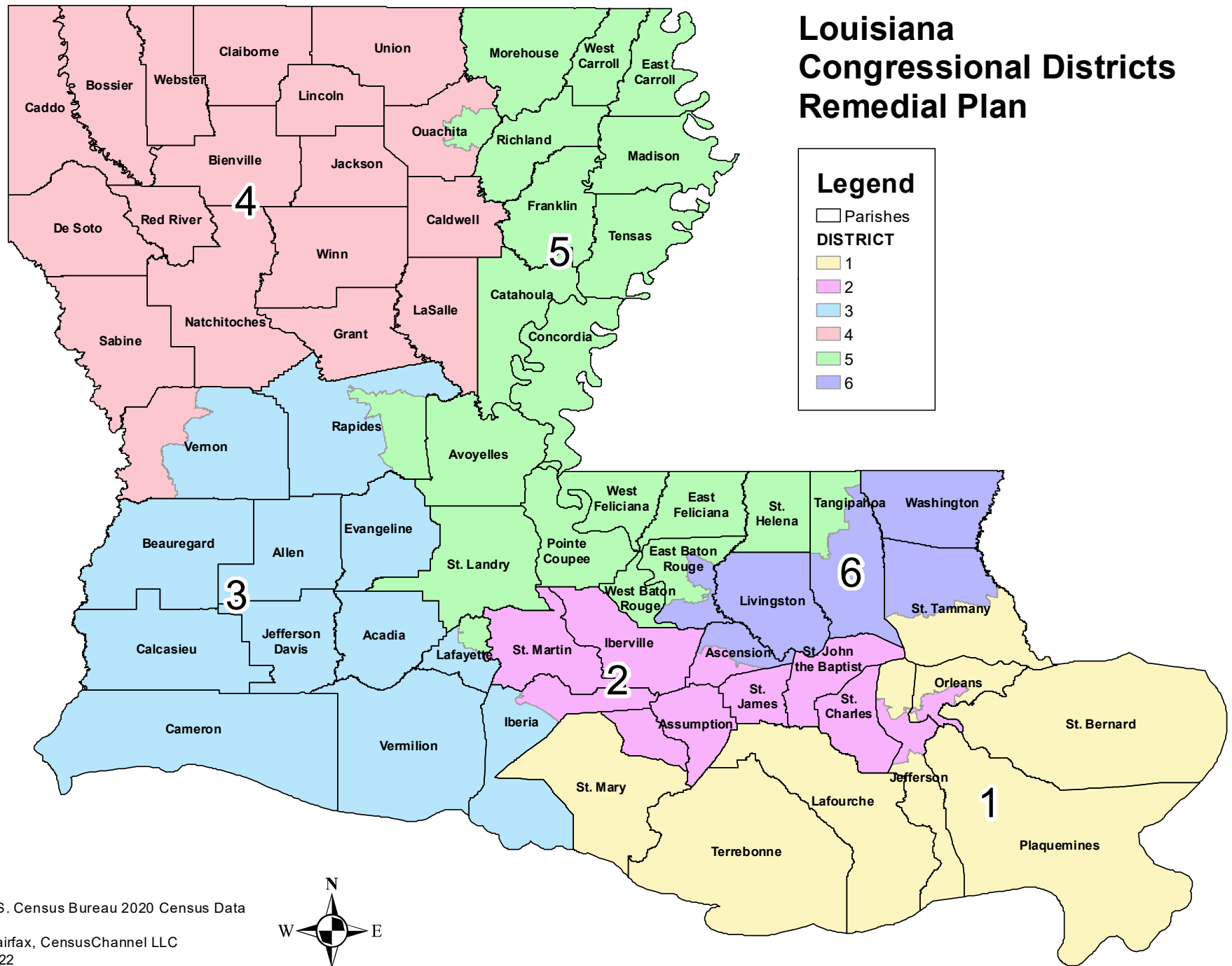

Anthony E. Fairfax
June 22, 2022

Appendix A

Redistricting Criteria Reports

(Maps/Maptitude Data Reports – Remedial Plan)

1. Louisiana CD Remedial Plan (Statewide)
2. Louisiana CD Remedial Plan (District Zoom)
3. Equal Population/Pop Deviation – TTL
4. Equal Population/Pop Deviation – TTL for, VAP, CVAP, REG VOT
5. Equal Population/Pop Deviation – VAP
6. Equal Population/Pop Deviation – CVAP/REG VOT
7. Equal Population/Pop Deviation – “DOJ” Black VAP
8. Contiguity
9. Compactness
10. Political Sub Division Splits - Parish
11. Political Sub Division Splits – New VTDs
12. Community of Interest - Cities
13. Community of Interest - Landmark Splits
14. Fracking
15. District Core compared to H.B. 1

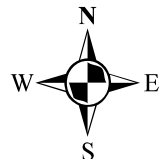


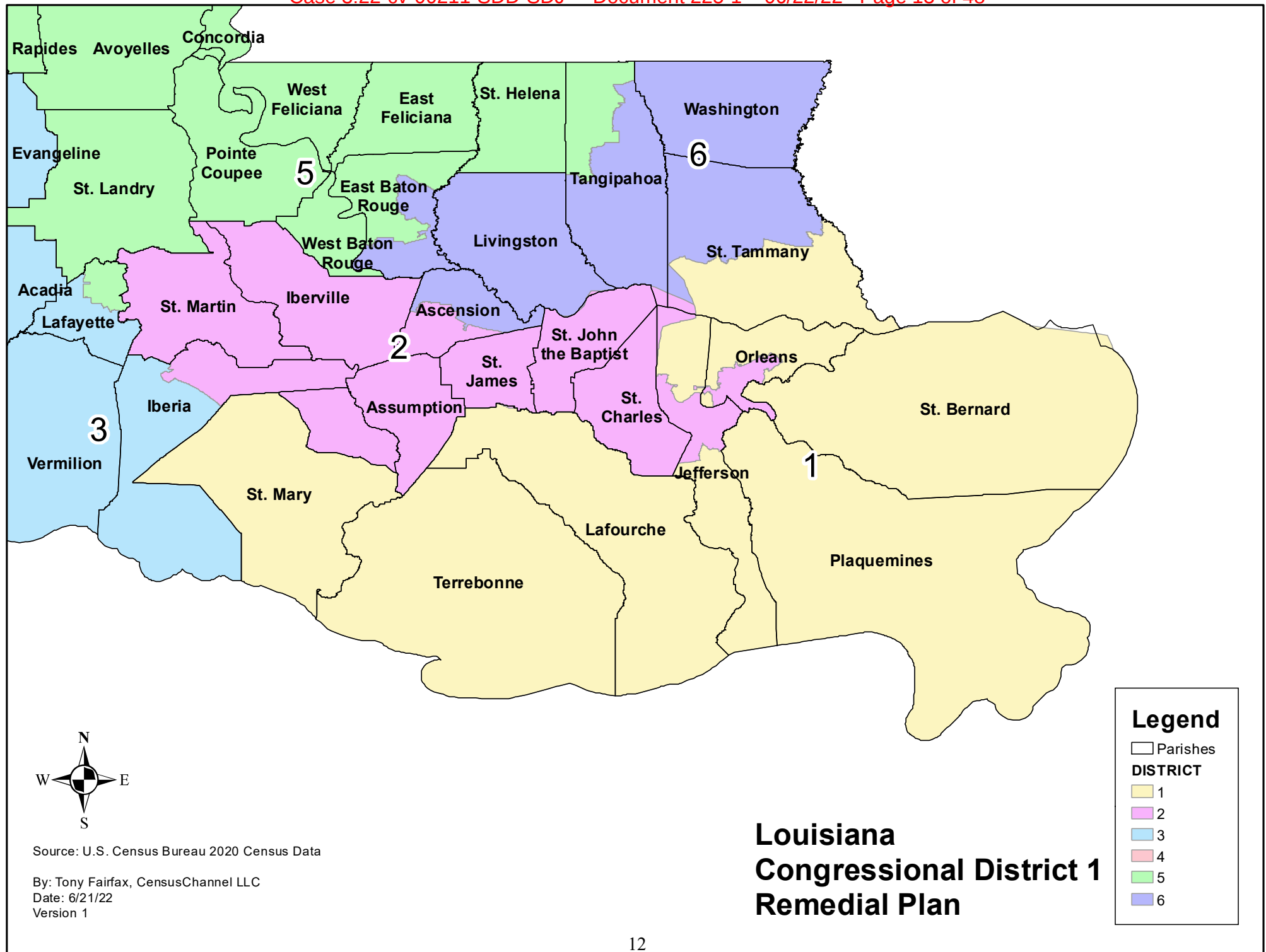
Source: U.S. Census Bureau 2020 Census Data

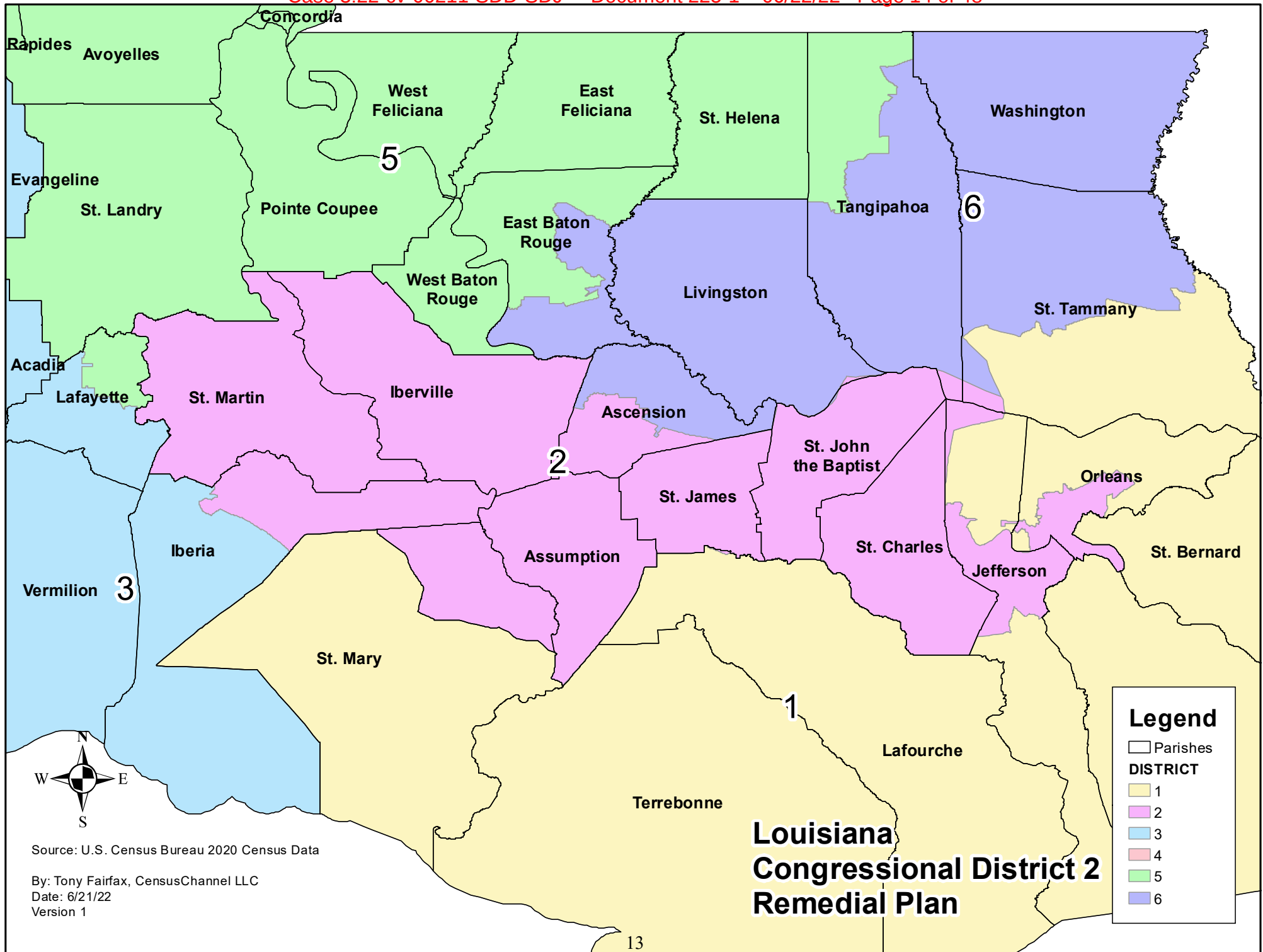
By: Tony Fairfax, CensusChannel LLC

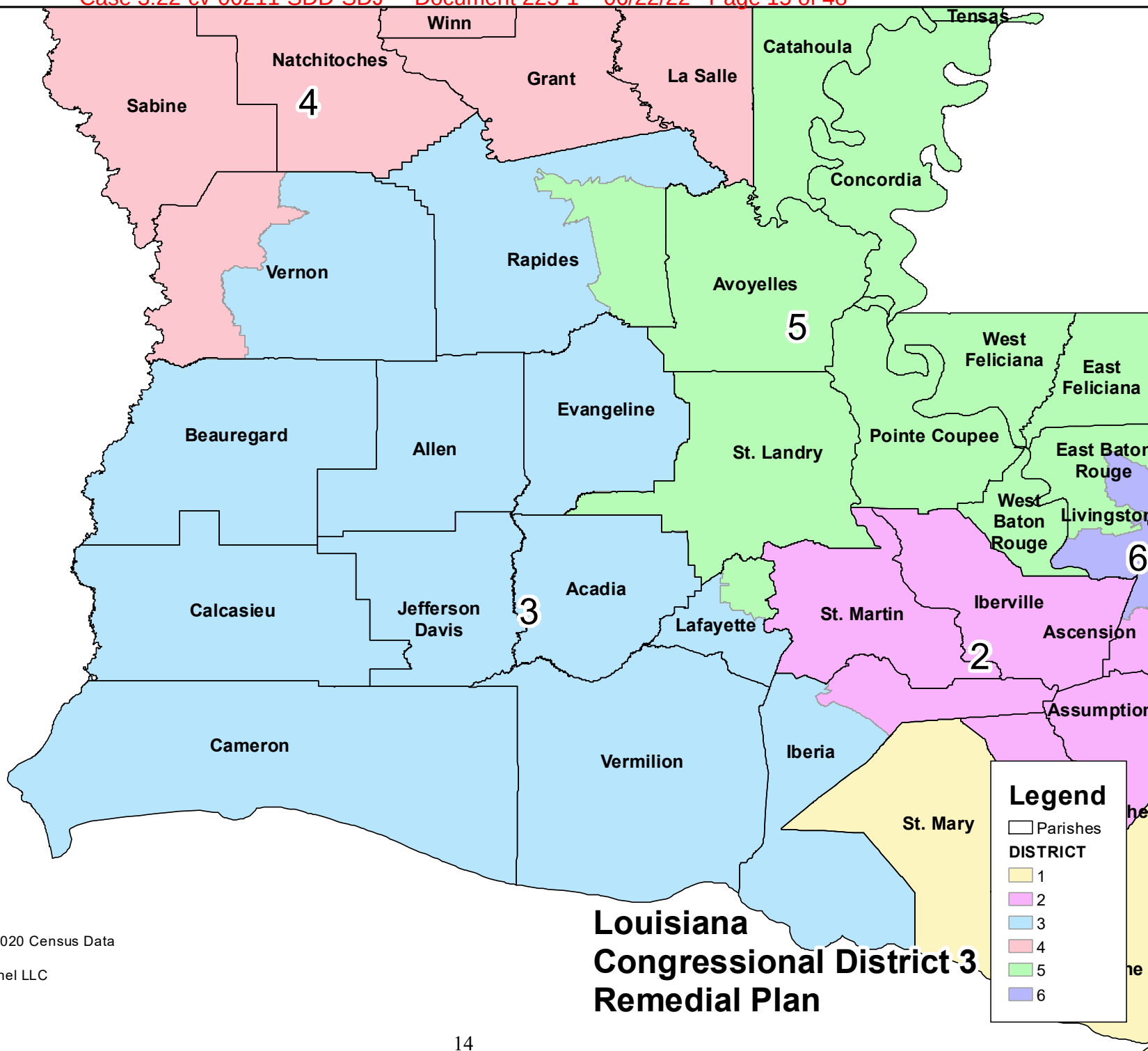
Date: 6/20/22

Version 1



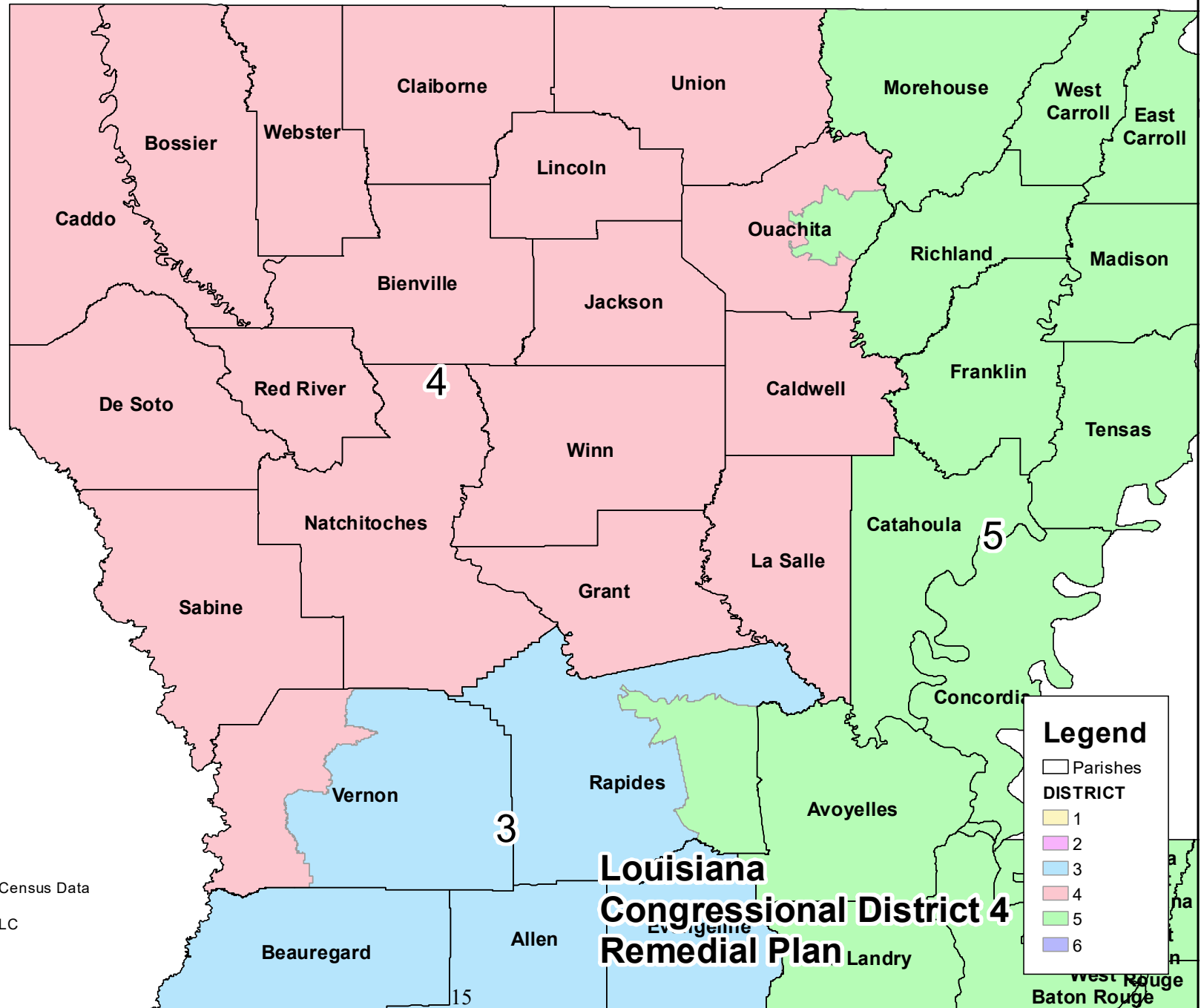






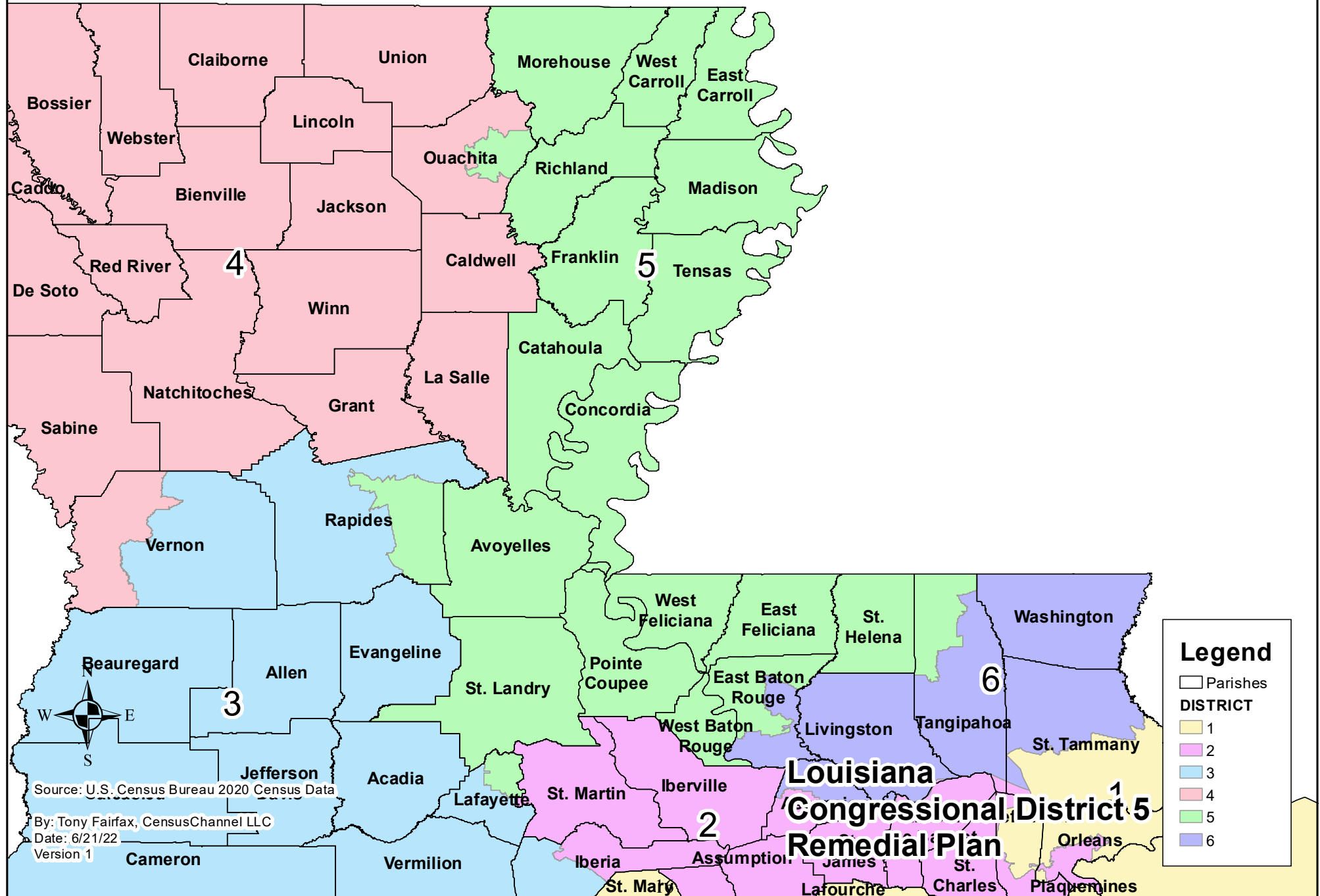
Source: U.S. Census Bureau 2020 Census Data

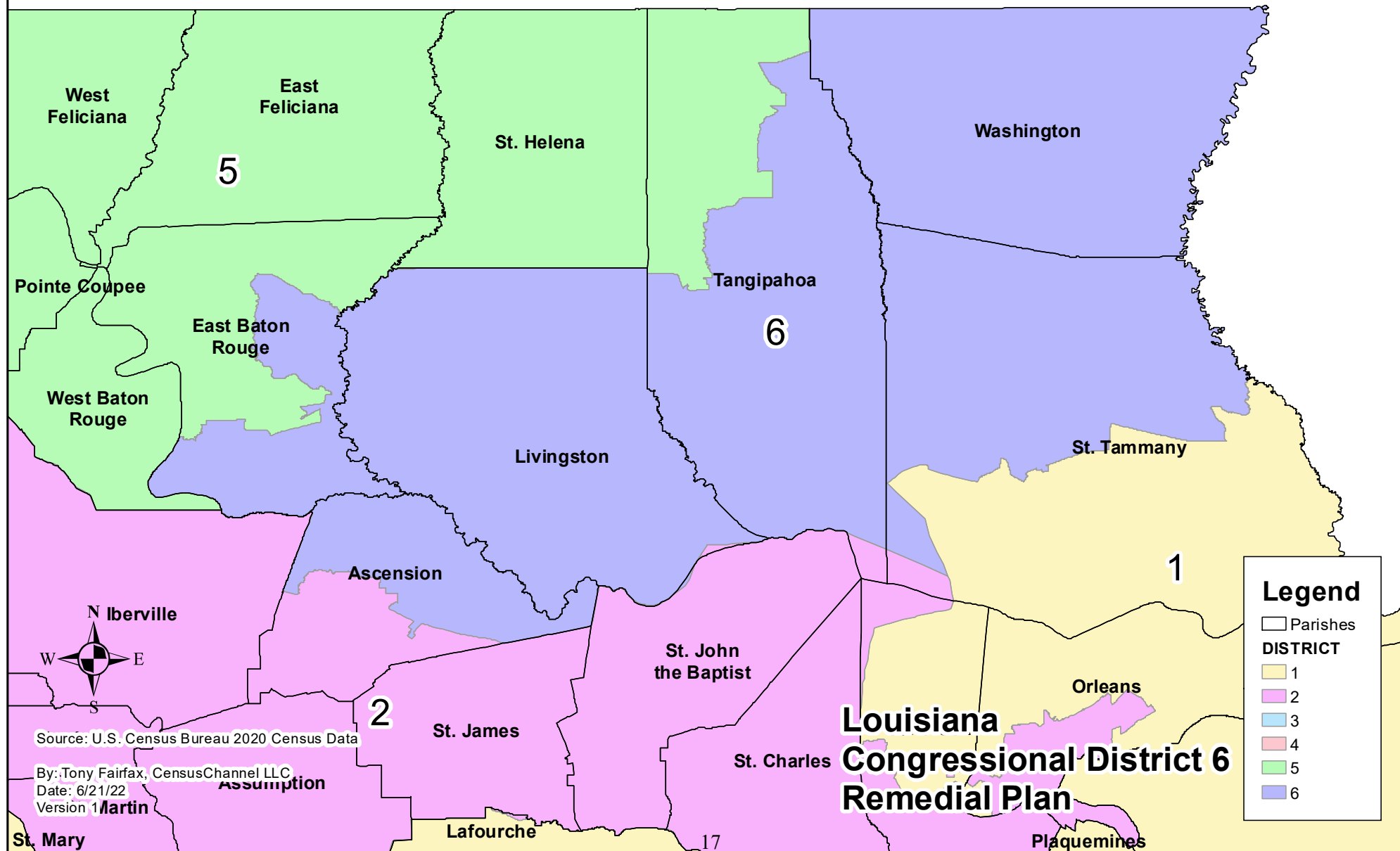
By: Tony Fairfax, CensusChannel LLC
Date: 6/21/22
Version 1



Source: U.S. Census Bureau 2020 Census Data

By: Tony Fairfax, CensusChannel LLC
Date: 6/21/22
Version 1





User: Tony Fairfax

Plan Name: LA CD Remedial Plan

Plan Type: LA Congressional Districts

Population Summary

Monday, June 20, 2022

2:19 PM

District	Population	Deviation	% Devn.	[Hispanic Origin]	[% Hispanic Origin]	NH_Wht	[% NH_Wht]	AP_Black	[% AP_Black]
1	776,290	-3	0.00%	93,846	12.09%	490,516	63.19%	144,673	18.64%
2	776,320	27	0.00%	66,866	8.61%	267,640	34.48%	414,138	53.35%
3	776,259	-34	0.00%	42,248	5.44%	543,632	70.03%	156,534	20.17%
4	776,267	-26	0.00%	34,593	4.46%	447,361	57.63%	261,925	33.74%
5	776,310	17	0.00%	28,798	3.71%	305,823	39.39%	424,046	54.62%
6	776,311	18	0.00%	56,198	7.24%	541,730	69.78%	141,803	18.27%

Total Population: 4,657,757

Ideal District Population: 776,293

Summary Statistics:

Population Range: 776,259 to 776,320

Ratio Range: 0.00

Absolute Range: -34 to 27

Absolute Overall Range: 61

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.01%

Absolute Mean Deviation: 20.83

Relative Mean Deviation: 0.00%

Standard Deviation: 23.03

User: Tony Fairfax

Plan Name: LA CD Remedial Plan

Plan Type: LA Congressional Districts

Population Summary

Monday, June 20, 2022

2:26 PM

District	Population	Deviation	% Devn.	[18+_Pop]	CVAP_TOT20	REGTTL1221
1	776,290	-3	0.00%	604,886	571,603	479,852
2	776,320	27	0.00%	598,687	590,331	499,967
3	776,259	-34	0.00%	586,624	570,156	467,568
4	776,267	-26	0.00%	596,355	592,824	477,674
5	776,310	17	0.00%	590,113	584,267	491,751
6	776,311	18	0.00%	593,883	558,613	477,534

Total Population: 4,657,757

Ideal District Population: 776,293

Summary Statistics:

Population Range: 776,259 to 776,320

Ratio Range: 0.00

Absolute Range: -34 to 27

Absolute Overall Range: 61

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.01%

Absolute Mean Deviation: 20.83

Relative Mean Deviation: 0.00%

Standard Deviation: 23.03

User: Tony Fairfax

Plan Name: LA CD Remedial Plan

Plan Type: LA Congressional Districts

Population Summary

Monday, June 20, 2022

2:28 PM

District	Population	Deviation	% Devn.	[H18+_Pop]	[% H18+_Pop]	[NH18+_Wht]	[% NH18+_Wht]	[18+_AP_Blkl]	[% 18+_AP_Blkl]
1	776,290	-3	0.00%	66,207	10.95%	400,638	66.23%	103,146	17.05%
2	776,320	27	0.00%	46,285	7.73%	223,076	37.26%	306,288	51.16%
3	776,259	-34	0.00%	28,951	4.94%	423,684	72.22%	108,925	18.57%
4	776,267	-26	0.00%	23,991	4.02%	357,213	59.9%	190,266	31.9%
5	776,310	17	0.00%	20,411	3.46%	249,175	42.22%	306,739	51.98%
6	776,311	18	0.00%	37,817	6.37%	428,324	72.12%	100,405	16.91%

Total Population: 4,657,757

Ideal District Population: 776,293

Summary Statistics:

Population Range: 776,259 to 776,320

Ratio Range: 0.00

Absolute Range: -34 to 27

Absolute Overall Range: 61

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.01%

Absolute Mean Deviation: 20.83

Relative Mean Deviation: 0.00%

Standard Deviation: 23.03

User: Tony Fairfax

Plan Name: LA CD Remedial Plan

Plan Type: LA Congressional Districts

Population Summary

Monday, June 20, 2022

2:27 PM

District	Population	Deviation	% Devn.	[% CVAP_HSP20]	[% CVAP_WHT20]	[% CVAP_BLK20]	[% REGWHT122 1]	[% REGBLK1221]	[% REGOTH1221]
1	776,290	-3	0.00%	5.62%	73.86%	16.22%	75.43%	15.44%	9.13%
2	776,320	27	0.00%	3.97%	39.42%	53.76%	39.33%	53.15%	7.52%
3	776,259	-34	0.00%	2.76%	76.44%	18.35%	78.31%	17.21%	4.48%
4	776,267	-26	0.00%	2.34%	62.64%	32.91%	64.66%	31.2%	4.13%
5	776,310	17	0.00%	1.41%	44.71%	52.44%	43.39%	53.41%	3.2%
6	776,311	18	0.00%	2.8%	77.99%	16.82%	79.78%	14.82%	5.4%

Total Population: 4,657,757

Ideal District Population: 776,293

Summary Statistics:

Population Range:	776,259 to 776,320
Ratio Range:	0.00
Absolute Range:	-34 to 27
Absolute Overall Range:	61
Relative Range:	0.00% to 0.00%
Relative Overall Range:	0.01%
Absolute Mean Deviation:	20.83
Relative Mean Deviation:	0.00%
Standard Deviation:	23.03

User: Tony Fairfax

Plan Name: LA CD Remedial Plan

Plan Type: LA Congressional Districts

Population Summary

Tuesday, June 21, 2022

3:16 PM

District	Population	Deviation	% Devn.	[NH18+_Blk]	[% NH18+_Blk]	[NH18+_WhtBlk]	[% NH18+_WhtBlk]	NHBlkBW18	[NHBlkBW18 %]
1	776,290	-3	0.00%	94,205	15.57%	2,410	0.4%	96,615	15.97%
2	776,320	27	0.00%	293,434	49.01%	3,884	0.65%	297,318	49.66%
3	776,259	-34	0.00%	102,096	17.4%	3,115	0.53%	105,211	17.93%
4	776,267	-26	0.00%	183,465	30.76%	2,914	0.49%	186,379	31.25%
5	776,310	17	0.00%	298,280	50.55%	3,550	0.6%	301,830	51.15%
6	776,311	18	0.00%	95,031	16%	2,299	0.39%	97,330	16.39%

Total Population: 4,657,757

Ideal District Population: 776,293

Summary Statistics:

Population Range: 776,259 to 776,320

Ratio Range: 0.00

Absolute Range: -34 to 27

Absolute Overall Range: 61

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.01%

Absolute Mean Deviation: 20.83

Relative Mean Deviation: 0.00%

Standard Deviation: 23.03

User: Tony Fairfax

Plan Name: LA CD Remedial Plan

Plan Type: LA Congressional Districts

Contiguity Report

Monday, June 20, 2022

4:49 PM

District	Number of Distinct Areas
1	1
2	1
3	1
4	1
5	1
6	1

User: Tony Fairfax

Plan Name: LA CD Remedial Plan

Plan Type: LA Congressional Districts

Measures of Compactness Report

Monday, June 20, 2022

4:48 PM

	Reock	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A
Min	0.27	0.10	0.56
Max	0.56	0.28	0.84
Mean	0.40	0.20	0.71
Std. Dev.	0.10	0.06	0.09
District	Reock	Polsby-Popper	Area/Convex Hull
1	0.37	0.22	0.72
2	0.27	0.17	0.66
3	0.48	0.21	0.75
4	0.56	0.28	0.84
5	0.34	0.10	0.56
6	0.36	0.21	0.74

Measures of Compactness Report

LA CD Remedial Plan

Measures of Compactness Summary

Reock	The measure is always between 0 and 1, with 1 being the most compact.
Polsby-Popper	The measure is always between 0 and 1, with 1 being the most compact.
Area / Convex Hull	The measure is always between 0 and 1, with 1 being the most compact.

User: Tony Fairfax

Plan Name: LA CD Remedial Plan

Plan Type: LA Congressional Districts

Political Subdivision Splits Between Districts

Monday, June 20, 2022

4:49 PM

Number of subdivisions not split:

County 53

Number of subdivisions split into more than one district:

County 11

Number of splits involving no population:

County 0

Split Counts

County

Cases where an area is split among 2 Districts: 11

County	District	Population
<i>Split Counties:</i>		
Ascension LA	2	24,459
Ascension LA	6	102,041
East Baton Rouge LA	5	217,705
East Baton Rouge LA	6	239,076
Iberia LA	2	32,706
Iberia LA	3	37,223
Jefferson LA	1	236,631
Jefferson LA	2	204,150
Lafayette LA	3	175,072
Lafayette LA	5	66,681
Orleans LA	1	87,257
Orleans LA	2	296,740
Ouachita LA	4	90,953
Ouachita LA	5	69,415
Rapides LA	3	69,584
Rapides LA	5	60,439
St. Tammany LA	1	128,580
St. Tammany LA	6	135,990
Tangipahoa LA	5	21,698
Tangipahoa LA	6	111,459
Vernon LA	3	33,144
Vernon LA	4	15,606

User: Tony Fairfax

Plan Name: LA CD Remedial Plan

Plan Type: LA Congressional Districts

New VTDs by District and by County

Monday, June 20, 2022

5:09 PM

	Population	% of District
District 1		
Total District 1	776,290	
District 2		
Total District 2	776,320	
District 3		
Total District 3	776,259	
District 4		
Total District 4	776,267	
District 5		
Total District 5	776,310	
District 6		
Total District 6	776,311	

User: Tony Fairfax

Plan Name: LA CD Remedial Plan

Plan Type: LA Congressional Districts

Communities of Interest (Landscape, 11x8.5)

Monday, June 20, 2022

5:15 PM

City/Town	District	Population	%
Alexandria LA	3	13,740	30.4
Alexandria LA	5	31,535	69.7
Arnaudville LA	2	39	3.9
Arnaudville LA	5	970	96.1
Baton Rouge LA	5	137,827	60.6
Baton Rouge LA	6	89,643	39.4
Broussard LA	2	190	1.4
Broussard LA	3	13,227	98.6
Brownsville LA	4	4,014	92.2
Brownsville LA	5	339	7.8
Central LA	5	249	0.8
Central LA	6	29,316	99.2
Des Allemands LA	1	449	20.6
Des Allemands LA	2	1,730	79.4
Eunice LA	3	302	3.2
Eunice LA	5	9,120	96.8
Gonzales LA	2	5,038	41.2
Gonzales LA	6	7,193	58.8
Independence LA	5	1,619	99.0
Independence LA	6	16	1.0
Jefferson LA	1	9,432	88.7

Communities of Interest (Landscape, 11x8.5)

LA CD Remedial Plan

City/Town	District	Population	%
Jefferson LA	2	1,201	11.3
Kenner LA	1	53,996	81.3
Kenner LA	2	12,452	18.7
Lafayette LA	3	84,924	70.0
Lafayette LA	5	36,450	30.0
Leesville LA	3	1,992	35.3
Leesville LA	4	3,657	64.7
Lewisburg LA	1	420	100.0
Lewisburg LA	6	0	0.0
Mandeville LA	1	7,059	53.5
Mandeville LA	6	6,133	46.5
Metairie LA	1	141,267	98.4
Metairie LA	2	2,240	1.6
Monroe LA	4	10,565	22.2
Monroe LA	5	37,137	77.9
Morgan City LA	1	11,472	100.0
Morgan City LA	2	0	0.0
New Iberia LA	2	19,396	67.9
New Iberia LA	3	9,159	32.1
New Llano LA	3	634	28.7
New Llano LA	4	1,579	71.4
New Orleans LA	1	87,257	22.7
New Orleans LA	2	296,740	77.3
Pineville LA	3	4,753	33.0
Pineville LA	5	9,631	67.0

Communities of Interest (Landscape, 11x8.5)

LA CD Remedial Plan

City/Town	District	Population	%
River Ridge LA	1	11,276	83.0
River Ridge LA	2	2,315	17.0
Scott LA	3	7,413	91.3
Scott LA	5	706	8.7
Swartz LA	4	2,165	49.7
Swartz LA	5	2,189	50.3
West Monroe LA	4	7,824	59.7
West Monroe LA	5	5,279	40.3

Communities of Interest (Landscape, 11x8.5)

LA CD Remedial Plan

City/Town**-- Listed by District**

Population %

Des Allemands LA (part)	449	20.6
Jefferson LA (part)	9,432	88.7
Kenner LA (part)	53,996	81.3
Mandeville LA (part)	7,059	53.5
Metairie LA (part)	141,267	98.4
New Orleans LA (part)	87,257	22.7
River Ridge LA (part)	11,276	83.0

District 1 Totals**629,964**

Arnaudville LA (part)	39	3.9
Broussard LA (part)	190	1.4
Des Allemands LA (part)	1,730	79.4
Gonzales LA (part)	5,038	41.2
Jefferson LA (part)	1,201	11.3
Kenner LA (part)	12,452	18.7
Metairie LA (part)	2,240	1.6
Morgan City LA (part)	0	0.0
New Iberia LA (part)	19,396	67.9
New Orleans LA (part)	296,740	77.3
River Ridge LA (part)	2,315	17.0

District 2 Totals**676,924**

Communities of Interest (Landscape, 11x8.5)

LA CD Remedial Plan

	Population	%
Alexandria LA (part)	13,740	30.4
Broussard LA (part)	13,227	98.6
Eunice LA (part)	302	3.2
Lafayette LA (part)	84,924	70.0
Leesville LA (part)	1,992	35.3
New Iberia LA (part)	9,159	32.1
New Llano LA (part)	634	28.7
Pineville LA (part)	4,753	33.0
Scott LA (part)	7,413	91.3
District 3 Totals	442,764	
Brownsville LA (part)	4,014	92.2
Leesville LA (part)	3,657	64.7
Monroe LA (part)	10,565	22.2
New Llano LA (part)	1,579	71.4
Swartz LA (part)	2,165	49.7
West Monroe LA (part)	7,824	59.7
District 4 Totals	470,605	

Communities of Interest (Landscape, 11x8.5)

LA CD Remedial Plan

	Population	%
Alexandria LA (part)	31,535	69.7
Arnaudville LA (part)	970	96.1
Baton Rouge LA (part)	137,827	60.6
Brownsville LA (part)	339	7.8
Central LA (part)	249	0.8
Eunice LA (part)	9,120	96.8
Independence LA (part)	1,619	99.0
Lafayette LA (part)	36,450	30.0
Monroe LA (part)	37,137	77.9
Pineville LA (part)	9,631	67.0
Scott LA (part)	706	8.7
Swartz LA (part)	2,189	50.3
West Monroe LA (part)	5,279	40.3
District 5 Totals	480,917	
Baton Rouge LA (part)	89,643	39.4
Central LA (part)	29,316	99.2
Gonzales LA (part)	7,193	58.8
Independence LA (part)	16	1.0
Lewisburg LA (part)	0	0.0
Mandeville LA (part)	6,133	46.5
District 6 Totals	317,394	

Communities of Interest (Landscape, 11x8.5)

LA CD Remedial Plan

Summary Statistics

Number of City/Town not split	461
Number of City/Town split	27
Number of City/Town split in 2	27
Total number of splits	54

User: Tony Fairfax

Plan Name: LA CD Remedial Plan

Plan Type: LA Congressional Districts

Communities of Interest (Landscape, 11x8.5)

Monday, June 20, 2022

5:39 PM

Landmark Area	District	Population	%
Jean Lafitte National Historical Park an	1	48	63.2
Jean Lafitte National Historical Park an	2	28	36.8
Louisiana State Univ	5	0	0.0
Louisiana State Univ	6	8,838	100.0

Communities of Interest (Landscape, 11x8.5)

LA CD Remedial Plan

Landmark Area	-- Listed by District	
	Population	%
Audobon Park Golf Course	0	0.0
East Jefferson General Hosp	0	0.0
Fontainebleau St Park Preserve	0	0.0
Franklin Foundation Hosp	0	0.0
Green St Cmtry	0	0.0
Jean Lafitte National Historical Park an (part)	48	63.2
Jean Lafitte National Historical Park an	0	0.0
Jean Lafitte National Historical Park an	0	0.0
Lawrence Park	0	0.0
Leonard J Chabert Medical Ctr	0	0.0
New Orleans Adolescent Hosp	0	0.0
Ochsner Baptist Medical Ctr	0	0.0
Ochsner Medical Ctr	0	0.0
Pearl River Wildlife Mngt Area	0	0.0
Plaquemines Parish Sheriff's Office-Bell	0	0.0
Slidell Memorial Hosp	0	0.0
Southern Surgical Hosp	0	0.0
St Mary Cmtry	0	0.0
St Mary Parish Correctional Ctr	0	0.0
Teche Regional Medical Ctr	0	0.0
Terrebonne General Medical Ctr	0	0.0
US Army Corps of Engineers	0	0.0

Communities of Interest (Landscape, 11x8.5)

LA CD Remedial Plan

	Population	%
West End Park	0	0.0
District 1 Totals	7,648	
Algiers Technology Acdmy	0	0.0
Behrman Memorial Pk	0	0.0
Couba-Island	0	0.0
Folgers Coffee	0	0.0
Jean Lafitte National Historical Park an (part)	28	36.8
Jean Lafitte National Historical Park an	0	0.0
Jean Lafitte National Historical Park an	0	0.0
Jean Lafitte National Historical Park an	0	0.0
Louis Armstrong New Orleans Internationa	0	0.0
Louis Armstrong New Orleans Internationa	0	0.0
Louisiana Correctional Institute for Wom	0	0.0
Louisiana Correctional Institute for Wom	0	0.0
Louisiana State University Health Scienc	0	0.0
North Side City Park	0	0.0
Orleans Parish Intake Processing Ctr	0	0.0
Orleans Parish Prison	0	0.0
Orleans Parish Temporary Jails	0	0.0
South White Street Female Division	0	0.0

Communities of Interest (Landscape, 11x8.5)

LA CD Remedial Plan

	Population	%
St John Schl	0	0.0
St Martin Sheriff's Office Juvenile Trai	0	0.0
Touro Infirmary	0	0.0
Tulane Univ	0	0.0
Tulane Univ	0	0.0
University Medical Ctr	0	0.0
Xavier Univ of Louisiana	0	0.0
Xavier Univ of Louisiana	0	0.0
District 2 Totals	6,574	
A Kaplan Memorial Pk	0	0.0
Abrom Kaplan Memorial Hosp	0	0.0
Acadia Parish Detention Ctr	0	0.0
Acadia Parish Jail	0	0.0
Acadiana Rgnl Arprt	0	0.0
American Legion Hosp	0	0.0
C Paul Phelps Correctional Ctr	0	0.0
Cameron Parish Jail	0	0.0
Chicot State Park	0	0.0
Chicot State Park	0	0.0
Chicot State Park	0	0.0
Christus St Patrick Hosp	0	0.0
City Park	0	0.0
Dequincy City Jail	0	0.0
Duson Park	0	0.0
Evangeline Parish Jail	0	0.0
Jean Lafitte National Historical Park an	0	0.0
Jennings City Jail	0	0.0

Communities of Interest (Landscape, 11x8.5)

LA CD Remedial Plan

	Population	%
Kaplan Indl Park	0	0.0
Lafayette General Medical Ctr	0	0.0
Lafayette General Surgical Hosp	0	0.0
Lafayette Regional	0	0.0
Lake Charles Regional	0	0.0
Levy Park	0	0.0
Louisiana State University Eunice	0	0.0
M L King Park	0	0.0
McNeese State Univ	0	0.0
Riverside Park	0	0.0
South Louisiana Correctional Ctr	0	0.0
Univ of Louisiana Lafayette	0	0.0
District 3 Totals	5,676	
Caldwell Detention Ctr	0	0.0
Caldwell Memorial Hosp	0	0.0
Caldwell Parish Jail	0	0.0
Cane River Creole Natl Hist Pk	0	0.0
Catholic Cmtry	0	0.0
Centenary College of Louisiana	0	0.0
Claiborne Parish Womens Jail	0	0.0
David Wade Correctional Ctr	0	0.0
Desoto Parish Detention Ctr	0	0.0
Desoto Regional Health System	0	0.0
Forcht-Wade Correctional Ctr	0	0.0
Grambling State Univ	0	0.0
Hardtner Medical Ctr	0	0.0
Hart Arprt	0	0.0
Hart Arprt	0	0.0

Communities of Interest (Landscape, 11x8.5)

LA CD Remedial Plan

	Population	%
Jackson Parish Hosp	0	0.0
L S U Health Shreveport	0	0.0
Louisiana Tech Univ	0	0.0
Louisiana Tech Univ	0	0.0
Natchitoches Regional Medical Ctr	0	0.0
New Llano City Park	0	0.0
Northern Louisiana Medical Ctr	0	0.0
Northwestern State Univ	0	0.0
Shreveport City Jail	0	0.0
Shreveport Regional	0	0.0
Specialists Hospital Shreveport	0	0.0
Springhill Police Dept	0	0.0
Squires Cmtry	0	0.0
Stonewall Park	0	0.0
United States Penitentiary Pollock	0	0.0
United States Penitentiary Pollock	0	0.0
Webster Parish Jail	0	0.0
White Rock Cmtry	0	0.0
Willis Knighton Medical Ctr	0	0.0
Winn Parish Jail	0	0.0
Winn Parish Medical Ctr	0	0.0
Winnfield City Jail	0	0.0
District 4 Totals	12,529	
Amite City Jail	0	0.0
Arsenal Park	0	0.0
Avoyelles Hosp	0	0.0

Communities of Interest (Landscape, 11x8.5)

LA CD Remedial Plan

	Population	%
Baton Rouge General Medical Ctr	0	0.0
Baton Rouge Metropolitan	0	0.0
Baton Rouge Metropolitan	0	0.0
Blakeman Park	0	0.0
Bunkie General Hosp	0	0.0
Camelot Colg	0	0.0
Civitan Park	0	0.0
Delhi Hosp	0	0.0
Evans Correctional Ctr	0	0.0
Evans Correctional Ctr	0	0.0
Glenwood Regional Medical Ctr	0	0.0
Greater Baton Rouge Surgical Hosp	0	0.0
Lallie Kemp Medical Ctr	0	0.0
Louisiana State Capitol	0	0.0
Louisiana State Univ (part)	0	0.0
Monroe Regional	0	0.0
Monroe Regional	0	0.0
Newman Park	0	0.0
Old City Cmtry	0	0.0
Opelousas City Jail	0	0.0
P&S Surgical Hosp	0	0.0
Palmetto Is	0	0.0
Pecanland Mall	0	0.0
Poverty Point Natl Mnmt	0	0.0
Rapides Regional Medical Ctr	0	0.0
Rapides Regional Medical Ctr	0	0.0
State Capitol Park	0	0.0
Tensas Parish Jail	0	0.0

Communities of Interest (Landscape, 11x8.5)

LA CD Remedial Plan

	Population	%
West Carroll Parish Jail	0	0.0
Woman's Hosp	0	0.0
District 5 Totals	16,911	
Athletic Park	0	0.0
Bogalusa Medical Ctr	0	0.0
Carver Park	0	0.0
Jambalaya Park	0	0.0
Our Lady of the Lake Livingston	0	0.0
Our Lady of the Lake Regional Medical Ct	0	0.0
St Tammany Parish Hosp	0	0.0
Summit Hosp	0	0.0
Summit Hosp	0	0.0
Washington St Tammany Regional Medical C	0	0.0
Woman's Hosp	0	0.0
District 6 Totals	13,173	

Communities of Interest (Landscape, 11x8.5)

LA CD Remedial Plan

Summary Statistics

Number of Landmark Area not split	384
Number of Landmark Area split	58
Number of Landmark Area split in 2	41
Number of Landmark Area split in 3	9
Number of Landmark Area split in 4	3
Number of Landmark Area split in 5	4
Number of Landmark Area split in 6	0
Number of Landmark Area split in 7	0
Number of Landmark Area split in 8	0
Number of Landmark Area split in 9	1
Total number of splits	150

User: Tony Fairfax

Plan Name: LA CD Remedial Plan

Plan Type: LA Congressional Districts

Districts & Their Incumbents

Monday, June 20, 2022

6:01 PM

District	Name	Party	Previous District
1	scalise	r	1
2	carter	d	2
3	higgins	r	3
4	johnson	r	4
5	letlow	r	5
6	graves	r	6

Number of Incumbents in District with more than one Incumbent:

0

Number of Districts with No Incumbent:

0

Number of Districts with Incumbents of more than one party:

0

Number of Districts with Paired Democrats:

0

Number of Districts with Paired Republicans:

0

User: Tony Fairfax

Plan Name: LA CD Remedial Plan

Plan Type: LA Congressional Districts

Fracking

Monday, June 20, 2022

5:57 PM

Pieces

District 1

County: Jefferson LA (22051)	2
County: Orleans LA (22071)	2

District 2

County: Jefferson LA (22051)	2
County: St. Martin LA (22099)	2

District 5

County: Madison LA (22065)	2
County: West Feliciana LA (22125)	2

User: Tony Fairfax

Plan Name: LA CD Remedial Plan

Plan Type: LA Congressional Districts

Core Constituencies

Monday, June 20, 2022

6:08 PM

From Plan: LA CD Plan HB1

Plan: LA CD Remedial Plan, District 1 --**776,290 Total Population**

	Population	[Hispanic Origin]	NH_Wht	AP_Bl
Dist. 1	589,903 (75.99%)	79,337 (84.54%)	376,139 (76.68%)	96,277 (66.55%)
Dist. 2	41,400 (5.33%)	5,392 (5.75%)	24,708 (5.04%)	9,429 (6.52%)
Dist. 3	44,607 (5.75%)	3,298 (3.51%)	24,046 (4.90%)	15,198 (10.51%)
Dist. 6	100,380 (12.93%)	5,819 (6.20%)	65,623 (13.38%)	23,769 (16.43%)
Total and % Population		93,846 (12.09%)	490,516 (63.19%)	144,673 (18.64%)

Plan: LA CD Remedial Plan, District 2 --**776,320 Total Population**

	Population	[Hispanic Origin]	NH_Wht	AP_Bl
Dist. 1	10,694 (1.38%)	1,205 (1.80%)	6,096 (2.28%)	2,649 (0.64%)
Dist. 2	625,283 (80.54%)	58,307 (87.20%)	173,795 (64.94%)	370,036 (89.35%)
Dist. 3	83,105 (10.70%)	3,082 (4.61%)	49,293 (18.42%)	28,462 (6.87%)
Dist. 6	57,238 (7.37%)	4,272 (6.39%)	38,456 (14.37%)	12,991 (3.14%)
Total and % Population		66,866 (8.61%)	267,640 (34.48%)	414,138 (53.35%)

Plan: LA CD Remedial Plan, District 3 --**776,259 Total Population**

	Population	[Hispanic Origin]	NH_Wht	AP_Bl
Dist. 3	581,882 (74.96%)	31,055 (73.51%)	402,355 (74.01%)	124,577 (79.58%)
Dist. 4	124,793 (16.08%)	7,861 (18.61%)	87,840 (16.16%)	23,361 (14.92%)
Dist. 5	69,584 (8.96%)	3,332 (7.89%)	53,437 (9.83%)	8,596 (5.49%)
Total and % Population		42,248 (5.44%)	543,632 (70.03%)	156,534 (20.17%)

Plan: LA CD Remedial Plan, District 4 --**776,267 Total Population**

	Population	[Hispanic Origin]	NH_Wht	AP_Bl
Dist. 4	569,000 (73.30%)	25,203 (72.86%)	301,210 (67.33%)	218,570 (83.45%)
Dist. 5	207,267 (26.70%)	9,390 (27.14%)	146,151 (32.67%)	43,355 (16.55%)
Total and % Population		34,593 (4.46%)	447,361 (57.63%)	261,925 (33.74%)

Plan: LA CD Remedial Plan, District 5 --**776,310 Total Population**

	Population	[Hispanic Origin]	NH_Wht	AP_Bl
Dist. 2	108,233 (13.94%)	3,289 (11.42%)	10,993 (3.59%)	93,140 (21.96%)
Dist. 3	66,681 (8.59%)	3,630 (12.61%)	24,322 (7.95%)	37,583 (8.86%)
Dist. 4	82,540 (10.63%)	2,178 (7.56%)	43,225 (14.13%)	35,836 (8.45%)
Dist. 5	382,185 (49.23%)	11,056 (38.39%)	178,607 (58.40%)	183,967 (43.38%)
Dist. 6	136,671 (17.61%)	8,645 (30.02%)	48,676 (15.92%)	73,520 (17.34%)
Total and % Population		28,798 (3.71%)	305,823 (39.39%)	424,046 (54.62%)

Plan: LA CD Remedial Plan, District 6 --**776,311 Total Population**

Core Constituencies

LA CD Remedial Plan

From Plan: **LA CD Plan HB1**

	Population	[Hispanic Origin]	NH_Wht	AP_Black
Dist. 1	175,671 (22.63%)	12,887 (22.93%)	138,002 (25.47%)	16,912 (11.93%)
Dist. 2	1,401 (0.18%)	240 (0.43%)	499 (0.09%)	631 (0.44%)
Dist. 5	117,241 (15.10%)	5,722 (10.18%)	71,435 (13.19%)	36,810 (25.96%)
Dist. 6	481,998 (62.09%)	37,349 (66.46%)	331,794 (61.25%)	87,450 (61.67%)
Total and % Population		56,198 (7.24%)	541,730 (69.78%)	141,803 (18.27%)

Exhibit B

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA**

PRESS ROBINSON, EDGAR CAGE,
DOROTHY NAIRNE, EDWIN RENÉ SOULÉ,
ALICE WASHINGTON, CLEE EARNEST
LOWE, DAVANTE LEWIS, MARTHA DAVIS,
AMBROSE SIMS, NATIONAL ASSOCIATION
FOR THE ADVANCEMENT OF COLORED
PEOPLE (“NAACP”) LOUISIANA STATE
CONFERENCE, and POWER COALITION FOR
EQUITY AND JUSTICE,

Plaintiffs,

v.

KYLE ARDOIN, in his official capacity as
Secretary of State for Louisiana,

Defendant.

Case No. 3:22-cv-00211-SDD-SDJ c/w

EDWARD GALMON, SR., CIARA HART,
NORRIS HENDERSON, and TRAMELLE
HOWARD,

Plaintiffs,

v.

R. KYLE ARDOIN, in his official capacity as
Louisiana Secretary of State,

Defendant.

Case No. 3:22-cv-00214-SDD-SDJ

DR. LISA HANDLEY REPORT ON REMEDIAL MAP

Plaintiffs have introduced a proposed remedial map (Remedial Map), drawn by plaintiffs' demography expert Anthony Fairfax, for consideration by the Court. I have been asked to review the Remedial Map to determine whether it includes districts that would provide Black voters with an opportunity to elect their candidates of choice to the U.S. House. I have also been asked to ascertain whether a district with less than a majority Black voting age population in the specific area of Remedial District 5 would provide Black voters with an opportunity to elect their preferred candidates.

District-specific, Functional Analysis of Remedial Map

A district-specific, functional analysis of the districts in the Remedial Map produces effectiveness scores that demonstrate that the plan offers two districts that would provide Black voters with an opportunity to elect their candidates of choice: Districts 2 and 5. The effectiveness scores for all six districts in the Remedial Map are reported in Table 1.¹

Table 1: Effectiveness Scores for Remedial Map

Remedial Map Districts	Effectiveness Score #1:	Effectiveness Score #2:
	Percentage of Contests Black-Preferred Candidate Wins or Advances to Runoff (15 Elections)	Percentage of Two-Candidate Contests Black-Preferred Candidate Wins (9 Elections)
1	13.3%	0.0%
2	100.0%	100.0%
3	0.0%	0.0%
4	26.7%	0.0%
5	86.7%	77.8%

¹ This analysis was conducted using the same methodology as my previous reports in this matter. See my expert report (Expert Report of Dr. Lisa Handley, April 13, 2022) for a complete description of the process used to derive these effectiveness scores.

Remedial Map Districts	Effectiveness Score #1:	Effectiveness Score #2:
	Percentage of Contests Black-Preferred Candidate Wins or Advances to Runoff (15 Elections)	Percentage of Two-Candidate Contests Black-Preferred Candidate Wins (9 Elections)
6	0.0%	0.0%

Voting Patterns in Remedial Map District 5

My analysis of voting patterns in recent statewide elections indicates that voting in Remedial District 5 is consistently and starkly racially polarized.² In every one of the 15 statewide elections analyzed, Black and white voters preferred different candidates. Black voters provided overwhelming support for their preferred candidates,³ and white voters strongly favored the opponents of these candidates. Estimates of the percentage of Black and white voters who supported each of the candidates in these 15 contests can be found in *Appendix A*.

Calculating the Black Voting Age Population Needed to Elect Black-Preferred Candidates

To determine the Black voting age population (“BVAP”) necessary to provide Black voters with an opportunity to elect their preferred candidates in this starkly polarized area of the State, I used turnout rates by race and estimates of Black and white support for Black-preferred

² This racial bloc voting analysis was conducted using the same methodology as my previous reports in this matter. See my expert report (Expert Report of Dr. Lisa Handley, April 13, 2022) for a description of the statistical techniques and data used to produce estimates of Black and white voting patterns. The racial bloc voting analysis here looks at the same 15 elections examined in my earlier analyses.

³ The only exceptions to very high levels of Black cohesion were the two contests that included two Black candidates preferred by Black voters: U.S. Senate in November 2020 and Attorney General in October 2015. Black voters split their votes between these two candidates.

candidates to calculate the percentage of the vote each of the 15 Black-preferred candidates would receive given these specific voting patterns but varying BVAP percentages.⁴

Because Black Louisianans who are eligible to vote often turn out to vote at lower rates than white Louisianans (this is consistently the case in Remedial District 5, as reported in *Appendix A*), the BVAP needed to ensure that Black voters comprise at least half of the voters in an election is often higher than 50%. The BVAP percentage needed to equalize Black and white voters can be calculated mathematically.⁵ But equalizing turnout is only the first step in the process – it does not take into account the voting patterns of Black and white voters. If voting is racially polarized but a significant number of white voters typically “crossover” to vote for Black voters’ preferred candidate, it may be the case that this crossover voting can compensate for depressed Black turnout relative to white turnout. If this is the case, Black voters need not make

⁴ For an in-depth discussion of this approach to creating effective minority districts, see Bernard Grofman, Lisa Handley and David Lublin, “Drawing Effective Minority Districts: A Conceptual Framework and Some Empirical Evidence,” *North Carolina Law Review*, volume 79(5), June 2001.

⁵ The equalizing percentage is calculated mathematically by solving the following equation:

Let

M = the proportion of the district’s voting age population that is Black

W = 1-M = the proportion of the district’s voting age population that is white

A = the proportion of the Black voting age population that turned out to vote

B = the proportion of the white voting age population that turned out to vote

Therefore,

M(A) = the proportion of the population that is Black and turned out to vote (1)

(1-M)B = the proportion of total population that is white and turned out to vote (2)

To find the value of M that is needed for (1) and (2) to be equal, (1) and (2) are set as equal and we solve for M algebraically:

$$M(A) = (1 - M) B$$

$$M(A) = B - M(B)$$

$$M(A) + M(B) = B$$

$$M(A + B) = B$$

$$M = B / (A+B)$$

Thus, for example, if 39.3% of the black population turned out and 48.3% of the white population turned out, B=.483 and A=.393, and $M = .483 / (.393 + .483) = .483 / .876 = .5513$, therefore a Black VAP of 55.1% would produce an equal number of Black and white voters. (For a more in-depth discussion of equalizing turnout see Kimball Brace, Bernard Grofman, Lisa Handley and Richard Niemi, “Minority Voting Equality: The 65 Percent Rule in Theory and Practice,” *Law and Policy*, 10(1), January 1988.)

up at least 50% of the voters in an election for the Black-preferred candidate to win. On the other hand, without significant white crossover voting, a BVAP of 50%, or even higher, may be necessary to elect the candidates of choice of Black voters.

To illustrate this mathematically, consider a district that has 1000 persons of voting age, 50% of whom are Black and 50% of whom are white. Let us begin by assuming that Black turnout is lower than White turnout in a two-candidate election. In our hypothetical election example, 42% of the BVAP turn out to vote and 60% of the white voting age population (“WVAP”) vote.⁶ This means that, for our illustrative election, there are 210 Black voters and 300 white voters.

Further suppose that 96% of the Black voters supported their candidate of choice and 25% of the white voters cast their votes for this candidate (with the other 75% supporting her opponent in the election contest). Thus, in our example, Black voters cast 200 of their 210 votes for the Black-preferred candidate and their other 8 votes for her opponent; white voters cast 75 of their 300 votes for the Black-preferred candidate and 225 votes for their preferred candidate:

	VAP	turnout	voters	support for Black- preferred candidate	votes for Black- preferred candidate	support for white- preferred candidate	votes for white- preferred candidate
Black	500	0.42	210	0.96	202	0.04	8
White	500	0.60	300	0.25	75	0.75	225
			510		277		233

The candidate of choice of Black voters would receive a total of 277 votes (202 from Black voters and 75 from white voters), while the candidate preferred by white voters would receive only 233 votes (8 from Black voters and 225 from white voters). The Black-preferred candidate would win the election with 55.4% (277/500) of the vote in this hypothetical 50% Black VAP district. And the Black-preferred candidate would be successful despite the fact that Black eligible voters turned out to vote at a lower rate than white eligible voters and the election was racially polarized.

⁶ In this example, a district that is 58.8% BVAP would be required to ensure that 50% of the voters on Election Day are Black voters.

The candidate of choice of Black voters would still win the election by a very small margin (50.9%) in a district that is 45% Black with these same voting patterns:

	VAP	turnout	voters	support for Black- preferred candidate	votes for Black- preferred candidate	support for white- preferred candidate	votes for white- preferred candidate
Black	450	0.42	189	0.96	181	0.04	8
White	550	0.60	330	0.25	83	0.75	248
			519		264		255

In a district with a 40% BVAP, however, the Black-preferred candidate would garner only 47.5% of the vote.⁷

Table 2 utilizes the results of the racial bloc voting analysis of Black and white voters to calculate the percentage of the vote each Black-preferred candidate would receive,⁸ given the turnout rates of Black and white eligible voters and the degree of Black cohesion and white crossover voting for each of these candidates, in a 55%, 50%, 45%, and 40% Black VAP district in this very specific area of the State.⁹ I have offered opinions relying upon this methodology that have been accepted by courts in other voting cases.

The 15 elections have been divided into three sections: those elections with only two candidates, elections with more than two candidates, and the two elections in which Black voters

⁷ In the illustrative examples, VAP and voting patterns are known and the equation solves for the percentage of votes received by the Black-preferred candidate. In determining the percentage of BVAP needed to provide Black voters with an opportunity to elect their candidates of choice, voting patterns and the percentage of votes are known and we are solving for the VAP needed to produce at least 50 percent of the votes for the Black-preferred candidate.

⁸ Because there was a small number of voters (less than 3% in every instance) that indicated they were not Black or white – they marked “other” on their voter registration form – and I wanted to account for all possible voters in calculating the percentage Black VAP needed to win election, I conducted an additional racial bloc voting analysis with Black and non-Black voters. The results of this analysis can be found in *Appendix B*. (Because “other” voters had lower turnout rates than white voters and tended to support Black-preferred candidates more than white voters, non-Black turnout was lower than white turnout and Black-preferred candidates received a slightly higher percentage of the non-Black vote than the white vote.)

⁹ Table 2 is generated based on the EI RxC estimates in *Appendix B*.

divided their support across two Black candidates (in contests that included more than two candidates). In the two contests in which Black voters were not cohesive in support of a single candidate, the Black-preferred candidates would not have won 50% of the vote with even 100% BVAP and therefore the discussion that follows disregards these contests and focuses on the 13 elections in which shifts in the percentage BVAP would impact whether the candidate would receive at least 50% of the vote.

In a district with a 40% BVAP, the Black-preferred candidate would have won only one of the 13 election contests (the Lieutenant Governor's contest in November 2015). If the district had a BVAP of 45%, the Black-preferred candidate would have won three of the possible 13 elections (Lieutenant Governor in November 2015, and Secretary of State in December 2018 and November 2019). However, it is not until the district has a BVAP of 50% that the Black-preferred candidate wins a majority of the two-candidate contests (6 out of 9), and one of the contests with more than two candidates, for a total of seven wins across the possible 13 contests (54%).

Table 2: Percent Black Voting Age Population Needed to Win Election

Remedial Map Percent Black VAP needed for Black-Preferred candidate to win 50% of the vote in Congressional District 5	race of B-P candidate	Turnout Rate and Percent of Vote for Black-preferred Candidates						percent of vote B-P cand would have received if district was 55% black VAP	percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP
		Black voters			Non-Black voters						
		turnout of VAP	votes for B-P	votes for all others	turnout of VAP	votes for B-P	votes for all others				
2 Candidate Contests											
US President Nov 2020	W/B	58.8	92.6	7.4	61.7	16.0	84.0	57.2	53.4	49.6	45.8
Lt Governor Oct 2019	B	38.9	88.8	11.2	43.5	7.0	93.0	49.7	45.6	41.6	37.6
Attorney General Oct 2019	B	38.9	90.9	9.1	43.5	7.9	92.1	51.2	47.1	43.0	38.9
Treasurer Oct 2019	B	38.9	94.4	5.6	43.5	9.4	90.6	53.8	49.5	45.3	41.1
Secretary of State Nov 2019	B	48.3	96.8	3.2	45.0	11.1	88.9	59.7	55.5	51.2	46.8
Secretary of State Dec 2018	B	17.4	96.9	3.1	17.0	14.0	86.0	60.1	55.9	51.8	47.6
Treasurer Nov 2017	B	7.7	98.5	1.5	10.1	15.9	84.1	55.7	51.6	47.6	43.7
Secretary of State Oct 2015	B	34.3	94.4	5.6	36.7	15.1	84.9	57.4	53.4	49.5	45.5
Lieut Governor Nov 2015	B	36.4	97.5	2.5	34.2	24.6	75.4	65.8	62.2	58.5	54.9
Contests with more than 2 Candidates											
Secretary of State Oct 2019	B	38.9	92.0	8.0	43.5	7.9	92.1	51.8	47.6	43.4	39.3
Secretary of State 2018 Nov	B	42.8	56.3	43.7	43.8	3.7	96.3	32.3	29.7	27.1	24.4
Treasurer Oct 2017	B	7.3	88.4	11.6	13.6	7.3	92.7	39.4	35.6	32.0	28.7
Lieut Governor Oct 2015	B	34.3	90.6	9.4	36.7	15.4	84.6	55.5	51.7	48.0	44.3
Contests with more than 1 Black Candidate											
US Senate Nov 2020	B	58.8	46.6	53.4	61.7	4.5	95.5	27.2	25.0	22.9	20.9
Attorney General Oct 2015	B	34.3	41.3	49.0	36.7	5.2	94.8	25.8	23.8	21.8	19.8

Table 3 summarizes Table 2 by providing the number (and percentage) of elections the Black-preferred candidate would win depending on the percentage BVAP.

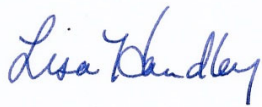
Table 3: Number of Elections Won by Black-Preferred Candidates Depending on the BVAP Percentage

	55% BVAP	50% BVAP	45% BVAP	40% BVAP
Two candidate contests	8 (88.9%)	6 (66.7%)	3 (33.3%)	1 (11.1%)
Contests with more than 2 candidates	2 (50.0%)	1 (25.0%)	0 (0.0%)	0 (0.0%)

Conclusion

The Remedial Map offers two districts that would provide Black voters with an opportunity to elect their preferred candidates to the U.S. House of Representatives: Districts 2 and 5. Because voting is consistently and starkly polarized in the area of Remedial District 5, and there is no significant white crossover voting in this specific area of the State, a district with a BVAP of at least 50% is needed to provide Black voters with an opportunity to participate in the electoral process and elect candidates of their choice to office.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed June 22, 2022.



Lisa Handley, Ph. D.

Appendix A

Appendix A Remedial Map District 5	Party	Race	Estimates for Black Voters				Estimates for White Voters					
			95% confidence interval	El	2x2	ER	HP	95% confidence interval	El	2x2	ER	HP
2020 November U.S. President Biden/Harris Trump/Pence Others Black turnout/BVAP White turnout/WWAP U.S. Senator Adrian Perkins Derrick Edwards Bill Cassidy Others Black turnout/BVAP White turnout/WWAP 2019 October Lieutenant Governor Willie Jones Billy Nungesser Black turnout/BVAP White turnout/WWAP Attorney General Ike Jackson Jeff Landry Black turnout/BVAP White turnout/WWAP	D	W/B	88.5	76.1, 94.2	96.6	99.2	94.3	19.5	12.9, 33.5	9.1	6.1	8.4
	R	W/W	10.5	4.8, 22.9	2.9	-1.1	4.1	79.8	65.6, 86.5	88.9	92.9	90.8
	58.8		0.9	.8, 1.1	1.9	1.9	1.6	0.7	.6, .9	1.3	1.0	0.8
	68.4											
	D	B	46.5	46.0, 47.0	47.7	46.2	46.2	3.4	3.1, 3.8	2.9	1.7	3.0
	D	B	31.6	31.0, 32.2	32.4	33.2	29.7	1.8	1.5, 2.2	1.6	1.4	2.9
	R	W	5.7	5.3, 6.0	4.8	3.4	7.4	90.5	90.0, 90.8	90.2	91.7	88.7
	58.8		16.3	15.8, 16.8	17.3	17.2	16.8	4.3	3.9, 4.7	4.7	5.1	5.4
	68.4											
	D	B	87.5	87.0, 88.2	88.2	89.6	83.8	5.7	5.2, 6.2	6.1	6.2	9.6
	R	W	12.5	11.8, 13.0	11.8	10.5	16.2	94.3	93.8, 94.8	93.9	93.9	90.4
	38.9											
49.1												
D	B	89.4	88.9, 90.0	90.4	90.8	86.8	6.2	5.8, 6.7	6.9	6.6	9.8	
R	W	10.6	10.0, 11.1	9.6	9.2	13.2	93.8	93.3, 94.2	93.1	93.4	90.2	
38.9												
49.1												

Appendix B

Exhibit C

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

PRESS ROBINSON, ET AL	*	CIVIL ACTION
	*	
VERSUS	*	NO. 22-211-SDD
	*	
KYLE ARDOIN, ET AL	*	CONSOLIDATED WITH
	*	
EDWARD GALMON SR., ET AL	*	NO. 22-214-SDD
	*	
VERSUS	*	MAY 9, 2022
	*	
KYLE ARDOIN, ET AL	*	VOLUME 1 OF 5
* * * * *	*	

MOTION FOR PRELIMINARY INJUNCTION BEFORE
THE HONORABLE SHELLY D. DICK
UNITED STATES CHIEF DISTRICT JUDGE

APPEARANCES:

FOR THE ROBINSON
PLAINTIFFS:

NAACP LEGAL DEFENSE FUND AND
EDUCATIONAL FUND, INC.
BY: STUART NAIFEH, ESQ.
KATHRYN SADASIVAN, ESQ.
VICTORIA WENGER, ESQ.
SARA ROHANI, ESQ.
40 RECTOR STREET, FIFTH FLOOR
NEW YORK, NEW YORK 10006

ADCOCK LAW, LLC
BY: JOHN ADCOCK, ESQ.
3110 CANAL STREET
NEW ORLEANS, LOUISIANA 70119

FOR THE GALMON
PLAINTIFFS:

WALTERS, PAPILLION, THOMAS,
CULLENS, LLC
BY: DARREL J. PAPILLION, ESQ.
12345 PERKINS ROAD, BUILDING ONE
BATON ROUGE, LOUISIANA 70810

1 ELIAS LAW GROUP, LLP
2 BY: ABHA KHANNA, ESQ.
3 1700 SEVENTH AVE., SUITE 2100
4 SEATTLE, WASHINGTON 98101

5 ELIAS LAW GROUP, LLP
6 BY: JACOB D. SHELLY, ESQ.
7 OLIVIA N. SEDWICK, ESQ.
8 LALITHA D. MADDURI, ESQ.
9 10 G STREET N.E., SUITE 600
10 WASHINGTON, D.C. 20002

11 FOR KYLE ARDOIN,
12 IN HIS OFFICIAL
13 CAPACITY AS SECRETARY
14 OF STATE
15 SHOWS, CALI & WALSH, LLP
16 BY: JOHN C. WALSH, ESQ.
17 628 ST. LOUIS STREET
18 BATON ROUGE, LOUISIANA 70821

19 NELSON MULLINS RILEY AND
20 SCARBOROUGH, LLC
21 BY: PHILLIP STRACH, ESQ.
22 THOMAS A. FARR, ESQ.
23 4140 PARKLAKE AVENUE, SUITE 200
24 RALEIGH, NORTH CAROLINA 27612

25 FOR THE LOUISIANA
LEGISLATIVE BLACK CAUCUS:
STEPHEN M. IRVING, LLC
BY: STEPHEN M. IRVING, ESQ.
111 FLOUNDERS DRIVE, SUITE 700
BATON ROUGE, LOUISIANA 70810

JOHNSON LAW FIRM
BY: ERNEST L. JOHNSON, ESQ.
3313 GOVERNMENT STREET
BATON ROUGE, LOUISIANA 70806

ARTHUR THOMAS & ASSOCIATES
BY: ARTHUR R. THOMAS, ESQ.
3313 GOVERNMENT STREET
BATON ROUGE, LOUISIANA 70806

FOR LEGISLATIVE
INTERVENORS CLAY
SCHEXNAYDER AND PATRICK
CORTEZ:
BAKERHOSTETLER, LLP
BY: PATRICK T. LEWIS, ESQ.
127 PUBLIC SQUARE, SUITE 2000
CLEVELAND, OHIO 44114

BAKERHOSTETLER, LLP
BY: E. MARK BRADEN, ESQ.
KATHERINE L. MCKNIGHT, ESQ.
1050 CONNECTICUT AVENUE, N.W.,
SUITE 1100
WASHINGTON, D.C. 20036

1 INTERVENOR DEFENDANT
2 STATE OF LOUISIANA:

LOUISIANA'S OFFICE OF THE ATTORNEY
GENERAL

3 BY: JEFFREY M. WALE, ESQ.
4 ANGELIQUE D. FREEL, ESQ.
5 CAREY TOM JONES, ESQ.
6 1885 NORTH THIRD STREET
7 BATON ROUGE, LOUISIANA 70802

8 HOLTZMAN VOGEL BARAN TORCHINSKY &
9 JOSEFIK, PLLC

10 BY: PHILLIP M. GORDON, ESQ.
11 15405 JOHN MARSHALL HIGHWAY
12 HAYMARKET, VIRGINIA 20169

13 OFFICIAL COURT REPORTER:

14 SHANNON L. THOMPSON, CCR
15 UNITED STATES COURTHOUSE
16 777 FLORIDA STREET
17 BATON ROUGE, LOUISIANA 70801
18 SHANNON_THOMPSON@LAMD.USCOURTS.GOV
19 (225)389-3567
20
21
22
23
24
25

PROCEEDINGS RECORDED BY MECHANICAL STENOGRAPHY USING
COMPUTER-AIDED TRANSCRIPTION SOFTWARE

10:23 1 A. OKAY.

2 Q. SO YOU WOULD ADMIT THAT A LOT OF PEOPLE LIVING IN BATON
3 ROUGE -- LIVE HERE NOW, THEY ONCE LIVED IN NEW ORLEANS?

4 A. I DON'T KNOW WHERE THEY CAME FROM 'CAUSE, YOU KNOW,
5 KATRINA AFFECTED ALMOST ALL OF LOUISIANA.

6 Q. SURE.

7 A. SO THEY COULD HAVE COME FROM A LITTLE BIT OF EVERYWHERE.
8 I DON'T KNOW WHERE THEY CAME FROM, THOUGH.

9 Q. SURE. BUT YOU COULD SEE THAT SOME PEOPLE DID -- YOU KNOW,
10 DID MOVE FROM NEW ORLEANS TO THE BATON ROUGE AREA?

11 A. I KNOW A FEW THAT MOVED.

12 MR. NAIFEH: OBJECTION. ASKED AND ANSWERED.

13 MR. WALE: I APOLOGIZE, YOUR HONOR. I'M MOVING ON.

14 BY MR. WALE:

15 Q. AND SO --

16 THE COURT: OKAY, FOLKS. IF YOU'RE GOING TO MAKE
17 OBJECTIONS, MAKE THEM AND THEN EITHER LET ME RULE ON THEM OR IF
18 -- I MEAN, OKAY. GO AHEAD. CARRY ON.

19 MR. WALE: YES, YOUR HONOR, I APOLOGIZE. I'M GOING
20 TO MOVE ON.

21 THE COURT: CARRY ON.

22 BY MR. WALE:

23 Q. SO WOULD YOU SAY THAT NEW ORLEANS AND BATON ROUGE WOULD
24 HAVE A LOT IN COMMON WITH EACH OTHER AS BOTH URBAN AREAS?

25 A. NO.

10:24 1 Q. YOU WOULD NOT.

2 WELL, IN YOUR DECLARATION YOU DO STATE THAT NEW
3 ORLEANS AND BATON ROUGE ARE DISTINCT CITIES WITH DISTINCT
4 NEEDS?

5 A. "DISTINCT," THAT MEANS THAT THEY HAVE THEIR OWN -- NEW
6 ORLEANS HAS ITS OWN AND BATON ROUGE HAS ITS OWN.

7 Q. RIGHT. AND SO FOR THAT REASON YOU THINK THAT THEY SHOULD
8 BE IN DIFFERENT CONGRESSIONAL DISTRICTS. RIGHT?

9 A. YEAH.

10 Q. AND SO MY QUESTION FOR YOU IS: DON'T ALL THE
11 CONGRESSIONAL DISTRICTS HAVE CITIES THAT ARE VERY DISTINCT FROM
12 EACH OTHER? I MEAN, FOR EXAMPLE, MONROE AND BOGALUSA ARE IN
13 THE SAME CONGRESSIONAL DISTRICT, BUT THEY HAVE VERY DISTINCT
14 NEEDS.

15 WOULD YOU AGREE TO THAT?

16 A. YEAH.

17 Q. AND WOULD YOU AGREE ABOUT LAKE CHARLES AND LAFAYETTE
18 HAVING DISTINCT NEEDS?

19 A. UH-HUH.

20 Q. AND THEN ALSO, YOU KNOW, LIKE SHREVEPORT AND MINDEN UP IN
21 NORTH LOUISIANA?

22 A. RIGHT.

23 Q. SO YOU WOULD AGREE WITH THAT.

24 I WAS INTERESTED THAT YOU HAD STATED IN YOUR
25 DECLARATION -- I DO FORGET WHERE -- THAT YOU SAID THAT YOU FEEL

03:27 1 A. I DO.

2 Q. YOU MENTIONED YOU'RE A LAWYER. WHERE DID YOU ATTEND LAW
3 SCHOOL?

4 A. SOUTHERN UNIVERSITY LAW CENTER IN BATON ROUGE.

5 Q. IN YOUR EXPERIENCE, IS IT COMMON FOR ST. LANDRY RESIDENTS
6 TO ATTEND COLLEGE OR A UNIVERSITY IN BATON ROUGE?

7 A. YES.

8 Q. DO YOU HAVE ANY OTHER PERSONAL EXPERIENCE WITH THAT?

9 A. YES. WE ARE NINE SIBLINGS IN MY FAMILY. OF THE NINE,
10 FIVE HAVE COLLEGE DEGREES OR POST-GRADUATE DEGREES. ALL FIVE
11 OF THOSE ATTENDED COLLEGE IN BATON ROUGE. ALSO, JUST A LOT --
12 THERE ARE A LOT OF PEOPLE I KNOW -- A LOT OF PEOPLE FROM ST.
13 LANDRY PARISH WHO ATTEND COLLEGE IN BATON ROUGE.

14 Q. AND WHAT DO YOU ATTRIBUTE THAT EDUCATIONAL CONNECTION TO?

15 A. WELL, I THINK AS FAR AS THE AFRICAN-AMERICAN COMMUNITY IS
16 CONCERNED, THAT STARTED AS THE ONLY OPTION, BECAUSE THERE WERE
17 NO INTEGRATED COLLEGES THAT PEOPLE COULD ATTEND. THERE WAS
18 GRAMBLING, BUT GRAMBLING IS IN NORTHWEST LOUISIANA AND
19 VIRTUALLY INACCESSIBLE AT THAT TIME FROM ST. LANDRY PARISH.

20 AND THE OTHER COLLEGE IN LAFAYETTE WAS AT THE TIME
21 KNOWN AS SOUTHERN LOUISIANA INSTITUTE. SO IT WAS A REGIONAL
22 COLLEGE AND JUST DIDN'T HAVE THE PRESTIGE THAT LSU HAD AND
23 CONTINUES TO HAVE IN LOUISIANA.

24 AND SO FROM THAT NECESSITY, I GUESS, FROM THE
25 SEGREGATION AND THE EDUCATIONAL OPPORTUNITIES, IT'S BECOME SORT

03:28 1 OF A TRADITION FOR PEOPLE TO ATTEND IN BATON ROUGE.

2 Q. IN ADDITION TO THE EDUCATIONAL TIES, ARE THERE OTHER
3 ECONOMIC TIES THAT LINK ST. LANDRY PARISH WITH BATON ROUGE?

4 A. DEFINITELY.

5 Q. CAN YOU DESCRIBE THAT?

6 A. ALL OF SOUTH LOUISIANA IS VERY INVOLVED AND, IN SOME
7 EXTENT, DEPENDENT UPON THE PETROCHEMICAL INDUSTRY, AND
8 PARTICULARLY AS IT RELATES TO OFFSHORE DRILLING AND REFINING.
9 AND SO THERE ARE A LOT OF JOBS IN THAT INDUSTRY.

10 MY FATHER, FOR INSTANCE, BELONGED TO BATON ROUGE
11 LOCAL 1177, WHICH IS THE LABORERS LOCAL. AND HE AND A LOT OF
12 MEN FROM ST. LANDRY PARISH OF HIS GENERATION RODE A BUS OR
13 HITCHHIKED EVERY DAY TO BATON ROUGE TO WORK. AS A MATTER OF
14 FACT, THOSE BUSES WEREN'T COMMERCIAL BUSES. THEY WERE BUSES
15 THAT WERE SET UP SPECIFICALLY FOR THAT PURPOSE: TO BRING
16 PEOPLE TO WORK IN BATON ROUGE. SO THAT, AND, OF COURSE, WE
17 HAVE A REFINERY IN ST. LANDRY PARISH THAT'S A VERY STRONG TIE,
18 A VERY STRONG ECONOMIC TIE.

19 ALSO, THERE IS AGRICULTURAL TIES THAT -- YOU KNOW,
20 IMMEDIATELY TO THE WEST OF THE CITY OF BATON ROUGE. IF YOU ARE
21 TRAVELING UP 190 TOWARD OPELOUSAS, YOU'LL SEE SUGARCANE FIELDS
22 ALL THROUGHOUT THAT AREA, AND THAT IS A VERY IMPORTANT RURAL
23 CROP IN ST. LANDRY PARISH AND A LOT OF SOUTH LOUISIANA UP -- AS
24 I SAID, UP TO THE BORDER OF BATON ROUGE PROPER.

25 Q. ARE THERE SOCIAL AND CULTURAL CONNECTIONS THAT ST. LANDRY

03:30 1 PARISH SHARES WITH BATON ROUGE?

2 A. WELL, WE DO A ZYDECO PUBLIC AFFAIRS PROGRAM, SO -- THAT
3 PEOPLE LISTEN TO IN BATON ROUGE. AND YES, THERE ARE. THE
4 MEDIA -- I KNOW A MEDIA MARKET IS A TERM OF ART USED IN THAT
5 INDUSTRY. BUT MEDIA -- SO ST. LANDRY PARISH IS NOT PART OF THE
6 BATON ROUGE MEDIA MARKET, BUT THERE IS A GREAT DEAL OF BATON
7 ROUGE MEDIA CONSUMPTION IN ST. LANDRY PARISH.

8 WHEN YOU SUBSCRIBE FOR CABLE, FOR INSTANCE, YOU CAN
9 GET THE BATON ROUGE STATIONS. THE BATON ROUGE NEWSPAPER IS
10 VERY WIDELY READ IN ST. LANDRY PARISH. BATON ROUGE TELEVISION
11 STATIONS, RADIO STATIONS ARE VERY POPULAR IN ST. LANDRY PARISH.
12 SO THERE IS THAT CONNECTION.

13 THERE'S ALSO FAMILY CONNECTIONS THAT DERIVE FROM
14 THOSE ECONOMIC CONNECTIONS WE TALKED ABOUT EARLIER. PEOPLE GET
15 JOBS AT THE PLANTS, THEY MOVE THERE, THEIR FAMILIES GROW UP
16 THERE. I HAVE TWO DAUGHTERS WHO LIVE IN BATON ROUGE.

17 YOU ALSO HAVE THAT HISTORIC CONNECTION. I TALKED
18 ABOUT SPANISH GOVERNANCE OF LOUISIANA. BATON ROUGE AND ST.
19 LANDRY PARISH ALSO BOTH SHARE THE VESTIGES OF THAT STRONG
20 FRENCH AND SPANISH INFLUENCE ON BOTH OF THOSE AREAS, AND THE
21 FOOD. YOU KNOW, IT'S PERVASIVE. THOSE CONNECTIONS ARE
22 PERVASIVE.

23 Q. ANY OTHER CONNECTIONS IN RELIGION, SPORTS, OTHER THINGS
24 LIKE THAT?

25 A. YEAH. THE CATHOLIC CHURCH IS VERY -- THERE ARE A LOT OF

03:32 1 CATHOLICS IN SOUTH LOUISIANA, AND THE CATHOLIC CHURCH
2 HISTORICALLY HAS HAD A LOT OF INFLUENCE IN THE SOUTHERN PART OF
3 THE STATE, BOTH -- WELL, PARTICULARLY FROM A CULTURAL AND
4 SOCIAL STANDPOINT.

5 AND AS FAR AS SPORTS ARE CONCERNED, THIS IS SAINTS
6 COUNTRY. AND SO, YOU KNOW, THIS IS WHERE THE SAINTS FANS ARE.

7 Q. WOULD COMMUNITIES OF INTEREST BEST BE MAINTAINED BY
8 GROUPING ST. LANDRY PARISH IN A CONGRESSIONAL DISTRICT WITH
9 SHREVEPORT OR WITH BATON ROUGE?

10 A. DEFINITELY BATON ROUGE.

11 Q. WHEN WE'RE THINKING SPECIFICALLY ABOUT CONGRESSIONAL
12 REPRESENTATION, WHY IS IT IMPORTANT TO KEEP ST. LANDRY PARISH
13 WITH BATON ROUGE?

14 A. ST. LANDRY PARISH IS NOT A SMALL PARISH, YOU KNOW,
15 LOUISIANA -- AS FAR AS LOUISIANA PARISHES GO, BUT IT IS NOT A
16 LARGE HEAVILY-POPULATED AREA. GENERALLY MOSTLY RURAL, 13
17 MUNICIPALITIES BUT NOT DENSELY POPULATED. IN ORDER FOR ST.
18 LANDRY TO HAVE ITS FULL POLITICAL POTENTIAL, IT NEEDS TO BE
19 PAIRED WITH WHAT I CALL SOME CENTER OF INFLUENCE OR CENTERS OF
20 INFLUENCE.

21 AND THERE HAVE TRADITIONALLY BEEN MORE DENSELY --
22 THREE -- THREE MORE DENSELY POPULATED AREAS THAT ST. LANDRY HAS
23 BEEN ASSOCIATED WITH AND HAS ALIGNED WITH. AND THOSE WOULD BE
24 LAKE CHARLES, LAFAYETTE AND BATON ROUGE. AND THERE ARE NO
25 OTHER DENSELY-POPULATED AREAS THAT -- WHERE ST. LANDRY CAN

03:33 1 EXTEND AND MAGNIFY ITS INFLUENCE BY ASSOCIATING WITH THOSE
2 AREAS. IF ST. LANDRY IS CUT OFF FROM ONE OF THOSE, YOU CAN
3 MAKE IT. YOU STILL HAVE SOME VOICE BECAUSE YOU HAVE TWO
4 REMAINING. IF YOU'RE CUT OFF FROM TWO, YOU HAVE LESS OF A
5 VOICE, BUT YOU STILL -- THERE IS STILL SOME REASON FOR PEOPLE
6 TO PAY ATTENTION TO YOU. BUT WHEN YOU'RE CUT OFF FROM ALL
7 THREE, YOU ARE EFFECTIVELY DISENFRANCHISED AS FAR AS
8 CONGRESSIONAL POLITICS GO BECAUSE NOBODY CARES ABOUT YOU.

9 FOR INSTANCE, RIGHT NOW UNDER THE 2011 MAP, ST.
10 LANDRY IS DIVIDED BETWEEN THE NORTHWESTERN PART OF THE STATE
11 AND THE NORTHEASTERN PART OF THE STATE. AS FAR AS I KNOW, THE
12 CONGRESSMAN FROM SHREVEPORT HAS NEVER VISITED. HE HAS ROUGHLY
13 HALF THE GEOGRAPHIC AREA OF ST. LANDRY PARISH. I DON'T KNOW
14 THAT HE'S VISITED SINCE HE'S BEEN ELECTED.

15 NOW, I DO KNOW THAT SEVERAL DIFFERENT CONGRESS PEOPLE
16 FROM NORTHWEST LOUISIANA HAVE VISITED. SO I DON'T -- I DON'T
17 KNOW WHAT'S THE REASON FOR THAT DISPARITY. WELL, I DO HAVE
18 SOME IDEAS WHAT THE REASONS ARE FOR THAT DISPARITY, BUT THE
19 DISPARITY EXISTS.

20 Q. JUST FOR THE RECORD, I THINK YOU SAID PEOPLE FROM
21 NORTHWEST HAVE --

22 A. NO. NORTHEAST. I'M SORRY. I MEANT TO SAY FROM THE
23 NORTHEAST HAVE VISITED. FROM THE MONROE AREA, THE CURRENT
24 CONGRESSMAN IS FROM START, I BELIEVE. I KNOW SHE'S BEEN THERE,
25 WHICH IS IN THE NORTHEAST PORTION OF THE STATE. BUT THE

03:35 1 CONGRESSMAN FROM THE NORTHWEST, WHO IS FROM SHREVEPORT, AS FAR
2 AS I KNOW, HAS NEVER VISITED ST. LANDRY.

3 Q. ARE THERE POLICY INTERESTS THAT RESIDENTS OF ST. LANDRY
4 SHARE WITH BATON ROUGE THAT THEY DO NOT NECESSARILY SHARE WITH
5 SHREVEPORT RESIDENTS?

6 A. ABSOLUTELY. AND LET ME JUST -- I'LL GIVE YOU JUST A
7 COUPLE. ONE IS THE PETROCHEMICAL INDUSTRY THAT I MENTIONED
8 EARLIER, PARTICULARLY AS IT DEALS WITH REFINING AND OFFSHORE
9 OIL DRILLING. AND, YOU KNOW, THAT -- IN THE NORTHERN PART OF
10 THE STATE YOU HAVE NATURAL GAS. BUT THAT IS A DIFFERENT ANIMAL
11 FROM THE REFINERY AND OFFSHORE OIL DRILLING PETROCHEMICAL
12 BUSINESS.

13 IN THE SOUTHERN PART OF THE STATE YOU ALSO HAVE THE
14 ENVIRONMENTAL CONCERNS THAT COME WITH THOSE REFINERIES. AND
15 I'M SURE YOU'VE HEARD OF CANCER ALLEY AND THOSE TYPES OF
16 ENVIRONMENTAL CONCERNS INVOLVED WITH, YOU KNOW, AIR QUALITY AND
17 WATER QUALITY AND THAT TYPE OF THING THAT WOULD -- THAT WOULD
18 BE COMMON TO ST. LANDRY PARISH AND TO BATON ROUGE.

19 ALSO, YOU HAVE THE ISSUE OF CLIMATE AS IT RELATES TO
20 THE PETROCHEMICAL INDUSTRY, BUT YOU ALSO HAVE THE ISSUE OF
21 WEATHER AND DISASTER RELIEF. IN SOUTH LOUISIANA, DISASTER
22 RELIEF -- CONGRESSIONAL POLICY ON DISASTER RELIEF IS CRITICAL.
23 AND BATON ROUGE AND ST. LANDRY PARISH WOULD SHARE THAT; WHEREAS
24 THE NORTHERN PART OF THE STATE, PARTICULARLY NORTHWESTERN PART
25 OF THE STATE -- THE NORTHEASTERN PART OF THE STATE HAS THE

03:37 1 RIVER -- MISSISSIPPI RIVER. THERE ARE SOME FLOODING PROBLEMS.
2 THERE ARE SOME DISASTER RELIEF ISSUES THAT WOULD AFFECT THAT
3 PART.

4 BUT THE SOUTHERN PART, HURRICANES ARE THE THING. AND
5 IT SEEMS THAT EVERY YEAR WE GET HIT WITH ONE, SOMETIMES
6 MULTIPLE HURRICANES. YOU MAY HAVE SEEN IN THE NEWS IN THE LAST
7 COUPLE OF YEARS THERE ARE SOME CONGRESS PEOPLE WHO ARE OPPOSED
8 TO THE FEDERAL GOVERNMENT'S AGGRESSIVE RESPONSE TO DISASTER --
9 FEMA'S RESPONSE APPROPRIATIONS DEALING WITH DISASTER RELIEF.

10 IN NORTH LOUISIANA YOU MIGHT BE ABLE TO GET AWAY WITH
11 BEING OPPOSED TO THOSE RELIEF EFFORTS. IN SOUTH LOUISIANA
12 YOU'RE NOT GOING TO MAKE IT THROUGH THE NEXT ELECTION IF YOU
13 ARE NOT SUPPORTING YOUR PEOPLE IN THAT DISASTER RELIEF.

14 Q. ARE THE CROPS THE SAME CROPS FOR --

15 A. ONE -- I WAS GOING TO TELL YOU ONE MORE. AND THIS ONE IS
16 NOT AS WIDELY KNOWN, BUT I MENTIONED THE SUGARCANE FIELDS WEST
17 OF BATON ROUGE. SUGARCANE IS AN IMPORTANT RURAL CROP IN SOUTH
18 LOUISIANA. AND THE ISSUE OF SUGAR SUPPORTS, THAT'S SOMETHING A
19 LOT OF PEOPLE NEVER PAY ANY ATTENTION TO. IT'S NOT AS WIDELY
20 KNOWN AS MAYBE SOME OF THE OTHER ISSUES THAT I'VE MENTIONED.
21 BUT THE ISSUE OF SUGAR SUPPORTS, PRICE SUPPORTS IS CRITICAL IN
22 SOUTH LOUISIANA AND UNIMPORTANT IN THE NORTHWESTERN PART OF THE
23 STATE.

24 Q. SWITCHING GEARS SLIGHTLY, HAS YOUR VOTING PRECINCT CHANGED
25 RECENTLY?

03:57 1 FROM THOSE CENTERS OF INFLUENCE.

2 Q. I'M SORRY. I NEED YOU TO CLARIFY OR REPEAT SOMETHING FOR
3 ME. WHAT DID YOU SAY THE THREE CENTERS OF INFLUENCE ARE?

4 A. LAFAYETTE, LAKE CHARLES AND BATON ROUGE.

5 Q. WHAT ARE THOSE THE THREE CENTERS OF INFLUENCE OF?

6 A. OF POLITICAL INFLUENCE. THEY ALSO HAVE ECONOMIC
7 INFLUENCE, SOCIAL INFLUENCE. WE HAVE A CONNECTION. WE HAVE
8 SOME COMMONALITIES WITH THOSE THREE AREAS THAT RESIDENTS OF THE
9 PARISH USE TO STRENGTHEN THEIR VOICE. AS FAR -- WE'RE IN HERE
10 ON A HEARING ON AN INJUNCTION ON A POLITICAL MATTER, SO MY
11 FOCUS IS ABOUT POLITICS. AND FROM A POLITICAL STANDPOINT, ST.
12 LANDRY'S CONNECTION WITH THOSE AREAS MAGNIFIES ST. LANDRY'S
13 INFLUENCE.

14 Q. BUT ARE YOU SAYING THOSE ARE THE ONLY THREE CENTERS OF
15 INFLUENCE IN THE STATE?

16 A. EXCUSE ME?

17 Q. ARE YOU SAYING THOSE THREE CITIES THAT YOU NAMED ARE THE
18 ONLY THREE CENTERS OF INFLUENCE IN THE STATE OF LOUISIANA?

19 A. I DON'T THINK I SAID THAT.

20 Q. YOU SAID THOSE ARE THE THREE CENTERS OF INFLUENCE.

21 A. THAT ST. LANDRY PARISH HAS COMMONALITY OF INTEREST WITH.

22 Q. ALL RIGHT. SO SPEAKING OF COMMONALITY --

23 A. ST. LANDRY PARISH HAS NO COMMONALITY OF INTEREST WITH
24 SHREVEPORT. SHREVEPORT IS THE CENTER OF INFLUENCE OF THE
25 STATE. ST. LANDRY PARISH HAS LESS COMMONALITY OF INTEREST WITH

03:58 1 NEW ORLEANS THAN IT DOES WITH BATON ROUGE, LAKE CHARLES AND
2 LAFAYETTE.

3 Q. ALL RIGHT, MR. CRAVINS. ARE YOU FAMILIAR WITH INTERSTATE
4 49?

5 A. I AM.

6 Q. WHERE DOES INTERSTATE 49 TAKE YOU? FROM WHERE TO WHERE?

7 A. IT TAKES YOU FROM SHREVEPORT TO THIBODAU AND ON TO NEW
8 ORLEANS.

9 Q. ALL RIGHT. DOES IT RUN THROUGH THE CENTER OF ST. LANDRY
10 PARISH?

11 A. YES, IT DOES.

12 Q. ALL RIGHT. AND SO IF I WAS GOING -- IF I WAS TRAVELING TO
13 NORTH LOUISIANA FROM THE BATON ROUGE AREA, WHAT WOULD BE THE
14 QUICKEST WAY FOR ME TO GET TO SHREVEPORT?

15 A. WHAT YOU FIRST DO IF YOU KNEW WHERE YOU -- WHERE YOU WERE
16 GOING AND HOW TO GET THERE MOST EXPEDITIOUSLY, IS THAT YOU
17 WOULD GO DOWN HIGHWAY 190 THROUGH ALL THOSE SUGARCANE FARMS
18 UNTIL YOU GOT TO OPELOUSAS. AND THEN YOU WOULD TAKE A RIGHT
19 AND GET ON I-49 AND YOU WOULD TRAVEL NORTH AND YOU WOULD SEE
20 THOSE SAME SUGARCANE FARMS THAT I WAS TALKING ABOUT EARLIER ON
21 YOUR RIGHT AND LEFT AS YOU WERE HEADED TOWARDS SHREVEPORT.

22 NOW, IF YOU'RE HEADED SOUTH -- IF YOU MADE A WRONG
23 TURN ON I-49 AND YOU HEADED SOUTH, YOU WOULD ALSO SEE THOSE
24 SAME SUGARCANE FARMS AND YOU WOULD SEE ASPECTS OF THE OFFSHORE
25 DRILLING INDUSTRY. IF YOU CONTINUED NORTH ON I-49 HAVING MADE

04:10 1 AND WHEN I LOOK BACK OVER MY LIFE -- I DON'T THINK I REALIZED
2 IT GROWING UP -- MANY OF THE CHANGES THAT WERE HAPPENING IN THE
3 CITY BECAUSE OF INTEGRATION AND BATON ROUGE'S KIND OF LONG
4 RESISTANCE TO IMPLEMENTING THE MANDATES OF BROWN WERE REFLECTED
5 IN MY LIFE IN THE CHANGES THAT I WOULD SEE IN THE CITY BEFORE
6 LEAVING FOR SCHOOL AND THEN COMING BACK TO FIND REALLY A TALE
7 OF TWO CITIES NARRATIVE AS WE TALK ABOUT OFTEN WITH BUILD BATON
8 ROUGE. AND I THINK RESONATES WITH MANY PEOPLE AS WE GRAPPLE
9 WITH THE ISSUES OF RACE AND CLASS STRATIFICATION IN BATON
10 ROUGE.

11 Q. SO I WANT TO SHIFT GEARS JUST A LITTLE BIT. HAVE YOU HAD
12 THE OPPORTUNITY TO REVIEW THE GALMON PLAINTIFFS' ILLUSTRATIVE
13 PLANS?

14 A. YES.

15 Q. AND IN YOUR VIEW, WOULD IT MAKE SENSE TO CREATE A
16 CONGRESSIONAL DISTRICT THAT CONNECTS BATON ROUGE AND THE DELTA
17 PARISHES?

18 A. ABSOLUTELY.

19 Q. AT A HIGH LEVEL, COULD YOU SHARE WITH US THE CONNECTIONS
20 THAT YOU SEE BETWEEN BATON ROUGE AND THE DELTA PARISHES?

21 A. WELL, BATON ROUGE IS HERE ON THE MISSISSIPPI RIVER, AND
22 LOUISIANA'S HISTORY FLOWS THROUGH THE DELTA -- AND LOUISIANA'S
23 BLACK HISTORY FLOWS THROUGH THE DELTA. IN MANY WAYS, BLACK
24 POPULATION IS STILL CENTERED AROUND THE RIVER, WHICH WE KNOW IS
25 THE SOURCE OF THE PLANTATION INDUSTRY. AND SO WE KNOW THAT

04:11 1 THOSE CONNECTIONS EXIST THROUGH FAMILY, THROUGH FAITH NETWORKS,
2 THROUGH CULTURAL EXPERIENCES. THE CONNECTION TO BATON ROUGE
3 THROUGHOUT THE DELTA AND PARTS OF CENTRAL LOUISIANA INCLUDED I
4 THINK ARE FELT IN FAMILY BONDS. I'VE SEEN IT IN MY FAMILY
5 THROUGH FAITH BONDS, AND PEOPLE TRAVEL FOR REVIVALS AND OTHER
6 EXPERIENCES THROUGHOUT THIS REGION. THERE ARE STRONG
7 CONNECTIONS. AND I KNOW MANY OTHERS WHOSE FAMILIES ARE
8 CONNECTED TO THE AREAS OF THE DELTA. AND THEY SPEND WEEKENDS
9 GOING HOME FOR DINNER AND CAN BE BACK AT WORK IN BATON ROUGE ON
10 MONDAY MORNING. SO I THINK THOSE CONNECTIONS ARE STRONG.

11 Q. OKAY. LET'S TAKE A FEW OF THOSE IN TURN. SO FIRST, IF
12 YOU COULD KIND OF GIVE US -- YOU'VE GIVEN US A LITTLE BIT
13 ALREADY, BUT THE FAMILIAL TIES, THE EDUCATIONAL TIES BETWEEN
14 BATON ROUGE AND THE DELTA PARISHES.

15 A. YEAH. AND I'LL TAKE THOSE IN REVERSE. THE EDUCATIONAL
16 TIES ARE STRONG. MY FAMILY, AS MANY OTHERS, GRANDPARENTS AND
17 GREAT GRANDPARENTS RECEIVED EDUCATION FROM MCKINLEY SENIOR HIGH
18 SCHOOL WHEN THAT WAS THE ONLY OPTION FOR PURSUING HIGH SCHOOL
19 FOR BLACK STUDENTS IN THIS REGION BEFORE CAPITOL HIGH SCHOOL
20 WOULD COME ONLINE, I BELIEVE, IN THE 1950'S. AND THEN WE HAD,
21 YOU KNOW, SLOW SCHOOL INTEGRATION AND OTHER OPTIONS.

22 AND SO MCKINLEY SENIOR HIGH SCHOOL, PEOPLE MAY NOT
23 REALIZE, WAS ONE OF THE ONLY PLACES TO PURSUE EDUCATION AFTER
24 EIGHTH GRADE FOR BLACK STUDENTS, NOT JUST IN BATON ROUGE BUT
25 THROUGHOUT THE REGION. AND I'VE MET PEOPLE WHO -- ELDERLY

04:13 1 PEOPLE WHO TALK ABOUT COMING TO BATON ROUGE TO GO TO NINTH
2 GRADE FROM THE RURAL AREAS OF THE DELTA. AND SO THAT IS
3 STRONG.

4 WE ALSO KNOW THAT SOUTHERN UNIVERSITY IS HERE, AND
5 ALSO LELAND COLLEGE USED TO BE HERE AS WELL. SO YOU HAD TWO
6 HISTORICALLY BLACK COLLEGES IN THE REGION. BOTH OF MY
7 GRANDMOTHERS ATTENDED BOTH INSTITUTIONS, AND SO -- AND THEY
8 WERE CONNECTED TO OTHERS WHO CONNECTED TO THOSE INSTITUTIONS AS
9 ROUTES TO HIGHER EDUCATION AND ONTO THE MIDDLE CLASS AS THOSE
10 INSTITUTIONS WERE VERY IMPORTANT FOR BLACK ACCESS TO THE MIDDLE
11 CLASS IN THIS REGION.

12 FAMILIAL, AGAIN, I KNOW SO MANY PEOPLE, INCLUDING MY
13 OWN FAMILY. AND THEN YOU LOOK AT THE FUNERAL PROGRAMS AND YOU
14 SEE THE CONNECTION THROUGHOUT THE DELTA AND MANY OTHERS WHO
15 STILL HAVE PARENTS AND GRANDPARENTS THROUGHOUT THE DELTA THAT
16 THEY VISIT AND CONNECT WITH ON A REGULAR BASIS, EVEN THOUGH
17 THEY RESIDE HERE IN THE CITY OF BATON ROUGE OR IN THE BROADER
18 METROPOLITAN AREA.

19 Q. NOW, WHAT ABOUT FROM AN ECONOMIC PERSPECTIVE, THE
20 CONNECTIONS BETWEEN BATON ROUGE AND THE DELTA PARISHES?

21 A. WELL, BATON ROUGE OBVIOUSLY IS THE MOST URBANIZED AREA IN
22 THE DELTA BEFORE YOU GET FURTHER DOWN TO NEW ORLEANS. THE
23 PETROCHEMICAL INDUSTRY HAS A STRONG FOOTHOLD HERE. AND THAT
24 HAS GROWN THROUGHOUT THE 20TH CENTURY.

25 ONE OF MY GREAT-GRANDFATHERS WAS ONE OF THE FIRST

04:14 1 BLACK EMPLOYEES AT EXXON. AND SO, YOU KNOW, THOSE JOBS
2 PROVIDED SOME OPPORTUNITIES FOR BLACK PEOPLE EARLY ON IN THE
3 20TH CENTURY AND CONTINUE TO DO SO TODAY. AND THOSE ARE JOBS
4 THAT NOT ONLY EXIST IN BATON ROUGE, BUT STRETCH UP THE RIVER.
5 AND THE PEOPLE WHO WORK IN THOSE INDUSTRIES LIVE ALL AROUND AND
6 COMMUTE FROM ALL AROUND THE DELTA. AND SO THERE ARE STRONG
7 ECONOMIC TIES THERE, TO SAY NOTHING OF THE GOVERNMENTAL BASE
8 HERE IN BATON ROUGE AND THE AMOUNT OF TRAVEL THAT PEOPLE ENJOY
9 WHEN THEY COMMUTE TO WORK FROM RURAL AREAS AS WE LIKE TO DO IN
10 LOUISIANA.

11 Q. NOW, WHAT ABOUT FROM A HISTORICAL PERSPECTIVE? YOU TALKED
12 ABOUT THE CONNECTION EARLIER, THE CONNECTION BETWEEN BATON
13 ROUGE AND THE MISSISSIPPI RIVER. SO FROM A HISTORICAL
14 PERSPECTIVE, WHAT WOULD YOU SAY?

15 A. THE HISTORY OF THAT, AGAIN, IS THE DELTA REGION, THE
16 PLANTATION ECONOMY TRANSFORMING INTO THE PETROCHEMICAL ECONOMY,
17 BLACK COMMUNITIES REALLY NEVER LEAVING THE PLANTATION GEOGRAPHY
18 OF LOUISIANA, STAYING CLOSE TO THE RIVER. AND THAT'S WHERE WE
19 FIND POPULATION TO THIS DAY, LITERALLY, THROUGHOUT LOUISIANA.

20 Q. NOW, SHIFTING GEARS AGAIN JUST A LITTLE BIT, YOU'VE ALSO
21 SEEN THE ENACTED MAP. CORRECT?

22 A. YES.

23 Q. AND WHEN VIEWING THE ENACTED MAP, IT IS YOUR UNDERSTANDING
24 THAT DISTRICT 2 LINKS BATON ROUGE AND NEW ORLEANS TOGETHER.
25 CORRECT?

04:16 1 A. YES.

2 Q. AND IN YOUR LIVED EXPERIENCE, WOULD YOU SAY THAT BATON
3 ROUGE AND NEW ORLEANS ARE -- MAKE SENSE AS COMMUNITIES JOINED
4 TOGETHER?

5 A. NO. IN THE WAY THAT IT IS -- IT IS CONSTRUCTED IN CD --
6 IN THE EXISTING CD2, YOU HAVE IN BATON ROUGE AND NEW ORLEANS
7 THE TWO POPULATION CENTERS OF THE STATE. AND WHILE THEY ARE AN
8 HOUR AND SOME CHANGE APART FROM EACH OTHER, THEY ARE VERY
9 DIFFERENT ECONOMIES. THEY HAVE VERY DIFFERENT HISTORIES. AND
10 THE SCALE AND SCOPE OF NEW ORLEANS' ECONOMY AND THE ISSUES IT
11 FACES -- AS IT RECEIVES OVER 30 MILLION VISITORS A YEAR IS A
12 SYMBOL FOR GLOBAL TOURISM -- ARE VERY DIFFERENT FROM THE STATE
13 CAPITAL, UNIVERSITY TOWN THAT BATON ROUGE IS.

14 I KNOW FROM MY EXPERIENCE IN SENATOR LANDRIEU'S
15 OFFICE AND ON CAPITOL HILL THE IMPORTANCE OF CONGRESSIONAL
16 REPRESENTATION TO BRING FEDERAL RESOURCES HOME TO THE DISTRICT
17 AND HOME TO LOUISIANA. AND THE ISSUES THAT NEW ORLEANS FACES
18 AND THE ISSUES THAT BATON ROUGE FACE ARE VERY DIFFERENT AND
19 REQUIRE THEIR OWN LEVELS OR THEIR OWN ADVOCATES IN CONGRESS TO
20 ADVANCE THOSE ISSUES.

21 AND SO LINKING PEOPLE ON HARDING BOULEVARD AND PEOPLE
22 ON BULLARD DOES NOT NECESSARILY MAKE SENSE TO ME BECAUSE THOSE
23 ARE DISTINCT COMMUNITIES LINKED BY RACE. BUT THERE ARE OTHER
24 FACTORS THAT I THINK NEED TO BE TAKEN INTO CONSIDERATION THAT
25 JUSTIFY HAVING A DIFFERENT REPRESENTATION IN THE BATON ROUGE

04:22 1 Q. AND IN YOUR LIVED EXPERIENCE, DO YOU BELIEVE THAT IT MAKES
2 MORE SENSE TO LINK BATON ROUGE WITH NEW ORLEANS AND THE RIVER
3 PARISHES THAN TO LINK BATON ROUGE WITH THE DELTA PARISHES?

4 A. NO. I THINK, AGAIN, RACE IS A FACTOR THAT WE TAKE INTO
5 ACCOUNT, AND WE TAKE RACE INTO ACCOUNT WITH OTHER URBAN
6 DYNAMICS. I DO NOT THINK IT MAKES SENSE TO LINK BATON ROUGE
7 AND NEW ORLEANS, THE TWO, YOU KNOW, LARGEST POPULATION CENTERS
8 OF THE STATE, THE TWO LARGEST BLACK COMMUNITIES OF THE STATE
9 AND VERY DIFFERENT ECONOMIES AND VERY DIFFERENT, YOU KNOW,
10 SETTINGS THAT REQUIRE REPRESENTATION.

11 I THINK BATON ROUGE IS NATURALLY CONNECTED TO THE
12 DELTA REGION, AND I THINK THE HISTORY OF BLACK SETTLEMENT IN
13 BATON ROUGE ALSO REFLECTS VERY REAL AND ENDURING CONNECTIONS TO
14 THE DELTA REGION.

15 MS. SEDWICK: NO FURTHER QUESTIONS, YOUR HONOR.

16 THE COURT: CROSS.

17 MR. WALSH: GOOD AFTERNOON, YOUR HONOR.

18 JOHN WALSH ON BEHALF OF SECRETARY OF STATE
19 ARDOIN.

20 THE COURT: MR. WALSH.

21 CROSS-EXAMINATION

22 BY MR. WALSH:

23 Q. GOOD AFTERNOON, MR TYSON.

24 A. GOOD AFTERNOON.

25 Q. IS IT MR. TYSON OR PROFESSOR TYSON?

Exhibit D

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

PRESS ROBINSON, ET AL	*	CIVIL ACTION
	*	
VERSUS	*	NO. 22-211-SDD
	*	
KYLE ARDOIN, ET AL	*	CONSOLIDATED WITH
	*	
EDWARD GALMON SR., ET AL	*	NO. 22-214-SDD
	*	
VERSUS	*	MAY 10, 2022
	*	
KYLE ARDOIN, ET AL	*	VOLUME 2 OF 5
* * * * *	*	

MOTION FOR PRELIMINARY INJUNCTION BEFORE
THE HONORABLE SHELLY D. DICK
UNITED STATES CHIEF DISTRICT JUDGE

APPEARANCES:

FOR THE ROBINSON
PLAINTIFFS:

NAACP LEGAL DEFENSE FUND AND
EDUCATIONAL FUND, INC.
BY: STUART NAIFEH, ESQ.
KATHRYN SADASIVAN, ESQ.
VICTORIA WENGER, ESQ.
SARA ROHANI, ESQ.
40 RECTOR STREET, FIFTH FLOOR
NEW YORK, NEW YORK 10006

ADCOCK LAW, LLC
BY: JOHN ADCOCK, ESQ.
3110 CANAL STREET
NEW ORLEANS, LOUISIANA 70119

AMERICAN CIVIL LIBERTIES UNION
FOUNDATION VOTING RIGHTS PROJECT
BY: SARAH E. BRANNON, ESQ.
SAMANTHA OSAKI, ESQ.
915 15TH STREET N.W.
WASHINGTON, D.C. 20005

1 PAUL, WEISS, RIFKIND, WHARTON &
2 GARRISON, LLP
3 BY: AMITAV CHAKRABORTY, ESQ.
4 RYAN RIZZUTO, ESQ.
5 ADAM SAVITT, ESQ.
6 1285 AVENUE OF THE AMERICAS
7 NEW YORK, NEW YORK 10019

8 FOR THE GALMON
9 PLAINTIFFS:

10 WALTERS, PAPILLION, THOMAS,
11 CULLENS, LLC
12 BY: DARREL J. PAPILLION, ESQ.
13 12345 PERKINS ROAD, BUILDING ONE
14 BATON ROUGE, LOUISIANA 70810

15 ELIAS LAW GROUP, LLP
16 BY: ABHA KHANNA, ESQ.
17 1700 SEVENTH AVE., SUITE 2100
18 SEATTLE, WASHINGTON 98101

19 ELIAS LAW GROUP, LLP
20 BY: JACOB D. SHELLY, ESQ.
21 OLIVIA N. SEDWICK, ESQ.
22 LALITHA D. MADDURI, ESQ.
23 10 G STREET N.E., SUITE 600
24 WASHINGTON, D.C. 20002

25 FOR KYLE ARDOIN,
IN HIS OFFICIAL
CAPACITY AS SECRETARY
OF STATE

SHOWS, CALI & WALSH, LLP
BY: JOHN C. WALSH, ESQ.
628 ST. LOUIS STREET
BATON ROUGE, LOUISIANA 70821

NELSON MULLINS RILEY AND
SCARBOROUGH, LLC
BY: PHILLIP STRACH, ESQ.
THOMAS A. FARR, ESQ.
4140 PARKLAKE AVENUE, SUITE 200
RALEIGH, NORTH CAROLINA 27612

FOR THE LOUISIANA
LEGISLATIVE BLACK CAUCUS:

STEPHEN M. IRVING, LLC
BY: STEPHEN M. IRVING, ESQ.
111 FLOUNDERS DRIVE, SUITE 700
BATON ROUGE, LOUISIANA 70810

JOHNSON LAW FIRM
BY: ERNEST L. JOHNSON, ESQ.
3313 GOVERNMENT STREET
BATON ROUGE, LOUISIANA 70806

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

ARTHUR THOMAS & ASSOCIATES
BY: ARTHUR R. THOMAS, ESQ.
3313 GOVERNMENT STREET
BATON ROUGE, LOUISIANA 70806

FOR LEGISLATIVE
INTERVENORS CLAY
SCHEXNAYDER AND PATRICK
CORTEZ:
BAKERHOSTETLER, LLP
BY: PATRICK T. LEWIS, ESQ.
127 PUBLIC SQUARE, SUITE 2000
CLEVELAND, OHIO 44114

BAKERHOSTETLER, LLP
BY: E. MARK BRADEN, ESQ.
KATHERINE L. MCKNIGHT, ESQ.
1050 CONNECTICUT AVENUE, N.W.,
SUITE 1100
WASHINGTON, D.C. 20036

INTERVENOR DEFENDANT,
STATE OF LOUISIANA:
LOUISIANA'S OFFICE OF THE ATTORNEY
GENERAL
BY: JEFFREY M. WALE, ESQ.
ANGELIQUE D. FREEL, ESQ.
CAREY TOM JONES, ESQ.
1885 NORTH THIRD STREET
BATON ROUGE, LOUISIANA 70802

HOLTZMAN VOGEL BARAN TORCHINSKY &
JOSEFIAK, PLLC
BY: PHILLIP M. GORDON, ESQ.
15405 JOHN MARSHALL HIGHWAY
HAYMARKET, VIRGINIA 20169

OFFICIAL COURT REPORTER:
SHANNON L. THOMPSON, CCR
UNITED STATES COURTHOUSE
777 FLORIDA STREET
BATON ROUGE, LOUISIANA 70801
SHANNON_THOMPSON@LAMD.USCOURTS.GOV
(225)389-3567

PROCEEDINGS RECORDED BY MECHANICAL STENOGRAPHY USING
COMPUTER-AIDED TRANSCRIPTION SOFTWARE

11:06 1 CONGRESSIONAL DISTRICT 6 OF THIS ENACTED MAP?

2 A. SURE. SO A LOT OF THE WORK THAT I DO IS WITH PEOPLE
3 WITHIN THE RIVER PARISHES: ST. JOHN, ST. JAMES, ST. CHARLES
4 AND JEFFERSON AND ORLEANS PARISH. AND SO WHEN IT COMES TIME TO
5 DISCUSS CANDIDATES AND VOTING, I'M SILENT. I HAVE NOTHING TO
6 SAY BECAUSE THEY ARE IN ONE DISTRICT AND I'M IN ANOTHER.

7 Q. SO UNDER CONGRESSIONAL DISTRICT 6, YOU'RE THE -- CAN YOU
8 DESCRIBE SOME OF THE PARISHES THAT YOU WOULD BE LINKED WITH
9 HERE?

10 A. SO ST. MARY'S, IBERVILLE, I HAVE ABSOLUTELY NO ALLIANCE
11 THERE, NO COMMUNITY MEMBERS THERE IN THOSE PARISHES.

12 Q. I'D LIKE TO TALK A LITTLE BIT MORE ABOUT THAT. BASED ON
13 YOUR LIVED EXPERIENCES, HOW WOULD YOU DESCRIBE SOME OF THOSE
14 COMMUNITIES THAT ARE INCLUDED ALONGSIDE YOURS HERE?

15 A. SO A LOT OF THE COMMUNITY WORK THAT I DO IS WITH THE RIVER
16 PARISHES WHERE WE DO A LOT OF WORK AROUND ENVIRONMENTAL JUSTICE
17 AND RACIAL JUSTICE AND LOOKING AT CANCER ALLEY AND LOOKING AT
18 JUST WHAT'S HAPPENING WITH PEOPLE'S LIVED EXPERIENCES, AS WELL
19 AS WITH HIV, WITH CRIME, AND WITH HOW WE IMPROVE EACH OTHER'S
20 LIVES.

21 SO I DON'T WORK WITH PEOPLE WITHIN TERREBONNE OR THE
22 OTHER PARISHES, SO I'M KIND OF A SORE THUMB STANDING OUT THERE
23 BECAUSE WE WORK TOGETHER, BUT THEN WE DON'T VOTE TOGETHER.

24 Q. I SEE. SO IT SOUNDS LIKE YOU'RE SAYING YOU'RE NOT AS
25 FAMILIAR WITH THESE -- THAT YOU'RE INCLUDED WITH?

11:09 1 DISTRICT 2 IN THIS ILLUSTRATIVE MAP. THANK YOU.

2 BY MS. OSAKI:

3 Q. DR. NAIRNE, GEOGRAPHICALLY WHAT AREAS WOULD YOU BE LINKED
4 WITH IN THIS CONGRESSIONAL DISTRICT 2 OF THIS ILLUSTRATIVE MAP?

5 A. IN THIS MAP I WOULD BE WITH THE PEOPLE THAT I'M WORKING
6 WITH CURRENTLY, ALONG WITH THE RIVER PARISHES, ALL THE WAY INTO
7 ORLEANS AND JEFFERSON PARISHES. THIS MAP MAKES SENSE TO ME.

8 Q. DO YOU HAVE ANY PERSONAL CONNECTIONS WITH ANY OF THOSE
9 OTHER PARISHES?

10 A. I HAVE PERSONAL CONNECTIONS: FAMILY, FRIENDS, COLLEAGUES
11 IN ALL OF THIS -- IN THIS ENTIRE AREA.

12 Q. HOW WOULD YOU DESCRIBE COMMUNITIES IN THESE AREAS, THESE
13 RIVER PARISH AREAS, BASED ON YOUR PERSONAL KNOWLEDGE?

14 A. WE HAVE A SHARED HISTORY. WE HAVE A SHARED CULTURAL
15 HERITAGE, AND WE WORK TOGETHER TO MAKE IMPROVEMENTS ALONG THIS
16 AREA WITH COMMUNITY DEVELOPMENT WHERE WE'RE DOING WORK AROUND
17 CREATING JOBS FOR PEOPLE, OPPORTUNITIES FOR YOUNG PEOPLE AND
18 TRYING TO IMPROVE OUR HEALTH.

19 Q. WHAT DID YOU MEAN BY THAT, "TRYING TO IMPROVE YOUR
20 HEALTH"?

21 A. THIS AREA IS KNOWN AS CANCER ALLEY AND JUST -- SO I'VE
22 WORKED SOMEWHAT WITH THE CANCER INDEX AND LOOKING AT JUST
23 NEIGHBORS ACROSS THE STREET, NEXT TO ME, EVEN MY OWN MOTHER
24 WHO HAD A TUMOR THE SIZE OF A SOCCER BALL IN HER BELLY. AND
25 SO, YOU KNOW, JUST CANCER IS EVERYWHERE. AND, YOU KNOW, IF

11:10 1 IT'S IN MY OWN HOUSE, THEN IS IT IN ME TOO? SO IT REALLY
2 REQUIRES US TO DO QUITE A BIT OF WORK TOGETHER.

3 Q. SO YOU DESCRIBE SOME OF THE HEALTH INEQUITIES THAT ARE
4 SIMILAR ALONG THE RIVER PARISHES. WHAT ABOUT INDUSTRIES? ARE
5 THERE ANY INDUSTRIES THAT ARE SIMILAR ALONG THESE COMMUNITIES?

6 A. WELL, THE SUGARCANE INDUSTRY DEFINED THIS AREA AND THIS
7 REGION, BUT NOW THE SUGARCANE INDUSTRY IS MECHANIZED SO PEOPLE
8 DON'T HAVE THOSE JOBS ANYMORE. SO THERE'S A LOT OF NOT MUCH TO
9 DO GOING ON IN ASSUMPTION AND ST. JAMES, ST. JOHN AND ST.
10 CHARLES.

11 Q. NOW, UNDER THIS NEW -- UNDER THIS ILLUSTRATIVE PLAN AND
12 BASED ON YOUR LIVED EXPERIENCES, DO YOU BELIEVE THAT YOUR
13 COMMUNITY'S INTEREST WOULD BE FAIRLY REPRESENTED?

14 A. UNDER THIS MAP, YES.

15 Q. WHY IS THAT?

16 A. IT WOULD GIVES US A BASE SO THAT WE CAN MOBILIZE AND SO
17 THAT WE CAN ORGANIZE AND SO THAT WE HAVE ONE COLLECTIVE VOICE
18 AND SO THAT WE WOULD HAVE ACTION TOGETHER SO THAT WE CAN MOVE
19 FORWARD AND IMPROVE NOT JUST OUR COMMUNITIES AND OUR HOUSEHOLDS
20 BUT OUR ENTIRE STATE.

21 Q. BASED ON YOUR LIVED EXPERIENCES AS A LOUISIANIAN, DOES IT
22 MAKE SENSE CULTURALLY, SOCIOECONOMICALLY, HISTORICALLY OR
23 OTHERWISE FOR YOUR COMMUNITY TO FALL UNDER THIS ILLUSTRATIVE
24 MAP'S CONGRESSIONAL DISTRICT 2 ALONGSIDE THESE OTHER RIVER
25 PARISH COMMUNITIES?

11:11 1 A. TO ME IT MAKES COMPLETE SENSE THAT WE ARE IN THIS
2 DISTRICT.

3 Q. THANK YOU.

4 FINALLY, DR. NAIRNE, HOW WOULD YOU FEEL IF A MAP LIKE
5 THIS ILLUSTRATIVE PLAN -- THAT IS, A MAP THAT ENACTS A SECOND
6 MAJORITY-BLACK CONGRESSIONAL DISTRICT -- WERE TO BE ENACTED
7 INTO LAW?

8 A. I KNOW EXACTLY THE HOUSEHOLDS THAT I'M GOING TO KNOCK ON
9 THEIR DOORS, SHOULD THIS HAPPEN. THERE WERE A NUMBER OF PEOPLE
10 -- SO DURING THE CENSUS AND LEADING UP TO THE ELECTIONS FOR
11 2020, I WAS A BLOCK CAPTAIN FOR "TOGETHER LOUISIANA." SO THERE
12 WERE A COUPLE OF HOUSEHOLDS THAT I KNOCKED ON THEIR DOORS, AND
13 THEY WERE LIKE, "OH, GOOD. YOU MEAN CHANGE IS COMING FOR US?"
14 SO THEN WHEN THEY SEE THAT, AWE, CHANGE IS NOT REAL, THEIR
15 HOPES ARE DASHED, THEY FEEL LIKE, "WOW," YET AGAIN
16 DISAPPOINTED. "YOU LIED TO ME," SOME MAN SAID. SO IT'S JUST
17 LIKE, "NO, I DIDN'T LIE TO YOU. THIS PROCESS JUST TAKES A
18 WHILE."

19 SO I KNOW I WOULD GO TO HIS HOME. THIS IS SOMEBODY
20 I'VE KNOWN ALL MY LIFE. AND JUST TO SEE THAT, YOU KNOW, HE'S
21 WEATHERED AND WORN OUT, AND JUST TO HAVE HIM HAVE A LITTLE BIT
22 OF HOPE, WOW, WOULD THAT MAKE MY YEAR, MY DAY, MY HOUR. SO
23 THAT'S WHERE I WOULD GO AND SAY, "LOOK, CHANGE IS COMING, EVEN
24 HERE TO ASSUMPTION PARISH." SO WE'D HAVE SOME HAPPY PEOPLE WHO
25 WOULD HAVE HOPE AGAIN IN LOUISIANA.

05:22 1 A. YES. I THINK IT'S WELL-DOCUMENTED THAT BATON ROUGE IS A
2 TALE OF TWO CITIES. YOU KNOW, BASICALLY WE HAVE THE WORST AND
3 THE BEST QUALITY OF LIFE WITHIN A FEW SQUARE MILES OF EACH
4 OTHER, IN THAT, YOU KNOW, NORTH BATON ROUGE BEING PREDOMINANTLY
5 AFRICAN AMERICAN; SOUTH BATON ROUGE BEING PREDOMINANTLY WHITE
6 AND, YOU KNOW, THE INCOME BATCHING.

7 YOU KNOW, CERTAINLY THE NORTH BATON ROUGE COMMUNITY
8 IS POOR IN MODERATE INCOME, AND SOUTH BATON ROUGE IS SO MUCH
9 MORE A WEALTHY COMMUNITY. AND THEN, YOU KNOW, ALSO TOO
10 POLITICALLY. IT'S BEEN INTERESTING BECAUSE BASICALLY VOTERS IN
11 THE STATE OF LOUISIANA -- I MEAN, IN THE CITY OF BATON ROUGE,
12 THEY BASICALLY HAVE VOTED TO SECEDE FROM NORTH BATON ROUGE, IS
13 THE BEST WAY I COULD PUT IT. IT IS CURRENTLY IN COURT.
14 BUT I MEAN, IT GIVES YOU AN IDEA OF HOW POWERFUL THAT
15 DIFFERENCE IS OR THE DIVISION BETWEEN COMMUNITIES IN EAST BATON
16 ROUGE PARISH.

17 Q. THANK YOU.

18 AND YOU MENTIONED THAT NORTH BATON ROUGE WAS
19 PREDOMINANTLY PEOPLE OF COLOR. WOULD YOU SAY THAT NORTH BATON
20 ROUGE HAS -- OR THE PEOPLE OF NORTH BATON ROUGE HAVE COMMON
21 NEEDS THAT GO BEYOND RACE?

22 A. YES.

23 Q. AND COULD YOU SPEAK TO THOSE NEEDS?

24 A. I MEAN, I THINK THAT, YOU KNOW, WE'VE -- AGAIN, SECOND --
25 YOU KNOW, LIKE WE'RE THE SECOND POOREST STATE, BUT I THINK

05:24 1 AFTER SOME OF THE DATA WE SAW TODAY, MAYBE WE'VE BEAT
2 MISSISSIPPI, UNFORTUNATELY, TO BE THE POOREST STATE.
3 YOU KNOW, IN NORTH BATON ROUGE WE HAVE HOUSING
4 INSECURITY. WE'VE GOT FOOD INSECURITY. WE HAVE ABSOLUTELY,
5 YOU KNOW, FOOD DESERTS, AS WELL AS -- YOU KNOW, JUST NOT -- NO
6 OPPORTUNITIES FOR ECONOMIC -- YOU KNOW, ECONOMIC GROWTH, AND,
7 YOU KNOW, AND -- YEAH.

8 Q. THANK YOU, MS. SHELTON.

9 SHIFTING GEARS AGAIN, THE DEFENDANTS ARGUE THAT
10 POLITICAL PARTY RATHER THAN RACE IS RESPONSIBLE FOR VOTING
11 PATTERNS IN LOUISIANA. IN YOUR EXPERIENCE AS PRESIDENT AND CEO
12 OF POWER COALITION, DO YOU FIND THAT BLACK VOTERS VOTE FOR
13 DEMOCRATS JUST BECAUSE THEY ARE DEMOCRATS?

14 A. NO. I THINK THAT THEY VOTE FOR -- I MEAN, I THINK THEY
15 VOTE FOR WHO IS GOING TO CARE ABOUT THEIR SELF-INTERESTS. DOES
16 THAT HAPPEN TO BE DEMOCRATS? MOST OF THE TIME, MORE THAN
17 LIKELY. HOWEVER, I THINK IT IS ALSO TRUE THAT I DON'T THINK
18 THAT BLACK COMMUNITIES ARE SERVED WELL BY EITHER SIDE.

19 Q. THANK YOU, MS. SHELTON.

20 AND JUST ONE MORE TOPIC. WHY IS IT IMPORTANT TO
21 POWER COALITION'S CONSTITUENTS FOR THERE TO BE AN ADDITIONAL
22 MAJORITY-BLACK DISTRICT?

23 A. BECAUSE, AGAIN, I MEAN, I THINK THAT ONE OF THE THINGS
24 THAT WAS SO BEAUTIFUL WAS THAT WHEN WE STARTED THE
25 REDISTRICTING JOURNEY AS AN ORGANIZATION AND TRYING TO ENGAGE