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WESTERN DISTRICT OF LOUISIANA
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45 Years Of Experience In Reapportionment and Redistricting

Responding to Special Master's Report
Proposed Redistricting Plan
For the Desoto Parish Police Jury
Based on the 2020 US Census

Means et al v. DeSoto Parish, et al
Case Number: 5:23-cv-00669-JE-MLH

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Overview

This Court must be guided by previous US Supreme Courts cases concerning the creation of a redistricting plan. The US Supreme Court states in Whitcomb v. Chavis, 403 US 124, 160-161: "we held that the District Court erred in fashioning a court-ordered plan that rejected state policy more than necessary to meet the specific constitutional violations involved." In Connor v. Finch 431 US 407, at 414: the Court stated that "An appropriate reconciliation of these goals can only be reached if the district court's modifications of a state plan are limited to those necessary to cure any constitutional or statutory defect." In Tennant v. Jefferson County Commission, 567 US 758: the Court stated that "Redistricting ordinarily involves criteria and standards that have been weighed and evaluated by the elected branches in the exercise of their political judgment; courts are willing to defer to such state legislative policies, so long as they are consistent norms, even if they require small differences in the population of congressional districts."

This Court has not made a finding on specified district (s) in Plan H-revised, just the whole plan is permanently enjoined, see Doc# 127. All the districts in the Desoto Police Jury Plan H-revised are not illegal. Since Plan H-revised is enjoined, the Special Master's Plan must be based on the Benchmark Plan. The Callais court made a finding that Congressional District 6 was illegal. No other districts or Congressional District 2, the Black Majority District based in New Orleans were held to be illegal in Callais. Upon closer review, this Court may find that the Plan H-revised may not be an illegal plan and thus amend its July 2nd Court Order.

Benchmark Plan and Retrogressive Effect

Federal (Hadley v Junior College, 90 S. Ct. 791) and State Law (RS 33:1411) require a Benchmark Plan, (Exhibit 1, Federal Register, February 9, 2011, US Department of Justice, Guidance Concerning Redistricting Under Section 5 of the Voting Rights Act). The Benchmark Plan is taking the current (2010 US Census) plan and applying the 2020 US Census. The Benchmark Plan has many indicators. The two relevant factors now are Malapportionment and the number of Black Majority Districts. Mike Hefner, Demographer, presented the Benchmark Plan to the Desoto Police Jury during his presentation prior to getting the job. Based on that presentation and stating it many times at Redistricting Workshops, the members of the Police Jury knew the Benchmark Plan had a deviation of 63 percent (10% is the goal) and it contained 5 Black Majority Districts with these Black percentages in the following-District 4A-55%, District 4B-64%, District 4C-72%, District 4D-59%, and District 6-57%. The Plaintiffs' Complaint and Motion for Summary Judgment makes it seem as though Mike Hefner and the members of the Police Jury did something illegal by stating what is in the Benchmark Plan.

Digging a little deeper, the Benchmark Plan indicates that the new plan can easily consist of 5 Black Majority Districts by using the Ideal District Size-2,437. The Ideal District Size is taking the parish population (26,812) and dividing it into the 11 districts. A District must be over 50 percent Black to be considered a Black Majority District, half of the Ideal District Size is 1,218.5 people or 1,219. According to the Benchmark Plan, each of the 5 Black Majority Districts exceeds 1,219 Black Population prior to adjusting the plan for population imbalance among the 11 districts. There was no need to go on a "Black Vote Search Party" as in the Callais Case (250 miles) to add Blacks to make a new Black Majority District. Please note that the Benchmark Plan for Louisiana Congressional Districts had only 1 Black Majority District. This Court must examine any plan created for its Retrogressive Effect, see Exhibit 1.

In 2002, the US Department of Justice, Civil Rights Division, under Section 5 of the Voting Rights Act, objected to (permanent injunction) the Desoto Parish School Board Plan (11 members), See Exhibit 2. Dr. Gary Joiner, Plaintiffs' Expert, was the demographer for the Desoto Parish School Board when the plan was objected to under Section 5 of the Voting Rights Act. Dr. Joiner is attempting to do the same thing twenty years later. The facts in the document are very relevant to this case. The new Redistricting Plan is created from the Benchmark Plan. The Desoto Police Jury had Criteria and Standards that should be deferred to as mandated by the US Supreme Court, Exhibit 3. Repeating what the US Supreme Court mandated, "Redistricting ordinarily involves criteria and standards that have been weighed and evaluated by the elected branches in the exercise of their political judgment." After many months of workshops and reviewing many options, the Desoto Parish Police Jury voted 11-0 for Plan H-revised.

Features in the Benchmark Plan or Plan H-revised that are different in the Special Master's Plan (Criteria and Standards used by the Desoto Parish Police Jury):

1. Incumbents in different districts;
2. Districts are named 1A, 1B, 1C, 2, 3, 4A, 4B, 4C, 4D, 5, and 6;
3. Mansfield is split similar to the Benchmark Plan;
4. Maintaining core of existing districts;

Reviewing the Special Master's Plan

The Special Master's Plan violates criteria stated in Callais Case (Head note 24) and the Criteria and Standards used by the Desoto Parish Police Jury. Districts 1A, 1B, 1C, 2, 3, 4A, 4B, 4C, 4D, 5, and 6 are the names (labelled) used by the Desoto Parish Police Jury.

The Special Master established his own criteria such as:

1. Plan Retrogression based on the Benchmark Plan;
2. Changing District Names;
3. Putting incumbents in the same districts;
4. Not maintaining Core of existing Districts; and
5. Mansfield cannot be split as in the Benchmark Plan and Plan H-revised.

2027 Desoto PJ Plan 1

Data Center LLC has created the 2027 Desoto PJ Plan 1 that complies with the criteria in the Callais case and Desoto Parish Police Jury using Maptitude software. The 2020 US Census and Voter Registration of September 15, 2026 were used in the creation of the plan, Exhibit 4.

These are the reports generated:

1. Map of the 2027 Desoto PJ Plan 1;
2. Voter Registration by Districts;
3. Population by Districts;
4. Voting Age Population by Districts;
5. Core Constituencies Report; and
6. Map Book Report-each district highlighting changes from Benchmark Plan.

Callais v. Means

The Means case was filed May 5, 2023, seven months prior to the 2024 Special Legislative Session that created Senate Bill 8 (the plan was struck down by Callais). The Cases are apples to oranges, no correlation. For example, based on the Congressional Benchmark Plan, there was only one Black Majority District (District 2). Using Callais 146 S. Ct. 1131 at 1152, "Observing that SB8's "second majority-minority districts… stretches some 250 miles from Shreveport in the northwest corner of the state to Baton Rouge in the southeast Louisiana.""

The Desoto Police Jury did not create a new Black Majority District after the 2020 US Census. In Cedric Floyd's deposition in this case, the history of redistricting of the Desoto Parish Police Jury was given for the 2000 and 2010 Plan. Dr. Joiner and the Plaintiffs had ten years to file a lawsuit against the 2010 Plan but no lawsuit was filed. The 2010 Plan was used for the 2011, 2015, and 2019 Police Jury Elections.

Eye Ball Test

Data Center LLC is providing the Court with 24 inch maps of 5 Redistricting Plans to compare district sizes (area), using the Eye Ball Test that was used by US District Judges in the 1980s and 1990s, Exhibit 5. The districts are similar in size and shape in Desoto Parish, Black Majority Districts are the same as White Majority Districts. District 6 in the Callais Case looks different than the other 5 Congressional Districts.

Sincerely,

October 5, 2026

Cedric Floyd

Cedric Floyd, Founder and President
(Exhibit 6)

Submitted on behalf of Interested Parties in Desoto Parish

Exhibit 1

FEDERAL REGISTER

Vol. 76 Wednesday,
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Part III

Department of Justice

Guidance Concerning Redistricting Under Section 5 of the Voting Rights Act; Notice

DEPARTMENT OF JUSTICE

Guidance Concerning Redistricting Under Section 5 of the Voting Rights Act; Notice

AGENCY: Office of the Assistant Attorney General, Civil Rights Division, Department of Justice.

ACTION: Notice.

SUMMARY: The Attorney General has delegated responsibility and authority for determinations under Section 5 of the Voting Rights Act to the Assistant Attorney General, Civil Rights Division, who finds that, in view of recent legislation and judicial decisions, it is appropriate to issue guidance concerning the review of redistricting plans submitted to the Attorney General for review pursuant to Section 5 of the Voting Rights Act.

FOR FURTHER INFORMATION CONTACT: T. Christian Herren, Jr., Chief, Voting Section, Civil Rights Division, United States Department of Justice, Washington, DC 20530, (202) 514–1416.

SUPPLEMENTARY INFORMATION: Section 5 of the Voting Rights Act, 42 U.S.C. 1973c, requires jurisdictions identified in Section 4 of the Act to obtain a determination from either the Attorney General or the United States District Court for the District of Columbia that any change affecting voting which they seek to enforce does not have a discriminatory purpose and will not have a discriminatory effect.

Beginning in 2011, these covered jurisdictions will begin to seek review under Section 5 of the Voting Rights Act of redistricting plans based on the 2010 Census. Based on past experience, the overwhelming majority of the covered jurisdictions will submit their redistricting plans to the Attorney General. This guidance is not legally binding; rather, it is intended only to provide assistance to jurisdictions covered by the preclearance requirements of Section 5.

Guidance Concerning Redistricting Under Section 5 of the Voting Rights Act, 42 U.S.C. 1973c

Following release of the 2010 Census data, the Department of Justice expects to receive several thousand submissions of redistricting plans for review pursuant to Section 5 of the Voting Rights Act. The Civil Rights Division has received numerous requests for guidance similar to that it issued prior to the 2000 Census redistricting cycle concerning the procedures and standards that will be applied during review of these redistricting plans. 67 FR 5411 (January 18, 2001). In addition, in 2006, Congress reauthorized the Section 5 review requirement and refined its definition of some substantive standards for compliance with Section 5. In view of these developments, issuing revised guidance is appropriate.

The "Procedures for the Administration of Section 5 of the Voting Rights Act," 28 CFR Part 51, provide detailed information about the Section 5 review process. Copies of these Procedures are available upon request and through the Voting Section Web site (*http://www.usdoj.gov/crt/voting*). This document is meant to provide additional guidance with regard to current issues of interest. Citations to judicial decisions are provided to assist the reader but are not intended to be comprehensive. The following discussion provides supplemental guidance concerning the following topics:

- The Scope of Section 5 Review;
- The Section 5 Benchmark;
- Analysis of Plans (discriminatory purpose and retrogressive effect);
- Alternatives to Retrogressive Plans; and
- Use of 2010 Census Data.

The Scope of Section 5 Review

Under Section 5, a covered jurisdiction has the burden of establishing that a proposed redistricting plan "neither has the purpose nor will have the effect of denying or abridging the right to vote on account of race or color, or in contravention of the guarantees set forth in [Section 4(f)(2) of the Act]" (i.e., membership in a language minority group defined in the Act). 42 U.S.C 1973c(a). A plan has a discriminatory effect under the statute if, when compared to the benchmark plan, the submitting jurisdiction cannot establish that it does not result in a "retrogression in the position of racial minorities with respect to their effective exercise of the electoral franchise." *Beer* v. *United States,* 425 U.S. 125, 141 (1976).

If the proposed redistricting plan is submitted to the Department of Justice for administrative review, and the Attorney General determines that the jurisdiction has failed to show the absence of any discriminatory purpose or retrogressive effect of denying or abridging the right to vote on account of race, color or membership in a language minority group defined in the Act, the Attorney General will interpose an objection. If, in the alternative, the jurisdiction seeks a declaratory judgment from the United States District Court for the District of Columbia, that court will utilize the identical standard to determine whether to grant the request; i.e., whether the jurisdiction has established that the plan is free from discriminatory purpose or retrogressive effect. Absent administrative preclearance from the Attorney General or a successful declaratory judgment action in the district court, the jurisdiction may not implement its proposed redistricting plan.

The Attorney General may not interpose an objection to a redistricting plan on the grounds that it violates the one-person one-vote principle, on the grounds that it violates *Shaw* v. *Reno,* 509 U.S. 630 (1993), or on the grounds that it violates Section 2 of the Voting Rights Act. The same standard applies in a declaratory judgment action. Therefore, jurisdictions should not regard a determination of compliance with Section 5 as preventing subsequent legal challenges to that plan under other statutes by the Department of Justice or by private plaintiffs. 42 U.S.C. 1973c(a); 28 CFR 51.49.

The Section 5 "Benchmark"

As noted, under Section 5, a jurisdiction's proposed redistricting plan is compared to the "benchmark" plan to determine whether the use of the new plan would result in a retrogressive effect. The "benchmark" against which a new plan is compared is the last legally enforceable redistricting plan in force or effect. *Riley* v. *Kennedy,* 553 U.S. 406 (2008); 28 CFR 51.54(b)(1). Generally, the most recent plan to have received Section 5 preclearance or to have been drawn by a Federal court is the last legally enforceable redistricting plan for Section 5 purposes. When a jurisdiction has received Section 5 preclearance for a new redistricting plan, or a Federal court has drawn a new plan and ordered it into effect, that plan replaces the last legally enforceable plan as the Section 5 benchmark. *McDaniel* v. *Sanchez,* 452 U.S. 130 (1981); *Texas* v. *United States,* 785 F. Supp. 201 (D.D.C. 1992); *Mississippi* v. *Smith,* 541 F. Supp. 1329, 1333 (D.D.C. 1982), appeal dismissed, 461 U.S. 912 (1983).

A plan found to be unconstitutional by a Federal court under the principles of *Shaw* v. *Reno* and its progeny cannot serve as the Section 5 benchmark, *Abrams* v. *Johnson,* 521 U.S. 74 (1997), and in such circumstances, the benchmark for Section 5 purposes will be the last legally enforceable plan predating the unconstitutional plan. Absent such a finding of unconstitutionality under *Shaw* by a Federal court, the last legally enforceable plan will serve as the benchmark for Section 5 review. Therefore, the question of whether the

benchmark plan is constitutional will not be considered during the Department's Section 5 review.

Analysis of Plans

As noted above, there are two necessary components to the analysis of whether a proposed redistricting plan meets the Section 5 standard. The first is a determination that the jurisdiction has met its burden of establishing that the plan was adopted free of any discriminatory purpose. The second is a determination that the jurisdiction has met its burden of establishing that the proposed plan will not have a retrogressive effect.

Discriminatory Purpose

Section 5 precludes implementation of a change affecting voting that has the purpose of denying or abridging the right to vote on account of race or color, or membership in a language minority group defined in the Act. The 2006 amendments provide that the term "purpose" in Section 5 includes "any discriminatory purpose," and is not limited to a purpose to retrogress, as was the case after the Supreme Court's decision in *Reno* v. *Bossier Parish* ("*Bossier II*), 528 U.S. 320 (2000). The Department will examine the circumstances surrounding the submitting authority's adoption of a submitted voting change, such as a redistricting plan, to determine whether direct or circumstantial evidence exists of any discriminatory purpose of denying or abridging the right to vote on account of race or color, or membership in a language minority group defined in the Act.

Direct evidence detailing a discriminatory purpose may be gleaned from the public statements of members of the adopting body or others who may have played a significant role in the process. *Busbee* v. *Smith,* 549 F. Supp. 494, 508 (D.D.C. 1982), *aff'd,* 459 U.S. 1166 (1983). The Department will also evaluate whether there are instances where the invidious element may be missing, but the underlying motivation is nonetheless intentionally discriminatory. In the *Garza* case, Judge Kozinski provided the clearest example:

> Assume you are an anglo homeowner who lives in an all-white neighborhood. Suppose, also, that you harbor no ill feelings toward minorities. Suppose further, however, that some of your neighbors persuade you that having an integrated neighborhood would lower property values and that you stand to lose a lot of money on your home. On the basis of that belief, you join a pact not to sell your house to minorities. Have you engaged in intentional racial and ethnic discrimination? Of course you have. Your personal feelings toward minorities don't matter; what matters is that you intentionally took actions calculated to keep them out of your neighborhood.

Garza and United States v. *County of Los Angeles,* 918 F.2d 763, 778 n.1 (9th Cir. 1990) (Kozinski, J., concurring and dissenting in part), *cert. denied,* 498 U.S. 1028 (1991).

In determining whether there is sufficient circumstantial evidence to conclude that the jurisdiction has not established the absence of the prohibited discriminatory purpose, the Attorney General will be guided by the Supreme Court's illustrative, but not exhaustive, list of those "subjects for proper inquiry in determining whether racially discriminatory intent existed," outlined in *Village of Arlington Heights* v. *Metropolitan Housing Development Corp.,* 429 U.S. 252, 268 (1977). In that case, the Court, noting that such an undertaking presupposes a "sensitive inquiry," identified certain areas to be reviewed in making this determination: (1) The impact of the decision; (2) the historical background of the decision, particularly if it reveals a series of decisions undertaken with discriminatory intent; (3) the sequence of events leading up to the decision; (4) whether the challenged decision departs, either procedurally or substantively, from the normal practice; and (5) contemporaneous statements and viewpoints held by the decision-makers. *Id.* at 266–68.

The single fact that a jurisdiction's proposed redistricting plan does not contain the maximum possible number of districts in which minority group members are a majority of the population or have the ability to elect candidates of choice to office, does not mandate that the Attorney General interpose an objection based on a failure to demonstrate the absence of a discriminatory purpose. Rather, the Attorney General will base the determination on a review of the plan in its entirety.

Retrogressive Effect

An analysis of whether the jurisdiction has met its burden of establishing that the proposed plan would not result in a discriminatory or "retrogressive" effect starts with a basic comparison of the benchmark and proposed plans at issue, using updated census data in each. Thus, the Voting Section staff loads the boundaries of the benchmark and proposed plans into the Civil Rights Division's geographic information system [GIS]. Population data are then calculated for each district in the benchmark and the proposed plans using the most recent decennial census data.

A proposed plan is retrogressive under Section 5 if its net effect would be to reduce minority voters' "effective exercise of the electoral franchise" when compared to the benchmark plan. *Beer* v. *United States* at 141. In 2006, Congress clarified that this means the jurisdiction must establish that its proposed redistricting plan will not have the effect of "diminishing the ability of any citizens of the United States" because of race, color, or membership in a language minority group defined in the Act, "to elect their preferred candidate of choice." 42 U.S.C. 1973c(b) & (d). In analyzing redistricting plans, the Department will follow the congressional directive of ensuring that the ability of such citizens to elect their preferred candidates of choice is protected. That ability to elect either exists or it does not in any particular circumstance.

In determining whether the ability to elect exists in the benchmark plan and whether it continues in the proposed plan, the Attorney General does not rely on any predetermined or fixed demographic percentages at any point in the assessment. Rather, in the Department's view, this determination requires a functional analysis of the electoral behavior within the particular jurisdiction or election district. As noted above, census data alone may not provide sufficient indicia of electoral behavior to make the requisite determination. Circumstances, such as differing rates of electoral participation within discrete portions of a population, may impact on the ability of voters to elect candidates of choice, even if the overall demographic data show no significant change.

Although comparison of the census population of districts in the benchmark and proposed plans is the important starting point of any Section 5 analysis, additional demographic and election data in the submission is often helpful in making the requisite Section 5 determination. 28 CFR 51.28(a). For example, census population data may not reflect significant differences in group voting behavior. Therefore, election history and voting patterns within the jurisdiction, voter registration and turnout information, and other similar information are very important to an assessment of the actual effect of a redistricting plan.

The Section 5 Procedures contain the factors that the courts have considered in deciding whether or not a redistricting plan complies with Section 5. These factors include whether minority voting strength is reduced by the proposed redistricting; whether minority concentrations are fragmented

among different districts; whether minorities are overconcentrated in one or more districts; whether alternative plans satisfying the jurisdiction's legitimate governmental interests exist, and whether they were considered; whether the proposed plan departs from objective redistricting criteria set by the submitting jurisdiction, ignores other relevant factors such as compactness and contiguity, or displays a configuration that inexplicably disregards available natural or artificial boundaries; and, whether the plan is inconsistent with the jurisdiction's stated redistricting standards. 28 CFR 51.56–59.

Alternatives to Retrogressive Plans

There may be circumstances in which the jurisdiction asserts that, because of shifts in population or other significant changes since the last redistricting (*e.g.*, residential segregation and demographic distribution of the population within the jurisdiction, the physical geography of the jurisdiction, the jurisdiction's historical redistricting practices, political boundaries, such as cities or counties, and/or state redistricting requirements), retrogression is unavoidable. In those circumstances, the submitting jurisdiction seeking preclearance of such a plan bears the burden of demonstrating that a less-retrogressive plan cannot reasonably be drawn.

In considering whether less-retrogressive alternative plans are available, the Department of Justice looks to plans that were actually considered or drawn by the submitting jurisdiction, as well as alternative plans presented or made known to the submitting jurisdiction by interested citizens or others. In addition, the Department may develop illustrative alternative plans for use in its analysis, taking into consideration the jurisdiction's redistricting principles. If it is determined that a reasonable alternative plan exists that is non-retrogressive or less retrogressive than the submitted plan, the Attorney General will interpose an objection.

Preventing retrogression under Section 5 does not require jurisdictions to violate the one-person, one-vote principle. 52 FR 488 (Jan. 6, 1987). Similarly, preventing retrogression under Section 5 does not require jurisdictions to violate *Shaw* v. *Reno* and related cases.

The one-person, one-vote issue arises most commonly where substantial demographic changes have occurred in some, but not all, parts of a jurisdiction. Generally, a plan for congressional redistricting that would require a greater overall population deviation than the submitted plan is not considered a reasonable alternative by the Department. For state legislative and local redistricting, a plan that would require significantly greater overall population deviations is not considered a reasonable alternative.

In assessing whether a less retrogressive plan can reasonably be drawn, the geographic compactness of a jurisdiction's minority population will be a factor in the Department's analysis. This analysis will include a review of the submitting jurisdiction's historical redistricting practices and district configurations to determine whether the alternative plan would (a) abandon those practices and (b) require highly unusual features to link together widely separated minority concentrations.

At the same time, compliance with Section 5 of the Voting Rights Act may require the jurisdiction to depart from strict adherence to certain of its redistricting criteria. For example, criteria that require the jurisdiction to make the least possible change to existing district boundaries, to follow county, city, or precinct boundaries, protect incumbents, preserve partisan balance, or in some cases, require a certain level of compactness of district boundaries may need to give way to some degree to avoid retrogression. In evaluating alternative or illustrative plans, the Department of Justice relies upon plans that make the least departure from a jurisdiction's stated redistricting criteria needed to prevent retrogression.

The Use of 2010 Census Data

The most current population data are used to measure both the benchmark plan and the proposed redistricting plan. 28 CFR 51.54(b)(2) (Department of Justice considers "the conditions existing at the time of the submission."); *City of Rome* v. *United States,* 446 U.S. 156, 186 (1980) ("most current available population data" to be used for measuring effect of annexations); *Reno* v. *Bossier Parish School Board,* 528 U.S. 320, 334 (2000) ("the baseline is the status quo that is proposed to be changed: If the change 'abridges the right to vote' relative to the status quo, preclearance is denied * * * .").

For redistricting after the 2010 Census, the Department of Justice will, consistent with past practice, evaluate redistricting submissions using the 2010 Census population data released by the Bureau of the Census for redistricting pursuant to Public Law 94–171, 13 U.S.C. 141(c). Thus, our analysis of the proposed redistricting plans includes a review and assessment of the Public Law 94–171 population data, even if those data are not included in the submission or were not used by the jurisdiction in drawing the plan. The failure to use the Public Law 94–171 population data in redistricting does not, by itself, constitute a reason for interposing an objection. However, unless other population data used can be shown to be more accurate and reliable than the Public Law 94–171 data, the Attorney General will consider the Public Law 94–171 data to measure the total population and voting age population within a jurisdiction for purposes of its Section 5 analysis.

As in 2000, the 2010 Census Public Law 94–171 data will include counts of persons who have identified themselves as members of more than one racial category. This reflects the October 30, 1997, decision by the Office of Management and Budget [OMB] to incorporate multiple-race reporting into the Federal statistical system. 62 FR 58782–58790. Likewise, on March 9, 2000, OMB issued Bulletin No. 00–02 addressing "Guidance on Aggregation and Allocation of Data on Race for Use in Civil Rights Enforcement." Part II of that Bulletin describes how such census responses will be allocated by Federal executive agencies for use in civil rights monitoring and enforcement.

The Department will follow both aggregation methods defined in Part II of the Bulletin. The Department's initial review of a plan will be based upon allocating any multiple-item response that includes white and one of the five other race categories identified in the response. Thus, the total numbers for "Black/African American," "Asian," "American Indian/Alaska Native," "Native Hawaiian or Other Pacific Islander" and "Some other race" reflect the total of the single-race responses and the multiple responses in which an individual selected a minority race and white race.

The Department will then move to the second step in its application of the census data to the plan by reviewing the other multiple-race category, which is comprised of all multiple-race responses consisting of more than one minority race. Where there are significant numbers of such responses, we will, as required by both the OMB guidance and judicial opinions, allocate these responses on an iterative basis to each of the component single-race categories for analysis. *Georgia* v. *Ashcroft,* 539 U.S. 461, 473, n.1 (2003).

As in the past, the Department will analyze Latino voters as a separate group for purposes of enforcement of the Voting Rights Act. If there are significant numbers of responses which

report Latino and one or more minority races (for example, Latinos who list their race as Black/African-American), those responses will be allocated alternatively to the Latino category and the minority race category.

Dated: February 3, 2011.

Thomas E. Perez,

Assistant Attorney General, Civil Rights Division.

[FR Doc. 2011–2797 Filed 2–8–11; 8:45 am]

BILLING CODE 4410–13–P

Exhibit 2

U. S. Departm of Justice

Civil Rights Division

Office of the Assistant Attorney General Washington, D.C. 20530

DEC 31 2002

Mr. Walter C. Lee
Superintendent, Parish School Board
201 Crosby Street
Mansfield, Louisiana 71052

Mr. B.D. Mitchell
President, Parish Police Jury
P.O. Box 898
Mansfield, Louisiana 71052

Dear Messrs. Lee and Mitchell:

This refers to the 2002 redistricting plan for the DeSoto Parish School District; and the related voting precinct and polling place changes for DeSoto Parish, Louisiana, submitted to the Attorney General pursuant to Section 5 of the Voting Rights Act, 42 U.S.C. 1973c. We received the school district's responses to our August 23, 2002, request for additional information on September 16 and November 1, 2002. Upon receipt of the school district's completed response, we reopened the parish's submission.

With regard to the redistricting plan, we have considered carefully the information you have provided, as well as census data, comments and information from other interested parties, and other information, including the district's previous submissions. Based on our analysis of the information available to us, I am compelled to object to the submitted redistricting plan on behalf of the Attorney General.

The 2000 Census indicates that the district, which is coterminous with DeSoto Parish, has a total population of 25,494, of whom 10,724 (42.1%) are black persons. The total voting age population of the parish is 18,264, of whom 7,146 (39.1%) are black persons. The school board consists of 11 board members, elected from single-member districts in non-partisan elections, by majority vote, to four-year terms.

Under 2000 Census data, five of the eleven districts in the current, or benchmark, plan have a total population that is majority black and which, in fact, have been electing the candidate of choice of black voters. In four of these five districts under the proposed plan, black voters will continue to have the ability to elect candidates of their choice. Our analysis, however, shows that this is not true for the fifth district, District 9. Under the benchmark plan, black voters in that district have the ability to elect their candidates of choice, and they will not have that same ability under the proposed plan.

Our analysis shows that elections in DeSoto Parish are marked by a pattern of racially polarized voting. Moreover, we analyzed several parish-wide elections to determine whether black voters in District 9 have the present ability to elect candidates of choice under the benchmark plan and whether they would continue to have that ability under the proposed plan. We determined that, while under the benchmark plan black voters did indeed have the ability to elect a candidate of choice, under the proposed plan they will not. Accordingly, the implementation of the proposed plan will result in a retrogression in the minority voters effective exercise of their electoral franchise.

This retrogression was avoidable. Our analysis of the information submitted indicates that the reduction of the black population percentage in District 9 was not required to comply with the redistricting criteria used by the school district. First, the district did not require any modification to comply with constitutional requirements. Second, the school district's own consultant presented an alternative plan, Plan 6, which satisfied traditional redistricting criteria and maintained the benchmark district's demographics.

A proposed change has a discriminatory effect when it will "lead to a retrogression in the position of racial minorities with respect to their effective exercise of the electoral franchise." Beer v. United States, 425 U.S. 125, 141 (1976). If the proposed plan materially reduces the ability of minority voters to elect candidates of their choice to a level less than what they enjoyed under the benchmark plan, preclearance must be denied. State of Georgia v. Ashcroft, 195 F.Supp 2d. 25 (D.D.C. 2002). In Texas v. United States, the court held that "preclearance must be denied under the 'effects' prong of Section 5 if a new system places minority voters in a weaker position than the existing system." 866 F.Supp. 20, 27 (D.D.C. 1994).

With respect to the district's ability to demonstrate that the plan was adopted without a prohibited purpose, in Village of Arlington Heights v. Metropolitan Housing Development Corp., 429 U.S. 252, 266 (1977), the Supreme Court identified the analytical structure for determining whether racially discriminatory intent exists. This approach requires an inquiry into the following: 1) the impact of the decision; 2) the historical background of the decision, particularly if it reveals a series of decisions undertaken with discriminatory intent; 3) the sequence of events leading up to the decision; 4) whether the challenged decision departs, either procedurally or substantively, from the normal practice; and 5) contemporaneous statements and viewpoints held by the decision-makers. Id. at 266-68.

Here the retrogressive effect, as noted above, was easily avoidable. The school board was not compelled to redraw the district, and even if it wished to do so, it was presented with an alternative that met all of its legitimate criteria while maintaining the minority community's electoral ability in District 9, an alternative that the board rejected. Most revealing is the fact that the board has indicated that it sought to devise a redistricting plan resulting in four districts where black persons were a majority of the population, similar to the benchmark plan implemented in 1994. However, your plan does not take into account the current population of the district according to the 2000 Census as required by the Guidance Concerning Redistricting and Retrogression Under Section 5 of the Voting Rights Act, 66 Fed. Reg. 5412 (January 18, 2001). The 2000 data shows that the current District 9 is a fifth district with a majority black population, and our analysis establishes that District 9 is now one in which blacks can elect a candidate of choice. In these circumstances, we cannot conclude that the district will be able to sustain its burden, as it must, that the action in question was not motivated by an intent to retrogress.

Under Section 5 of the Voting Rights Act, the submitting authority has the burden of showing that a submitted change has neither a discriminatory purpose nor a discriminatory effect. Georgia v. United States, 411 U.S. 526 (1973); Reno v. Bossier Parish School Board, 528 U.S. 320 (2000); see also the Procedures for the Administration of Section 5 (28 C.F.R. 51.52). In light of the considerations discussed above, I cannot conclude that your burden has been sustained in this instance. Therefore, on behalf of the Attorney General, I must object to the submitted redistricting plan.

We note that under Section 5 you have the right to seek a declaratory judgment from the United States District Court for

the District of Columbia that the proposed change neither has the purpose nor will have the effect of denying or abridging the right to vote on account of race, color, or membership in a language minority group. See 28 C.F.R. 51.44. In addition, you may request that the Attorney General reconsider the objection. See 28 C.F.R. 51.45. However, until the objection is withdrawn or a judgment from the District of Columbia Court is obtained, the change continues to be legally unenforceable. Clark v. Roemer, 500 U.S. 646 (1991); 28 C.F.R. 51.10.

Please note that the Attorney General will make no determination regarding the submitted voting precinct and polling place changes because those changes are dependent upon the objected-to redistricting plan.

To enable us to meet our responsibility to enforce the Voting Rights Act, please inform us of the action the DeSoto Parish School District plans to take concerning this matter. If you have any questions, you should call Ms. Maureen S. Riordan (202-353-2087), an attorney in the Voting Section. Refer to File No. 2002-2926 in any response to this letter so that your correspondence will be channeled properly.

Sincerely,

Andrew E. Lelling
Acting Assistant Attorney
General

Exhibit 3

EXHIBIT 4



Geographic Planning & Demographic Services

Reapportionments / Census / Economic Analysis / Geocoding

MEMORANDUM
DeSoto Parish Police Jury
2020 Census District Determination

I have computed the new 2020 Census population into the Police Jury's current election districts. The average population is calculated by dividing the 2020 Parish count of 26,812 by the eleven election districts. The results are as follows:

DeSoto Parish Police Jury
2020 Election District Population Determinations

District	Total Population	Deviation	% Deviation	White	% White	Black	% Black
1A	2,254	-183	-8%	1,462	65%	581	26%
1B	2,128	-309	-13%	1,371	64%	626	29%
1C	2,124	-313	-13%	1,531	72%	452	21%
2	3,516	1079	44%	2,860	81%	331	9%
3	3,188	751	31%	2,710	85%	247	8%
4A	2,245	-192	-8%	882	39%	1,225	55%
4B	1,974	-463	-19%	586	30%	1,273	64%
4C	2,202	-235	-10%	512	23%	1,578	72%
4D	2,307	-130	-5%	766	33%	1,372	59%
5	2,616	179	7%	1,739	66%	652	25%
6	2,258	-179	-7%	865	38%	1,284	57%

Average District 2020 Population: 2,437

Source: U.S. Census Bureau 2020 PL 94-171 Datafile. Compiled by GPDS, LLC

If any district is outside a +/-5% deviation from the ideal population of 2,437 persons then redistricting is necessary to rebalance the election districts among each other. Since the determination has shown that 10 districts are outside the allowable deviation range, then redistricting must take place.

I have prepared the appropriate ordinance for the Police Jury's consideration. The ordinance will reflect the 2020 election district populations and state that reapportionment is required. Adoption of this ordinance will satisfy R.S. 33:1411.

In the near future I would like to start holding an initial workshop to start formulating a plan with the Jury members and the public. I will get with the Secretary of the Jury to set up a schedule that is convenient. In the meantime, please do not hesitate to call me if you have any questions.

Mike Hefner, Chief Demographer

905 Golden Grain Rd. | Duson, LA 70529 | 337-873-4244 | gpds@cox.net

EXHIBIT 5

Geographic Planning & Demographic Services

Reapportionments / Census / Economic Analysis / Geocoding

SUMMARY OF 2020 REDISTRICTING CRITERIA

TRADITIONAL REDISTRICTING PRINCIPALS

The U.S. Supreme Court, in a series of decisions, has validated what is referred to as traditional redistricting principals. They are:

1. Compactness: The districts need to be as compact as necessary and avoid unnecessary stretching of the districts across the jurisdiction.
2. Contiguity: The districts need to be connected unless there is a legal boundary that would separate a district into two unconnected parts.
3. Preservation of communities of interest: Keep areas of like interests together where possible.
4. Preservation of cores of prior districts: Keep the current districts largely intact and avoid any unnecessary reconfigurations of the districts that might invite voter confusion.
5. Protection of Incumbents: Where possible, keep the incumbents in their respective districts.
6. Compliance with Section 2 of the Voting Rights Act
    a. In 2013, the Supreme Court in the case of *Shelby County v Holder*, struck down as unconstitutional the Section 5 Pre-Clearance covered jurisdiction formula being used for election changes. Since that time Congress has not acted to adopt a new formula and until such time, Section 5 Pre-Clearance is not required.
    b. Although Pre-Clearance is no longer required, adherence to Section 2 of the Voting Rights Act is required.

OTHER REDISTRICTING CRITERIA

1. One man, one vote principal (+/-5% from ideal district population): the +/-5% deviation allowance was the result of two U.S. Supreme Court cases involving state level redistricting. Since an entire state has more flexibility with census geography and census counts, the +/-5% deviation allowance is absolute. For smaller jurisdictions like parishes, school boards, and municipalities, the deviation allowance is more flexible since the census geography and counts are more limited. The exact percentage allowed is on a case-by-case basis.
2. State laws governing precincts, precinct splits, use of physical boundaries and census tabulation blocks: State statutes limit school boards to no more than three precinct splits per district and a precinct not divided between no more than two districts. For municipalities, use of whole precincts to the extent practicable is preferred. For parish governing authorities, they must use whole precincts and any split precincts in their plan must be made into whole precincts.
3. State timelines: For November 8, 2022 elections, June 21, 2022 is the deadline for submission to the Secretary of State. For the October 14th elections, the deadline to submit is July 8, 2023.

RACE AND ITS EFFECT ON A PLAN

Race cannot be the primary consideration in forming districts without regard to traditional redistricting principals.[12] While preservation of the ability of minorities to elect a candidate of their choice is a critical part of any plan, going

[12] Shaw v. Reno, 509 U.S. 630, 642 (1993)

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to extreme lengths that use race as the sole basis for drawing a district in violation of traditional redistricting principals opens the plan up to a Section 2 challenge.

The challenge is to preserve traditional minority voting strengths while adhering to traditional principals of redistricting. This can be difficult if the traditional minority communities have been diffused over time due to out-migration of minorities and/or the in-migration of non-minorities.

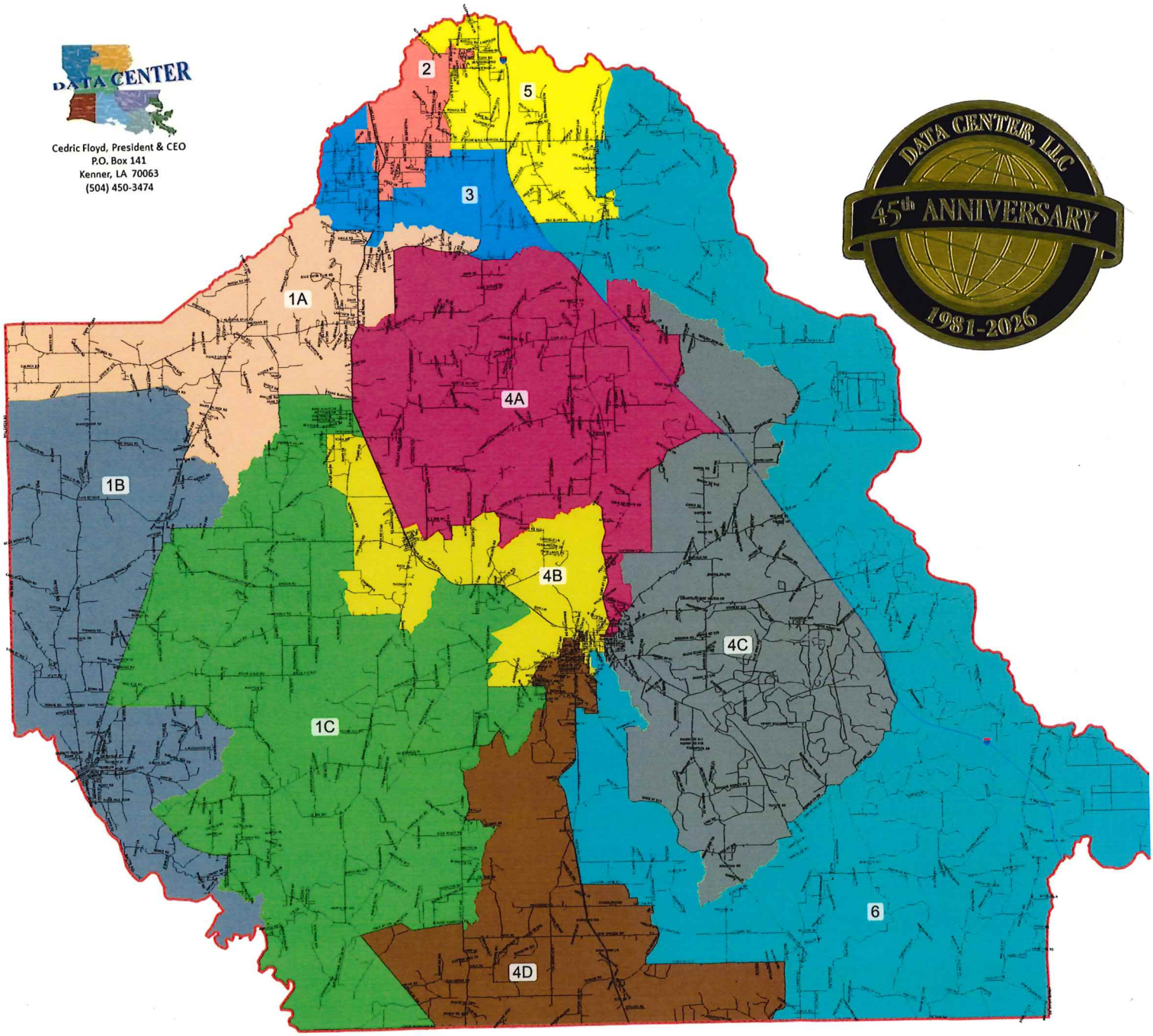
The prohibition on using race as a sole factor in redistricting cannot be used as an excuse to develop a plan that ignores or minimizes minorities. For a plan to survive a Section 2 challenge, the plan would have to meet the needs of the minority community and to preserve to the greatest extent practicable their ability to elect a candidate of their choice under current jurisprudence criteria.

Prepared by:
Michael Hefner
Geographic Planning & Demographic Services, LLC

Exhibit 4

2027 Desoto PJ Plan 1

DATA CENTER
Cedric Floyd, President & CEO
P.O. Box 141
Kenner, LA 70063
(504) 450-3474



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2027 DESOTO POLICE JURY - PLAN 1
Registered Voters 9-15-2026 Summary

Total Population – 26,812 **Ideal District Size – 2,437** **Plan Deviation – 5.99%**

District	Population	Dev.	% Dev.	RV26 Total	RV26 Dem	% RV26 Dem	RV26 Rep	% RV26 Rep
1A	2,467	30	1.23%	1,705	431	25.28%	916	53.72%
1B	2,480	43	1.76%	1,820	627	34.45%	709	38.96%
1C	2,509	72	2.95%	1,823	443	24.30%	937	51.40%
2	2,417	-20	-0.82%	1,752	252	14.38%	1,047	59.76%
3	2,503	66	2.71%	1,598	206	12.89%	961	60.14%
4A	2,501	64	2.63%	1,738	889	51.15%	496	28.54%
4B	2,373	-64	-2.63%	1,699	1,006	59.21%	338	19.89%
4C	2,363	-74	-3.04%	1,763	1,018	57.74%	379	21.50%
4D	2,391	-46	-1.89%	1,478	875	59.20%	283	19.15%
5	2,422	-15	-0.62%	1,600	345	21.56%	793	49.56%
6	2,386	-51	-2.09%	1,521	736	48.39%	477	31.36%
Totals	**26,812**			**18,497**	**6,828**	**36.91%**	**7,336**	**39.66%**

Source: 2020 US Census Bureau-PL 94-171 Datafile, Voter Registration 9-15-26 - Compiled by Data Center LLC, P.O. Box 141, Kenner, LA 70063 (504) 450-3474



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2027 DESOTO POLICE JURY - PLAN 1
Race Population Summary

Total Population – 26,812 **Ideal District Size – 2,437** **Plan Deviation – 5.99%**

District	Population	Dev.	% Dev.	White	% White	Black	% Black
1A	2,467	30	1.23%	1,683	68.22%	584	23.67%
1B	2,480	43	1.76%	1,608	64.84%	705	28.43%
1C	2,509	72	2.95%	1,878	74.85%	466	18.57%
2	2,417	-20	-0.82%	1,950	80.68%	263	10.88%
3	2,503	66	2.71%	2,135	85.30%	159	6.35%
4A	2,501	64	2.63%	1,007	40.26%	1,345	53.78%
4B	2,373	-64	-2.63%	672	28.32%	1,574	66.33%
4C	2,363	-74	-3.04%	752	31.82%	1,483	62.76%
4D	2,391	-46	-1.89%	822	34.38%	1,393	58.26%
5	2,422	-15	-0.62%	1,834	75.72%	365	15.07%
6	2,386	-51	-2.09%	943	39.52%	1,284	53.81%
Totals	**26,812**			**15,284**	**57.00%**	**9,621**	**35.88%**

Source: 2020 US Census Bureau-PL 94-171 Datafile - Compiled by Data Center LLC, P.O. Box 141, Kenner, LA 70063 (504) 450-3474

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2027 DESOTO POLICE JURY - PLAN 1
Voting Age Population Summary

Total Population – 26,812 **Ideal District Size – 2,437** **Plan Deviation – 5.99%**

District	Population	Dev.	% Dev.	18+ Total	18+ White	% 18+ White	18+ Black	% 18+ Black
1A	2,467	30	1.23%	1,770	1,209	68.31%	464	26.21%
1B	2,480	43	1.76%	1,909	1,288	67.47%	524	27.45%
1C	2,509	72	2.95%	2,010	1,519	75.57%	386	19.20%
2	2,417	-20	-0.82%	1,737	1,425	82.04%	181	10.42%
3	2,503	66	2.71%	1,855	1,591	85.77%	118	6.36%
4A	2,501	64	2.63%	1,934	814	42.09%	1,031	53.31%
4B	2,373	-64	-2.63%	1,838	577	31.39%	1,166	63.44%
4C	2,363	-74	-3.04%	1,855	641	34.56%	1,128	60.81%
4D	2,391	-46	-1.89%	1,849	705	38.13%	1,022	55.27%
5	2,422	-15	-0.62%	1,847	1,397	75.64%	283	15.32%
6	2,386	-51	-2.09%	1,836	743	40.47%	975	53.10%
Totals	**26,812**			**20,440**	**11,909**	**58.26%**	**7,278**	**35.61%**

Source: 2020 US Census Bureau-PL 94-171 Datafile - Compiled by Data Center LLC, P.O. Box 141, Kenner, LA 70063 (504) 450-3474

User: **Data Center LLC**
Plan Name: **2027 Desoto Police Jury Plan 1**
Plan Type: **11 Single Member Election Districts**

Core Constituencies

From Plan: **Benchmark Plan-Desoto-9-26**

Plan: 2027 Desoto PJ Plan 1, District 1A --

2,467 Total Population

	Population	[RV26 Total]	[RV26 DEM]	[RV26 REP]	[18+_Pop]	[18+_Wht]	[18+_Blk]
Dist. 1A	1,423 (57.68%)	874 (51.26%)	333 (77.26%)	361 (39.41%)	1,064 (60.11%)	597 (49.38%)	387 (83.41%)
Dist. 3	1,044 (42.32%)	831 (48.74%)	98 (22.74%)	555 (60.59%)	706 (39.89%)	612 (50.62%)	77 (16.59%)
Total and % Population		1,705 (69.11%)	431 (17.47%)	916 (37.13%)	1,770 (71.75%)	1,209 (49.01%)	464 (18.81%)

Plan: 2027 Desoto PJ Plan 1, District 1B --

2,480 Total Population

	Population	[RV26 Total]	[RV26 DEM]	[RV26 REP]	[18+_Pop]	[18+_Wht]	[18+_Blk]
Dist. 1A	352 (14.19%)	319 (17.53%)	95 (15.15%)	141 (19.89%)	290 (15.19%)	204 (15.84%)	62 (11.83%)
Dist. 1B	2,128 (85.81%)	1,500 (82.42%)	531 (84.69%)	568 (80.11%)	1,619 (84.81%)	1,084 (84.16%)	462 (88.17%)
Dist. 1C	0 (0.00%)	1 (0.05%)	1 (0.16%)	(0.00%)	(0.00%)	(0.00%)	(0.00%)
Total and % Population		1,820 (73.39%)	627 (25.28%)	709 (28.59%)	1,909 (76.98%)	1,288 (51.94%)	524 (21.13%)

Plan: 2027 Desoto PJ Plan 1, District 1C --

2,509 Total Population

	Population	[RV26 Total]	[RV26 DEM]	[RV26 REP]	[18+_Pop]	[18+_Wht]	[18+_Blk]
Dist. 1A	385 (15.34%)	304 (16.68%)	48 (10.84%)	178 (19.00%)	313 (15.57%)	283 (18.63%)	11 (2.85%)
Dist. 1C	2,124 (84.66%)	1,519 (83.32%)	395 (89.16%)	759 (81.00%)	1,697 (84.43%)	1,236 (81.37%)	375 (97.15%)
Total and % Population		1,823 (72.66%)	443 (17.66%)	937 (37.35%)	2,010 (80.11%)	1,519 (60.54%)	386 (15.38%)

Plan: 2027 Desoto PJ Plan 1, District 2 --

2,417 Total Population

	Population	[RV26 Total]	[RV26 DEM]	[RV26 REP]	[18+_Pop]	[18+_Wht]	[18+_Blk]
Dist. 2	2,417 (100.00%)	1,752 (100.00%)	252 (100.00%)	1,047 (100.00%)	1,737 (100.00%)	1,425 (100.00%)	181 (100.00%)
Total and % Population		1,752 (72.49%)	252 (10.43%)	1,047 (43.32%)	1,737 (71.87%)	1,425 (58.96%)	181 (7.49%)

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Core Constituencies

From Plan: **Benchmark Plan-Desoto-9-26**

Plan: 2027 Desoto PJ Plan 1, District 3 --

2,503 Total Population

	Population	[RV26 Total]	[RV26 DEM]	[RV26 REP]	[18+_Pop]	[18+_Wht]	[18+_Blk]
Dist. 2	410 (16.38%)	316 (19.77%)	47 (22.82%)	193 (20.08%)	322 (17.36%)	278 (17.47%)	19 (16.10%)
Dist. 3	2,093 (83.62%)	1,282 (80.23%)	159 (77.18%)	768 (79.92%)	1,533 (82.64%)	1,313 (82.53%)	99 (83.90%)
Total and % Population		1,598 (63.84%)	206 (8.23%)	961 (38.39%)	1,855 (74.11%)	1,591 (63.56%)	118 (4.71%)

Plan: 2027 Desoto PJ Plan 1, District 4A --

2,501 Total Population

	Population	[RV26 Total]	[RV26 DEM]	[RV26 REP]	[18+_Pop]	[18+_Wht]	[18+_Blk]
Dist. 3	40 (1.60%)	32 (1.84%)	2 (0.22%)	22 (4.44%)	31 (1.60%)	28 (3.44%)	3 (0.29%)
Dist. 4A	2,245 (89.76%)	1,601 (92.12%)	839 (94.38%)	446 (89.92%)	1,754 (90.69%)	728 (89.43%)	941 (91.27%)
Dist. 5	216 (8.64%)	105 (6.04%)	48 (5.40%)	28 (5.65%)	149 (7.70%)	58 (7.13%)	87 (8.44%)
Total and % Population		1,738 (69.49%)	889 (35.55%)	496 (19.83%)	1,934 (77.33%)	814 (32.55%)	1,031 (41.22%)

Plan: 2027 Desoto PJ Plan 1, District 4B --

2,373 Total Population

	Population	[RV26 Total]	[RV26 DEM]	[RV26 REP]	[18+_Pop]	[18+_Wht]	[18+_Blk]
Dist. 1A	94 (3.96%)	76 (4.47%)	13 (1.29%)	37 (10.95%)	77 (4.19%)	66 (11.44%)	10 (0.86%)
Dist. 4A	0 (0.00%)	0 (0.00%)	(0.00%)	(0.00%)	(0.00%)	(0.00%)	(0.00%)
Dist. 4B	1,974 (83.19%)	1,375 (80.93%)	792 (78.73%)	298 (88.17%)	1,541 (83.84%)	507 (87.87%)	949 (81.39%)
Dist. 4C	296 (12.47%)	244 (14.36%)	197 (19.58%)	3 (0.89%)	215 (11.70%)	4 (0.69%)	202 (17.32%)
Dist. 6	9 (0.38%)	4 (0.24%)	4 (0.40%)	(0.00%)	5 (0.27%)	(0.00%)	5 (0.43%)
Total and % Population		1,699 (71.60%)	1,006 (42.39%)	338 (14.24%)	1,838 (77.45%)	577 (24.32%)	1,166 (49.14%)

Plan: 2027 Desoto PJ Plan 1, District 4C --

2,363 Total Population

	Population	[RV26 Total]	[RV26 DEM]	[RV26 REP]	[18+_Pop]	[18+_Wht]	[18+_Blk]
Dist. 4C	1,906 (80.66%)	1,354 (76.80%)	854 (83.89%)	239 (63.06%)	1,486 (80.11%)	434 (67.71%)	986 (87.41%)
Dist. 5	39 (1.65%)	65 (3.69%)	24 (2.36%)	22 (5.80%)	33 (1.78%)	7 (1.09%)	23 (2.04%)
Dist. 6	418 (17.69%)	344 (19.51%)	140 (13.75%)	118 (31.13%)	336 (18.11%)	200 (31.20%)	119 (10.55%)
Total and % Population		1,763 (74.61%)	1,018 (43.08%)	379 (16.04%)	1,855 (78.50%)	641 (27.13%)	1,128 (47.74%)

Plan: 2027 Desoto PJ Plan 1, District 4D --

2,391 Total Population

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Core Constituencies

From Plan: **Benchmark Plan-Desoto-9-26**

	Population	[RV26 Total]	[RV26 DEM]	[RV26 REP]	[18+_Pop]	[18+_Wht]	[18+_Blk]
Dist. 4D	2,307 (96.49%)	1,423 (96.28%)	853 (97.49%)	260 (91.87%)	1,785 (96.54%)	665 (94.33%)	1,004 (98.24%)
Dist. 6	84 (3.51%)	55 (3.72%)	22 (2.51%)	23 (8.13%)	64 (3.46%)	40 (5.67%)	18 (1.76%)
Total and % Population		1,478 (61.82%)	875 (36.60%)	283 (11.84%)	1,849 (77.33%)	705 (29.49%)	1,022 (42.74%)

Plan: 2027 Desoto PJ Plan 1, District 5 -- **2,422 Total Population**

	Population	[RV26 Total]	[RV26 DEM]	[RV26 REP]	[18+_Pop]	[18+_Wht]	[18+_Blk]
Dist. 2	689 (28.45%)	417 (26.06%)	67 (19.42%)	225 (28.37%)	507 (27.45%)	409 (29.28%)	39 (13.78%)
Dist. 3	11 (0.45%)	17 (1.06%)	4 (1.16%)	11 (1.39%)	9 (0.49%)	2 (0.14%)	(0.00%)
Dist. 5	1,722 (71.10%)	1,166 (72.88%)	274 (79.42%)	557 (70.24%)	1,331 (72.06%)	986 (70.58%)	244 (86.22%)
Total and % Population		1,600 (66.06%)	345 (14.24%)	793 (32.74%)	1,847 (76.26%)	1,397 (57.68%)	283 (11.68%)

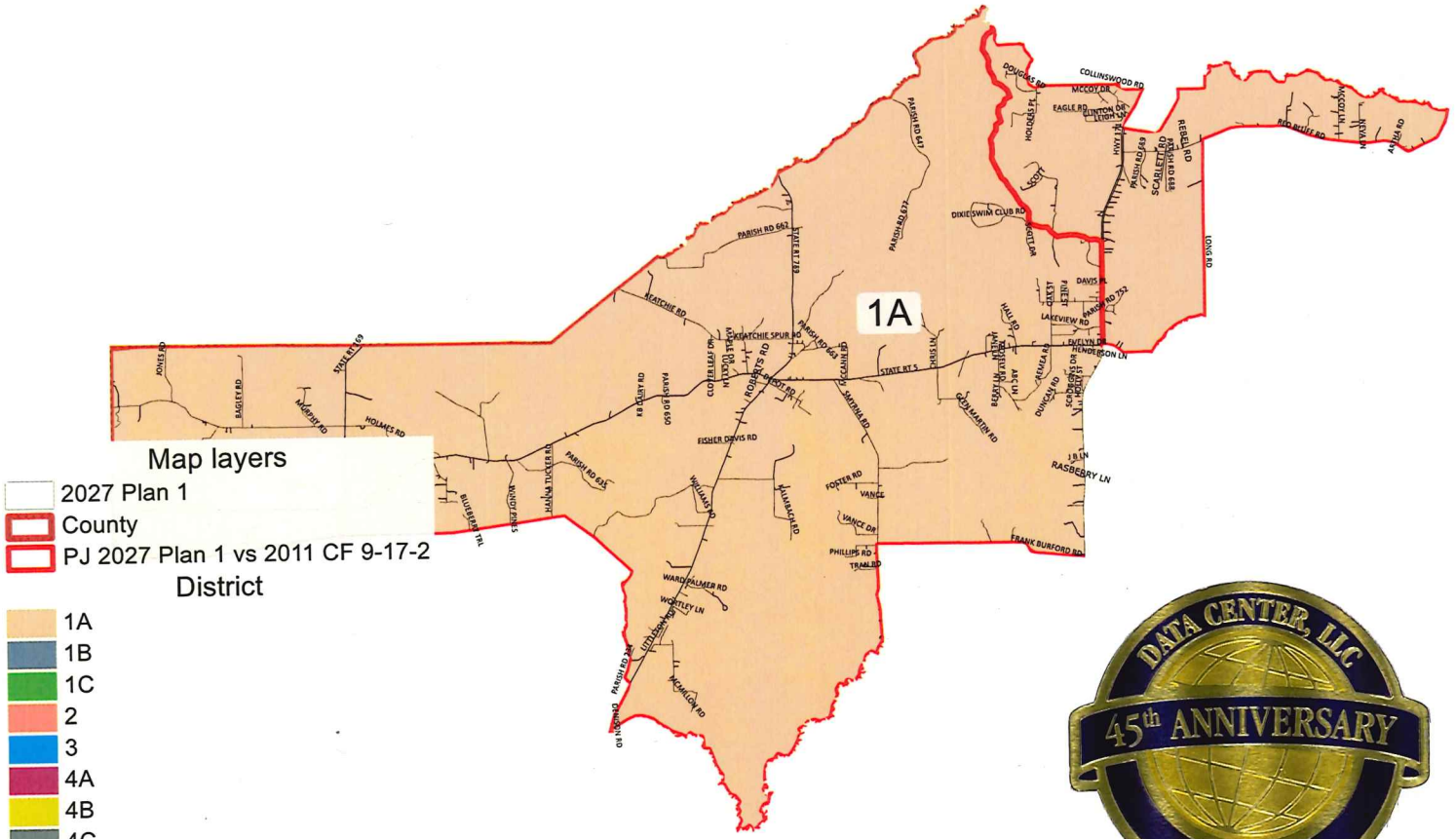
Plan: 2027 Desoto PJ Plan 1, District 6 -- **2,386 Total Population**

	Population	[RV26 Total]	[RV26 DEM]	[RV26 REP]	[18+_Pop]	[18+_Wht]	[18+_Blk]
Dist. 5	639 (26.78%)	508 (33.40%)	126 (17.12%)	250 (52.41%)	492 (26.80%)	287 (38.63%)	148 (15.18%)
Dist. 6	1,747 (73.22%)	1,013 (66.60%)	610 (82.88%)	227 (47.59%)	1,344 (73.20%)	456 (61.37%)	827 (84.82%)
Total and % Population		1,521 (63.75%)	736 (30.85%)	477 (19.99%)	1,836 (76.95%)	743 (31.14%)	975 (40.86%)

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District: 1A

District 1A



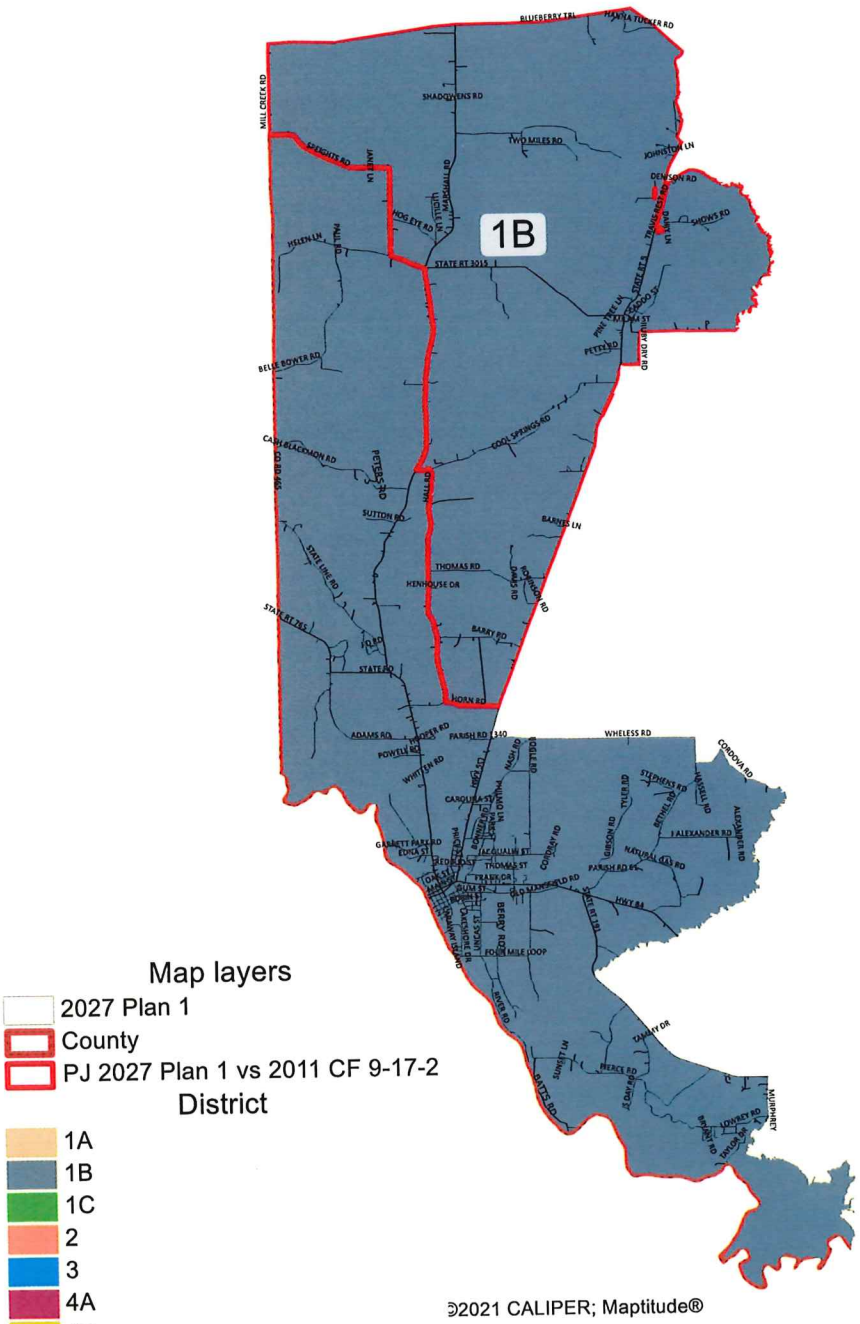
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Field	Value
ID	174
Area	57.02
District	1A
Members	1.0
Locked	
Name	District 1A
Population	2467
White	1683
Black	584
Other	30
18+_Pop	1770
18+_Wht	1209
18+_Blk	464
RV26 Total	1705
RV26 Race A	5
RV26 Race B	399
RV26 Race H	10
RV26 Race I	16
RV26 Race O	37
RV26 Race W	1238
RV26 DEM	431
RV26 GRN	0
RV26 LBT	12
RV26 NOPTY	346
RV26 OTHER	0
RV26 REP	916
Ideal Value	2,437
Deviation	30
% Deviation	1.23%
% White	68.22%
% Black	23.67%
% Other	1.22%
% 18+_Wht	68.31%
% 18+_Blk	26.21%
District Number	1
% RV26 Race A	0.29%
% RV26 Race B	23.4%
% RV26 Race H	0.59%
% RV26 Race I	0.94%

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District: 1B

District 1B

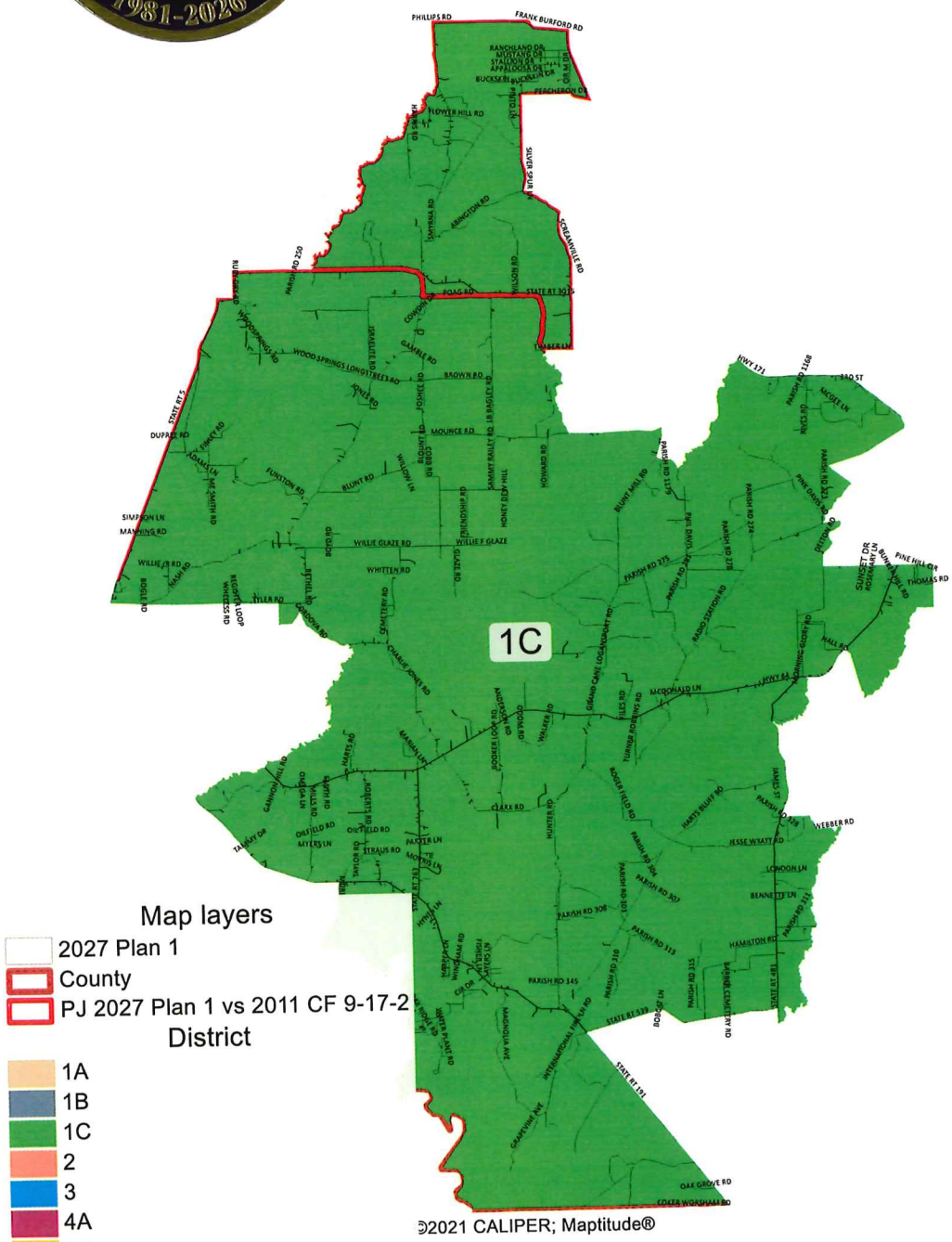


Field	Value
ID	192
Area	85.75
District	1B
Members	1.0
Locked	
Name	District 1B
Population	2480
White	1608
Black	705
Other	53
18+_Pop	1909
18+_Wht	1288
18+_Blk	524
RV26 Total	1820
RV26 Race A	2
RV26 Race B	570
RV26 Race H	7
RV26 Race I	1
RV26 Race O	21
RV26 Race W	1219
RV26 DEM	627
RV26 GRN	1
RV26 LBT	5
RV26 NOPTY	474
RV26 OTHER	4
RV26 REP	709
Ideal Value	2,437
Deviation	43
% Deviation	1.76%
% White	64.84%
% Black	28.43%
% Other	2.14%
% 18+_Wht	67.47%
% 18+_Blk	27.45%
District Number	1
% RV26 Race A	0.11%
% RV26 Race B	31.32%
% RV26 Race H	0.38%
% RV26 Race I	0.05%
% RV26 Race O	1.15%
% RV26 Race W	66.98%
% RV26 DEM	34.45%
% RV26 GRN	0.05%
% RV26 LBT	0.27%
% RV26 NOPTY	26.04%
% RV26 OTHER	0.22%



District: 1C

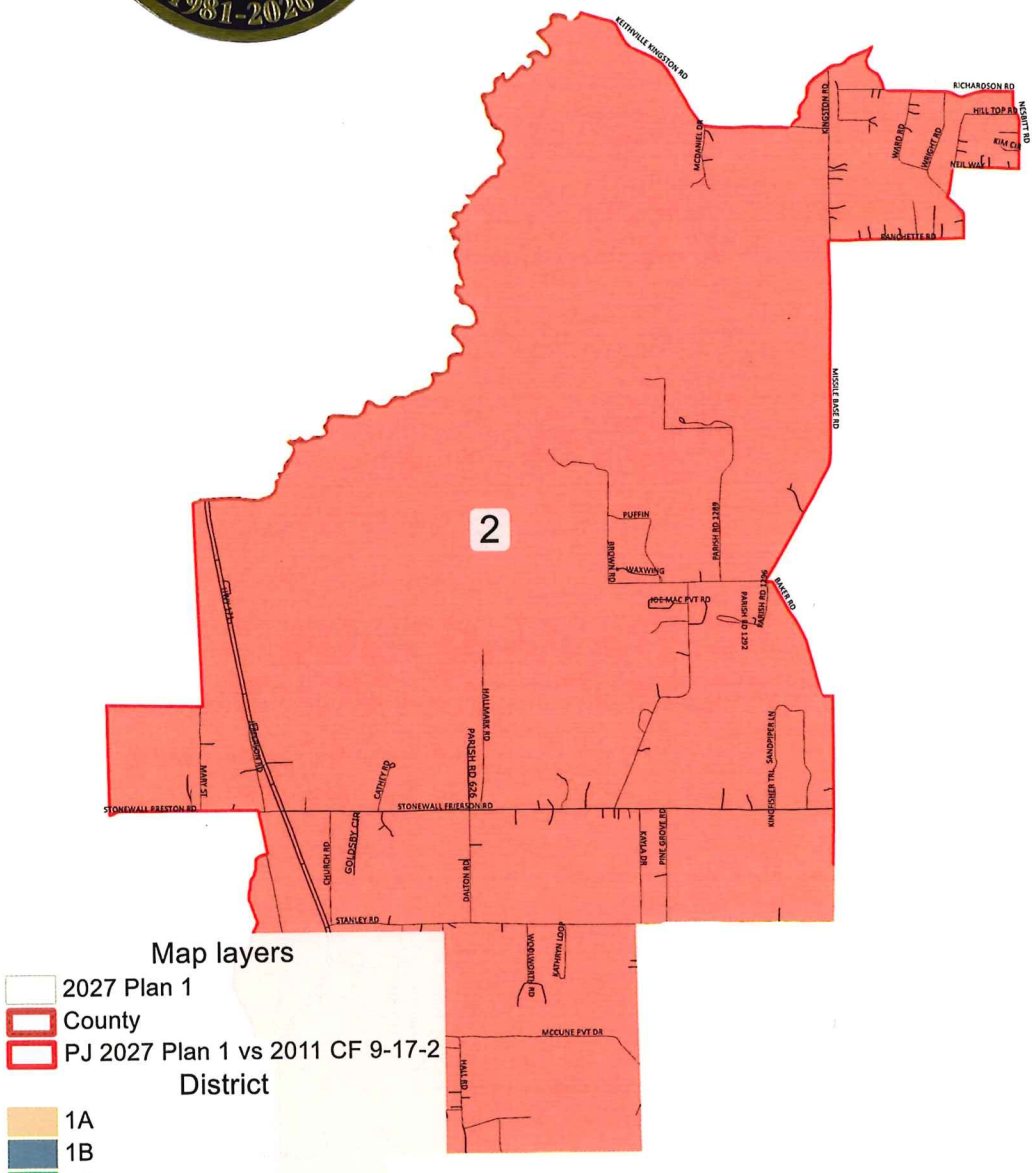
District 1C



Field	Value
ID	216
Area	162.41
District	1C
Members	1.0
Locked	
Name	District 1C
Population	2509
White	1878
Black	466
Other	47
18+_Pop	2010
18+_Wht	1519
18+_Blk	386
RV26 Total	1823
RV26 Race A	4
RV26 Race B	329
RV26 Race H	10
RV26 Race I	10
RV26 Race O	26
RV26 Race W	1444
RV26 DEM	443
RV26 GRN	0
RV26 LBT	7
RV26 NOPTY	431
RV26 OTHER	5
RV26 REP	937
Ideal Value	2,437
Deviation	72
% Deviation	2.95%
% White	74.85%
% Black	18.57%
% Other	1.87%
% 18+_Wht	75.57%
% 18+_Blk	19.2%
District Number	1
% RV26 Race A	0.22%
% RV26 Race B	18.05%
% RV26 Race H	0.55%
% RV26 Race I	0.55%
% RV26 Race O	1.43%
% RV26 Race W	79.21%
% RV26 DEM	24.3%
% RV26 GRN	0%
% RV26 LBT	0.38%
% RV26 NOPTY	23.64%
% RV26 OTHER	0.27%

District: 2

District 2



Map layers

- 2027 Plan 1
- County
- PJ 2027 Plan 1 vs 2011 CF 9-17-2

District

- 1A
- 1B
- 1C
- 2
- 3
- 4A
- 4B
- 4C
- 4D
- 5
- 6
- Other

0 .75 1.5

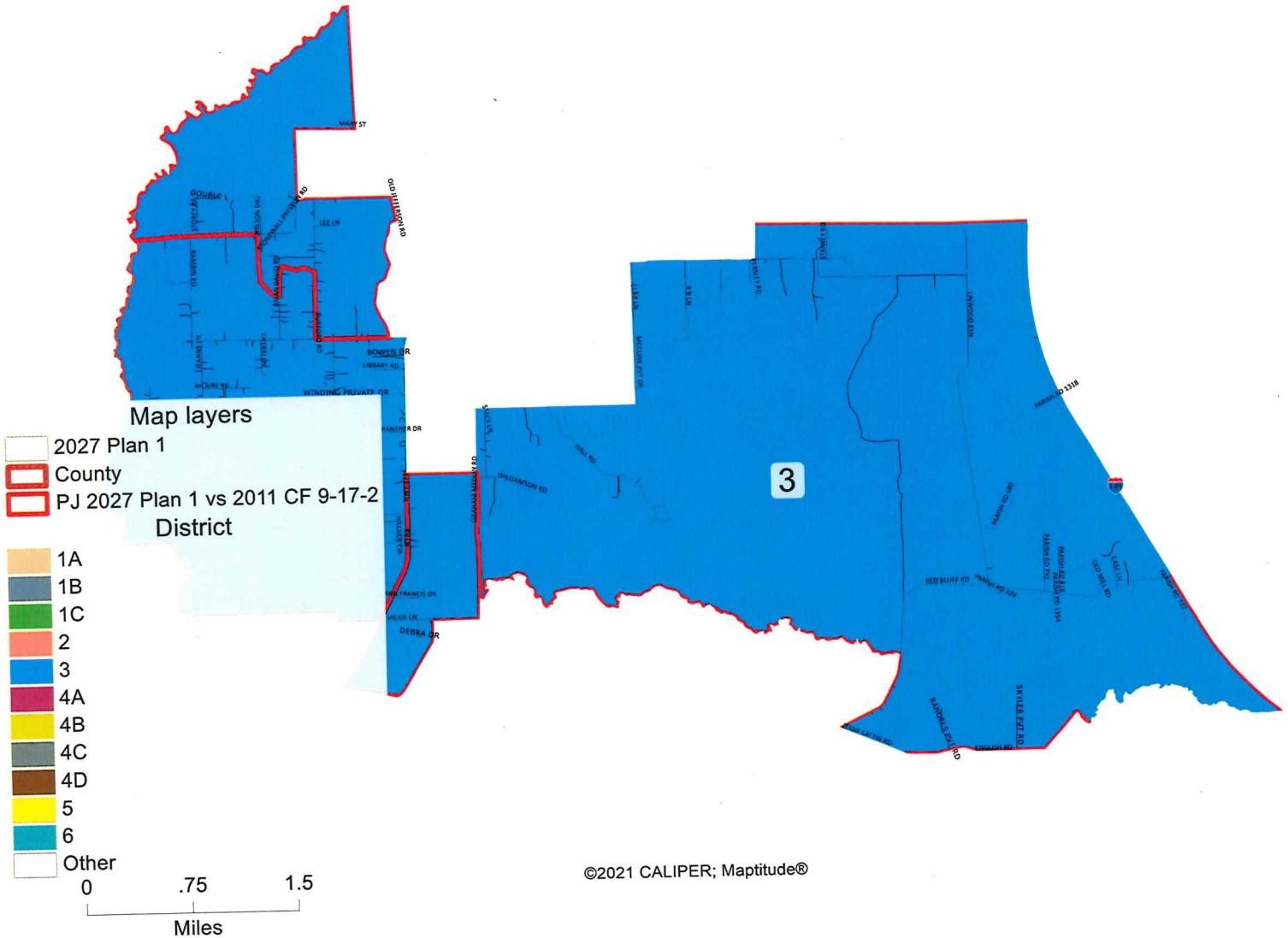
Miles

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Field	Value
ID	161
Area	11.03
District	2
Members	1.0
Locked	
Name	District 2
Population	2417
White	1950
Black	263
Other	35
18+_Pop	1737
18+_Wht	1425
18+_Blk	181
RV26 Total	1752
RV26 Race A	6
RV26 Race B	206
RV26 Race H	21
RV26 Race I	18
RV26 Race O	31
RV26 Race W	1470
RV26 DEM	252
RV26 GRN	1
RV26 LBT	6
RV26 NOPTY	443
RV26 OTHER	3
RV26 REP	1047
Ideal Value	2,437
Deviation	-20
% Deviation	-0.82%
% White	80.68%
% Black	10.88%
% Other	1.45%
% 18+_Wht	82.04%
% 18+_Blk	10.42%
District Number	2
% RV26 Race A	0.34%
% RV26 Race B	11.76%
% RV26 Race H	1.2%
% RV26 Race I	1.03%
% RV26 Race O	1.77%
% RV26 Race W	83.9%
% RV26 DEM	14.38%
% RV26 GRN	0.06%
% RV26 LBT	0.34%
% RV26 NOPTY	25.29%
% RV26 OTHER	0.17%

District: 3

District 3

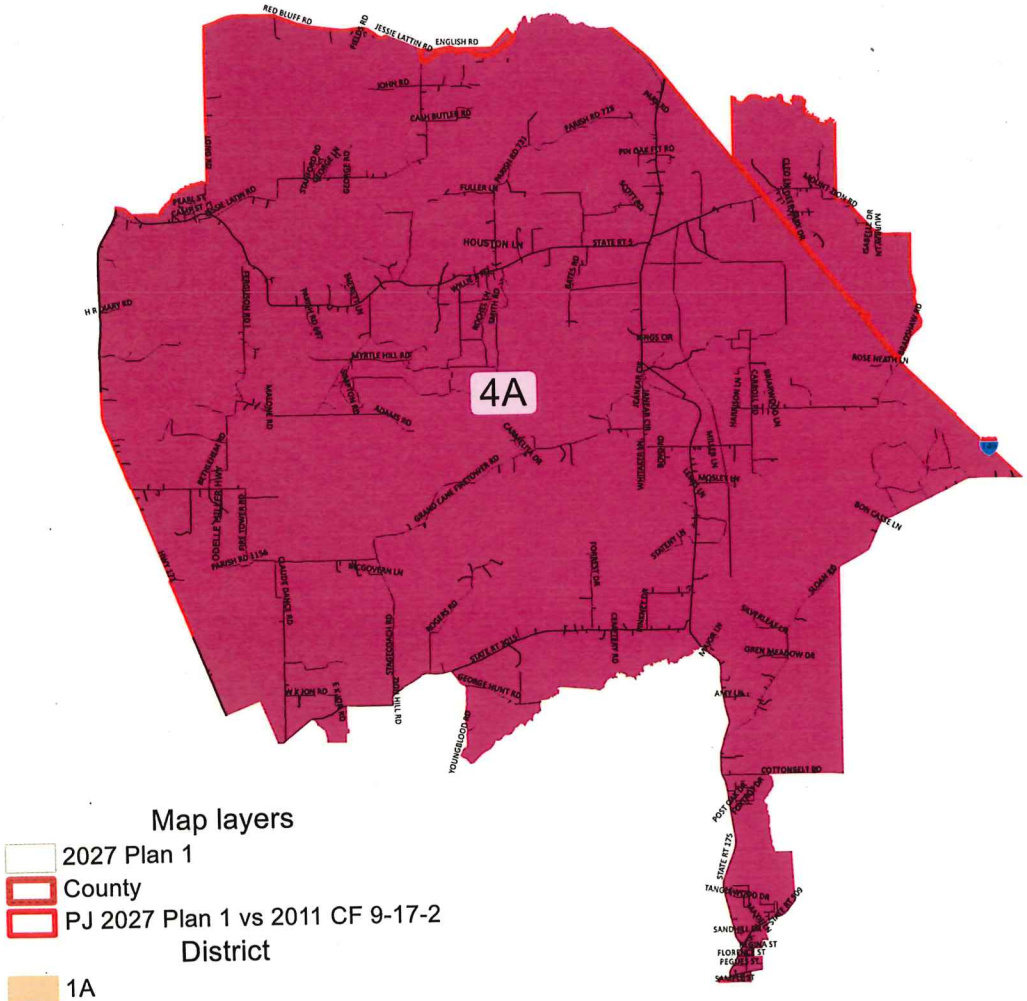


Field	Value
ID	171
Area	19.58
District	3
Members	1.0
Locked	
Name	District 3
Population	2503
White	2135
Black	159
Other	39
18+_Pop	1855
18+_Wht	1591
18+_Blk	118
RV26 Total	1598
RV26 Race A	5
RV26 Race B	123
RV26 Race H	22
RV26 Race I	23
RV26 Race O	26
RV26 Race W	1399
RV26 DEM	206
RV26 GRN	0
RV26 LBT	9
RV26 NOPTY	419
RV26 OTHER	3
RV26 REP	961
Ideal Value	2,437
Deviation	66
% Deviation	2.71%
% White	85.3%
% Black	6.35%
% Other	1.56%
% 18+_Wht	85.77%
% 18+_Blk	6.36%
District Number	3
% RV26 Race A	0.31%
% RV26 Race B	7.7%
% RV26 Race H	1.38%
% RV26 Race I	1.44%

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District: 4A

District 4A



Map layers

- 2027 Plan 1
- County
- PJ 2027 Plan 1 vs 2011 CF 9-17-2

District

- 1A
- 1B
- 1C
- 2
- 3
- 4A
- 4B
- 4C
- 4D
- 5
- 6
- Other

0 2.5 5

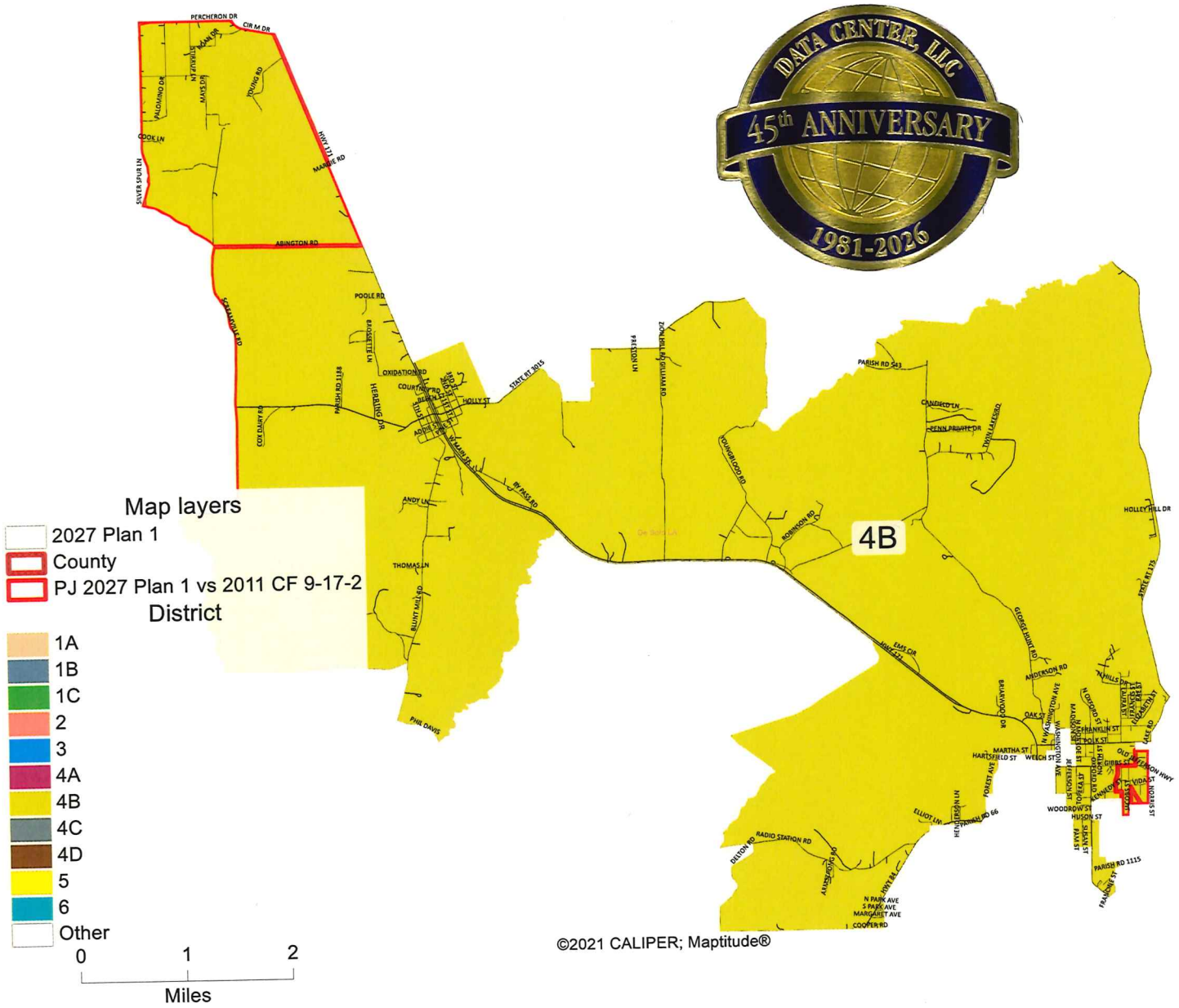
Miles

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Field	Value
ID	103
Area	94.12
District	4A
Members	1.0
Locked	
Name	District 4A
Population	2501
White	1007
Black	1345
Other	25
18+_Pop	1934
18+_Wht	814
18+_Blk	1031
RV26 Total	1738
RV26 Race A	5
RV26 Race B	906
RV26 Race H	15
RV26 Race I	6
RV26 Race O	32
RV26 Race W	774
RV26 DEM	889
RV26 GRN	0
RV26 LBT	9
RV26 NOPTY	342
RV26 OTHER	2
RV26 REP	496
Ideal Value	2,437
Deviation	64
% Deviation	2.63%
% White	40.26%
% Black	53.78%
% Other	1%
% 18+_Wht	42.09%
% 18+_Blk	53.31%
District Number	4
% RV26 Race A	0.29%
% RV26 Race B	52.13%
% RV26 Race H	0.86%
% RV26 Race I	0.35%
% RV26 Race O	1.84%
% RV26 Race W	44.53%
% RV26 DEM	51.15%
% RV26 GRN	0%
% RV26 LBT	0.52%
% RV26 NOPTY	19.68%
% RV26 OTHER	0.12%

District: 4B

District 4B

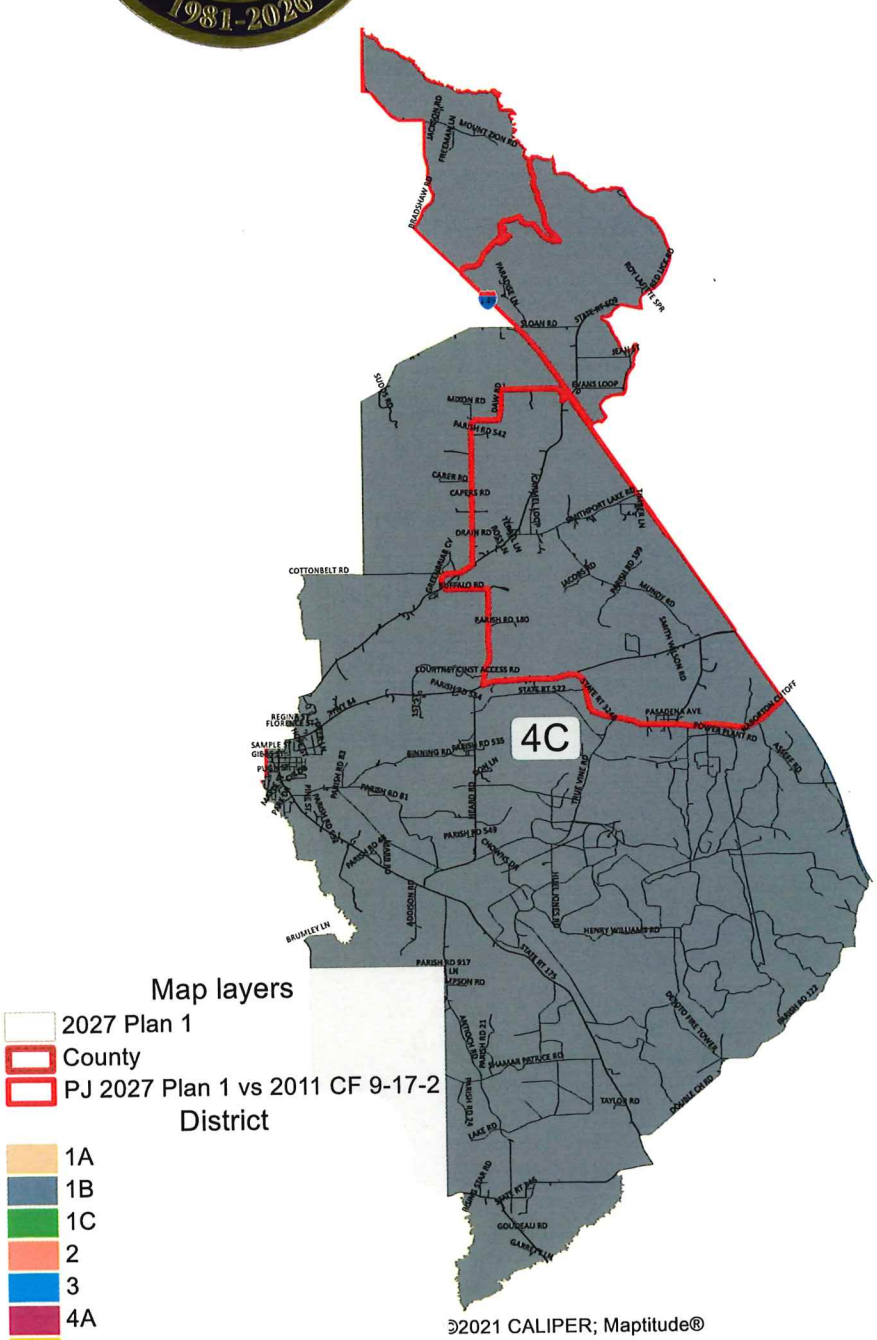


Field	Value
ID	118
Area	35.54
District	4B
Members	1.0
Locked	
Name	District 4B
Population	2373
White	672
Black	1574
Other	34
18+_Pop	1838
18+_Wht	577
18+_Blk	1166
RV26 Total	1699
RV26 Race A	2
RV26 Race B	1146
RV26 Race H	3
RV26 Race I	8
RV26 Race O	27
RV26 Race W	513
RV26 DEM	1006
RV26 GRN	0
RV26 LBT	4
RV26 NOPTY	349
RV26 OTHER	2
RV26 REP	338
Ideal Value	2,437
Deviation	-64
% Deviation	-2.63%
% White	28.32%
% Black	66.33%
% Other	1.43%
% 18+_Wht	31.39%
% 18+_Blk	63.44%
District Number	4
% RV26 Race A	0.12%
% RV26 Race B	67.45%
% RV26 Race H	0.18%
% RV26 Race I	0.47%

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District: 4C

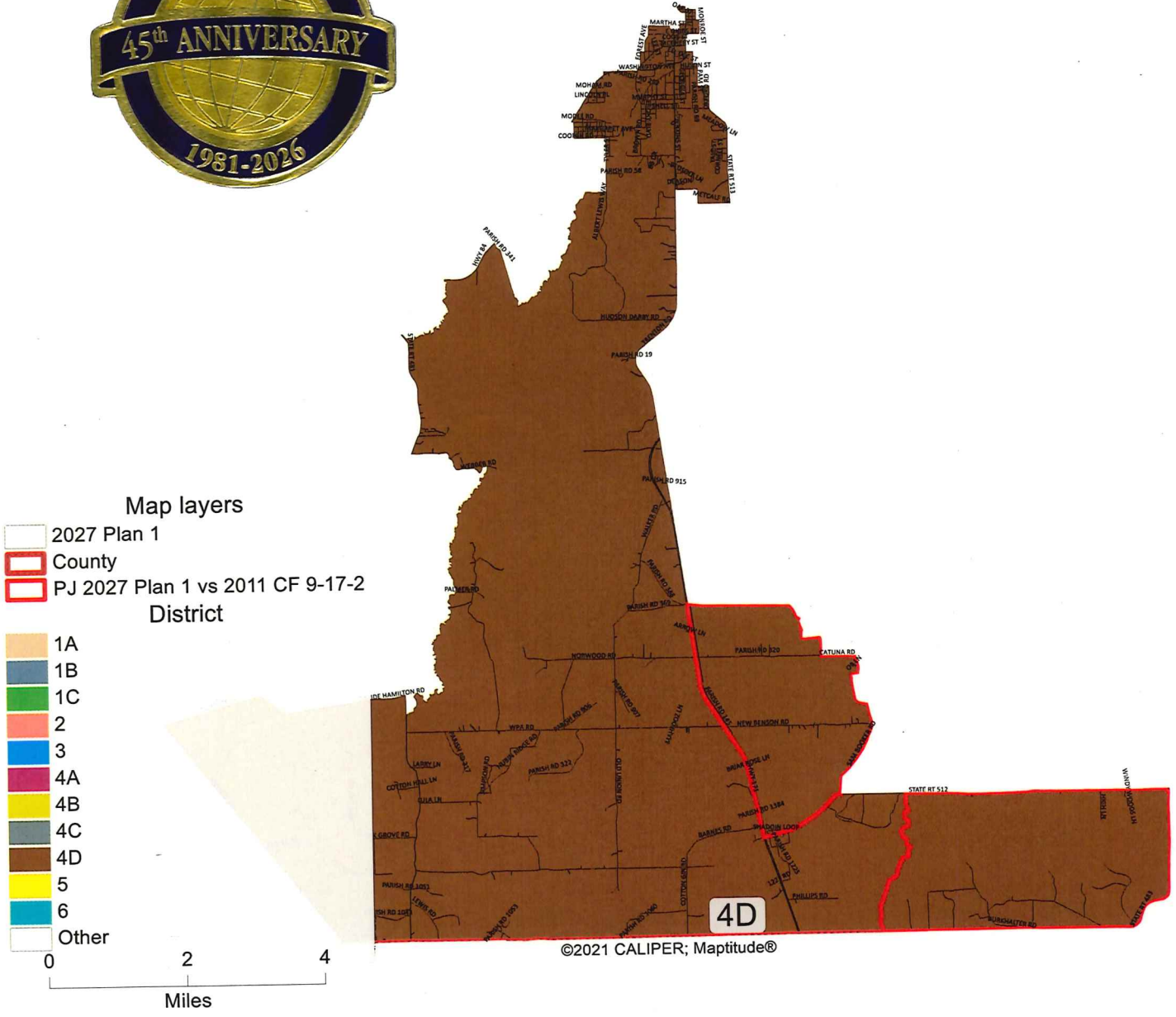
District 4C



Field	Value
ID	133
Area	107.93
District	4C
Members	1.0
Locked	
Name	District 4C
Population	2363
White	752
Black	1483
Other	17
18+_Pop	1855
18+_Wht	641
18+_Blk	1128
RV26 Total	1763
RV26 Race A	4
RV26 Race B	1133
RV26 Race H	7
RV26 Race I	6
RV26 Race O	18
RV26 Race W	595
RV26 DEM	1018
RV26 GRN	0
RV26 LBT	2
RV26 NOPTY	363
RV26 OTHER	1
RV26 REP	379
Ideal Value	2,437
Deviation	-74
% Deviation	-3.04%
% White	31.82%
% Black	62.76%
% Other	0.72%
% 18+_Wht	34.56%
% 18+_Blk	60.81%
District Number	4
% RV26 Race A	0.23%
% RV26 Race B	64.27%
% RV26 Race H	0.4%
% RV26 Race I	0.34%
% RV26 Race O	1.02%
% RV26 Race W	33.75%
% RV26 DEM	57.74%
% RV26 GRN	0%
% RV26 LBT	0.11%
% RV26 NOPTY	20.59%
% RV26 OTHER	0.06%

District: 4D

District 4D

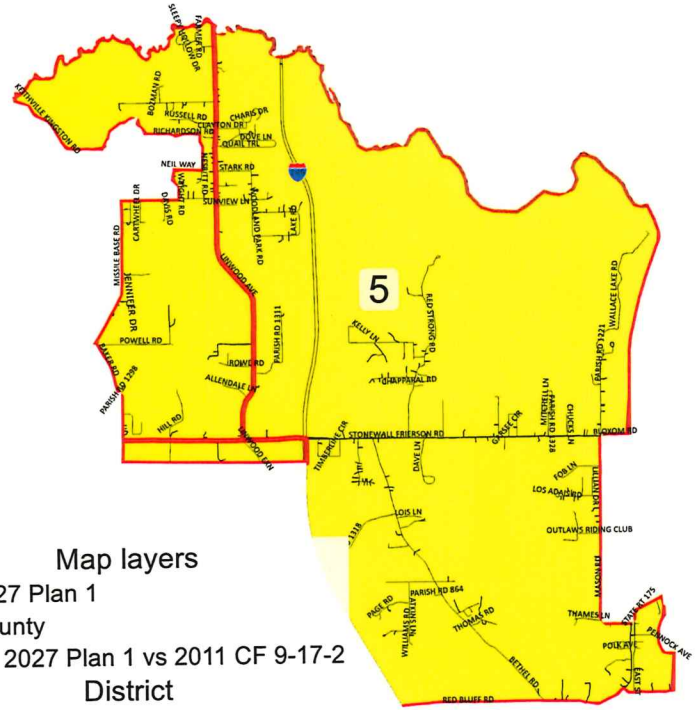


Field	Value
ID	79
Area	68.38
District	4D
Members	1.0
Locked	
Name	District 4D
Population	2391
White	822
Black	1393
Other	59
18+_Pop	1849
18+_Wht	705
18+_Blk	1022
RV26 Total	1478
RV26 Race A	11
RV26 Race B	949
RV26 Race H	19
RV26 Race I	6
RV26 Race O	23
RV26 Race W	470
RV26 DEM	875
RV26 GRN	1
RV26 LBT	3
RV26 NOPTY	312
RV26 OTHER	4
RV26 REP	283
Ideal Value	2,437
Deviation	-46
% Deviation	-1.89%
% White	34.38%
% Black	58.26%
% Other	2.47%
% 18+_Wht	38.13%
% 18+_Blk	55.27%
District Number	4
% RV26 Race A	0.74%
% RV26 Race B	64.21%
% RV26 Race H	1.29%
% RV26 Race I	0.41%

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District: 5

District 5



Map layers

- 2027 Plan 1
- County
- PJ 2027 Plan 1 vs 2011 CF 9-17-2

District

- 1A
- 1B
- 1C
- 2
- 3
- 4A
- 4B
- 4C
- 4D
- 5
- 6
- Other

0 1.5 3

Miles

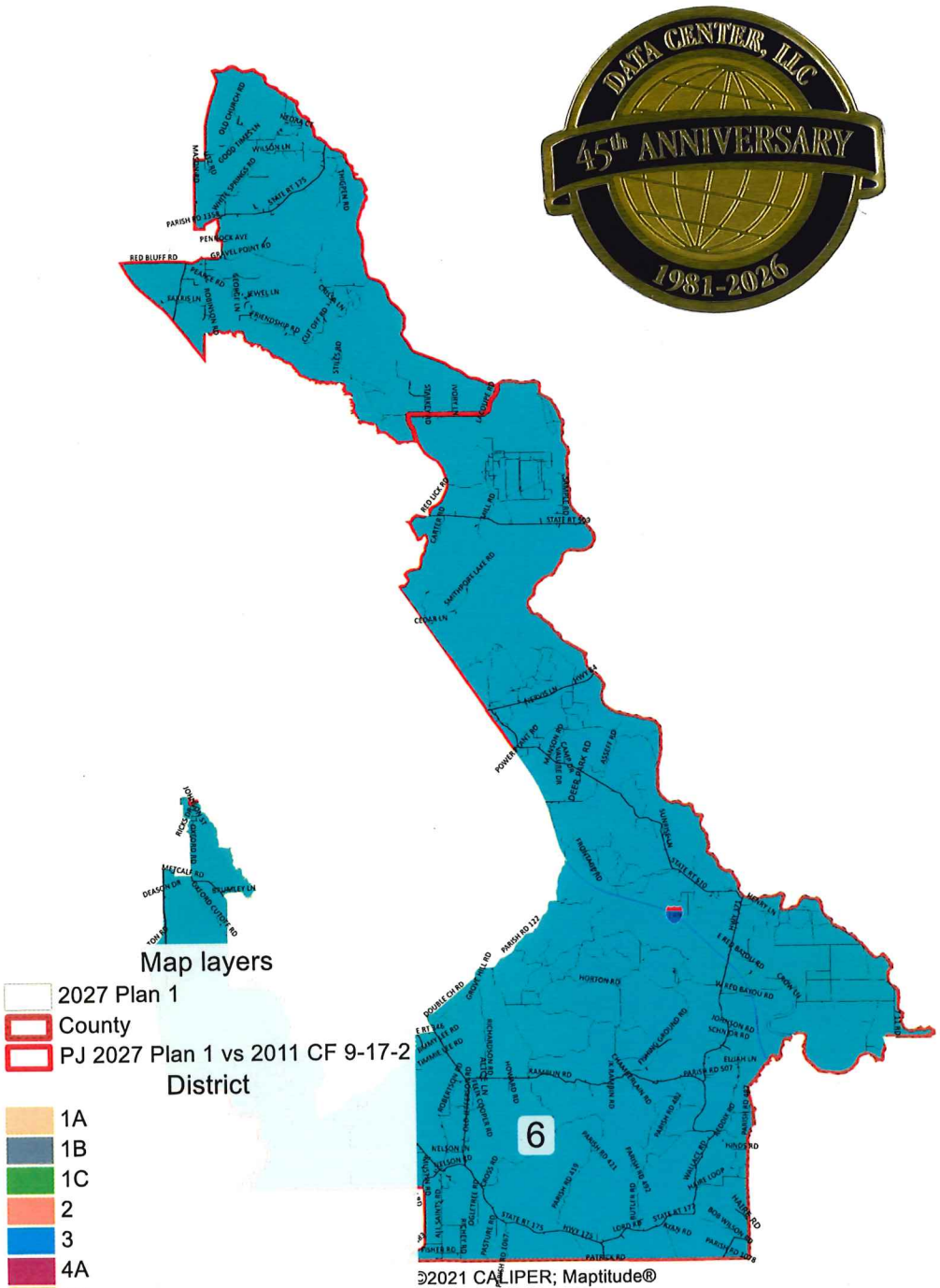
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Field	Value
ID	2
Area	27.39
District	5
Members	1.0
Locked	
Name	District 5
Population	2422
White	1834
Black	365
Other	42
18+_Pop	1847
18+_Wht	1397
18+_Blk	283
RV26 Total	1600
RV26 Race A	2
RV26 Race B	276
RV26 Race H	17
RV26 Race I	17
RV26 Race O	36
RV26 Race W	1252
RV26 DEM	345
RV26 GRN	2
RV26 LBT	8
RV26 NOPTY	449
RV26 OTHER	3
RV26 REP	793
Ideal Value	2,437
Deviation	-15
% Deviation	-0.62%
% White	75.72%
% Black	15.07%
% Other	1.73%
% 18+_Wht	75.64%
% 18+_Blk	15.32%
District Number	5
% RV26 Race A	0.12%
% RV26 Race B	17.25%
% RV26 Race H	1.06%
% RV26 Race I	1.06%

District: 6

District 6



Field	Value
ID	15
Area	226.06
District	6
Members	1.0
Locked	
Name	District 6
Population	2386
White	943
Black	1284
Other	21
18+_Pop	1836
18+_Wht	743
18+_Blk	975
RV26 Total	1521
RV26 Race A	0
RV26 Race B	781
RV26 Race H	9
RV26 Race I	6
RV26 Race O	29
RV26 Race W	696
RV26 DEM	736
RV26 GRN	1
RV26 LBT	1
RV26 NOPTY	305
RV26 OTHER	1
RV26 REP	477
Ideal Value	2,437
Deviation	-51
% Deviation	-2.09%
% White	39.52%
% Black	53.81%
% Other	0.88%
% 18+_Wht	40.47%
% 18+_Blk	53.1%
District Number	6
% RV26 Race A	0%
% RV26 Race B	51.35%
% RV26 Race H	0.59%
% RV26 Race I	0.39%
% RV26 Race O	1.91%
% RV26 Race W	45.76%
% RV26 DEM	48.39%
% RV26 GRN	0.07%
% RV26 LBT	0.07%
% RV26 NOPTY	20.05%
% RV26 OTHER	0.07%

Exhibit 5

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

DAVID B MEANS ET AL	**CASE NO. 5:23-CV-00669**
VERSUS	**JUDGE EDWARDS**
PARISH OF DESOTO ET AL	**MAGISTRATE JUDGE HORNSBY**

NOTICE OF MANUAL ATTACHMENT

ATTACHMENTS TO: **Responding to Special Master's Report Proposed Redistricting Plan for the Desoto Parish Police Jury**

DESCRIPTION: **Various maps of Desoto Parish**

FILED BY: **Cedric Floyd**

FILE DATE: **October 05, 2026**

********************************NOTICE********************************

The attached document is an *original* manual attachment provided by counsel. Please return to the Clerk's Office!

This attachment could not be converted to electronic form. The original will be maintained in the division of the presiding judge, until expiration of appeal delays.

Attachment sent to the ALEXANDRIA DIVISION.

Prepared by: Liz Muncey

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

DAVID B MEANS ET AL	**CASE NO. 5:23-CV-00669**
VERSUS	**JUDGE EDWARDS**
PARISH OF DESOTO ET AL	**MAGISTRATE JUDGE HORNSBY**

IDENTIFICATION OF MANUAL ATTACHMENT

GROUP _____ OF _____ GROUPS

ATTACHMENTS TO: **Responding to Special Master's Reort Proposed Redistricting Plan for the Desoto Parish Police Jury**

DESCRIPTION: **Various maps of Desoto Parish**

FILED BY: **Cedric Floyd**

FILE DATE: **October 05, 2026**

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Attachment sent to the ALEXANDRIA DIVISION.

Prepared by: Liz Muncey

DOCUMENT#: 153

Received by: Liz Muncey

Exhibit 6

CEDRIC FLOYD

Personal

Company: Data Center, LLC
P.O. Box 141
Kenner, LA 70063
(504) 450-3474

Position: Founder &
Chief Executive Officer
October 1981-present
(504) 908-8196
Datacenterla@gmail.com

Education: Louisiana State University
BS, 1980

Data Center is a National Demographics, Redistricting, and Planning Company

Certified As An Expert Witness (Demographer) in the Following Courts

-United States District Court, Eastern District of Louisiana

-United States District Court, Middle District of Louisiana

-United States District Court, Western District of Louisiana

-Nineteenth (19th) Judicial Court, State of Louisiana

-Eighteen (18th) Judicial Court, State of Louisiana

CLIENTS FOR 2020 CENSUS

Sabine Parish Police Jury
St. Helena Parish Police Jury
City of Winnfield
City of Mansfield
Caddo Parish Commission
City of Natchitoches
Livingston Parish Council
Claiborne Parish Police Jury
Livingston Parish School Board
St. Helena Parish School Board
Red River Parish School Board
Caddo Parish School Board
Natchitoches Parish Council
East Carroll Parish School Board
Town of Homer
Town of Oberlin
City of Port Allen
Town of Simmesport
City of Westwego
City of Amite
City of Winnsboro
City of Franklin
City of New Roads
Sabine Parish School Board
City of Jonesboro
City of New Iberia
City of St. Martinville
Red River Parish Police Jury
Claiborne Parish School Board
City of Ponchatoula
Town of Haynesville
Town of Jonesville
Town of Arcadia
Town of Ferriday
Town of Many
East Carroll Parish Police Jury

Court Activities

-Gretna Citizens for Better Government, et al v. City of Gretna, et al, C.A. No. 09-4458: Section 2 and 5 Voting Rights and One-Person One-Vote Lawsuit challenging the annexation and redistricting plan of the City of Gretna.

-Henry Williams, et al v. Fox McKeithen, et al, C.A. No. 05-1180: Section 2 Voting Rights Lawsuit challenging the At Large Method of electing Judges to the Fifth Circuit Court of Appeals-District 1 in Jefferson Parish.

-Elaine Davis v. Pamela Malveaux, et al, Number 548, 226-19th Judicial District Court- Election Challenged to the 2002 Baker City School Board District 1 Election claiming voters living outside of election district voted in said election.

-Rudolph Sorapuru, et al v. Leroy Mitchell, et al, C.A. No. 02-2524: Section 2 and 5 Voting Rights and One-Person One-Vote Lawsuit challenging the St. John Parish School Board Redistricting Plan.

-Jefferson Citizens For Better Government, et al v. The Parish of Jefferson, et al, C.A. No. 03-345: Section 2 Voting Rights Lawsuit challenging the change in the structure of the parish council.

-Rudolph Sorapuru, et al v. Leroy Mitchell, et al, C.A. No. 02-2524: Section 2 Voting Rights and One-Person One-Vote Lawsuit challenging the St. John Parish Council Redistricting Plan.

-Patterson Citizens for Better Government, et al v. The City of Patterson, et al. C.A. No. 02-1903: Section 2 Voting Rights Lawsuit challenging the At Large Method of electing Aldermen in the City of Patterson.

-St. Bernard Citizens for Better Government, et al v. The St. Bernard Parish School Board, et al, C.A. No. 02-2209: Section 2 Voting Rights Lawsuit challenging the St. Bernard Parish School Board Redistricting Plan and the change in the structure of the board.

-Jewel Allen, et al v. Rocky Cantillo, et al, C.A. No. 93-0491: Section 2 Voting Rights Lawsuit challenging the At Large Method of electing the Board of Aldermen in the Town of Gramercy.

-Hunt, et al v. The State of Arkansas, et al, No. PB-C-89-406: Statewide Section 2 Voting Rights Lawsuit challenging the election systems employed by the State of Arkansas in electing its Supreme Court, Court of Appeals, and Circuit, Chancery, and Juvenile Courts.

-**Arnold, et al v. Roemer, et al, C.A. No. 88-3983**: Statewide Section 2 and 5 Voting Rights Lawsuit challenging the At Large Method of electing Juvenile, Municipal, City, Parish, and Traffic Court Judges and the failure to preclear voting changes affecting those judgeships in the State of Louisiana

-**Lutcher Citizens for Equal Representative Government, et al v. The Town of Lutcher, et al, C.A. No. 88-3650**: Section 2 Voting Rights Lawsuit challenging the At Large Method of electing the Board of Aldermen

-**Gonzales Citizens for Better Representative Government, et al v. City of Gonzales, et al, C.A. No. 87-1063:** Section 2 Voting Rights Lawsuit challenging the At Large Method of electing the Board of Aldermen

-**Gorman v. City of New Orleans, et al, C.A. No. 88-1574:** Section 2 and 5 Voting Rights Lawsuit challenging the Change in Polling Place Locations between the Qualifying Period and the Primary Election

-**Chisom, et al v. Edwards, et al, C.A. No. 86-4075:** Section 2 Voting Rights Lawsuit challenging the Multi-Member District of the Louisiana Supreme Court

-**Clark, et al v. Edwards, et al, C.A. No. 86-435-A:** Statewide Section 2 and 5 Voting Rights Lawsuit challenging the At Large Method of Electing Judges on the District Court and Court of Appeals and the failure to preclear voting changes affecting those judgeships in the State of Louisiana

-**East Jefferson Coalition for Leadership and Development, et al v. Parish of Jefferson, et al, C.A. No. 86-3668:** Section 2 Voting Rights Lawsuit challenging the Multi-Member Districts on the Parish Council

-**The Fifth Ward Precinct 1A Coalition and Progressive Association, et al v. The Jefferson Parish School Board, et al, C.A. No. 86-2963:** Section 2 Voting Rights Lawsuit challenging the dilution of minority voting strength when the school board redistricted

-**Cedric Floyd, et al v. Parish of Jefferson, et al, C.A. No. 86-0265:** Equal Protection Clause of the 14th Amendment to the U.S. Constitution (one man-one vote principle) challenged the malapportionment of the Jefferson Parish Council

-**Washington, et al v. Tensas Parish School Board and Police Jury, et al, C.A. No. 85-3460:** Section 2 Voting Rights Lawsuit challenging the dilution of minority voting strength when a majority of the election districts did not have a Black Majority in Registration when the Parish is Black Majority in Population

-**Westwego Citizens For Better Government, et al v. City of Westwego, et al, C.A. No. 84-5599:** Section 2 Voting Rights Lawsuit challenging the At Large Method of electing the Board of Aldermen

-**Citizens For A Better Gretna, et al v. City of Gretna, et al, C.A. No. 84-4901:** Section 2 Voting Rights Lawsuit challenging the At Large Method of electing the Board of Aldermen

Redistricting

Sabine Parish Police Jury, Natchitoches Parish Police Jury, Desoto Parish Police Jury, St. Helena Parish Police Jury, St. Bernard Parish Council, Red River Parish Police Jury, Sabine Parish School Board, Natchitoches Parish School Board, St. Helena Parish School Board, Red River Parish School Board, City of Winnsboro, Town of Simmesport, Town of St. Joseph, City of Winnfield, St. John Parish School Board, St. Bernard Parish School Board, City of Franklin , City of Oakdale, Town of Oberlin, City of Mansfield, City of Franklin, West Feliciana Parish Police Jury, City of Westwego, and City of St Martinville retained by the respective governmental bodies to redistrict their election districts based on the 2010 Census.

-**St. Mary Parish School Board, St. Helena Parish School Board, Plaquemines Parish Council, Town of Oberlin, St. Helena Parish Police Jury, St. Bernard Parish Council, DeSoto Parish Police Jury, City of Westwego, Plaquemines Parish School Board, Town of Kinder, City of Oakdale, City of Bogalusa, St. Bernard Parish School Board, City of Baker, City of Bastrop, Town of St. Joseph, Baker City School Board, City of Franklin, and the City of Gretna,** retained by the respective governmental bodies to redistrict their election districts based on the 2000 Census.

-**St. Mary Parish School Board (1993):** Retained by the School Board to redistrict its body from 15 multi-member districts to 11 single member districts.

-**Iberia Parish Council, St. Mary Parish Council, Iberia Parish School Board, Monroe City School Board, and St. Bernard Police Jury (1991):** Retained by the respective governmental bodies to reapportion their election districts based on the 1990 Census.

-**Jefferson Parish Council (1989):** Handled the Successful Objection under Section 5 of the Voting Rights Act to the Redistricting Plan created by the Parish of Jefferson and approved by the Court. The Parish did not create a Black Majority District to remedy a Section 2 Voting Rights Violation.

-**Jefferson Parish School Board (1989):** Handled the Submission to the Department of Justice for preclearance under Section 5 of the Voting Rights Act after a Consent Judgment was signed by the parties in a Section 2 Lawsuit

-**St. Bernard Parish Police Jury (1987):** Retained by the Police Jury to redistrict its board from 11 to 5 Single Member Districts; Handled the Submission to the Department of Justice for preclearance under Section 5 of the Voting Rights Act

-**Town of Melville (1986):** Conducted Special Census and Redistricted the Board of Aldermen from the At Large Method to 4 Single Member Districts and 1 at Large Member; Handled the Submission to the Department of Justice for preclearance under Section 5 of the Voting Rights Act

-**7th Justice Of The Peace Court, Parish of Jefferson (1985):** Redistricted the 4th Justice of the Peace Court to create the 4th and the 7th Justice of the Peace Courts

-**City of Kenner (1981):** Created alternative redistricting plans to redistrict the City Council

-**Jefferson Parish School Board (1982):** Retained by the Jefferson Parish Voters' League to create alternative redistricting plans for the School Board

-**United States Department of Justice (1981-present):** Asked to comment on election changes statewide and in the southeast area of the State of Louisiana; and to create alternative redistricting plans for Section 5 Preclearance Analysis

Section 5 Objections

Parish of Jefferson-Jefferson Parish Council--1989 -After a Federal Court ruled that the method of electing members to the Jefferson Parish Council violated Section 2 of the Voting Rights Act, the Parish Council created an influence district (under 50% in Black Voting Age Population) and not a Black Majority Voting Age Population District. A Black Majority Voting Age Population District was created and submitted to the US Department of Justice to show it could be done.

Parish of St Mary-St. Mary Parish School Board--1993 The St. Mary School Board reduced its membership from 15 to 11. The redistricting plan submitted by the School Board to the US Department of Justice created 3 Black Majority Districts but only 1 District had a Black Majority in Voting Age Population, thus 2 Districts did not a Black Majority in Voting Age Population. Two Redistricting Plans were submitted to the School Board during the redistricting process that had 3 Black Majority Districts in Voting Age or in Black Registered Voters.

Parish of Desoto-Desoto Parish School Board--2002 The Desoto Parish School redistricted based on the 2000 Census. According to the benchmark plan, five of the eleven districts were Black Majority Districts and electing the candidates of choice of Black Voters. The School Board submitted a redistricting plan to the US Department of Justice that only created four Black Majority Districts. There were alternative plans submitted that did not result in a retrogression in the Black Voters effective exercise of their electoral franchise.

Parish of Tangipahoa-Tangipahoa Parish Council--2003 The Tangipahoa Parish Council redistricted based on the 2000 Census. According to the benchmark plan, there were 2 Black Majority Voting Age Population Districts. The redistricting plan submitted by the Tangipahoa Parish Council had only 1 Black Majority District in Voting Age Population and the other district was reduced from a Black Majority Voting Age Population of 58.32 to 49.9. Alternative plans were created that had 2 Black Majority Voting Age Population Districts.