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DANIEL J. MCCOY, CLERK

Analysis of Special Master's Plan BGD2

David B. Means, et al. v. DeSoto Parish, et al., CA 5:23-cv-00669-JE-MLH
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I. Introduction

On September 22, 2026, the Special Master, Mr. Thomas M. Bryan, submitted his *Demographic Report on DeSoto Parish, Louisiana* (the "Special Master's Report" or "SM Report") and a proposed remedial plan for the eleven (11) DeSoto Parish Police Jury districts. The Special Master refers to the plan as the "BGD2 Remedial Plan" ("Plan BGD2").

This analysis was prepared at the request of the attorneys representing the DeSoto Parish Police Jury (the "Police Jury"). I input the shapefiles provided by the Special Master for his Plan BGD2 into my GIS redistricting software and evaluated the plan against the traditional redistricting criteria and the Louisiana statutes that govern police jury redistricting. All population figures are from the 2020 Census PL 94-171 file.

II. Summary of My Findings

The findings of this analysis are summarized below in the order they are presented.

Areas of Concern

1. **Incumbency:** Plan BGD2 does not give meaningful consideration to incumbency. Two (2) incumbents are placed in District 6, and two (2) incumbents are placed in District 7. Districts 8 and 10 are left without an incumbent. By the Special Master's own account, nine (9) of the eleven (11) incumbents are either paired with another incumbent or placed in a substantially redrawn district.
2. **Preservation of Core Election Districts:** The Special Master deliberately disregarded the prior districts. Of the eight (8) 2011 Plan districts that needed to gain population, five (5) keep only about 61% or less of their population together, and District 6 keeps only 46%. The district designations used for decades are eliminated.
3. **State Redistricting Statutes:** Plan BGD2 splits fourteen (14) of the twenty-six (26) current precincts into thirty-seven (37) pieces, requiring a minimum of twenty-three (23) new precincts, for a total of at least forty-nine (49). The plan also uses non-visible municipal boundaries in South Mansfield, Mansfield, and Stonewall contrary to L.R.S. 18:532, and would likely be ruled invalid by the Secretary of State if submitted on its own merits.
4. **Communities of Interest:** Plan BGD2 does not preserve communities of interest at the precinct level. It keeps eight (8) places whole, but separates the Village of South Mansfield from the City of Mansfield, a community of interest the Special Master himself describes, and splits more than half of the Parish's precincts.

Other Traditional Redistricting Criteria

5. **One Person-One Vote:** Plan BGD2 has an overall deviation of 3.08% and is within the traditional range.
6. **Contiguity:** Plan BGD2 is contiguous.
7. **Compactness:** Plan BGD2 is a moderately compact plan. When compared to the 2011 Plan, four (4) districts are less compact under Reock and four (4) are less compact under Polsby-Popper.

III. Analysis

A. Plan H Revised Is Not an Appropriate Benchmark

The Special Master measures Plan BGD2 almost entirely against Plan H Revised, which he refers to as the “Enacted Plan H.” Population deviation, compactness, and municipal splits are each presented as improvements over Plan H Revised. (SM Report ¶¶ 56, 119, 122). In my opinion, Plan H Revised is not an appropriate benchmark for evaluating Plan BGD2, or any other plan the Court may consider, for the following reasons.

1. Plan H Revised has been enjoined by agreement of the parties without any admission or finding that it was unconstitutional. The bench trial scheduled for February 2026 was cancelled and the case was held pending the *Callais* decision. (SM Report ¶ 3). After *Callais* was decided, the parties filed a Joint Motion for Entry of Consent Order agreeing that future elections should not be conducted under Plan H Revised and that the Court should enter a permanent injunction. The Court entered that order the next day. (SM Report ¶ 6; Docs. 126, 127). Plan H Revised was set aside by the agreement of the parties, not by a finding by the Court that the plan was unconstitutional. The Special Master’s statement that Plan H Revised “was found to be unlawful” (SM Report ¶ 11) is not supported by the procedural history described in his own report.
2. Plan H Revised is no longer an available plan. Since it cannot be used for future elections, showing that Plan BGD2 improves on Plan H Revised says nothing about whether Plan BGD2 is a sound plan. The relevant question is how Plan BGD2 compares to the lawful district configuration it replaces.
3. Plan H Revised was itself built on the 2011 Plan. Plan H Revised used the 2011 Plan as its starting point and adjusted those districts to rebalance the 2020 Census population. The Special Master uses that relationship to discard both plans (SM Report ¶ 30), when the more reasonable course is to return to the underlying 2011 Plan and make only the changes the 2020 Census requires.

The 2011 Plan is the proper benchmark. It is the most recent Police Jury plan that has not been enjoined. It was pre-cleared by the U.S. Department of Justice under Section 5 of the Voting

Rights Act, was used for the 2011, 2015, and 2019 Police Jury elections, and was never challenged in this or any other proceeding. When the 2020 Census was released, the 2011 Plan was the plan in effect, and it was the plan used to determine whether redistricting was required under L.R.S. 33:1411. Any new plan considered by the Court should use the core districts of the 2011 Plan as its basis. For these reasons, all comparisons in this analysis use the 2011 Plan as the benchmark.

B. Areas of Concern

After reviewing Plan BGD2 and the Special Master's Report, it is my opinion that traditional redistricting criteria and applicable State laws were not followed in four (4) areas:

1. *Incumbency* (Section IV.A);
2. *Preservation of Core Election Districts* (Section IV.B);
3. *State Redistricting Statutes*, specifically the use of whole precincts and the use of physical features for precinct boundaries (Section IV.C); and
4. *Communities of Interest* (Section IV.D).

The remaining traditional redistricting criteria, one person-one vote, contiguity, and compactness, are not among the primary areas of concern. They are addressed in Section V.

IV. Areas of Concern

A. **Incumbency:** The protection of incumbents has been recognized as a legitimate political consideration by the U.S. Supreme Court. This was most recently affirmed in *Callais*, which recognizes that a legislature may “aim to protect some or all incumbents.” (SM Report ¶ 25).

The Special Master places incumbency last among his plan criteria. (SM Report ¶ 32). He also draws a distinction between avoiding the pairing of incumbents and protecting them, noting that “[o]ne can redistrict and not pair any incumbents, but still endanger their incumbency by completely redrawing the geography that they represent.” (SM Report ¶ 147). *Plan BGD2 does both.*

Plan BGD2 does a poor job applying the incumbency principle. The plan pits two incumbents, Ross, and Jones, against each other in District 6, where Jones is the incumbent. All three are African American, and Ross and Jones have each been reelected by the voters over multiple elections. Two incumbents, Boyd-Simpson and Burrell, are placed in District 7, where Burrell is a multi-term incumbent.¹ District 8 around south Mansfield and District 10 in Stonewall are open seats under Plan BGD2.

The Special Master also concedes that five (5) more incumbents, Stacey Justice (District 2), Jimmy Holmes (District 3), Richard Fuller (District 4), Gregory Baker (District 5), and Robby

¹ Trina Boyd-Simpson was appointed to fill an unexpired term and went on to win in the next election. She is in her first full term.

Latham (District 11), have had their districts changed “to the point that they may no longer be protected.” (SM Report ¶ 148). By the Special Master’s own account, only two (2) of the eleven (11) incumbents, Bubba Clark (District 1) and Nick Rains (District 9), remain in districts similar to the ones they represent today. Both Mr. Clark and Mr. Rains were first elected in 2023. Studies have shown that first-term incumbents are more likely to lose their next election than multiple-term incumbents, and that they are more vulnerable when their districts are redrawn. One study of U.S. House incumbents found that each 10% increase in new constituents causes about seven times the electoral damage to first-term members as to senior members. (See Richard Born, “Seniority and the Electoral Performance of U.S. House Incumbents in Response to Redistricting,” *New England Journal of Political Science*, Vol. XII, No. 2).²

Finding: Plan BGD2 does not give meaningful consideration to incumbency. By the Special Master’s own account, nine (9) of the eleven (11) incumbents are either paired with another incumbent or placed in a substantially redrawn district. The remaining two are first-term jurors.

B. Preservation of Core Election Districts: This is a traditional redistricting criterion under which mapmakers keep as much of each existing district’s population and territory together as possible when drawing new lines after a census. Rather than redrawing from scratch, the new plan builds on the prior plan and makes only the changes needed to meet other requirements, chiefly equal population and compliance with the Voting Rights Act. It is usually measured as the percentage of a district’s population that remains together in the new plan.

The main justification is continuity of representation. When a district’s core stays intact, most constituents keep the same representative, and that representative keeps the relationships, local knowledge, and familiarity with constituent needs built over prior terms.

The Special Master made a deliberate decision not to consider the prior districts. He states: “*Since the Enacted Plan H was drawn with similar criteria and priorities as the 2011 map, and since the Enacted Plan H is unlawful, I did not consider maintaining those Police Jury district alignments.*” (SM Report ¶ 30). Core preservation does not appear anywhere in his list of plan criteria. (SM Report ¶ 32).

That decision is contrary to the very sources the Special Master relies on:

- a. Joint Rule 21, which the Special Master uses as his guide for Louisiana law, provides that “due consideration shall be given to traditional district alignments to the extent practicable.” (SM Report ¶¶ 26, 30; JR 21 D.4).
- b. The NCSL list of traditional redistricting criteria cited by the Special Master includes core preservation and avoiding the pairing of incumbents. (SM Report ¶ 28).

² First term incumbents are 52% more at risk of a defeat than multi-term incumbents.
<https://smartpolitics.lib.umn.edu/2017/03/07/which-1st-term-us-senator-will-lose-in-2018/>

c. The *Callais* opinion quoted by the Special Master recognizes that a legislature may “minimize changes in the prior map” and lists “preserving the core of existing districts” among the traditional districting factors a State may use. (SM Report ¶ 25).

To my knowledge, no court in this case or in any prior proceeding has found that the 2011 Plan, or Plan H Revised, was unconstitutional. Plan H Revised was set aside by consent (Section III.A), and the Special Master’s extension of that consent order to the 2011 Plan, a plan that was never before the Court, *is an assumption, not a finding*.

The 2011 Plan Is the Proper Basis for Any New Plan. Traditional redistricting begins with the plan in effect. When new census data is released, the population of each existing district is calculated to determine whether redistricting is required, and the existing districts are then adjusted only as needed to rebalance the population. That is the process required by L.R.S. 33:1411, and it is the process I followed for the Police Jury after the 2020 Census. With Plan H Revised set aside by consent, the 2011 Plan is the last lawful expression of the Police Jury’s district configuration and is the appropriate starting point.

The *Callais* decision does not change that. In my reading, *Callais* addressed how Section 2 of the Voting Rights Act applies going forward. It did not assume or declare that plans previously in effect were constitutionally defective. The same passage of *Callais* quoted by the Special Master recognizes that a mapmaker may “minimize changes in the prior map” and may preserve “the core of existing districts.” (SM Report ¶ 25). Those factors would have no meaning if every prior plan were presumed invalid. *Callais* does not direct a mapmaker to discard the prior plan; it expressly permits building on it.

The 2011 Plan was drawn under the Section 2 and Section 5 standards in effect at the time, and it was reviewed and pre-cleared by the U.S. Department of Justice. A plan that complied with the law as it stood when it was adopted is not, for that reason, unconstitutional. The 2011 Plan was never challenged during the years it was in effect, and the Plaintiffs’ challenge in this case was directed at Plan H Revised, not the 2011 Plan.

Therefore, the basis of any new plan using the 2020 Census should be the core districts of the 2011 Plan. The districts should be adjusted only as necessary to address the northward population shift reflected in the 2020 Census, where Districts 2 and 3 were overpopulated by +44.3% and +30.8%, and to satisfy the remaining traditional criteria and State law.

The Special Master’s approach is also inconsistent. He relies on ward maps dating from 1813 through 1950 to support his view of communities of interest (SM Report ¶¶ 40-47), yet sets aside the district configurations that DeSoto Parish voters have used to elect their police jurors for decades.

In Plan BGD2, the preservation of the core election districts is largely non-existent. For many districts, the plan erases all traces of their historical boundaries. The plan even erases the

district designations that have been in place for the past 50 years (1A, 1B, 1C, 2, 3, 4A, 4B, 4C, 4D, 5, and 6) and substitutes a numbering scheme that no voter will be familiar with.³

Using the 2020 Census, eight (8) of the eleven (11) districts in the 2011 Plan were underpopulated and needed to gain population: Districts 1A, 1B, 1C, 4A, 4B, 4C, 4D, and 6. Only Districts 2, 3, and 5 in the northern part of the Parish needed to shed population. Under a traditional application of this criterion, a district that needs to gain population keeps its existing population and adds territory along its edges. It should retain nearly all of its core.

That is not the case here. Of the eight (8) districts that needed to gain population, five (5) keep only about 61% or less of their population together in any single Plan BGD2 district: District 4A (53%), District 4B (60%), District 4C (61%), District 4D (50%), and District 6 (46%). District 6 is divided among five (5) Plan BGD2 districts, with less than half of its population remaining together. Only three (3) of the eleven (11) districts, Districts 1A, 1B, and 5, keep 90% or more of their population together.

The following chart shows how each 2011 Plan district is divided among the Plan BGD2 districts, using area in square miles and 2020 Census population.

³ The current district designations represent the divisions of the wards that were in place in the 1980's, beginning with the 1990 redistricting cycle. This made it easier to trace the changes in the election districts over time, starting from the prior wards.

Exhibit 1

**DeSoto Parish Police Jury
Preservation of Core Election Districts Based on Area and Population
Plan BGD2 as Compared to the 2011 Plan**

2011 Plan District	BGD2 District	Area (Sq. Mi.)	% Area	2020 Population	% Population
1A	Total	105.3	100%	2,254	100%
	3	94.3	90%	2,045	91%
	4	3.9	4%	106	5%
	1	7.2	7%	103	5%
1B	Total	48.3	100%	2,136	100%
	1	38.2	79%	2,088	98%
	3	10.1	21%	48	2%
1C	Total	147.0	100%	2,116	100%
	2	114.0	78%	1,488	70%
	3	22.9	16%	341	16%
	1	10.1	7%	287	14%
2	Total	19.1	100%	3,516	100%
	11	13.3	70%	2,355	67%
	10	5.8	30%	1,161	33%
3	Total	25.3	100%	3,188	100%
	5	22.7	90%	1,918	60%
	10	2.0	8%	1,242	39%
	11	0.6	2%	28	1%
4A	Total	90.2	100%	2,245	100%
	4	64.7	72%	1,181	53%
	5	25.1	28%	547	24%
	8	0.6	1%	517	23%
4B	Total	32.2	100%	1,978	100%
	7	1.1	3%	1,179	60%
	4	26.7	83%	627	32%
	2	4.3	13%	109	6%
	8	0.0	0%	59	3%
	6	0.0	0%	4	0%
4C	Total	77.7	100%	2,202	100%
	8	1.8	2%	1,351	61%
	6	66.1	85%	724	33%
	4	9.8	13%	127	6%
4D	Total	55.1	100%	2,303	100%
	7	0.9	2%	1,157	50%
	2	52.6	95%	606	26%
	6	1.6	3%	540	23%
5	Total	73.0	100%	2,616	100%

	9	65.9	90%	2,459	94%
	4	7.0	10%	123	5%
	11	0.2	0%	34	1%
6	Total	222.0	100%	2,258	100%
	6	172.1	78%	1,048	46%
	8	0.1	0%	596	26%
	2	28.2	13%	334	15%
	4	21.6	10%	189	8%
	7	0.0	0%	91	4%

Population percentages are calculated on each 2011 Plan district's 2020 Census population (parish total 26,812).

Finding: Plan BGD2 does not preserve the prior core election districts. There are no holdings by the Court in this case or in any prior legal proceeding that justify ignoring the prior election districts. Implementation of this plan would cause considerable voter confusion, which in turn could frustrate voters to the point where they do not participate in the election.

C. State Redistricting Statutes: The Louisiana Legislature has a strong say in how jurisdictions redistrict after each decennial census. Many of the statutes complement the traditional redistricting criteria.

The Special Master's discussion of Louisiana law centers on Joint Rule 21, which he concedes does not bind police juries. (SM Report ¶ 27). His report does not address L.R.S. 18:532 or 18:532.1, the statutes that govern precincts and precinct boundaries for police jury plans.

1. **Use of Whole Precincts:** Parish governing plans must be created using whole precincts. Where a precinct must be split for compliance with traditional redistricting criteria, a new precinct must be created from the split portion. (L.R.S. 18:532.1 D.(2)(a)). The Police Jury Manual cited by the Special Master states the same requirement: "Any newly apportioned election district must contain entire election precincts as established by the police jury." (SM Report n.15).

The numerous precinct splits in Plan BGD2 will require that a new precinct be created for each split at the time of plan adoption or Court order. If Plan BGD2 is ordered or implemented, the fourteen (14) split precincts will become thirty-seven (37) precincts, twenty-three (23) of which will be new. Some precincts in Plan BGD2 are split into non-contiguous parts. How those parts are handled can increase this number.

The increase in precincts has a direct effect on voting equipment. Under L.R.S. 18:1363(A), each precinct must be allocated at least one (1) voting machine, and each precinct with more than 300 registered voters must be allocated at least two (2). Every new precinct created by Plan BGD2 therefore adds to the number of voting machines the Parish must deploy on election day. At a minimum, the twenty-three (23) new precincts would require twenty-three (23) additional machines, and more where a new precinct has over 300 registered voters.

This comes at a time when Louisiana's voting machines are at the end of their service life. In February 2026, Secretary of State Nancy Landry told the Legislature that Louisiana needs approximately \$100 million to replace its voting machines, stating: "Simply put, the system has reached the end of its life cycle." (*Louisiana Illuminator*, Feb. 25, 2026). The machines currently in use are 30 to 35 years old, and the manufacturer no longer produces replacement parts. Catherine Newsome, the Secretary of State's top assistant, described the condition of the equipment: "They are really, really close to end of life. We don't have any extra parts, we can't order more parts, and so we have to cannibalize our machines if one breaks down." (WAFB, Mar. 2, 2026).

Relief is not imminent. The Secretary of State's office has stated that a vendor for the new voting system will be selected by the end of 2026, with machines placed in certain parishes beginning in the spring of 2027 and a statewide rollout projected approximately two years after that. (KSLA, July 29, 2026). Until then, parishes must conduct their elections with the existing, limited inventory of machines.

The Legislature has also acted to reduce the demand on the existing equipment. Act 386 of the 2025 Regular Session raised the number of registered voters required before a precinct is allocated a third or fourth voting machine, from 1,400 to 1,800 voters, and clarified that a single consolidated polling place may serve every precinct assigned to it.

DeSoto Parish responded to these same conditions. At a September 9, 2025 Police Jury workshop, the Parish's election officials presented a plan to consolidate fifty-seven (57) precincts and twenty-seven (27) polling locations into twenty-six (26) precincts and eighteen (18) polling locations, substantially reducing the number of voting machines needed on election day. The Clerk of Court noted that the Parish relies on legacy equipment for which parts are scarce. Plan BGD2 would reverse that consolidation and increase the Parish's demand for voting machines at the very time the State is least able to supply them.⁴

Finding: Plan BGD2 cannot be implemented in conformity with the whole-precinct requirement without the creation of a minimum of twenty-three (23) new precincts, nearly doubling the number of precincts the Parish currently uses, and would increase the Parish's need for voting machines at a time when the State's existing equipment has reached the end of its life cycle.

2. **Use of Physical Features:** Beginning with the 1990 Census, when the U.S. Census Bureau used physical features for census block and precinct boundaries, the Louisiana Legislature has required all jurisdictions to use physical features for their boundaries. The only exception is for municipal redistricting, where the outside boundary of the municipality may be a non-visible boundary.

⁴ The Clerk noted that the reduction of precincts from 57 to 26 reduced the number of voting machines needed from 117 to 64. Adoption of Plan BGD2 would increase the number of machines back to 110 or more.

With Plan BGD2, there are numerous areas where non-visible municipal boundaries are used as police jury district boundaries. Because these district boundaries must also serve as precinct boundaries, they implicate L.R.S. 18:532, which states in part:

Each precinct shall be a contiguous, compact area having clearly defined and clearly observable boundaries coinciding with visible features readily distinguishable on the ground and approved extensions of such features, such as designated highways, roads, streets, rivers, or canals, and depicted on United States Bureau of the Census base maps for the next federal decennial census, *except where the precinct boundary is coterminous with the boundary of a parish or an incorporated place when the boundaries of a single precinct contain the entire geographic area of the incorporated place.* [Emphasis added].

The Special Master's Report confirms the use of these boundaries. In the Stonewall area, where the current precincts do not follow the town limits, he states that "either the town or the precincts were going to be split. Deference was given to the town." (SM Report ¶ 108). District 10 closely follows Stonewall's southern boundary. (SM Report ¶ 107). District 6 was drawn to "exactly contain" the Village of South Mansfield. (SM Report ¶ 88). In Mansfield, District 7 was drawn to match the City's western boundaries. After rejecting divisions along Hwy 171, Hwy 175, and the railroad, the Special Master "worked inward from the eastern and western edges" of the City until Districts 7 and 8 met in the middle. (SM Report ¶¶ 92-93).

Plan BGD2 uses non-visible municipal boundaries in the following areas: South Mansfield, Mansfield, and Stonewall. None of these municipalities meet the exception in L.R.S. 18:532 since none is a single-municipal precinct.

Finding: Plan BGD2, as submitted, excessively uses non-visible municipal boundaries and is not in conformity with applicable Louisiana statutes. As such, those district boundaries are not valid.

If submitted on its own merits, it is likely the plan would be ruled invalid by the Louisiana Secretary of State. Correcting this defect would require a significant alteration of the plan, to the point where it would be an entirely new plan.

D. Preservation of Communities of Interest: The definition of a community of interest varies with the geographic size of the jurisdiction. Statewide jurisdictions can see towns and villages as communities of interest. Parish jurisdictions can see towns, villages, and precincts as communities of interest. Municipalities can see neighborhoods and precincts as communities of interest.

For this analysis, municipalities and precincts were used as communities of interest. In each case, the population shares a common geography, common interests, and one or more common linkages. The Special Master takes a similar approach. He identifies the ten (10) places

in DeSoto Parish, along with their urban and rural status, as the “prevailing communities of interest” in the design of his plan. (SM Report ¶ 49).

For municipalities, setting aside the legal defect in Plan BGD2 discussed in Section IV.C, the plan keeps eight (8) places whole and splits two (2) municipalities, the City of Mansfield and the Town of Stonewall, into four (4) pieces. The Stonewall split places only 434 of the town’s 2,273 residents in District 11. (SM Report ¶ 103).

The treatment of the Village of South Mansfield is notable. The Special Master acknowledges that South Mansfield has historically been drawn into a district with the City of Mansfield, is part of the same urban area, shares the U.S. 171 corridor with Mansfield, and sends its students to schools in Mansfield. (SM Report ¶ 85). By the Special Master’s own description, South Mansfield and Mansfield share a community of interest. Even so, Plan BGD2 separates the two, based largely on the stated preference of the village’s mayor in a private interview. (SM Report ¶ 86). The village, with a 2020 population of 333 persons, becomes the anchor for District 6, a large rural district where the remaining 2,000+ residents are scattered in small communities across the southeastern part of the Parish. (SM Report ¶ 87).

For precincts, Plan BGD2 creates an excessive number of precinct splits. By the Special Master’s own count, the plan keeps only twelve (12) of the twenty-six (26) current precincts whole. The remaining fourteen (14) precincts are split twenty-three (23) times into thirty-seven (37) pieces. (SM Report ¶ 132, Table VI.B.3). Eight (8) precincts are split into two (2) parts. Four (4) precincts are split into three (3) parts. One (1) precinct is split into four (4) parts, and one (1) precinct is split into five (5) parts. More than half (54%) of the Parish’s precincts are split. As discussed in Section IV.C, some precincts are split into non-contiguous parts, which can increase the total number of splits and new precincts.

Plan BGD2 requires a minimum of forty-nine (49) precincts to implement the plan.⁵ Currently, the Parish needs only twenty-six (26) precincts to run its elections. The Special Master’s own table shows that the Registrar reduced the number of precincts from fifty-one (51) in July 2025 to twenty-six (26) in 2026. (SM Report Table IV.C.2). Plan BGD2 would nearly double the number of precincts and undo that work.

As discussed in Section IV.C, Louisiana’s voting machines are at the end of their life cycle, and the Secretary of State has encouraged parishes to merge as many precincts as possible. DeSoto Parish worked diligently to develop an election plan that uses as few precincts as possible while keeping voter convenience at the forefront.

The Special Master states that he sought to follow current precinct boundaries and avoid further splits in order to minimize the burden on the Registrar’s office and voter confusion. (SM Report ¶¶ 54, 128). The results do not bear that out. By his own coincidence analysis, over one-

⁵ Non-contiguous precinct splits can add to this total number. It can only be avoided by reconfiguring the intervening precinct(s), which in turn, can create additional splits, depending upon the circumstance.

third (35.5%) of the interior district boundaries in Plan BGD2, approximately 63 miles, do not follow current precinct boundaries. (SM Report ¶ 133).

Finding: Plan BGD2 does not preserve communities of interest at the precinct level. It also separates the Village of South Mansfield from the City of Mansfield, a community of interest the Special Master himself describes. The legal defect at the municipal level, discussed in Section IV.C, prevents a valid measurement of the municipal splits.

V. Traditional Redistricting Criteria Not at Issue

The following traditional redistricting criteria are not among the primary areas of concern. Plan BGD2 meets the one person-one vote and contiguity requirements and is moderately compact. Each criterion is discussed below.

A. **One Person, One Vote:** This principle requires that election districts be as nearly equal in population to each other as practicable. The traditional threshold is a deviation not to exceed +/- 5% from the ideal district population, or a 10% overall deviation across the plan. With a 2020 Census population of 26,812 persons, the ideal district population for DeSoto Parish is 2,437 persons.

Plan BGD2 has an overall deviation of 3.08%. The lowest deviation is -1.40% in District 10. The highest deviation is +1.68% in District 1.

The Special Master's Report comments that the underpopulation of Districts 10 and 11 "likely reflects a more accurate balance of population between the districts today," based on the Census Bureau's 2025 population estimates for the Town of Stonewall. (SM Report ¶ 106). Post-census estimates are not a basis for redistricting. For redistricting purposes, the only relevant data is the decennial census, the PL 94-171 file. The 2025 estimates should carry no weight in evaluating Plan BGD2.

Finding: Plan BGD2 is within the traditional range for population deviation.

B. **Contiguity:** This principle requires that each district be a single part. A district that is split into two or more parts with no common boundary is considered non-contiguous.

Finding: Plan BGD2 is contiguous.

C. **Compactness:** This principle requires that each district be as geographically compact as practical. Various features of the jurisdiction, such as the absence of physical features on which to base census block boundaries, variations in population density, and political considerations can affect the shape and compactness of a district. Given the rural nature and varying population densities across DeSoto Parish, it is difficult to arrive at a high compactness score.

Two common methods of measurement are Reock and Polsby-Popper. Each bases its calculation on different criteria, but under each, the most compact value is "1." The plan values under the two methods are shown in the following table.

Exhibit 2

Plan BGD2 Compactness Scores

BGD2	Reock	Polsby-Popper
Min	0.28	0.20
Max	0.60	0.44
Mean	0.43	0.33
Std. Dev.	0.10	0.07

Under Reock, the least compact district is District 8. The most compact district is District 2. Under Polsby-Popper, the least compact district is District 8. The most compact district is District 9.

The Special Master compares the compactness of Plan BGD2 only to Plan H Revised. (SM Report ¶¶ 118-119). He does not compare it to the 2011 Plan.

Compactness also varies widely within Plan BGD2. District 8 has a Reock score of 0.28 and a Polsby-Popper score of 0.20. Both are below the Plan H Revised averages the Special Master criticizes (0.35 and 0.23). Districts 1 and 9 also have Reock scores (0.32 and 0.31) below the Plan H Revised average. The Special Master acknowledges that Districts 5, 7, and 8 are below the plan average and attributes this to following place and precinct boundaries. (SM Report ¶¶ 80-81, 94).

As the Special Master states, there is no such thing as a “good” compactness score, and compactness is only one of several criteria that must be balanced. (SM Report ¶¶ 116-117). I agree. As discussed in my prior report, compactness scores vary with the method used. A gain in compactness does not justify disregarding other traditional criteria, such as preservation of the core districts and incumbency.

Finding: Plan BGD2 is a moderately compact plan. When compared to the 2011 Plan, four (4) districts are less compact under Reock, and four (4) districts are less compact under Polsby-Popper. The improvement in compactness over Plan H Revised came at the expense of other traditional redistricting criteria.

VI. Opinion

After a review of Plan BGD2 and the Special Master’s Report, it is my opinion that the plan does not follow traditional redistricting criteria and applicable State laws in four (4) areas: incumbency, preservation of the core election districts, the State redistricting statutes, and communities of interest. Plan BGD2 pairs or substantially redraws the districts of nine (9) of the eleven (11) incumbents, disregards the core districts of the 2011 Plan, splits more than half of the Parish’s precincts, uses non-visible municipal boundaries contrary to Louisiana law, and separates the Village of South Mansfield from the City of Mansfield.

These shortcomings and defects are not necessary. One or more plans can be drawn that are consistent with *Callais*, meet all the traditional redistricting criteria, and comply with applicable Louisiana law.

The Special Master assumed that the prior police jury plans were racially driven, and on that basis set aside traditional redistricting criteria such as the preservation of prior core districts and incumbency. (SM Report ¶ 30). To my knowledge, there have been no court holdings in this or any prior litigation finding that any of the police jury plans were the result of using race as the predominant factor or that the 2011 Plan or Plan H Revised was constitutionally defective. The 2011 Plan was pre-cleared by the Department of Justice and never challenged.

The Special Master's Report also does not reflect any public workshop or hearing where the voters of DeSoto Parish could review and comment on Plan BGD2 before it was proposed, and the consent agreement between the parties did not provide for one. As submitted, the plan was developed from private interviews with a limited number of officials.

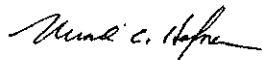
There are no valid reasons why Plan BGD2 should be considered as a remedy by the Court. There are other configurations that better serve the Parish and its voters while honoring the intent of the traditional redistricting criteria and meeting the requirements of Louisiana law.

It is my recommendation that the Police Jury consider the submission of one or more plans that meet all the traditional redistricting criteria and State requirements.

VII. Certification

The facts and opinions expressed above are true and based on the facts and criteria available to the demographer as of the time of this report. This demographer retains the right to amend this report as new information becomes available. My vitae is on file in this matter.

Submitted on the 30th day of September, 2026.



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