

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION**

DAVID B. MEANS, ET AL.

CIVIL ACTION NO. 5:23-cv-00669

VERSUS

JUDGE DAVID C. JOSEPH

DESOTO PARISH, ET AL.

MAGISTRATE JUDGE HORNSBY

**MOTION FOR LEAVE TO FILE BRIEF AS *AMICI CURIAE*  
IN SUPPORT OF DEFENDANTS**

The NAACP Legal Defense and Educational Fund, Inc. (“LDF”), Louisiana State Conference of the NAACP, and the DeSoto Branch of the NAACP respectfully move this Court for leave to file a brief as *Amici Curiae* in support of Defendants in this matter. For the reasons set forth below, *Amici* respectfully requests that this Court grant the motion and permit the filing of the amicus brief attached hereto as Exhibit A as well as an opportunity to address the Court at the preliminary injunction hearing commencing on July 11, 2023.

**Interest of *Amici Curiae***

1. *Amici* are nonprofit organizations that have a demonstrated interest in protecting the rights of Black voters under the Voting Rights Act of 1965 (“VRA”) and, in pursuit of that interest, engage in grassroots advocacy, voter engagement, and litigation in the areas of redistricting and voting rights law.

2. LDF is a nonprofit legal organization founded in 1940 under the leadership of Thurgood Marshall to achieve racial justice and ensure the full, fair, and free exercise of constitutional and statutory rights for Black people and other communities of color. Because equality of political representation is foundational to democracy, and the franchise is “a

fundamental political right . . . preservative of all rights,” *Yick Wo v. Hopkins*, 118 U.S. 356, 370 (1886). LDF has worked for nearly a century to combat threats to equal political participation.

3. In fulfilling its mission, LDF has filed and joined numerous lawsuits and amicus curiae briefs regarding enforcement of the Voting Rights Act of 1965 (“VRA”) and U.S. Constitution in the context of redistricting and has a strong interest in the proper interpretation and application of the surrounding doctrine and principles guiding the consideration of race in redistricting. *See, e.g., Allen v. Milligan*, 143 S. Ct. 1487 (2023); *Shelby Cnty. v. Holder*, 570 U.S. 529 (2013); *Nw. Austin Mun. Util. Dist. No. One v. Holder*, 557 U.S. 193 (2009); *Chisom v. Roemer*, 501 U.S. 380 (1991); *Thornburg v. Gingles*, 478 U.S. 30 (1986); *Gomillion v. Lightfoot*, 364 U.S. 339 (1960); *Robinson v. Ardoin*, 37 F.4th 208 (5th Cir. 2022); *Major v. Treen*, 574 F. Supp. 325 (E.D. La. 1983).

4. The Louisiana State Conference of the National Association for the Advancement of Colored People (the “Louisiana NAACP”) is a state subsidiary of the National Association for the Advancement of Colored People (“NAACP”). For decades, the Louisiana NAACP has worked to ensure the economic, educational, political, and social equity of Black people and of all Americans. The Louisiana NAACP’s mission includes eliminating racial discrimination in the democratic process and ensuring the protection of voting rights and equitable political representation. Its membership includes Black voters residing throughout Louisiana, including DeSoto Parish. The Louisiana NAACP has been a party in multiple lawsuits under Section 2 of the VRA (“Section 2”) and has a strong interest in ensuring that its members and other Black voters are not denied an equal opportunity to participate in the political process due to the enactment of maps that do not comply with the Voting Rights Act. *See, e.g., La. State Conf. of the NAACP v. Louisiana*, No. 3:19-479-JWD-SDJ (M.D. La. 2019); *Robinson v. Ardoin*, Nos. 3:22-cv-211-SDD-

SDJ & 3:22-cv-214-SDD-SDJ (M.D. La. filed Mar. 30, 2022); *Nairne v. Ardoin*, 3:22-cv-00178-SDD-SDJ (M.D. La. filed Mar. 14, 2022).

5. The DeSoto Parish NAACP is a regional branch of the NAACP. Its core mission and purpose mirrors that of the Louisiana NAACP. The DeSoto Parish NAACP monitored the redistricting process in DeSoto Parish to ensure the passage of a fair and representative Police Jury map. The DeSoto Parish NAACP has members living in each of the districts challenged in this matter, who risk having their voting strength diluted if Plaintiffs' requested relief is granted.

6. Together, *Amici* have a strong interest in ensuring maps in DeSoto Parish comply with the VRA and do not undermine the voting strength of Black DeSoto voters.

7. Counsel for *Amici* contacted counsel for the parties for their position on this motion and the request to address the Court. Counsel for Plaintiffs state consented to the filing of an amicus brief but objected to *Amici's* request to address the Court. Counsel for Defendants consented to the filing of an amicus brief as well as *Amici's* opportunity to address the Court, so long as their Rule 12(c) motion, ECF No. 40, is not granted first.

**The Amicus Brief Will Aid This Court's Consideration and Development of a Fair and Lawful Redistricting Plan**

8. As the Fifth Circuit has recently explained, courts are "well advised to grant motions for leave to file amicus briefs . . ." *Lefebure v. D'Aquilla*, 15 F.4th 670, 676 (5th Cir. 2021) (citation omitted). An amicus brief should "normally be allowed when [...] the amicus has unique information or perspective that can help the court beyond the help that the lawyers for the parties are able to provide." *In re Halo Wireless, Inc.*, 684 F.3d 581, 596 (5th Cir. 2012) (citation omitted); *see also United States v. Davis*, 180 F. Supp. 2d 797, 800 (E.D. La. 2001). "Courts should welcome amicus briefs for one simple reason: '[I]t is for the honour of a court of justice to avoid

error in their judgments.” *Lefebure v. D’Aquila*, 15 F.4th 670, 675 (5th Cir. 2021) (citing *The Protector v. Geering*, 145 Eng. Rep. 394 (K.B. 1686)).

9. *Amici’s* brief and supporting materials can assist the Court by analyzing the impacts that the Plaintiffs’ proposed redistricting plan will have on Black voters in DeSoto Parish, whose voices in the democratic process are at risk of being diminished if the relief sought by Plaintiffs is granted. Importantly, *Amici’s* brief can help ensure that any remedial map that may be developed complies with Section 2 of the Voting Rights Act.

10. The matters asserted in *Amici’s* brief are directly relevant to the issues the court is considering as it addresses the adequacy of Plaintiffs’ proposed relief. In their brief, *Amici* describe the importance to the Black community of preserving Black voting strength in the Parish and explain that the Plaintiffs’ intended redistricting plans would violate Section 2 of the Voting Rights Act by eliminating multiple Black-majority districts and diluting the voting strength of Black voters in DeSoto Parish. This argument is separate from but complimentary to the defenses asserted by Defendants and may therefore assist the Court by providing a perspective not otherwise represented in this matter.

11. While *Amici’s* interests will be directly affected by the outcome of this litigation, these interests are unlikely to be adequately represented by the existing parties. Defendants have an obligation to ensure a new redistricting plan is enacted after the decennial census and must balance the competing demands of multiple stakeholders. Ensuring compliance with the VRA is a part of fulfilling those obligations which must be balanced against many others. *Amici* have as their primary focus in the redistricting process ensuring Black voters do not have their votes diluted in violation of the VRA. Defendants have focused their defense on the efficient administration of elections and have not highlighted the importance or relevance of the VRA’s requirements.

12. *Amici's* brief is supported by declarations from two preeminent voting rights experts, including Dr. Lisa Handley and Bill Cooper, who was recently credited by the U.S. Supreme Court in its most recently ruling upholding four decades of precedent defining the frameworks applied in Section 2 redistricting cases. *Allen v. Milligan*, 143 S. Ct. 1487, 1504 (2023).

13. The brief and supporting expert analysis provided by *Amici* will assist the Court by providing information and highlighting the risk that the relief sought by Plaintiffs may run afoul of federal law and could lead to future litigation in the Parish under Section 2 of the Voting Rights Act.

For the foregoing reasons, *Amici* respectfully request that this Court grant leave to file the Brief attached hereto as Exhibit 1.

Dated: July 7, 2023

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 7, 2023, I presented the foregoing to the Clerk of the Court for filing and uploading to the CM/ECF system which will send notification of such filing to all counsel of record registered with the CM/ECF system.

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**[PROPOSED] BRIEF FOR *AMICI CURIAE*  
LEGAL DEFENSE FUND, LOUISIANA STATE  
CONFERENCE OF THE NAACP, AND DESOTO PARISH  
BRANCH OF THE NAACP**

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## STATEMENT OF INTEREST

*Amici curiae* are nonprofit, nonpartisan organizations that have a demonstrated interest in protecting the fundamental rights of Black voters under the Voting Rights Act of 1965 (“VRA”). In pursuit of that interest, the Legal Defense Fund (“LDF”) has used litigation, policy advocacy, public education, and community organizing strategies to enforce and promote policies that increase access to the electoral process and prohibit voter discrimination. LDF has litigated precedent-setting lawsuits relating to representation and voting rights of Black people and other people of color before courts nationwide, including VRA lawsuits challenging racially-discriminatory redistricting plans in Louisiana and elsewhere. *See, e.g., Allen v. Milligan*, 143 S. Ct. 1487 (2023); *Shelby Cnty. v. Holder*, 570 U.S. 529 (2013); *Chisom v. Roemer*, 501 U.S. 380 (1991); *Thornburg v. Gingles*, 478 U.S. 30 (1986); *Gomillion v. Lightfoot*, 364 U.S. 339 (1960); *Robinson v. Ardoin*, 37 F.4th 208 (5th Cir. 2022); *Major v. Treen*, 574 F. Supp. 325 (E.D. La. 1983).

The Louisiana State Conference of the National Association for the Advancement of Colored People (the “Louisiana NAACP”) is a state subsidiary of the National Association for the Advancement of Colored People (“NAACP”). For decades, the Louisiana NAACP has worked to ensure the political and social equity of Black people. The Louisiana NAACP’s mission includes eliminating racial discrimination in the democratic process and protecting the voting rights of its members, including Black voters residing throughout Louisiana and in DeSoto Parish. The Louisiana NAACP has been a party in multiple voting rights lawsuits and has a strong interest in ensuring that its members and other Black voters are not denied an equal opportunity to participate in the political process due to the enactment of any unfair or unlawful map. *See, e.g., La. State Conf. of the NAACP v. Louisiana*, No. 3:19-479-JWD-SDJ (M.D. La. 2019); *Robinson v. Ardoin*, Nos. 3:22-cv-211-SDD-SDJ & 3:22-cv-214-SDD-SDJ (M.D. La. filed Mar. 30, 2022); *Nairne v. Ardoin*, 3:22-cv-00178-SDD-SDJ (M.D. La. filed Mar. 14, 2022).

The DeSoto Parish NAACP is a regional branch of the NAACP. Its core mission and purpose mirrors that of the Louisiana NAACP. The DeSoto Parish NAACP monitored the redistricting process in DeSoto Parish to ensure the passage of a fair and representative Police Jury map. The DeSoto Parish NAACP has members living in the districts challenged in this matter, who risk having their voting strength diluted if Plaintiffs' requested relief is granted.

Together, *Amici* have a strong interest in ensuring maps in DeSoto Parish comply with the Voting Rights Act ("VRA") and do not undermine the voting strength of Black voters.

### **PRELIMINARY STATEMENT**

Plaintiffs in this action seek to replace DeSoto Parish's Police Jury map with a new map with the express purpose of weakening Black voters' representation. Plaintiffs' requested relief threatens to violate the rights of the members of the Louisiana and Desoto Parish NAACP and other Black voters under Section 2 of the VRA, which prohibits maps enacted with the intent or effect of diluting minority voting strength. 52 U.S.C. § 10301. *Amici* offer a robust analysis of Section 2, including expert declarations, to aid the Court's understanding of the legal flaws in Plaintiffs' claim and the risk of future liability under Section 2 if the proposed injunction is granted.

### **ARGUMENT**

Plaintiffs' preliminary injunction should be denied because they fail to account for compliance with the VRA, which negates their entitlement to injunction and renders the relief they seek unlawful. A preliminary injunction is "an extraordinary remedy never awarded as of right." *Benisek v. Lamone*, 138 S. Ct. 1942, 1943 (2018) (citation omitted). The movant must successfully establish four elements: "(1) a substantial likelihood of success on the merits, (2) a substantial threat of irreparable injury if the injunction is not issued, (3) that the threatened injury if the injunction is denied outweighs any harm that will result if the injunction is granted, and (4) that

the grant of an injunction will not disserve the public interest.” *Jiao v. Xu*, 28 F.4th 591, 597–98 (5th Cir. 2022) (citations omitted).

As detailed below, the high level of racially polarized voting (“RPV”) that persists in DeSoto Parish and the totality of the circumstances together mean that, to satisfy the requirements of Section 2, DeSoto Parish must maintain five districts with a majority-Black voting age population (“BVAP”) in which Black voters have an equal opportunity to elect candidates of their choice to the Police Jury. The necessity to comply with Section 2 precludes Plaintiffs from satisfying three of the four preliminary injunction requirements and renders injunction untenable.

*First*, Plaintiffs are not likely to succeed on the merits because they cannot show that an injunction would be compatible with Section 2, and they fail to offer sufficient evidence of racial gerrymandering. *Second*, the Supreme Court has made clear that a jurisdiction’s compelling interest in remedying the harms of vote dilution prohibited by Section 2 defeats a claim of racial gerrymandering and, therefore, as a matter of law, outweighs any harm that might result from the predominant use of race in redistricting. *See Cooper v. Harris*, 581 U.S. 285, 292 (2017). *Third*, granting a preliminary injunction in this case will disserve the public interest, because Plaintiffs’ desired injunction, mandating a map that eliminates multiple existing majority-Black districts, would violate the Section 2 rights of NAACP members and other Black voters in DeSoto Parish.

Finally, even if Plaintiffs could satisfy the injunction standard, the relief they seek is improper because it disregards Desoto Parish’s obligations under the VRA by failing to include any provision to ensure a remedial map complies with Section 2. If the Court concludes Plaintiffs are entitled to relief, it should mandate analysis of the VRA’s requirements in the remedial process.

**I. Plaintiffs Cannot Demonstrate a Likelihood of Success on the Merits Because the VRA Requires Preservation of Black Voters’ Electoral Opportunities and Because a VRA-Compliant Map Can Be and Has Been Drawn Without Race Predominating.**

Plaintiffs cannot show a likelihood of success on the merits for at least two reasons. First,

even if race had predominated in the creation of the Adopted Plan, Plaintiffs cannot succeed on their racial gerrymandering claim because the VRA requires DeSoto Parish maintain five majority-Black districts, like those enacted in the Adopted Plan. Second, the inference of racial predominance Plaintiffs ask the Court to draw is unsupported by the direct and circumstantial evidence they rely on. Specifically, the assertion that the districting choices DeSoto Parish made in the Adopted Plan can only be explained by race is belied by the evidence showing that five majority-Black districts can be created to satisfy the VRA without any of the purportedly race-based departures from traditional redistricting principles Plaintiffs cite.

**A. Plaintiffs’ Racial Gerrymandering Claim Fails Because a Map That Eliminates Existing Majority-Black Districts Would Likely Violate the Rights of Black Voters in DeSoto Parish Under Section 2.**

Plaintiffs claim that the Parish used race as the predominant factor in redistricting, and request that the Court dismantle as many as three of the Police Jury’s five majority-Black districts. The Parish has already demonstrated that race was not the predominant factor, Defs’ Opp., ECF No. 32, at 16–22, and the inadequacy of Plaintiffs’ evidence of racial predominance is further highlighted below. Even if Plaintiffs had a likelihood of success on that point, however, they would not be entitled to an injunction because the relief they seek is foreclosed by Section 2. There is a substantial likelihood that a map for the Police Jury that does not provide five majority-Black districts, as the Adopted Plan does, will violate the rights of NAACP members and other Black voters under Section 2. The risk of violation is apparent based on analysis under the clear framework established in *Thornburg v. Gingles*, 478 U.S. 30 (1986), and reaffirmed in *Allen v. Milligan*, 143 S. Ct. 1487 (2023).

Section 2 prohibits vote dilution by ensuring racial minority voters have an equal opportunity “to participate in the political process and to elect candidates of their choice,” based on demographics, voting trends, and other factors considered under the “totality of circumstances.”

See *Gingles*, 478 U.S. at 34, 36. A Section 2 violation occurs when a person is “disabled from ‘enter[ing] into the political process in a reliable and meaningful manner’ ‘in the light of past and present reality, political and otherwise.’” *Milligan*, 143 S. Ct. at 1507 (citation omitted).

In evaluating whether Section 2 has been violated, courts begin by assessing whether the three “*Gingles* Preconditions” are satisfied: (1) “the minority group must be sufficiently large and geographically compact to constitute a majority in a reasonably configured district”; (2) “the minority group must be able to show that it is politically cohesive”; and (3) “the minority must be able to demonstrate that the white majority votes sufficiently as a bloc to enable it to defeat the minority’s preferred candidate” in the absence of a majority-minority district. *Milligan*, 143 S. Ct. at 1503 (cleaned up). The first *Gingles* precondition (“*Gingles* 1”) shows the existence of a viable remedy to address the vote dilution; and, together, the second precondition (“*Gingles* 2”) and third precondition (“*Gingles* 3”) demonstrate the existence of racially polarized voting (“RPV”).<sup>1</sup> Where all three *Gingles* preconditions exist, the analysis proceeds to an examination of the “totality of circumstances” to determine whether Black voters in DeSoto Parish “have less opportunity than other members of the electorate to participate in the political process and to elect representatives of their choice.” 52 U.S.C. § 10301(b); see also *Milligan*, 143 S. Ct. at 1503.

As explained below and demonstrated by declarations from *Amici*’s two experts, Dr. Lisa Handley and William Cooper, any map that fails to include five majority-Black districts would likely violate the rights of DeSoto Parish’s Black voters under Section 2. Each of the *Gingles* preconditions are present. *Gingles* 1 is satisfied because, as the Adopted Plan and the plan included in Mr. Cooper’s declaration demonstrate, it is possible to draw a Police Jury map with five

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<sup>1</sup> Racially polarized voting occurs when different racial groups vote for different candidates. In a racially polarized election, for example, Black people vote together for their preferred (frequently Black) candidate, and white voters vote for the opposing (typically white) candidate. See, e.g., *Gingles*, 478 U.S. at 52–53.

reasonably configured majority-Black districts. *Gingles* 2 and 3 are satisfied because, as Dr. Handley’s declaration shows, there is overwhelming evidence of RPV within DeSoto Parish, and without majority-Black districts, candidates supported by Black voters would invariably be defeated by candidates supported by white voters. Finally, based on the “totality of circumstances,” Black voters in DeSoto Parish have less opportunity to participate in the political process and elect candidates of their choice.

**1. *Gingles* Precondition 1 Is Satisfied.**

All that is needed to satisfy *Gingles* 1 is “at least one illustrative map” with one or more reasonably configured majority-minority districts. *Milligan*, 143 S. Ct. at 1512. A district is “reasonably configured” where “it comports with traditional districting criteria, such as being contiguous and reasonably compact.” *Id.* at 1503. Here, the public record is replete with maps showing that the Desoto Parish Police Jury could, and did, draw a redistricting plan with five majority-Black districts in a manner that satisfies traditional redistricting principles. The map adopted by the Parish (“Adopted Plan”) satisfies *Gingles* 1. The Adopted Plan contains five districts with a Black VAP between 59 percent and 66.5 percent. Ex. 1 ¶ 36 (correcting errors in Plaintiffs’ calculations). The districts in the Adopted Plan are roughly as compact as the map enacted in 2011 by two standard measures, do not pair incumbents, and keep whole many small municipalities. *Id.* ¶ 51 & Fig. 11.

Beyond the Adopted Plan, the record contains other examples of maps drawn with five majority-Black districts that adhere to traditional redistricting principles. In a letter to the Police Jury on December 5, 2022, *Amicus* LDF provided the Parish with an illustrative map that satisfied the “one person, one vote” requirement of the Equal Protection Clause, contained five majority-Black districts, was even more compact than the Adopted Plan, did not pair incumbents, and largely respected boundaries of political subdivisions. *See* Ex. 3. In addition, at a hearing on February 21,

2023, demographer Cedric Floyd, who has drawn the DeSoto Parish Police Jury plans in prior cycles, presented another plan with five majority-Black districts that addressed the population deviations Plaintiffs had raised in their November letter. Pls.’ Ex. 3, ECF No. 10-5, at 1–4.

Another plan illustrating the feasibility of creating five reasonably configured majority-Black districts for the Police Jury is provided in Mr. Cooper’s declaration. The districts in Mr. Cooper’s plan are as compact on average as the 2011 benchmark plan and more compact than the Adopted Plan. *See* Ex. 1 ¶ 51 & Fig. 11. The population of all districts is balanced consistent with one-person-one-vote, with an overall deviation of less than 5 percent. *Id.* ¶ 49.<sup>2</sup> No incumbents are paired. *Id.* ¶ 48. The plan contains approximately the same number of voting precinct as the Adopted Plan, containing 23 precinct splits, as compared to 26 for the Adopted Plan. *Id.*, Fig. 12. Further, it splits no municipality other than Mansfield, which it splits among four of the five majority Black districts. *Id.*, Fig. 12, Ex. D-4 to Ex. 1.

In any event, a redistricting plan need not score highly on every traditional redistricting principle to satisfy *Gingles* 1. *See Milligan*, 143 S. Ct. at 1504–05 (holding that an illustrative plan satisfied *Gingles* 1 despite failure to preserve all communities of interest or retain the cores of prior maps). The examples described above all maintain five majority-Black districts and reasonably adhere to traditional redistricting principles. *Gingles* 1 is satisfied.

## **2. *Gingles* Preconditions 2 and 3 Are Satisfied.**

The second and third *Gingles* preconditions assess whether Black and white voters have different electoral preferences and whether the redistricting scheme permits the white majority to regularly defeat the preferred candidates of Black voters. *See Milligan*, 143 S. Ct. at 1503

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<sup>2</sup> Although not relevant to the Section 2 analysis, it bears remarking that in Mr. Cooper’s plan, two of the majority-Black districts are overpopulated compared to the ideal district size, while the three that are underpopulated are barely so, with deviations ranging from -0.25% to -0.53%.

(explaining that RPV analysis tests whether districting scheme “thwarts a distinctive minority vote at least plausibly on account of race”) (cleaned up). In this case, *Gingles 2* requires evidence that Black voters in DeSoto Parish are “politically cohesive,” which is demonstrated by “showing that a significant number of minority group members usually vote for the same candidates.” *Gingles*, 478 U.S. at 56. *Gingles 3* requires that the majority has different candidate preferences than Black voters and votes sufficiently cohesively to “enable it usually to defeat the minority’s preferred candidate.” *League of United Latin Am. Citizens v. Perry*, 548 U.S. 399, 425 (2006) (cleaned up).

No party can seriously dispute that DeSoto Parish’s elections are racially polarized. For example, *Amicus* LDF’s December letter to the Police Jury explained that a study of 11 recent elections in DeSoto Parish showed strong patterns of RPV, with Black voters supporting a common candidate by margins ranging from 60 percent to over 90 percent, while white voters preferred different candidates by similar margins. *See* Ex. 3 at 5–6.

Dr. Handley, *Amici*’s expert, found a similar pattern of RPV across 16 statewide elections from 2015 to 2022 between a Black and a white candidate. *See generally* Ex. 2. Evidence from elections between Black and white candidates is more probative of the existence of RPV. *See Gingles*, 478 U.S. at 68 (“Because both minority and majority voters often select members of their own race as their preferred representatives, it will frequently be the case that a black candidate is the choice of blacks, while a white candidate is the choice of whites”). Dr. Handley found that Black voters vote cohesively, with an average of 82.2 percent supporting the same candidate across all the elections studied, and 93 percent of Black voters supporting the same candidate in races involving only two candidates. Ex. 2 at 6. White voters, in contrast, supported the Black-preferred candidate at a rate of only 9.7 percent, which rose to only 12.4 percent in two-way contests. *Id.* at 6. As can be seen in Figure 1, below, Dr. Handley found that Black-preferred candidates received

fewer votes in DeSoto Parish than their opponents, with the share of votes cast for Black-preferred candidates in the Parish ranging from 13.4 percent to 46.3 percent. *Id.* (Appendix). That is, without exception, the candidate of choice of Black voters was defeated at a Parish-wide level. Moreover, Dr. Handley concluded that if districts were drawn with less than a majority-BVAP, white bloc-voting would result in the usual defeat of Black-preferred candidates. *Id.* at 1, 10–11.

**FIGURE 1: Estimates of Black and White Support for Black Candidates of Choice in DeSoto Parish**

Election	Black candidate of choice	Race	Share of votes cast in DeSoto Parish	Est. for Black voters		Est. for White voters	
				Vote share	95% conf. interval	Vote share	95% conf. interval
2022 U.S. Senate	Gary Chambers, Jr	B	13.4%	40.6%	37.3%, 43.8%	2.5%	1.4%, 3.8%
2020 U.S. President	Biden/Harris	W/B	37.0%	85.1%	68.5%, 90.3%	14.2%	9.7%, 16.2%
2020 U.S. Senate	Adrian Perkins	B	26.1%	70.2%	66.3%, 73.9%	5.0%	2.9%, 7.0%
2019 Lt. Gov.*	Willie Jones	B	36.3%	96.6%	93.1%, 98.8%	8.8%	6.6%, 11.4%
2019 AG*	Ike Jackson	B	33.9%	91.9%	87.1%, 95.4%	7.4%	5.1%, 10.5%
2019 SOS	Gwen Collins-Greenup	B	34.2%	90.3%	86.0%, 93.7%	9.8%	7.6%, 12.5%
2019 Treasurer	Derrick Edwards	B	35.8%	93.8%	90.3%, 96.4%	10.8%	8.7%, 13.0%
2019 SOS Runoff*	Gwen Collins-Greenup	B	40.6%	95.5%	91.7%, 98.0%	13.7%	11.3%, 16.5%
2018 SOS	Gwen Collins-Greenup	B	20.8%	61.3%	57.2%, 65.1%	4.5%	2.6%, 6.7%
2018 SOS Runoff*	Gwen Collins-Greenup	B	34.8%	95.2%	90.1%, 98.3%	11.0%	8.1%, 14.2%
2017 Treasurer	Derrick Edwards	B	29.3%	87.1%	81.2%, 91.8%	8.9%	6.3%, 11.7%
2017 Treas. Runoff*	Derrick Edwards	B	35.9%	95.2%	89.4%, 98.7%	12.2%	9.0%, 15.7%
2015 Lt. Gov.	Kip Holden	B	33.3%	90.0%	85.9%, 93.4%	8.7%	6.5%, 11.1%
2015 AG	Geri Broussard Baloney	B	15.4%	37.6	32.7%, 41.6%	5.5%	3.6%, 7.9%
2015 SOS*	Chris Tyson	B	35.6%	88.4	82.0%, 93.3%	12.4%	9.5%, 16.0%
2015 Lt. Gov. Runoff*	Kip Holden	B	46.3%	96.3	92.8%, 98.6%	19.5%	17.0%, 22.4%

\* Race featuring only two candidates

Accordingly, as the U.S. Department of Justice concluded in 2002, “elections in DeSoto Parish are marked by a pattern of racially polarized voting.”<sup>3</sup> Moreover, in line with these findings, courts evaluating Section 2 claims over the past five years have consistently found high levels of RPV in other parishes and Louisiana statewide, mirroring levels demonstrated here.<sup>4</sup>

<sup>3</sup> Letter from Andrew E. Lelling, Acting Assistant Att’y Gen., C.R. Div., U.S. Dep’t of Just., to Walter C. Lee, Superintendent, Par. Sch. Bd. and B.D. Mitchell, President, Par. Police Jury (Dec. 31, 2002), [bit.ly/DOJDeSoto2002](http://bit.ly/DOJDeSoto2002) (“Objection Letter 2002-2926 (DeSoto Parish School District (DeSoto Parish))”).

<sup>4</sup> See, e.g., *Robinson v. Ardoin*, 37 F.4th 208, 224-27 (5th Cir. 2022); *Fusilier v. Landry*, 963 F.3d 447, 458–59 (5th Cir. 2020); *La. State Conf. of the NAACP v. Louisiana*, 490 F. Supp. 3d 982, 1019 (M.D. La. 2020).

### 3. There Is Ample Evidence to Satisfy the Totality of the Circumstances.

In addition to establishing the *Gingles* preconditions, under Section 2, a court must determine whether under the “totality of circumstances” Black voters “have less opportunity than other members of the electorate to participate in the political process and to elect representatives of their choice.” 52 U.S.C. § 10301(b); *Gingles*, 478 U.S. at 36–38. The Senate Report accompanying the 1982 amendments to the VRA identified “typical factors,” now known as the “Senate Factors,” that are relevant in analyzing the totality of circumstances and determining whether Section 2 is violated. *Id.* (citing S. Rep. No. 97-417, at 28–29 (hereinafter “Senate Report”)). The Senate Factors consist of nine factors for courts to consider, addressed in turn below. *Id.* The existence of RPV (Factor 2) and the extent to which minorities are elected to public office (Factor 7) are the “two most important factors considered in the totality-of-circumstances inquiry.” *Clark v. Calhoun Cnty*, 88 F.3d 1393, 1397 (5th Cir. 1996) (citations omitted). To establish a Section 2 violation, it is not necessary to prove “any particular number of factors . . . or that a majority of them point one way or the other.” *Gingles*, 478 U.S. at 45. In DeSoto Parish nearly every Senate Factor applies.<sup>5</sup>

**Senate Factor 1: Historic Voting Discrimination.** Senate Factor 1 addresses the “history of official [voting-related] discrimination in the state or political subdivision.” *Gingles*, 478 U.S. at 36 (quoting Senate Report at 28–29). In DeSoto Parish, a legacy of violent voter intimidation marks the historic experiences of Black voters. “Following the Civil War, southern whites . . . used violence and intimidation to reestablish their economic, political, and social dominance over the

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<sup>5</sup> Senate Factor 4 regarding “whether members of the minority group have been denied access to [the candidate slating] process,” *Gingles*, 478 U.S. at 37 (quoting Senate Report at 28–29), is the only factor not discussed as slating processes are not readily apparent in DeSoto Parish.

recently freed black population.”<sup>6</sup> DeSoto Parish became an epicenter of racial violence in Louisiana during this period, with numerous documented lynchings and a record-breaking murder rate.<sup>7</sup> “[S]waths of the white population, particularly veterans of the Civil War, waged an ongoing guerrilla war against Republican regimes and the mostly black electorate that supported them.”<sup>8</sup> When former Confederates and their heirs “failed to carry elections, they turned to extra-legal, often violent, devices.”<sup>9</sup> Jim Crow voter suppression mechanisms soon took hold in DeSoto Parish and across the State of Louisiana. Black voting rates “plummeted” across Louisiana from 130,334 to less than 5,320 in just two years at the end of the 1800s.<sup>10</sup> From Louisiana “pioneering the grandfather clause” to enforcing literacy tests and white-only primaries, Black voter disenfranchisement marked every contour of 20<sup>th</sup> century state history.<sup>11</sup>

Racial discrimination in voting continued through the turn of the 21<sup>st</sup> century, even as the Civil Rights Movement led to the passage of the Voting Rights Act in 1965 and new mechanisms to facilitate federal oversight and intervention. For example, in 1994, the U.S. Department of Justice found that the DeSoto Parish School Board held sham public hearings on a map members had already settled on.<sup>12</sup> In 2002, the Department again faulted the School Board, rejecting a map that reduced the number of Black-majority districts from five to four, and asserting that the Parish had not met its burden to prove the plan was enacted with “neither a discriminatory purpose nor a

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<sup>6</sup> Mark Leon De Vries, *Between Equal Justice and Racial Terror: Freedpeople and the District Court of DeSoto Parish During Reconstruction*, 56 J. La. Hist. Ass’n 261, 262 (2015).

<sup>7</sup> See, e.g., *id.* at 262–63. See also Equal Just. Initiative, *Lynching in America: Confronting the Legacy of Racial Terror, County Data Supplement 8* (2022), [bit.ly/EJIDataJan22](https://bit.ly/EJIDataJan22) (recording multiple lynchings of Black people in the small Parish between 1877 and 1950).

<sup>8</sup> Leon De Vries, *supra* note 6, at 263.

<sup>9</sup> *Id.* at 264.

<sup>10</sup> Preliminary Expert Report of Dr. R. Blakeslee Gilpin at 29, *Robinson v. Ardoin*, No. 3:22-cv-00211-SDD-SDJ (M.D. La. Apr. 15, 2022), ECF No. 41-3 (“Gilpin Report”).

<sup>11</sup> *Id.* at 21.

<sup>12</sup> Letter from Deval L. Patrick, Assistant Att’y Gen., C.R. Div., U.S. Dep’t of Just., to Walter Lee, Superintendent of DeSoto Schs. (Apr. 25, 1994).

discriminatory effect.”<sup>13</sup> The Supreme Court’s 2013 *Shelby County v. Holder* decision, 570 U.S. 529 (2013), which undermined the federal government’s ability to intervene before the enactment of discriminatory maps or other voting policies, further unleashed a wave of suppression attempts across the jurisdictions previously subject to the VRA’s “preclearance” process—including DeSoto Parish.<sup>14</sup>

As courts have acknowledged, racial discrimination in voting persists today from “modern day practices such as restricting access to polling places, restrictions on early voting, and limited mail voting.”<sup>15</sup> These systems are present in DeSoto. For example, many DeSoto voters are subject to limits on mail voting eligibility, which was only temporarily expanded for high-vulnerability voters by court order during the peak of the COVID-19 pandemic that disproportionately plagued Black communities. *Harding v. Edwards*, 487 F. Supp. 3d 498 (M.D. La. 2020). In ordering the temporary expansion of early voting days and absentee-by-mail qualifications, the Court then noted the “significant evidence that the Virus, and therefore the need to vote in person, impose[d] a disproportionate burden on Black voters in Louisiana.” *Id.* at 520 n.156. Intimidation tactics targeting Black DeSoto community members also persist today. In a recent report submitted to the U.S. House Committee on the Judiciary, a Black voter in DeSoto Parish described her “disturbing” and “extremely intimidating” experience at a polling site when she, her mother, and an older Black gentleman were loudly confronted by a white man who identified himself as an “investigator.”<sup>16</sup> The man reprimanded her for telling the older man, who was a new voter, about his rights at the polls and then suggested, improperly, that she could not discuss such things.<sup>17</sup> The voter noted the

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<sup>13</sup> Objection Letter 2002-2926 (DeSoto Parish School District (DeSoto Parish)), *supra* note 3.

<sup>14</sup> Caren E. Short, Rachel Knowles, & Liza Weisberg, S. Poverty L. Ctr., *Fight For Representation: Louisiana’s Pervasive Record of Racial Discrimination in Voting, the Steadfast Louisianans Who Battle Onward, & the Urgent Need to Restore the Voting Rights Act* 28–84 (2021), [bit.ly/SPLC2021Report](https://bit.ly/SPLC2021Report).

<sup>15</sup> See, e.g., *Robinson v. Ardoin*, 605 F. Supp. 3d 759, 846–48 (M.D. La. 2022).

<sup>16</sup> Short, Knowle & Weisberg, *Fight for Representation*, *supra* note 14, at 77.

<sup>17</sup> *Id.*

deterrent effects intimidation efforts like these have on Black DeSoto residents, stating, “In my community, there are a number of people, like my mother, who are afraid to go to their polling place alone, and who are concerned that there may be people at the polling place who will try to keep them from voting.”<sup>18</sup> Citing “evidence of Louisiana’s long and ongoing history of voting-related discrimination,” the Middle District of Louisiana recently found there can be “no sincere dispute regarding Senate Factor 1.”<sup>19</sup> The same is true here: Senate Factor 1 is met.

**Senate Factor 2: Extent of Racially Polarized Voting.** Senate Factor 2 investigates “the extent to which voting in the elections of the state or political subdivision is racially polarized.” *Gingles*, 478 U.S. at 37 (quoting Senate Report at 28–29). Based on Dr. Handley’s analysis, there can be no doubt as to the presence of this factor in DeSoto Parish. Voting has been and remains severely polarized along racial lines in DeSoto Parish today. *See* Ex. 2. Senate Factor 2 is met.

**Senate Factor 3: Voting Discrimination Enhancing Factors.** Senate Factor 3 measures “the extent to which the state or political subdivision has used unusually large election districts, majority vote requirements, anti-single shot provisions, or other voting practices or procedures that may enhance the opportunity for discrimination against the minority group.” *Gingles*, 478 U.S. at 37 (quoting Senate Report at 28–29). Enhancing factors such as these are present in DeSoto Parish and throughout Louisiana. For example, the open primary and runoff system necessitates that candidates win a majority rather than plurality vote share to succeed.<sup>20</sup> This means even when their preferred candidates receive the most votes, Black voters cannot effectively determine the outcomes of at-large or district races where they do not constitute a majority population, as in

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<sup>18</sup> *Id.*

<sup>19</sup> *Robinson v. Ardoin*, 605 F. Supp. 3d 759, 848 (M.D. La. 2022), *cert. granted before judgment*, 213 L. Ed. 2d 1107, 142 S. Ct. 2892 (2022), and *cert. dismissed as improvidently granted sub nom. Ardoin v. Robinson*, No. 21-1596, 2023 WL 4163160 (Sup. Ct. June 26, 2023).

<sup>20</sup> Expert Report of Allan J. Lichtman at 33–35, *Robinson v. Ardoin*, No. 3:22-cv-00178-SDD-SDJ (M.D. La. Apr. 15, 2022) (“Lichtman Report”).

DeSoto Parish, absent rare alignment with a sufficient number of white “crossover” voters. Because of evidence like this, Senate Factor 3 is met.

**Senate Factor 5: Discrimination in Other Areas of Life.** Senate Factor 5 addresses “the extent to which minority group members bear the effects of discrimination in such areas as education, employment and health, which hinder their ability to participate effectively in the political process.” *Gingles*, 478 U.S. at 37 (quoting Senate Report at 28–29). DeSoto Parish exhibits stark disparities across these measures.<sup>21</sup>

Black DeSoto community members conspicuously bear the effects of discrimination in education. The DeSoto Parish school system is marked by a legacy of segregation and, to this day, is subject to federal court monitoring under desegregation litigation filed in 1967 by the U.S. Department of Justice.<sup>22</sup> This history has ongoing effects. According to American Community Survey (“ACS”) estimates, white people in DeSoto over 25 years of age are more than twice as likely to have at least a high school diploma than Black residents—11.6 percent of white residents have less than a high school education, compared to 27.1 percent of Black adults in DeSoto. Ex. 1 ¶ 53; Ex. E to Ex. 1 at 21-22. Representation for Black voters on the DeSoto Parish School Board also consistently necessitated federal intervention.<sup>23</sup> More recently, there have also been lawsuits threatened regarding racial discrimination in hiring and employee treatment in the school system.<sup>24</sup>

With respect to employment, *Amici* NAACP has received decades of complaints regarding racially-biased hiring and practices in the DeSoto Parish school system, including failures to hire

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<sup>21</sup> See, e.g., Kristen Lewis, Measure of Am., *The Measure of America Series: A Portrait of Louisiana 2020, Human Development in an Age of Uncertainty* 29–30 (2020), [bit.ly/LewisRep2020](https://bit.ly/LewisRep2020).

<sup>22</sup> See *United States v. DeSoto Par. Sch. Bd.*, No 5:67-cv-12589 (W.D. La. filed Jan. 17, 1967).

<sup>23</sup> See, e.g., Letter from Deval L. Patrick, Assistant Att’y Gen., C.R. Div., Dep’t of Just., to Walter Lee, Superintendent of DeSoto Schs. (Apr. 25, 1994); Objection Letter 2002-2926 (DeSoto Parish School District (DeSoto Parish)), *supra* note 3.

<sup>24</sup> Lynn Vance, *De Soto Parish NAACP Accuses School District of Racially Biased Hiring and Personnel Practices*, KTAL (Sept. 2, 2021), [bit.ly/KTAL2021](https://bit.ly/KTAL2021).

and promote Black teachers and inequitable discipline and retaliation against Black employees.<sup>25</sup> These accusations are particularly concerning given the school system is the third-largest employer in the Parish.<sup>26</sup> The effects of discrimination are evident in employment figures in DeSoto Parish, which are also wrought with racial inequities. According to ACS estimates, per capita income over a twelve-month period among Black DeSoto residents is less than half that of white residents—\$15,623 compared to \$34,273. Ex. E to Ex. 1 at 39-40. Unemployment rates are also highly disparate, with Black DeSoto residents ages 16 to 64 reporting rates of joblessness over four times as high as white residents. *Id.* ¶ 53; Ex. E to Ex. 1, at 51-52. Black DeSoto residents, 16 years and older, are less likely to have access to full-time, year-round work and more likely to have less than full-time earnings or no earnings at all compared to white residents in the span of 12 months. Ex. E to Ex. 1 at 44. Finally, Black adults are more likely to experience disabilities than white adults in DeSoto Parish, and are less likely to have access to health insurance. Ex. E to Ex. 1 at 61-62. The quantitative ACS estimate data, expanded upon in Mr. Cooper’s Report, see Ex. 1 ¶ 53 & Ex. E, and qualitative accounts above make clear that Senate Factor 5 is met.

**Senate Factor 6: Racial Campaign Appeals.** Senate Factor 6 investigates “whether political campaigns have been characterized by overt or subtle racial appeals.” *Gingles*, 478 U.S. at 37 (quoting Senate Report at 28–29). Both implicit and explicit appeals evoking racial animus and stereotypes have pervaded political messaging for generations across Louisiana.<sup>27</sup> In recent years, opposing candidates have attacked Black voters’ candidates of choice by evoking tropes of

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<sup>25</sup> Vance, *supra* note 24.

<sup>26</sup> N. La. Econ. Partnership, *Leading Employers in DeSoto Parish*, [bit.ly/NLEPDeSoto](https://bit.ly/NLEPDeSoto) (last visited July 3, 2023) (citing “NLEP Employers surveys; Louisiana Economic Development - Info for Partners and Allies (2016)”).

<sup>27</sup> See generally Expert Report of Dr. Traci Burch at 22–25, *Robinson v. Ardoin*, No. 3:22-cv-00211-SDD-SDJ (M.D. La. Apr. 15, 2022), ECF No. 41-3 (hereinafter “Burch Report”) (“Implicit racial appeals make racial attitudes and concerns more salient in the minds of voters, even without explicitly mentioning or referring to a particular race or group. Implicit racial appeals may rely on certain code words or issues, use images of Black exemplars, or a combination of both, to make race more salient to voters.”) (Internal citations omitted). See also Lichtman Report.

Black criminality through their campaign messages and imagery.<sup>28</sup> These messages were echoed in DeSoto Parish Sheriff Jayson Richardson’s recent endorsement of gubernatorial candidate Jeff Landry, citing the need to “fix the crime problem in our state” and “prioritize the law abiding citizens.”<sup>29</sup> Notably, Landry’s own record of evoking racialized attitudes includes accusing Black Lives Matter protesters of being “armed thugs.”<sup>30</sup> As racial appeals saturate political discourse in DeSoto Parish, Senate Factor 6 is met.

**Senate Factor 7: Black Candidates’ Representation in Elected Office.** Senate Factor 7 measures “the extent to which members of the minority group have been elected to public office in the jurisdiction.” *Gingles*, 478 U.S. at 37 (quoting Senate Report at 28–29). In every statewide election reviewed by Dr. Handley, the candidate of choice of DeSoto Parish’s Black voters lost the Parish. No Black person has been elected to a statewide office in Louisiana since Reconstruction.<sup>31</sup> There is not one Black elected official serving in the Parish now in at-large position or in any Police Jury district that is not majority-Black.<sup>32</sup> Senate Factor 7 is met.

**Senate Factor 8: Responsiveness of Elected Officials.** Senate Factor 8 concerns whether there is a lack of responsiveness from elected officials to the unique needs of minority group members in the jurisdiction. *Gingles*, 478 U.S. at 37 (citing Senate Report at 28–29). In DeSoto Parish, the unique concerns of Black community have been conspicuously neglected by Parish

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<sup>28</sup> Burch Report, *supra* note 27, at 22–25.

<sup>29</sup> The Hayride, *Landry’s Picking Up Endorsements from Sheriffs and DA’s; Clancy DuBos Hardest Hit* (May 31, 2023), [bit.ly/Hayride2023](https://bit.ly/Hayride2023). Of note, Sheriff Richardson’s tenure as Sheriff has also been marked by major accusations of racialized violence—in 2019, Sheriff’s deputies under Richardson’s charge “punched a Black man so brutally . . . they broke his nose and left eye socket,” sparking later civil litigation from the ACLU of Louisiana. See *ACLU Lawsuit: Louisiana Deputies Punched Black Man in 2019*, Associated Press (Sept. 30, 2021), [bit.ly/APress2021](https://bit.ly/APress2021).

<sup>30</sup> Wesley Muller, *Attorney General Jeff Landry Declines to Join Other AGs in Singling Out U.S. Capitol Attack for Condemnation*, La. Illuminator (Jan. 14, 2021), [bit.ly/Illumin2021](https://bit.ly/Illumin2021).

<sup>31</sup> See, e.g., Debo P. Adegbile, *Voting Rights in Louisiana: 1982–2006*, 17 S. Cal. Rev. L. & Soc. Just. 413, 461 (2008) (citing *Clark v. Edwards*, 725 F. Supp. 285 (M.D. La. 1988)).

<sup>32</sup> See La. Sec’y of State, *Elected Officials, By Parish, De Soto – 16*, [voterportal.sos.la.gov/electedofficials](https://voterportal.sos.la.gov/electedofficials) (last visited July 2, 2023).

leadership. In addition to the underlying policy considerations that perpetuate social and economic disparities discussed above regarding Senate Factor 5, qualitative evidence further supports this finding. For example, in 2020, northern neighboring Caddo Parish responded to calls from Black community members to remove a Confederate monument at the Parish courthouse.<sup>33</sup> Rather than similarly respecting the concerns of Black residents in DeSoto Parish,<sup>34</sup> leaders failed to intervene to prevent the statue from being relocated to Mansfield. Evidence like this supports a finding of Senate Factor 8 here.

**Senate Factor 9: Tenuousness of the Policy Justifications.** Senate Factor 9 addresses whether the policy underlying the state or political subdivision's use of the challenged standard, practice, or procedure is “tenuous.” *Gingles*, 478 U.S. at 37 (quoting Senate Report at 28–29). Throughout the map-drawing process and in this litigation, Plaintiffs, their experts, and legal representatives have made their intentions clear—to achieve a Police Jury map that dramatically reduces representation for Black voters, forsaking other redistricting criteria and compliance with the VRA. *See, e.g.*, Am. Compl., ECF No. 8, at 10–11; Pls.’ Ex. 5, ECF No. 10-7; Pls.’ Ex. 6, ECF No. 10-7. There is no valid policy rationale that would justify such a map. Nevertheless, Plaintiffs attempt to justify this baldly discriminatory goal by suggesting that population shifts and avoiding precinct and municipal splits necessitate drawing fewer majority-Black districts. *See id.* at ¶¶ 58–90. The tenuousness of these justifications is evident from the fact that, as discussed above, it is possible to enact a map with five majority-Black districts that balances the population, splits only Mansfield, and has fewer precinct splits than any recent map adopted by the Parish. When

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<sup>33</sup> Deborah Bayliss, *Caddo Parish Confederate Monument to be Moved to DeSoto Parish*, Shreveport Times (Sept. 12, 2020), [bit.ly/ShreveTimes2020](https://www.shreveporttimes.com/story/news/local/2020/09/12/caddo-parish-confederate-monument-to-be-moved-desoto-parish/). Notably, Plaintiffs’ expert, Dr. Gary Joiner, was a vocal opponent of the relocations of the monument, advocating that the calls of Black Shreveport residents should be ignored, and the statue should remain at the courthouse. *See, e.g.*, Sarah Crawford, *Divided Caddo Panel Picks Compromise for Confederate Monument*, Shreveport Times (Aug. 11, 2017), [bit.ly/ShreveTimes2017](https://www.shreveporttimes.com/story/news/local/2017/08/11/divided-caddo-panel-picks-compromise-for-confederate-monument/).

<sup>34</sup> Destinee Patterson, *Caddo’s Confederate Statue to Be Moved to DeSoto Parish*, KSLA (Sept. 12, 2020), <https://www.ksla.com/2020/09/12/caddo-parish-confederate-monument-be-moved-desoto-parish/>.

Plaintiffs' expert, Dr. Joiner, offered a map during the redistricting process that purportedly addressed these policy considerations, Juror Gerri Burrell noted Dr. Joiner's attention to keeping subcommunities whole where white voters benefitted, while neglecting similar care for DeSoto's Black communities. Pls.' Ex. 3, ECF No. 10-5, at 7. Had the Police Jury relied on these policy assertions to justify a map that eliminated as many as two or three majority-Black districts out of five, Senate Factor 9 would be easily satisfied.

**4. Plaintiffs' Failure to Account for the Parish's Need to Comply with Voting Rights Act Precludes a Finding that They are Likely to Prevail.**

Even assuming the Plaintiffs can establish that race predominated in the development of the Adopted Plan (which, for the reasons explained by the Parish and elaborated on below, they cannot), the Police Jury did not violate the Fourteenth Amendment. As Plaintiffs acknowledge, compliance with the VRA is a compelling interest sufficient to justify race-based line drawing. *See Milligan*, 143 S. Ct. at 1516–17 (“under certain circumstances, [the Court] ha[s] authorized race-based redistricting as a remedy for state districting maps that violate § 2”); *Shaw v. Hunt*, 517 U.S. 899, 909–910 (1996) (same); *see* Mem. in Supp. of Pls' Am. Mot. for Prelim. Inj., ECF No. 10-1, at 32 (“Pls.' Mem.”). As explained above, Section 2 requires the preservation of five majority-Black districts in the Police Jury plan. The Adopted Plan protects those districts without using race more than necessary. As Defendants explain, most of Mr. Hefner's line-drawing decisions were made to balance the population or to protect incumbents. Defs.' Opp., ECF No. 32, at 16–22. To the extent race was a factor, Plaintiffs have pointed to no evidence that Mr. Hefner chose an arbitrary racial target for the majority-Black districts. *See, e.g., Ala. Black Legis. Caucus v. Alabama*, 575 U.S. 254, 267 (2015) (prohibiting targets higher than are necessary to satisfy the VRA). In fact, the Adopted Plan reduces the BVAP in the majority-Black districts from the levels in the 2011 plan. *See* Pls.' Ex. 12, ECF No. 10-14, at 8. Thus, the Adopted Plan is narrowly tailored

to avoid a violation of Section 2, and Plaintiffs are not likely to succeed on their racial gerrymandering claim.

There is a second reason the need for VRA compliance precludes Plaintiffs from demonstrating a likelihood of success on the merits: They have not and cannot articulate any lawful remedy for their claims. Plaintiffs have made clear that the harm they allegedly suffer is a consequence of the Parish’s decision to draw five majority-Black districts, and their goal is to eliminate as many as three of those districts. *See, e.g.*, Am. Compl. ¶ 96 (Plaintiffs’ harm is the result of the Police Jury’s decision to “preserv[e] these five majority-Black districts[.]”); Pls.’ Mem. at 21 (describing plan to “divid[e] Mansfield between just two police jury districts rather than five”). But as detailed above, Plaintiffs’ desired goal of eliminating existing majority-Black districts would violate Section 2. Plaintiffs have not shown—and cannot show—they are entitled to the relief they seek because their desired remedy is barred by Section 2.

**B. Plaintiffs Do Not Have a Likelihood of Success on the Merits Because Race Need Not and Did Not Predominate in the Creation of Five Majority-Black Districts.**

In support of their motion, Plaintiffs point to what they call direct and circumstantial evidence of racial predominance in the Adopted Plan district lines. First, they argue that statements by parish demographer Mr. Hefner that he sought to maintain five majority-Black districts constitute “*prima facie* evidence of predominant racial intent.” Pls.’ Mem. at 19. Second, they cite what they describe as departures from traditional district criteria that can only be explained by race. Neither form of purported evidence is enough to show a likelihood of success on the merits.

With respect to the acknowledged goal of maintaining Black electoral opportunity, contrary to Plaintiffs’ argument, consciousness of race in devising a map does not automatically show racial predominance. *See North Carolina v. Covington*, 138 S. Ct. 2548, 2554 (2018) (“[T]his Court has long recognized the distinction between being aware of racial considerations and being motivated

by them.”) (cleaned up). Race may be considered along with other redistricting criteria without becoming the predominant factor. *See Covington*, 138 S. Ct. at 2554; *Shaw v. Hunt*, 509 U.S. 899, 646 (1996) (“race consciousness does not lead inevitably to impermissible race discrimination”); *Chen v. City of Houston*, 206 F.3d 502, 514 (5th Cir. 2000) (“[T]he mere presence of race in the mix of decision making factors, and even the desire to craft majority-minority districts, does not alone automatically trigger strict scrutiny.”). Indeed, even the deliberate creation of majority-minority districts is not *per se* evidence of racial predominance. *Bush v. Vera*, 517 U.S. 952, 958 (1996) (plurality opinion) (“Strict scrutiny does not apply merely because redistricting is performed with consciousness of race.... Nor does it apply to all cases of intentional creation of majority-minority districts.”). Thus, racial predominance cannot be presumed simply because a majority-minority district is drawn for the purpose of complying with the VRA. *Theriot v. Par. of Jefferson*, 185 F.3d 477, 488 (5th Cir. 1999) (“Issues of race were relevant, inasmuch as the Parish Council was directed to remedy a Section 2 violation, yet did not predominate.”); *accord Milligan*, 146 S. Ct. at 1512 n.7 (“The very reason a plaintiff adduces a map at the first step of *Gingles* is precisely because of its racial composition—that is, because it creates an additional majority-minority district that does not then exist.”). In sum, the racial predominance inquiry is not a test to be applied mechanically to a single fact, as Plaintiffs would have it, but requires a “holistic” analysis of all the relevant facts. *See Bethune-Hill v. Va. State Bd. of Elections*, 580 U.S. 178, 192 (2017).

Here, as the Parish has explained, maintaining existing majority-Black districts was one consideration among many, along with avoiding incumbent pairings (for all incumbents, not only Black incumbents, as Plaintiffs assert, *e.g.*, Pls.’ Mem. at 16, 18), maintaining the cores of prior districts to avoid a complete reconfiguration of the map, and balancing the population to

constitutional standards. Pls.’ Ex. 2, ECF No. 10-4, at 12 (statement of M. Hefner). Thus, the mere fact that the Police Jury sought to preserve its existing majority-Black districts—even if they stated that goal repeatedly—is insufficient to establish that the Adopted Plan is a racial gerrymander.

Plaintiffs’ contention that circumstantial evidence gives rise to an inference of racial predominance fares no better. Plaintiffs identify four ways in which, according to them, the Adopted Plan departs from traditional redistricting principles: the deviation in population among districts, the splitting of precincts purportedly on racial lines, the allegedly irregular shapes of the districts, and the splitting of certain municipalities in predominantly white parts of the Parish. At the outset, it must be observed that, as the illustrative plan offered by *Amici* demonstrates, it is possible to create a DeSoto Police Jury plan that includes five majority-Black districts and adheres to traditional redistricting principles in the ways Plaintiffs say the Adopted Plan does not. For example, Mr. Cooper’s plan does not split any of the towns or municipalities that Plaintiffs claim the Police Jury split for racial reasons. Ex. 1 ¶¶ 39–44 & Ex. D-4. Likewise, in Mr. Cooper’s plan, two of the five majority-Black districts are overpopulated, with one of them, District 4B, the most overpopulated district in the plan, while three of the six majority-white districts are underpopulated, with one of them, District 1A, the most underpopulated district in the plan. *Id.* ¶ 49 & Fig. 10. Mr. Cooper’s plan splits fewer precincts than either the Adopted Plan or the 2011 benchmark. *Id.* ¶ 52 & Fig. 12. Given that the departures from traditional redistricting principles in specific district lines highlighted by Plaintiffs were not necessary to achieve the Police Jury’s goal of maintaining the existing majority-Black districts, it would be dubious at best to infer from that race drove those departures or that race was the predominant factor in how each of those lines was drawn. It would be equally or more plausible to infer those departures were made for other reasons. See, e.g., Ex. 1 ¶¶ 43–44.

Additionally, the portions of the record Plaintiffs cite to support their claim that these line-drawing choices were race-based do not support their conclusions. For example, Plaintiffs point to a discussion of the boundaries in the northern part of the Parish as evidence that the decision to overpopulate those districts was race-based. *See* Pls.’ Mem. at 20 (citing Pls.’ Ex. 12, at 5–9). But as that discussion makes clear, the issue Mr. Hefner faced was the size of census blocks in that area, not their racial composition. Mr. Hefner explained that many census blocks in the northern part of the Parish have a population greater than the allowable deviation. Pls.’ Ex. 12, ECF No. 10-14, at 5–6 (observing that the census block Juror Kennington lives in has “814 people in it. That’s almost three times the – what your deviation allowances are,” and that moving “just that one block right there [in Juror Baker’s district] totally threw him off into double digits deviation.”).

Next, Plaintiffs assert that the precinct splits in the Adopted Plan are only explainable by race. But as Mr. Cooper explains, some precincts must be split to satisfy the population equality requirement, and compared to the benchmark 2011 plan, the Adopted Plan is not an outlier in the number of precincts split. Ex. 1 ¶ 43. Moreover, all of the VTD splits Plaintiffs identify are in or around Mansfield and divide population among the five majority-Black districts. Plaintiffs’ assertion that those splits were intended to carve white population out of majority-Black districts makes no sense. Take VTD 26, which Plaintiffs discuss in detail. Pls.’ Mem. at 27–28. Plaintiffs assert that the majority of VTD 26 north of Interstate 49 was carved off into VTD 26A, but a portion of the northern part of the VTD is retained and connected by a thread to the rest of VTD 26. This, the Plaintiffs assert, was done “to create a higher Black VAP VTD 26 that was then added to [majority-Black] District 4-A.” *Id.* at 27. There are two flaws in that claim: First, as Mr. Cooper explains, the portion of VTD 26 north of Interstate 49 is not majority Black so retaining it with the rest of VTD 26 has the net effect of *lowering* that VTD’s Black population. Second, VTD 26A, the

part that was carved out supposedly to increase VTD 26's Black VAP, was itself added to majority-Black District 6. *Id.* It is difficult to see how this supposedly surgical separation of voters by race served to maintain majority-Black districts rather than simple balance populations.

Finally, Plaintiffs assert that the shapes of the districts are unusual and only explainable by race. However, the Adopted Plan largely follows the outlines of the 2011 plan it replaces. For example, Plaintiffs complain that Mr. Hefner drew "District 6 to surround District 4-C on three sides," *Id.* at 31, but District 6 surrounded District 4-C on three sides in the 2011 map as well. This includes the feature of the plan that the Plaintiffs appear to find the most galling: that five districts extend out from the City of Mansfield. Those same five districts also include parts of Mansfield in the 2011 plan. Ex. B-4 to Ex. 1. Moreover, Plaintiffs make no attempt to argue that the 2011 district lines were unlawfully drawn with race as the predominant factor.

Plaintiffs also complain of what they call "tendrils," which they acknowledge keep current incumbent jurors in separate districts. Plaintiffs suggest this was done "to ensure that no African-American incumbents were forced to run against each other," Pls.' Mem. at 26, but in fact, the Adopted Plan pairs *no* incumbents, Black *or* white. So long as the Parish has not allowed race to predominate in their district lines or violated the VRA, they are free to adhere to the prior lines to avoid incumbent pairings while ensuring compliance with the "one person, one vote" principle. *See Theriot*, 185 F.3d at 484 (affirming finding that race did not predominate where "incumbency protection, maintaining communities of interest, addressing one-person, one-vote concerns and natural geographic conditions predominated in drawing District 3"); *accord Bush v. Vera*, 517 U.S. 952 (plurality opinion) ("In some circumstances, incumbency protection might explain as well as, or better than, race a State's decision to depart from other traditional districting principles, such as compactness, in the drawing of bizarre district lines.").

In sum, as Mr. Hefner explained and Mr. Cooper confirms, maintaining the existing majority-Black districts is easily accomplished while adhering to traditional redistricting principles. While race may be one consideration among many in the Adopted Plan, as the Constitution permits even without a compelling interest, it was not the predominant factor.

**C. The Harm to Black Voters That Will Result if Section 2 Is Violated Outweighs the Threatened Injury from the Alleged Racial Gerrymandering.**

Plaintiffs cannot meet their burden of demonstrating that the threatened injury if the injunction is denied outweighs any harm that will result if the injunction is granted. Even if Plaintiffs suffer some harm due to their allegations concerning DeSoto Parish’s map, such harm is, as a matter of law, outweighed by the harm that threatens DeSoto Parish’s Black voters—unlawful racial vote dilution prohibited by Section 2—if Plaintiffs are granted their desired relief. By “authoriz[ing] race-based redistricting as a remedy for state districting maps that violate § 2,” *Milligan*, 143 S. Ct at 1516–17, the Supreme Court has made clear that vote dilution harms prohibited under Section 2 of the VRA outweigh the types of harms arising from racial gerrymandering prohibited under the Equal Protection Clause.

**D. Plaintiffs’ Motion Will Disserve the Public Interest Because It Risks Violating the Rights of DeSoto Parish’s Black Voters Under Section 2.**

Plaintiffs also cannot meet their burden of demonstrating that the grant of an injunction is in the public interest, because granting a preliminary injunction would expose DeSoto Parish’s Black voters to an unacceptable risk of unlawful racial vote dilution under Section 2, in clear violation of the public interest. The public policy goal of combatting racial discrimination in voting, as enshrined in Section 2, is fundamentally tied to our nation’s history and remains a potent and relevant force today. As explained by the Supreme Court most recently in the *Milligan* opinion, the importance of ensuring compliance with Section 2 cannot be overstated as part of the ongoing work “to forever ‘banish the blight of racial discrimination in voting.’” 143 S. Ct. at 1499 (citing

*South Carolina v. Katzenbach*, 383 U.S. 301, 308 (1966)) Given the vital importance of Section 2 compliance, and the clear risk that Plaintiffs' desired relief will violate Section 2, Plaintiffs cannot meet their burden of establishing that the grant of an injunction will not disserve the public interest.

**II. If Plaintiffs' Motion Is Granted, a Remedial Map Must Comply with Section 2.**

Plaintiffs fault the Parish for allegedly failing to take needed steps to determine what Section 2 requires. *See* Am. Compl. ¶ 33. Yet Plaintiffs now ask this Court to order the Parish to draw a map that complies with the Fourteenth Amendment but omit any directive to ensure compliance with Section 2. Such an omission cannot stand. If the Court orders any relief in this matter, it should require that the Parish perform an RPV analysis and adopt a map that complies with Section 2, consistent with guidance in *Gingles* and *Milligan*.

**CONCLUSION**

For the foregoing reasons, this Court should deny Plaintiffs' motion for preliminary injunction.

Dated: July 7, 2023

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 7, 2023, I presented the foregoing to the Clerk of the Court for filing and uploading to the CM/ECF system which will send notification of such filing to all counsel of record registered with the CM/ECF system.

*s/ Allison Jones*

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# EXHIBIT 1

UNITED STATES DISTRICT COURT WESTERN  
DISTRICT OF LOUISIANA SHREVEPORT  
DIVISION

DAVID B. MEANS, ET AL.

VERSUS

DESOTO PARISH, ET AL.

CIVIL ACTION NO. 5:23-cv-  
00669

JUDGE DAVID C. JOSEPH

MAGISTRATE JUDGE  
HORNSBY

**DECLARATION OF WILLIAM S. COOPER**

WILLIAM S. COOPER, acting in accordance with 28 U.S.C. § 1746, Federal Rule of Civil Procedure 26(a)(2)(B), and Federal Rules of Evidence 702 and 703, does hereby declare and say:

**I. INTRODUCTION**

1. My name is William S. Cooper. I have a B.A. in Economics from Davidson College. As a private consultant, I serve as a demographic and redistricting expert for the amici curiae in the above-captioned case.

**A. Redistricting Experience**

2. I have testified at trial as an expert witness on redistricting and demographics in federal courts in about 55 voting rights cases since the late 1980s.

Five of these lawsuits resulted in changes to statewide legislative boundaries:

*Rural West Tennessee African-American Affairs Council, Inc. v. McWherter,*

No. 92-cv-2407 (W.D. Tenn.); *Old Person v. Brown*, No. 96-cv-0004 (D. Mont.);

*Bone Shirt v. Hazeltine*, No. 01-cv-3032 (D.S.D.); *Alabama Legislative Black Caucus v. Alabama*, No. 12-cv-691 (M.D. Ala.), and *Thomas v. Reeves*, No. 18-cv-441 (S.D. Miss.). In *Bone Shirt v. Hazeltine*, the court adopted the remedial plan I developed.<sup>1</sup> Approximately 25 of those cases led to changes in local election district plans.

3. In 2022 and 2023, I have testified at trial as an expert witness in redistricting and demographics in seven cases challenging district boundaries under Section 2 of the Voting Rights Act: *Caster v. Merrill*, No. 21-1356-AMM (N.D. Ala.); *Pendergrass v. Raffensperger*, No. 21-05337-SCJ (N.D. Ga.); *Alpha Phi Alpha Fraternity v. Raffensperger*, No. 21-05339-SCJ (N.D. Ga.); *NAACP v Baltimore County*, No.21-cv-03232-LKG (Md.); *Christian Ministerial Alliance v. Hutchinson* No. 4:19-cv-402-JM (E.D. Ar.); *Robinson v Ardoin*, No. 3:22-cv-00211-SDD-SDJ (M.D. La.); and *Caroline County Branch of the NAACP v Town of DeSoto Parish*, No. 23-00484-SAG (Md.). During that same timeframe, I also testified at trial as an expert in demographics in *NAACP v. Lee*, No. 4:21cv187-MW/MAF (N.D. Fla.).

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<sup>1</sup> I have also served as an expert witness on demographics in trials relating to issues other than voting and redistricting. For example, in an April 2017 opinion in *Stout v. Jefferson County Board of Education* (No.2:65-cv-00396-MHH), a school desegregation case involving the City of Gardendale, Alabama, the court made extensive reference to my testimony.

In 2023, I testified at trial in a school desegregation case involving the St. Martin Parish School Board – *Thomas v. St. Martin Parish School Board* (No. 6:65-cv-11314 (W.D. La.).

4. I have served as a redistricting and demographics consultant or expert in several local-level voting cases in Louisiana. In 1993, I developed illustrative Police Jury plans for the parishes of East Carroll, Madison, West Feliciana, and Point Coupee.<sup>2</sup> In 1994 and 1995, I developed illustrative school board plans for the parishes of Bossier, East Carroll, West Carroll, and Iberville.<sup>3</sup> In 1996, I served as a *Gingles I* expert for the plaintiffs and developed an illustrative plan for the Town Council in St. Francisville.<sup>4</sup> In 1998, I developed an illustrative plan for the 23<sup>rd</sup> Judicial District.<sup>5</sup>

5. In 2005, I served as an expert for the plaintiffs and developed an illustrative plan for the school board in St. Landry Parish.<sup>6</sup> In the 2010 redistricting cycle, I served as the *Gingles I* expert for the plaintiffs in a Section 2 lawsuit involving the 32<sup>nd</sup> Judicial District in Terrebonne Parish.<sup>7</sup>

6. As noted above, I serve as the *Gingles I* expert for the *Galmon* plaintiffs in *Robinson v. Ardoin*.

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<sup>2</sup> *Rodney v. McKeithen*, No. 3:1992-CV-735 (M.D. La.).

<sup>3</sup> *Knight v. McKeithen*, No. 3:1994-cv-00848 (M.D. La.) and *Reno v. Bossier Parish School Board*, 528 U.S. 320 (2000).

<sup>4</sup> *Wilson v. St. Francisville*, No. 92-765 (M.D. La.).

<sup>5</sup> *Prejean v. Foster*, No. 02-31065 (5th Cir. 2003).

<sup>6</sup> *NAACP v. St. Landry Parish Police Jury, et al.*, VR-LA-0097, No. 6:03-CV-00610 (W.D. La.).

<sup>7</sup> *Terrebonne Parish NAACP v. Jindal*, No. 3:14-cv-00069 (M.D. La.).

7. For additional historical information on my testimony as an expert witness and experience preparing and assessing proposed redistricting maps for Section 2 litigation, a summary of my redistricting work is attached as **Exhibit A**.

**B. Purpose of Report**

8. The attorneys for the *amici* in this matter have asked me to determine whether, consistent with traditional redistricting principles, the African-American<sup>8</sup> population in DeSoto Parish is “sufficiently large and geographically compact”<sup>9</sup> to allow for five majority-Black districts in an 11-district Police Jury Plan.

9. In addition, the attorneys for the *amici* asked me to develop an illustrative plan that would reduce the number of split VTDs and split communities as reflected in Enacted Plan H Revised (“Enacted Plan”) adopted by the DeSoto Parish Police Jury.

**C. Methodology**

10. I used the Maptitude software program as well as data and shapefiles from the U.S. Census Bureau and DeSoto Parish. *Maptitude* is deployed by many local and state governing bodies across the country for redistricting and other types

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<sup>8</sup> In this declaration, “African-American” refers to persons who are single-race Black or Any Part Black (*i.e.*, persons of two or more races and some part Black), including Hispanic Black. In some instances (*e.g.*, for historical comparisons) numerical or percentage references identify single-race Black as “SR Black” and Any Part Black as “AP Black.” Unless noted otherwise, “Black” means AP Black. It is my understanding that following the U.S. Supreme Court decision in *Georgia v. Ashcroft*, 539 U.S. 461 (2003), the “Any Part” definition is an appropriate Census classification to use in most Section 2 cases.

<sup>9</sup> *Thornburg v. Gingles*, 478 U.S. 30, 50 (1986).

of demographic analysis. The *Maptitude* software processes electronic Census Bureau geographic file information in order to produce a map for display on a computer screen. The software also merges demographic data and street address information to match the relevant decennial Census geography.

11. For purposes of the *Gingles I* analysis in this declaration, I define majority-Black districts as those that are majority-Black voting age (“BVAP”). Unless indicated otherwise, I use the Any Part Black census definition when discussing the Black population in DeSoto Parish.

12. In addition, as part of the analysis in this declaration, I review historical and current demographics reported in the decennial census published by the U.S. Census Bureau, as well as socioeconomic characteristics (reflecting communities of interest) reported in the American Community Survey (“ACS”) for African Americans and non-Hispanic Whites.<sup>10</sup>

13. In addition, I reviewed the May 2023 *Amended Complaint* filed by the Plaintiffs’ attorneys and a report prepared by Dr. Gary Joiner on behalf of the Plaintiffs.

14. The *amici* attorneys gave me a shapefile depicting the Enacted Plan and a spreadsheet identifying the addresses of the incumbent Police Jurors. The *amici* attorneys also gave me maps of the Enacted Plan and population summaries

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<sup>10</sup> In this report, “Latino” and “Hispanic” are synonymous. References to “non-Hispanic White” are abbreviated as “NH White” or “White”.

of Plan H prepared by Mr. Michael Hefner (redistricting consultant to the DeSoto Parish Police Jury).

15. I did not have access to shapefiles depicting plans prepared by Mr. Hefner other than the Enacted Plan. I did not have access to plans (disclosed or undisclosed) prepared by Dr. Joiner. I also did not have access to a shapefile for the new 2023 precinct boundaries. I rely on the 2020 VTDs as defined by the U.S. Census Bureau.

**D. Expert Summary Conclusions**

16. The Black population in DeSoto Parish is sufficiently numerous and geographically compact to allow for five majority-Black Police Jury districts, consistent with traditional redistricting principles and *Gingles I*.

17. As I explain *infra*, the *amici* Illustrative Plan that I have prepared is superior to the Enacted Plan across almost every metric that one could apply to local redistricting plans. Other district configurations, with similar metrics, would also contain five majority-Black districts.

18. I drew the Illustrative Plan based on traditional redistricting principles, including population equality, compactness, contiguity, respect for communities of interest, and the non-dilution of minority voting strength. I also took into account incumbent residences in order to avoid conflicts with district assignments.

19. In the *Amended Complaint*, the attorneys for the Plaintiffs misrepresent the demographic reality of DeSoto Parish. There is absolutely no need to systematically under-populate all five majority-Black districts in order to ensure that each majority-Black district is barely over 50% BVAP as the attorneys for the Plaintiffs imply in the *Amended Complaint*.

20. The Plaintiffs' under-population argument appears to rest on major calculation errors with respect to BVAP in a population table of the *Amended Complaint* (§65) and in Dr. Joiner's report (§44). Dr. Joiner erroneously calculated BVAP percentages, using Black population (all ages) in the denominator rather than Black voting age population. I report the correct figures in Figure 7 *infra*. With the correct figures, all five of the districts In the Enacted Plan have Black voting age populations in the 60% range. Given that level of Black voting age population, there would be no reason to systematically under-populate majority-Black districts to maintain a BVAP over 50%.

21. The Plaintiffs have failed to put forth an alternative plan that would comply with traditional redistricting principles – including the non-dilution of minority voting strength – even though they have had months to do so.

**E. Organization of Report**

22. The remainder of this declaration is organized as follows: **Section II** reviews parish population demographics from 2000 to 2020. **Section III** reviews

the Benchmark 2011 Plan. **Section IV** reviews the Enacted Plan. **Section V** presents a *Gingles I* Police Jury Plan based on the 2020 Census, containing five majority-Black districts. **Section VI** discusses charts and data summaries that I produced (from the American Community Survey published by the U.S. Census Bureau) – documenting socioeconomic disparities by race in DeSoto Parish.

**II. DEMOGRAPHIC PROFILE OF DESOTO PARISH**

**A. Decennial Census – 2000 to 2020**

23. The table in **Figure 1** presents the population of DeSoto Parish by race and ethnicity for the decennial censuses between 2000 and 2020. According to the 2020 Census, non-Hispanic Whites (“NH White”) comprise 56.4% of the population in Desoto Parish. African Americans are the next largest racial/ethnic category, representing 37.2% of the population.

**Figure 1: DeSoto Parish – 2000 to 2020 Census  
Population by Race and Ethnicity**

<b>All Ages</b>	<b>2000</b>	<b>% of Total Pop.</b>	<b>2010</b>	<b>% of Total Pop</b>	<b>2020</b>	<b>% of Total Pop.</b>	<b>Pop. Change 2000-2020</b>	<b>Pop. Change 2010-2020</b>
Total Population	25,494	100.00%	26,656	100.00%	26,812	100.00%	1,318	156
NH White*	14,089	55.26%	15,092	56.62%	15,122	56.40%	1,033	30
Total Minority Pop.	11,405	44.74%	11,564	43.38%	11,690	43.60%	285	126
Latino	396	1.55%	661	2.48%	762	2.84%	366	101
Any Part Black	10,814	42.42%	10,600	39.77%	9,973	37.20%	-841	-627

\*Single-race, non-Hispanic

24. As shown in **Figure 1**, the Any Part Black (“AP Black”) percentage in DeSoto Parish dropped from 42.42% in 2000 to 37.2% in 2020.<sup>11</sup> But the overall minority population held relatively constant — 44.74% in 2000 and 43.38% in 2020, bolstered by growth in the Latino population. The NH White population climbed slightly from 55.3% in 2000 to 56.6% in 2020.

25. Since 2010, the NH White population in DeSoto Parish has remained virtually unchanged – up by 30 persons. Over the course of the decade, the Black population fell by 622 persons. Overall, the minority population grew by 126 persons.

26. As shown in **Figure 2**, 2020 voting age and citizen voting age estimates (based on the 5-year 2017-21 ACS), generally track the overall population percentages.

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<sup>11</sup> In this declaration, “African American” or “Black” refers to persons who are Any Part Black (*i.e.*, persons of one or more races that are some part Black), including Hispanic Black, unless otherwise specified. It is my understanding that following the U.S. Supreme Court decision in *Georgia v. Ashcroft*, 539 U.S. 461 (2003), the “Any Part” definition is the appropriate Census classification to use in Section 2 cases.

**Figure 2: DeSoto Parish – Voting Age and Citizen Voting Age by Race and Ethnicity**

<b>Voting Age (VAP)</b>	<b>2020</b>	<b>% of VAP</b>	<b>% of Citizen VAP</b>
18+ Population	20,440	100%	100.0%
18+NH White*	11,802	57.74%	60.6%
18+ Minority Pop.	8,638	42.26%	39.4%
18+Latino	495	2.42%	2.3%
18+ Any Part Black	7,425	36.33%	NA
18 + NH DOJ Black*	7331	35.87%	35.0%

\* Includes persons who are NH SR Black plus of two races NH Black and NH White. Adding 2-race Black and Indigenous persons in the count yields 35.3%.

**B. 2010 to 2020 Population Change by Census Tract**

27. Beneath the stable overall population dynamics in DeSoto Parish since 2010, there has been a shift in population within the northwest quadrant of the Parish. This becomes apparent by comparing census tract<sup>12</sup> population change between 2010 and 2020.

28. The map in **Figure 3** illustrates that there was population growth in and around Stonewall between 2010 and 2020. (Bright green on the map identifies Stonewall area tract 950103 (up 1,493 persons since 2010 (+51%) and two adjacent tracts with modest growth. Pink to red shading depicts tract-level

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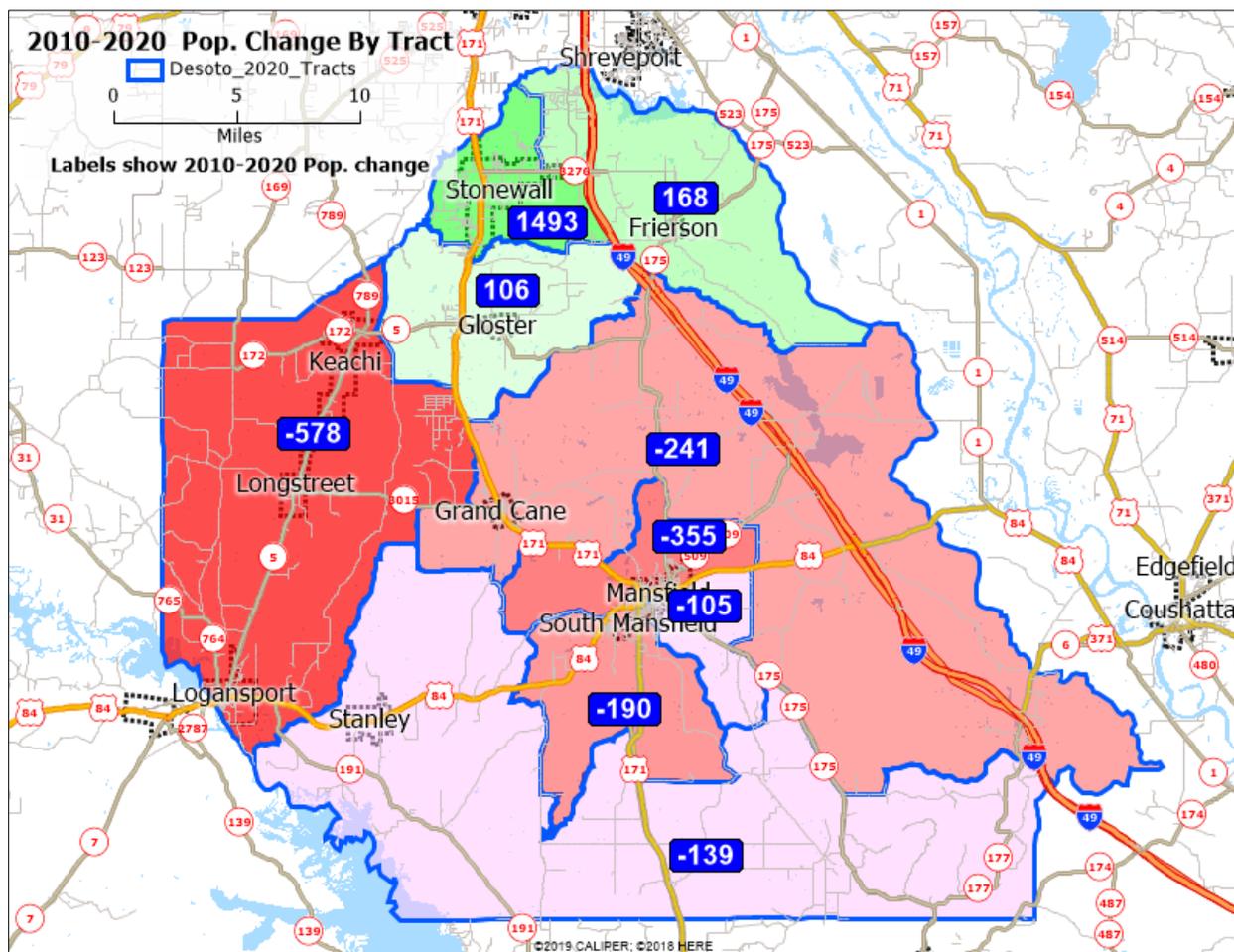
<sup>12</sup> “**Census Tracts** are small, relatively permanent statistical subdivisions of a county or statistically equivalent entity that can be updated by local participants prior to each decennial census.”

[https://www.census.gov/programs-surveys/geography/about/glossary.html#par\\_textimage\\_13](https://www.census.gov/programs-surveys/geography/about/glossary.html#par_textimage_13)

There were 11 tracts in DeSoto Parish under the 2010 Census. I merged 2010 census blocks into the corresponding 2020 Census tract boundaries...

population loss elsewhere. Labels show 2010 to 2020 population change. Growth in the northern section of the Parish means that population equating to about 75% of a single Police Jury district must be allocated to the Stonewall area compared to the population distribution under the 2010 Census.

**Figure 3: 2010 - 2020 Population Change by 2020 Census Tract**



29. As the map in **Figure 3** and accompanying table in **Figure 4** (below) reveal, the population loss in the predominantly White western part of the Parish (Tract 950200) offsets about a third of the growth in the three northern census

tracts. In the south, majority-White Tract 950700 lost 139 persons.

**Figure 4: 2010 - 2020 Population Change by 2020 Census Tract**

TRACT	2010 Census			2020 Census			2010 to 2020 Change		
	Pop.	AP Black	NH White	Pop	AP Black	NH White	Pop	AP Black	NH White
950101	2502	906	1490	2608	823	1598	106	-83	108
950102	3290	637	2520	3459	609	2506	168	-28	-14
950103	2902	221	2540	4396	388	3632	1493	167	1092
950200	4334	1137	2961	3755	940	2560	-578	-197	-401
950300	2726	1141	1503	2484	1001	1348	-241	-140	-155
950400	3140	1926	1081	2785	1817	805	-355	-109	-276
950500	2092	1538	533	1901	1440	396	-190	-98	-137
950600	2960	2499	416	2854	2478	316	-105	-21	-100
950700	2710	595	2048	2570	477	1961	-139	-118	-87
<b>Total</b>	<b>26,655</b>	<b>10,600</b>	<b>15,092</b>	<b>26,812</b>	<b>9,973</b>	<b>15,122</b>	<b>160</b>	<b>(627)</b>	<b>30</b>

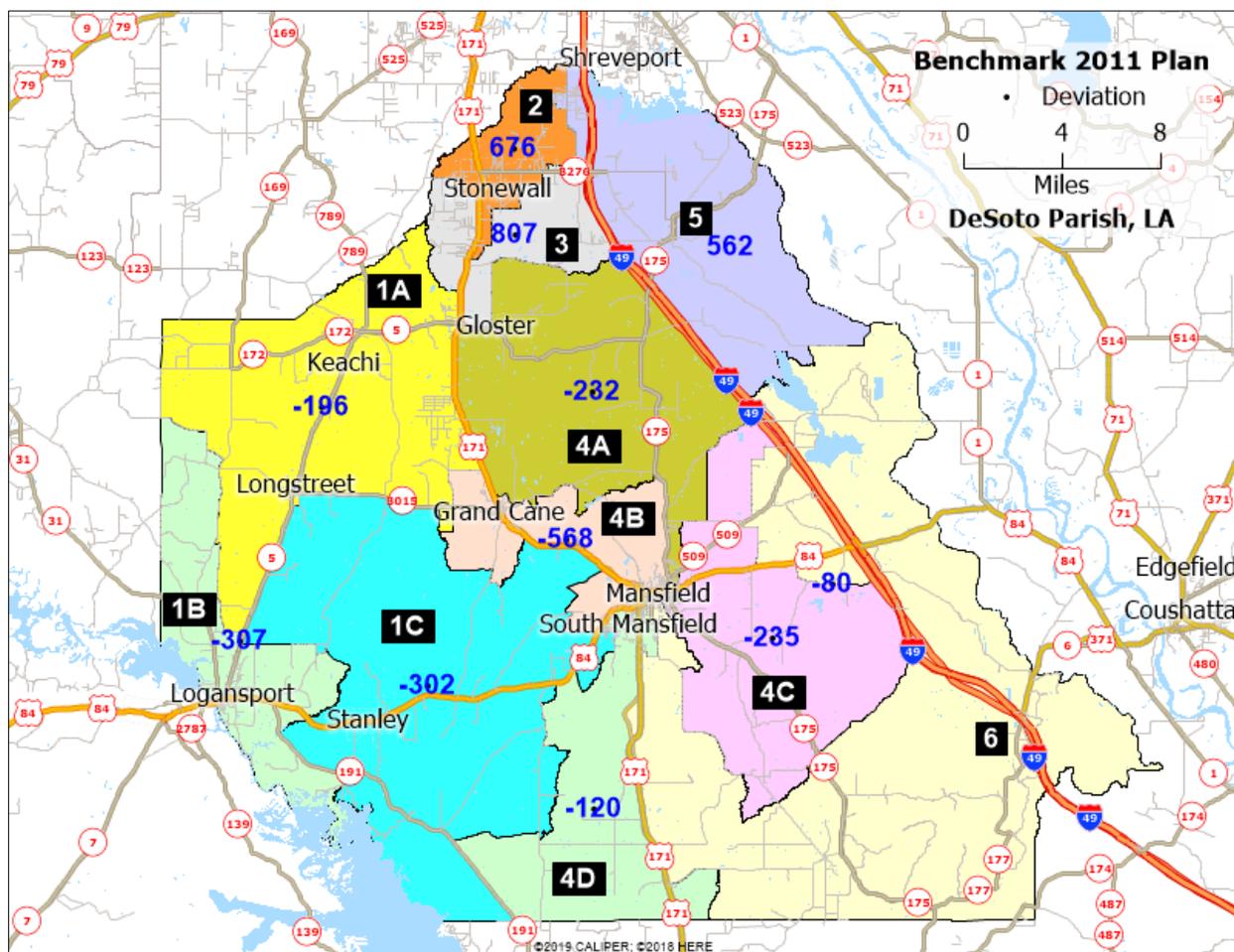
### III. BENCHMARK 2011 POLICE JURY PLAN

30. Under the 2020 Census, the ideal district size in an 11-district plan for DeSoto Parish is just 2,437 persons. This means that a district that is overpopulated or underpopulated by about 130 persons falls outside the +/- 5% deviation range necessary to meet one-person, one-vote requirements.

31. Consistent with relative volatility at the census tract level, by the time of the 2020 Census, the Benchmark 2011 Police Jury Plan (shown in **Figure 5** below) had become very malapportioned. Blue labels show population deviation by district. A higher resolution map is in **Exhibit B-1** with detailed population summary statistics is in **Exhibit B-2**. Of note, as shown in **Exhibit B-3**, the 2020

redistricting cycle was set for major changes because the 2011 Benchmark Plan was malapportioned when enacted under the 2010 Census, with an overall deviation of 28.31%.

**Figure 5: Benchmark 2011 Police Jury Plan**



32. As shown in **Figure 6**, nine of the 11 Police Jury districts were outside +/- 5% –ranging from 23.31% to 33.22%, resulting in an overall deviation of 56.42%. Three of the five majority-Black districts were underpopulated, with District 4B (in the Mansfield area) 568 persons short of the ideal district size. In

contrast, three of the six majority-White districts were extremely overpopulated – Districts 2, 3, and 5 in the north. This set the stage for major changes in district lines throughout the Parish in the 2022-23 redistricting process.

**Figure 6: Benchmark 2011 Plan --- 2020 Census**

District	2020 Pop.	Deviation	% Deviation	18+ Pop	% 18+ AP Black	% 18+ NH White
1A	2241	-196	-8.04%	1732	27.66%	65.36%
1B	2130	-307	-12.60%	1620	29.14%	66.67%
1C	2135	-302	-12.39%	1708	22.54%	72.42%
2	3113	676	27.74%	2276	9.80%	82.25%
3	3244	807	33.11%	2316	8.29%	84.84%
4A	2205	-232	-9.52%	1723	55.83%	40.57%
4B	1869	-568	-23.31%	1466	60.64%	33.90%
4C	2202	-235	-9.64%	1701	71.25%	25.57%
4D	2317	-120	-4.92%	1797	57.87%	36.06%
5	2999	562	23.06%	2285	23.11%	67.70%
6	2357	-80	-3.28%	1816	57.43%	38.00%

33. For reference, **Exhibit B-4** details the communities (incorporated and unincorporated) that are split under the 2011 Benchmark. **Exhibit B-5** reports compactness scores.<sup>13</sup>

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<sup>13</sup> “The Reock test is an area-based measure that compares each district to a circle, which is considered to be the most compact shape possible. For each district, the Reock test computes the ratio of the area of the district to the area of the minimum enclosing circle for the district. The measure is always between 0 and 1, with 1 being the most compact. The Reock test computes one number for each district and the minimum, maximum, mean and standard deviation for the plan.” *Maptitude For Redistricting* software documentation (authored by the Caliper Corporation).

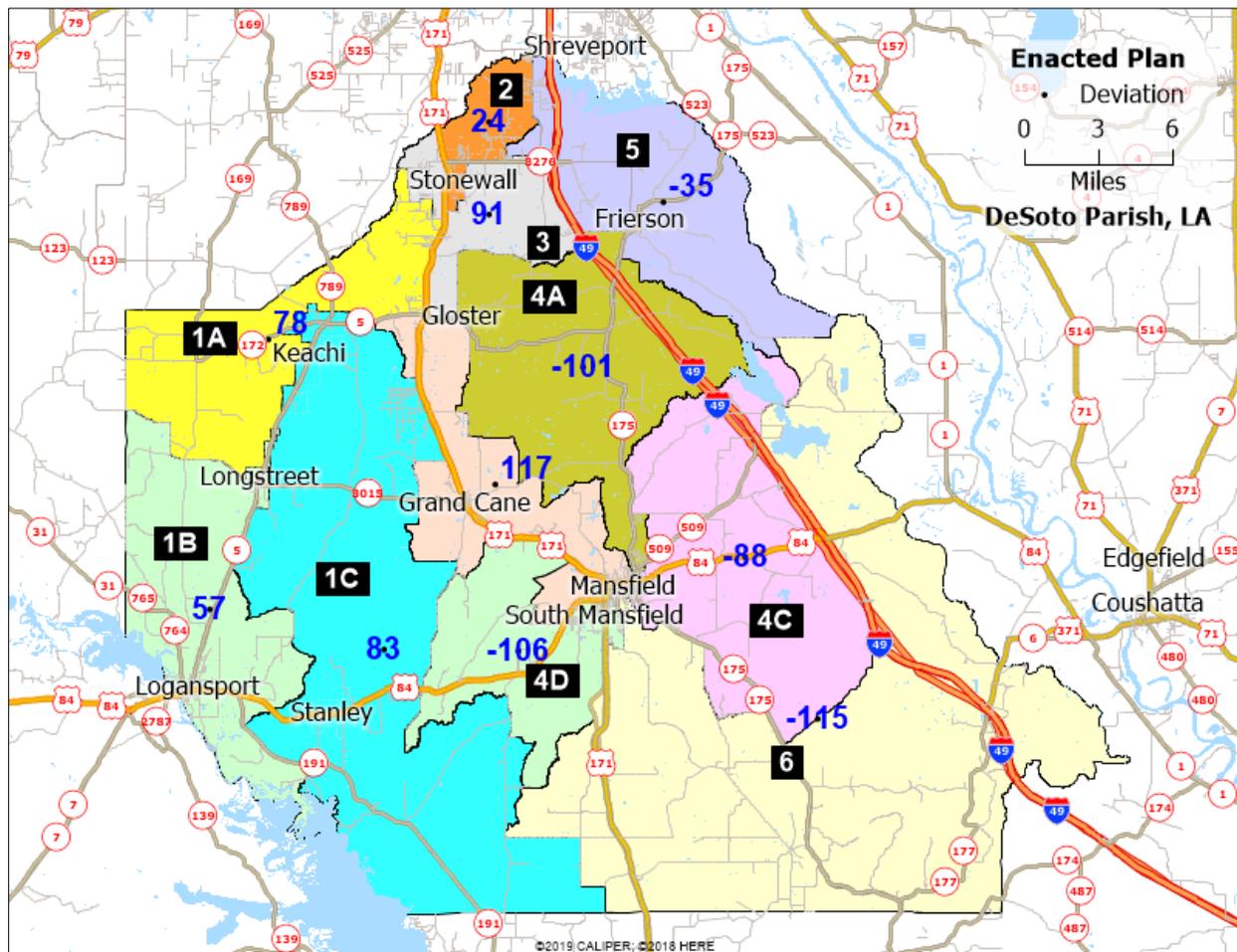
The Polsby-Popper test computes the ratio of the district area to the area of a circle with the same perimeter:  $4\pi \text{Area} / (\text{Perimeter}^2)$ . The measure is always between 0 and 1, with 1 being the most compact. The Polsby-Popper test computes one number for each district and the minimum, maximum, mean and standard deviation for the plan. *Id.*

The length-width test computes the absolute difference between the width (east-west) and the height (north-south) of each district. The bounding box of a district is computed in longitude-

#### IV ENACTED PLAN

34. The Enacted Plan (shown in **Figure 7**) brings all 11 districts into a +/- 5% range. Blue labels show population deviation by district.

**Figure 7: Enacted Police Jury Plan**



latitude space, and the height and width of the box through the center point are compared. The total is divided by the number of districts to create the average length-width compactness. A lower number indicates better length-width compactness. This measure of compactness is designed for contiguous districts, since the bounding box encloses the entire district.

35. A higher resolution map is in **Exhibit C-1** (also identifying incumbent residences) with detailed population summary statistics is in **Exhibit C-2**. **Exhibit C-3** zooms in on the Mansfield area... **Exhibit C-4** identifies split communities. **Exhibit C-5** reports compactness scores, **Exhibit C-6** identifies split VTDs.

36. As shown in **Figure 8**, the Enacted Plan contains five majority-Black districts – ranging from 59% to 66%. Four of the five are underpopulated but still within the +/-5% range. As I demonstrate by way of example in the Illustrative Plan *infra*, it was not necessary to under-populate the majority-Black districts. There are a number of different ways to configure five majority-Black districts, based on the 2020 Census, while adhering to traditional redistricting principles.

**Figure 8: Enacted Police Jury Plan – 2020 Census**

District	2020 Pop.	Deviation	% Deviation	18+ Pop	% 18+ AP Black	% 18+ NH White
1A	2515	78	3.20%	1781	10.89%	82.54%
1B	2494	57	2.34%	1924	26.87%	67.78%
1C	2520	83	3.41%	2005	12.92%	82.54%
2	2461	24	0.98%	1775	8.79%	82.87%
3	2528	91	3.73%	1857	10.77%	80.24%
4A	2336	-101	<b>-4.14%</b>	1767	<b>62.08%</b>	34.47%
4B	2554	117	4.80%	2033	<b>60.85%</b>	33.01%
4C	2349	-88	<b>-3.61%</b>	1847	<b>60.64%</b>	35.35%
4D	2331	-106	<b>-4.35%</b>	1798	<b>66.46%</b>	28.31%
5	2402	-35	-1.44%	1855	20.92%	70.84%
6	2322	-115	<b>-4.72%</b>	1798	<b>59.07%</b>	36.48%

37. Under the Enacted Plan, there are five majority-Black districts and six majority-White Districts. About three quarters of the Black population of voting

age resides in majority-Black districts (76.9%) and the same holds true for the White population of voting age living in majority-White districts (73.8%).

38. In my experience, having examined countless local plans throughout the nation, the Enacted Plan is within the normal range insofar as compactness scores are concerned. Whatever the reason for under-population of four of the five majority-Black districts in the Enacted Plan may be, it is clearly unrelated to whether or not five majority-Black districts out of 11 can be drawn in the Parish.

39. There are odd features in the Enacted Plan – e.g., a slice of District 2 extending into Stonewall in the center of town and several seemingly unnecessary splits of smaller communities (also present in the 2011 Plan). In the main, the Enacted Plan reflects incumbent preferences (Black and White) and is perhaps a product of too many cooks in the kitchen. There is a different set of incumbents in the 11-district DeSoto Parish School Board Plan, which may also have influenced how Policy Jury districts and new precincts are drawn.

40. The Plaintiffs complain about the division of Mansfield (pop. 4,714; 81% Black) into four districts, but five current incumbents live in the Mansfield area. Four live inside the City.

41. Unincorporated Gloster (Pop. 53; 15% Black) is split into three districts – perhaps for no reason other than it was split that way in the 2011 Plan, with three precincts converging on Gloster.

42. In his report, Dr. Joiner identifies a number of VTD/precinct splits that he views as problematic. His analysis is confusing and meaningless in isolation without a comparator map. He made no effort at a map that would correct these issues within the context of a “least change” or alternative plan. I examined a couple of the problematic splits singled out by Dr. Joiner.

43. For example, in ¶27 Dr. Joiner claims that by extending a split of VTD 26 across I-49, the map drawer intended to enhance the racial percentage of Enacted District 4C. How does he know that? An alternative and more likely explanation is that the extension was necessary in order to bring the deviation in District 4C below -5%. Without the extension, District 4C would have a deviation of -5.25%.

44. In ¶47 and ¶51, Dr. Joiner complains about a 5-way split affecting VTD 6 – a valid concern. But how does he propose to fix that given that four incumbents live in Mansfield? Well, one way is to assign all of VTD 6 to majority-Black District 4-C, as I do in the Illustrative Plan discussed in the next section.

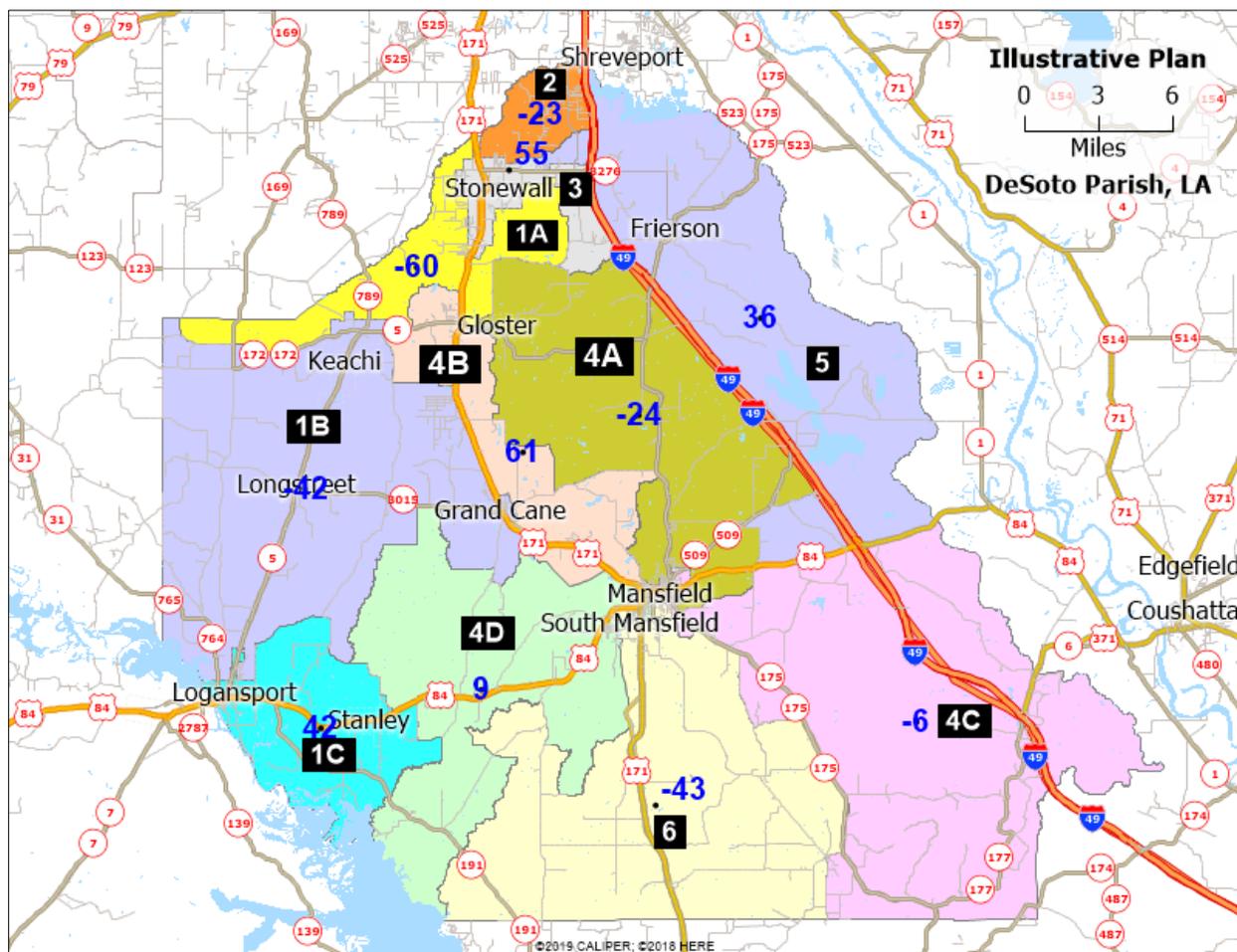
## **V. ILLUSTRATIVE PLAN**

45. I developed the Illustrative Plan to demonstrate that an 11-district Police Jury Plan in Desoto Parish can be drawn while adhering to traditional redistricting principles, including population equality, compactness, contiguity,

respect for communities of interest, and the non-dilution of minority voting strength.

46. The Illustrative Plan is shown in **Figure 9**. Blue labels show population deviation by district.

**Figure 9: Illustrative Police Jury Plan**



47. A higher resolution map is in **Exhibit D-1** (also identifying incumbent residences) with detailed population summary statistics is in **Exhibit D-2**. **Exhibit**

**D-3** zooms in on the Mansfield area. **Exhibit D-4** identifies split communities.

**Exhibit D-5** reports compactness scores, **Exhibit D-6** identifies split VTDs.

48. The Illustrative Plan is superior to the Enacted Plan with respect to key redistricting metrics – compactness, VTD splits, and community splits – while maintaining the relative level of minority voting strength found in the Benchmark 2011 Plan and reducing the overall deviation found in the Enacted Plan. There are no incumbent conflicts.

49. As shown in **Figure 10**, under the Illustrative Plan, there are five majority-Black districts and six majority-White Districts, with an overall deviation of 4.96%. Three of the majority-Black districts are slightly overpopulated and two are slightly underpopulated. Three of the majority-White districts are slightly overpopulated and three are slightly underpopulated.

**Figure 10: Illustrative Police Jury Plan -- 2020 Census**

District	2020 Pop.	Deviation	% Deviation	18+ Pop	% 18+ AP Black	% 18+ NH White
1A	2377	-60	-2.46%	1662	9.45%	84.78%
1B	2395	-42	-1.72%	1959	16.74%	76.62%
1C	2479	42	1.72%	1872	23.18%	73.18%
2	2414	-23	-0.94%	1730	8.03%	80.75%
3	2492	55	2.26%	1885	7.48%	83.71%
4A	2413	-24	-0.98%	1884	56.53%	39.12%
4B	2498	61	2.50%	1948	56.98%	35.73%
4C	2431	-6	-0.25%	1906	65.11%	31.58%
4D	2446	9	0.37%	1868	61.30%	34.58%
5	2473	36	1.48%	1918	30.14%	63.50%
6	2394	-43	-1.76%	1808	60.12%	35.84%

50. About three quarters of the Black population of voting age resides in majority-Black districts (76.1%) and the same holds true for the White population of voting age living in majority-White districts (71.8%).

51. **Figure 11** compares compactness scores for the Illustrative Plan against the 2011 Plan and the Enacted Plan. The Illustrative Plan is across-the-board superior to the Enacted Plan on the Reock, Polsby-Popper, and Length-Width scores. Reock and Polsby-Popper are the two most widely referenced compactness measures. Dr. Joiner’s preferred measure is the Length-Width.

**Figure 11: Compactness Scores**

	<b>Reock</b> higher is better	<b>Polsby- Popper</b> higher is better	<b>Length- Width</b> lower is better
<b>Illustrative Plan</b>			
All Districts	.40	.25	2.44
5 Majority-Black Districts	.41	.24	2.67
<b>2011 Benchmark Plan</b>			
All Districts	.37	.25	2.9
5 Majority-Black Districts	.39	.23	2.61
<b>Enacted Plan</b>			
All Districts	.35	.23	3.33
5 Majority-Black Districts	.40	.23	3.23

52. **Figure 12** compares VTD splits for the Illustrative Plan against the Enacted Plan. The Illustrative Plan is across-the-board superior.

**Figure 12: Political Subdivision Splits (excluding unpopulated areas)**

	<b>2020 VTD Splits</b>	<b>Total Place Splits</b>
Illustrative Plan	23	4*
2011 Benchmark Plan	NA	14
Enacted Plan	26	12

\*All 4 splits involve Mansfield where four incumbents live.

**VI. SOCIO-ECONOMIC PROFILE OF DESOTO PARISH (2015-2019 ACS)**

53. Non-Hispanic Whites significantly outpace African Americans in DeSoto Parish across a broad range of socioeconomic measures, as reported in the 5-year 2015-2019 ACS. These disparities are summarized below and depicted with further detail in the charts and tables found in **Exhibit E**, which highlight Black, Latino, and White categories.<sup>14</sup>

**(a) Education**

- Of persons 25 years of age and over in DeSoto Parish, 27.1% of Black people have not finished high school. By contrast, 11.8% of their White counterparts are without a high school diploma. **Exhibit E, pp. 21-22.**
- For ages 25 and over in DeSoto Parish, 10.6% of Black people have a bachelor’s degree or higher – compared to a 17.1% rate achieved by White people. **Exhibit E, pp. 21-22.**

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<sup>14</sup> In this section, for simplicity, the term “White” refers to non-Hispanic White people. The term “Black” refers to single-race Black people, including people who identify as Black Hispanics. There is not a separate category for non-Hispanic Black or Any Part Black in the 5-Year American Community Survey.

*(b) Housing*

- Nearly half of Black households (43.8%) rent their residences in DeSoto Parish, as compared to a rental rate of 19.5% for White households. **Exhibit E, pp. 55-56.**

*(c) Income*

- In DeSoto Parish, Black median household income is \$23,750 – about 35% of the \$60,777 median income of White households. **Exhibit E, pp. 32-33.**
- Black people in DeSoto Parish experience a poverty rate that is about four times the poverty rate for White people -- 39.7% of Black people live below the poverty line, as compared to 8.7% of White people. **Exhibit E, pp. 28-29.**
- Reflecting the high Black poverty rate, more than twice as many Black households rely on food stamps compared to White households, with 38.6% of Black households participating in the Supplemental Nutrition Assistance Program (SNAP), as compared to 9.7% of White households in DeSoto Parish. **Exhibit E, pp. 47-48.**

*(d) Employment*

- The Black unemployment rate (for the working-age population ages 16-64, expressed as a percent of the civilian labor force) is 22.8%, which is four times the 5.0% unemployment rate recorded for Whites. **Exhibit E, pp. 51-52.**
- Just 13.8% of Black people in DeSoto Parish are employed in management or professional occupations, as compared to 37.1% of White people. **Exhibit E, pp.53-54.**

*(e) Communication*

- Nearly one in five Black-White gap households are without a computer (17.8%), as compared to 5.4% of White Households/

**Exhibit E, pp. 63-64.**

- With respect to broadband internet connections, African-American households trail White households – 60% versus 83.6%. **Exhibit E., pp. 63-64.**

# # #

I reserve the right to continue to supplement my reports in light of additional facts, testimony, and/or materials that may come to light during the pendency of the above-captioned case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on: July 7, 2023



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WILLIAM S COOPER

# COOPER EXHIBIT A

June 30, 2022

*William S. Cooper*  
*P.O. Box 16066*  
*Bristol, VA 24209*  
*276-669-8567*  
*bcooper@msn.com*

### **Summary of Redistricting Work**

I have a B.A. in Economics from Davidson College in Davidson, North Carolina.

Since 1986, I have prepared proposed redistricting maps of approximately 750 jurisdictions for Section 2 litigation, Section 5 comment letters, and for use in other efforts to promote compliance with the Voting Rights Act of 1965. I have analyzed and prepared election plans in over 100 of these jurisdictions for two or more of the decennial censuses – either as part of concurrent legislative reapportionments or, retrospectively, in relation to litigation involving many of the cases listed below.

From 1986 to 2022, I have prepared election plans for Section 2 litigation in Alabama, Connecticut, Florida, Georgia, Louisiana, Maryland, Mississippi, Missouri, Montana, Nebraska, New Jersey, New York, North Carolina, Ohio, Pennsylvania, South Carolina, South Dakota, Tennessee, Texas, Utah, Virginia, Washington, and Wyoming.

### **Post-2020 Redistricting Experience**

Since the release of the 2020 Census in August 2021, I have served as a redistricting/re-precincting consultant to the San Juan County, Utah Commission. On December 21, 2021, the San Juan County Commission adopted a three-district commission plan that I developed.

In October 2021, I briefly served as a consultant to the city council in Wenatchee, Washington and determined that the 2018 redistricting plan I drew is not malapportioned under the 2020 Census.

June 30, 2022

In 2022, I have testified at trial in five Sec. 2 lawsuits: Alabama (Congress), Florida (voter suppression), Georgia (State House, State Senate, and Congress), and Maryland (Baltimore County Commission).

**2010s Redistricting Experience**

I developed statewide legislative plans on behalf of clients in nine states (Alabama, Connecticut, Florida, Georgia, Kentucky, Mississippi, South Carolina, Texas, and Virginia), as well as over 150 local redistricting plans in approximately 30 states – primarily for groups working to protect minority voting rights. In addition, I have prepared congressional plans for clients in eight states (Alabama, Florida, Georgia, Louisiana, Maryland, Ohio, Pennsylvania, South Carolina, and Virginia).

In March 2011, I was retained by the Sussex County, Virginia Board of Supervisors and the Bolivar County, Mississippi Board of Supervisors to draft new district plans based on the 2010 Census. In the summer of 2011, both counties received Section 5 preclearance from the U.S. Department of Justice (DOJ).

Also in 2011, I was retained by way of a subcontract with Olmedillo X5 LLC to assist with redistricting for the Miami-Dade County, Florida Board of Commissioners and the Miami-Dade, Florida School Board. Final plans were adopted in late 2011 following public hearings.

In the fall of 2011, I was retained by the City of Grenada, Mississippi to provide redistricting services. The ward plan I developed received DOJ preclearance in March 2012.

In 2012 and 2013, I served as a redistricting consultant to the Tunica County, Mississippi Board of Supervisors and the Claiborne County, Mississippi Board of Supervisors.

June 30, 2022

In *Montes v. City of Yakima* (E.D. Wash. Feb. 17, 2015) the court adopted, as a remedy for the Voting Rights Act Section 2 violation, a seven single-member district plan that I developed for the Latino plaintiffs. I served as the expert for the Plaintiffs in the liability and remedy phases of the case.

In *Pope v. Albany County* (N.D.N.Y. Mar. 24, 2015), the court approved, as a remedy for a Section 2 violation, a plan drawn by the defendants, creating a new Black-majority district. I served as the expert for the Plaintiffs in the liability and remedy phases of the case.

In 2016, two redistricting plans that I developed on behalf of the plaintiffs for consent decrees in Section 2 lawsuits in Georgia were adopted (*NAACP v. Fayette County, Georgia* and *NAACP v. Emanuel County, Georgia*).

In 2016, two federal courts granted summary judgment to the plaintiffs based in part on my *Gingles I* testimony: *Navajo Nation v. San Juan County, Utah* (C.D. Utah 2016) and *NAACP v. Ferguson-Florissant School District, Missouri* (E. D. Mo. August 22, 2016).

Also in 2016, based in part on my analysis, the City of Pasco, Washington admitted to a Section 2 violation. As a result, in *Glatt v. City of Pasco* (E.D. Wash. Jan. 27, 2017), the court ordered a plan that created three Latino majority single-member districts in a 6 district, 1 at-large plan.

In 2018, I served as the redistricting consultant to the Governor Wolf interveners at the remedial stage of *League of Women Voters, et al. v. Commonwealth of Pennsylvania*.

In August 2018, the Wenatchee City Council adopted a hybrid election plan that I developed – five single-member districts with two members at-large. The Wenatchee election plan is the first plan adopted under the Washington Voting Rights Acts of 2018.

June 30, 2022

In February 2019, a federal court ruled in favor of the plaintiffs in a Section 2 case regarding Senate District 22 in Mississippi, based in part on my *Gingles* 1 testimony in *Thomas v. Bryant* (S.D. Ms. Feb 16, 2019).

In the summer of 2019, I developed redistricting plans for the Grand County (Utah) Change of Form of Government Study Committee.

In the fall of 2019, a redistricting plan I developed for a consent decree involving the Jefferson County, Alabama Board of Education was adopted *Traci Jones, et al. v. Jefferson County Board of Education, et al.*

In May 2020, a federal court ruled in favor of the plaintiffs in a Section 2 case in *NAACP et al. v. East Ramapo Central School District, NY*, based in part on my *Gingles* 1 testimony. In October 2020, the federal court adopted a consent decree plan I developed for elections to be held in February 2021.

In May and June of 2020, I served as a consultant to the City of Quincy, Florida – the Defendant in a Section 2 lawsuit filed by two Anglo voters (*Baroody v. City of Quincy*). The federal court for the Northern District of Florida ruled in favor of the Defendants. The Plaintiffs voluntarily dismissed the case.

In the summer of 2020, I provided technical redistricting assistance to the City of Chestertown, Maryland.

I am currently a redistricting consultant and expert for the plaintiffs in *Jayla Allen v. Waller County, Texas*. I testified remotely at trial in October 2020.

Since 2011, I have served as a redistricting and demographic consultant to the Massachusetts-based Prison Policy Initiative for a nationwide project to end prison-based gerrymandering. I have analyzed proposed and adopted election plans in about 25 states as part of my work.

June 30, 2022

In 2018 (Utah) and again in 2020 (Arizona), I have provided technical assistance to the Rural Utah Project for voter registration efforts on the Navajo Nation Reservation.

**Post-2010 Demographics Experience**

My trial testimony in Section 2 lawsuits usually includes presentations of U.S. Census data with charts, tables, and/or maps to demonstrate socioeconomic disparities between non-Hispanic Whites and racial or ethnic minorities.

I served as a demographic expert for plaintiffs in four state-level voting cases related to the Covid-19 pandemic (South Carolina, Alabama, and Louisiana) and state court in North Carolina.

I have also served as an expert witness on demographics in non-voting trials. For example, in an April 2017 opinion in *Stout v. Jefferson County Board of Education* (Case no.2:65-cv-00396-MHH), a school desegregation case involving the City of Gardendale, Ala., the court made extensive reference to my testimony.

I provide technical demographic and mapping assistance to the Food Research and Action Center (FRAC) in Washington D.C and their constituent organizations around the country. Most of my work with FRAC involves the Summer Food Program and Child and Adult Care Food Program. Both programs provide nutritional assistance to school-age children who are eligible for free and reduced price meals. As part of this project, I developed an online interactive map to determine site eligibility for the two programs that has been in continuous use by community organizations and school districts around the country since 2003. The map is updated annually with new data from a Special Tabulation of the American Community Survey prepared by the U.S. Census Bureau for the Food and Nutrition Service of the U.S. Department of Agriculture.

June 30, 2022

### **Historical Redistricting Experience**

In the 1980s and 1990s, I developed voting plans in about 400 state and local jurisdictions – primarily in the South and Rocky Mountain West. During the 2000s and 2010s, I prepared draft election plans involving about 350 state and local jurisdictions in 25 states. Most of these plans were prepared at the request of local citizens’ groups, national organizations such as the NAACP, tribal governments, and for Section 2 or Section 5 litigation.

Election plans I developed for governments in two counties – Sussex County, Virginia and Webster County, Mississippi – were adopted and precleared in 2002 by the U.S. Department of Justice. A ward plan I prepared for the City of Grenada, Mississippi was precleared in August 2005. A county supervisors’ plan I produced for Bolivar County, Mississippi was precleared in January 2006.

In August 2005, a federal court ordered the State of South Dakota to remedy a Section 2 voting rights violation and adopt a state legislative plan I developed (*Bone Shirt v. Hazeltine*).

A county council plan I developed for Native American plaintiffs in a Section 2 lawsuit (*Blackmoon v. Charles Mix County*) was adopted by Charles Mix County, South Dakota in November 2005. A plan I drafted for Latino plaintiffs in Bethlehem, Pennsylvania (*Pennsylvania Statewide Latino Coalition v. Bethlehem Area School District*) was adopted in March 2009. Plans I developed for minority plaintiffs in Columbus County, North Carolina and Montezuma- Cortez School District in Colorado were adopted in 2009.

Since 1986, I have testified at trial as an expert witness on redistricting and demographics in federal courts in the following voting rights cases (approximate most recent testimony dates are in parentheses). I also filed declarations and was deposed in

June 30, 2022

most of these cases.

**Alabama**

*Caster v. Merrill* (2022)

*Chestnut v Merrill* (2019)

*Alabama State Conference of the NAACP v. Alabama* (2018)

*Alabama Legislative Black Caucus et al. v. Alabama et al.* (2013)

**Arkansas**

*The Christian Ministerial Alliance v. Hutchinson* (2022)

**Colorado**

*Cuthair v. Montezuma-Cortez School Board* (1997)

**Florida**

*NAACP v. Lee* (2022)

*Baroody v. City of Quincy* (2020)

**Georgia**

*Pendergrass v. Raffensperger* (2022)

*Alpha Phi Alpha v. Raffensperger* (2022)

*Cofield v. City of LaGrange* (1996)

*Love v. Deal* (1995)

*Askew v. City of Rome* (1995)

*Woodard v. Lumber City* (1989)

**Louisiana**

*Galmon v. Ardoin* (2022)

*Terrebonne Parish NAACP v. Jindal, et al.* (2017)

*Wilson v. Town of St. Francisville* (1996)

*Reno v. Bossier Parish* (1995)

*Knight v. McKeithen* (1994)

**Maryland**

*NAACP v. Baltimore County* (2022)

*Cane v. Worcester County* (1994)

**Mississippi**

*Thomas v. Bryant* (2019)

*Fairley v. Hattiesburg* (2014)

*Boddie v. Cleveland School District* (2010)

*Fairley v. Hattiesburg* (2008)

*Boddie v. Cleveland* (2003)

*Jamison v. City of Tupelo* (2006)

*Smith v. Clark* (2002)

*NAACP v. Fordice* (1999)

*Addy v Newton County (1995)*  
*Ewing v. Monroe County (1995)*  
*Gunn v. Chickasaw County (1995)*  
*Nichols v. Okolona (1995)*

**Montana**

*Old Person v. Brown (on remand) (2001)*  
*Old Person v. Cooney (1998)*

**Missouri**

*Missouri NAACP v. Ferguson-Florissant School District (2016)*

**Nebraska**

*Stabler v. Thurston County (1995)*

**New York**

*NAACP v. East Ramapo Central School District (2020)*  
*Pope v. County of Albany (2015)*  
*Arbor Hills Concerned Citizens v. Albany County (2003)*

**Ohio**

*A. Philip Randolph Institute, et al. v. Ryan (2019)*

**South Carolina**

*Smith v. Beasley (1996)*

**South Dakota**

*Bone Shirt v. Hazeltine (2004)*  
*Cottier v. City of Martin (2004)*

**Tennessee**

*Cousins v. McWherter (1994)*  
*Rural West Tennessee African American Affairs Council v. McWherter (1993)*

**Texas**

*Jayla Allen v. Waller County, Texas*

**Utah**

*Navajo Nation v. San Juan County (2017)*, brief testimony –11 declarations, 2 depositions

**Virginia**

*Smith v. Brunswick County (1991)*  
*Henderson v. Richmond County (1988)*  
*McDaniel v. Mehfoud (1988)*  
*White v. Daniel (1989)*

**Wyoming**

*Large v. Fremont County (2007)*

June 30, 2022

In addition, I have filed expert declarations or been deposed in the following cases that did not require trial testimony. The dates listed indicate the deposition date or date of last declaration or supplemental declaration:

**Alabama**

*People First of Alabama v. Merrill* (2020), Covid-19 demographics only  
*Alabama State NAACP v. City of Pleasant Grove* (2019)  
*James v. Jefferson County Board of Education* (2019)  
*Voketz v. City of Decatur* (2018)

**Arkansas**

*Mays v. Thurston* (2020)-- Covid-19 demographics only)

**Connecticut**

*NAACP v. Merrill* (2020)

**Florida**

*Florida State Conference of the NAACP v. Lee, et al.*, (2021)  
*Calvin v. Jefferson County* (2016)  
*Thompson v. Glades County* (2001)  
*Johnson v. DeSoto County* (1999)  
*Burton v. City of Belle Glade* (1997)

**Georgia**

*Dwight v. Kemp* (2018)  
*Georgia NAACP et al. v. Gwinnett County, GA* (2018)  
*Georgia State Conference NAACP et al v. Georgia* (2018)  
*Georgia State Conference NAACP, et al. v. Fayette County* (2015)  
*Knighton v. Dougherty County* (2002)  
*Johnson v. Miller* (1998)  
*Jones v. Cook County* (1993)

**Kentucky**

*Herbert v. Kentucky State Board of Elections* (2013)

**Louisiana**

*Power Coalition for Equity and Justice v. Edwards* (2020), Covid-19 demographics only  
*Johnson v. Ardoin* (2019)  
*NAACP v. St. Landry Parish Council* (2005)  
*Prejean v. Foster* (1998)  
*Rodney v. McKeithen* (1993)

**Maryland**

*Baltimore County NAACP v. Baltimore County* (2022)  
*Benisek v. Lamone* (2017)

*Fletcher v. Lamone (2011)*

**Mississippi**

*Partee v. Coahoma County (2015)*

*Figgs v. Quitman County (2015)*

*West v. Natchez (2015)*

*Williams v. Bolivar County (2005)*

*Houston v. Lafayette County (2002)*

*Clark v. Calhoun County (on remand)(1993)*

*Teague v. Attala County (on remand)(1993)*

*Wilson v. Clarksdale (1992)*

*Stanfield v. Lee County(1991)*

**Montana**

*Alden v. Rosebud County (2000)*

**North Carolina**

*Lewis v. Alamance County (1991)*

*Gause v. Brunswick County (1992)*

*Webster v. Person County (1992)*

**Rhode Island**

*Davidson v. City of Cranston (2015)*

**South Carolina**

*Thomas v. Andino (2020), Covid-19 demographics only*

*Vander Linden v. Campbell (1996)*

**South Dakota**

*Kirkie v. Buffalo County (2004)*

*Emery v. Hunt (1999)*

**Tennessee**

*NAACP v. Frost, et al. (2003)*

**Virginia**

*Moon v. Beyer (1990)*

**Washington**

*Glatt v. City of Pasco (2016)*

*Montes v. City of Yakima (2014)*

###

# COOPER EXHIBIT B-1



# COOPER EXHIBIT B-2

**Population Summary Report**  
**DeSoto Parish -- 2011 Benchmrk 2020 Census**

District	2020 Pop.	Deviation	% Deviation	18+ Pop	18+ AP Black	% 18+ AP Black	18+_NH White	% 18+ NH White	18+ Latine	% 18+ Latine
1A	2241	-196	-8.04%	1732	479	27.66%	1132	65.36%	51	2.94%
1B	2130	-307	-12.60%	1620	472	29.14%	1080	66.67%	26	1.60%
1C	2135	-302	-12.39%	1708	385	22.54%	1237	72.42%	35	2.05%
2	3113	676	27.74%	2276	223	9.80%	1872	82.25%	53	2.33%
3	3244	807	33.11%	2316	192	8.29%	1965	84.84%	68	2.94%
4A	2205	-232	-9.52%	1723	962	55.83%	699	40.57%	34	1.97%
4B	1869	-568	-23.31%	1466	889	60.64%	497	33.90%	40	2.73%
4C	2202	-235	-9.64%	1701	1212	71.25%	435	25.57%	18	1.06%
4D	2317	-120	-4.92%	1797	1040	57.87%	648	36.06%	76	4.23%
5	2999	562	23.06%	2285	528	23.11%	1547	67.70%	66	2.89%
6	2357	-80	-3.28%	1816	1043	57.43%	690	38.00%	28	1.54%
<b>Total 2020 Pop.</b>	<b>26,812</b>		<b>56.42%</b>	<b>20,440</b>	<b>7,425</b>	<b>36.33%</b>	<b>11,802</b>	<b>57.74%</b>	<b>495</b>	<b>2.42%</b>

# COOPER

# EXHIBIT B-3

**Population Summary Report**  
**DeSoto Parish -- 2011 Benchmark 2010 Census**

<b>District</b>	<b>2020 Pop.</b>	<b>Deviation</b>	<b>% Deviation</b>	<b>18+ Pop</b>	<b>18+ AP Black</b>	<b>% 18+ AP Black</b>	<b>18+_NH White</b>	<b>% 18+ NH White</b>	<b>18+ Latine</b>	<b>% 18+ Latine</b>
1A	2501	78	3.22%	1934	549	28.39%	1299	67.17%	54	2.79%
1B	2411	-12	-0.50%	1743	531	30.46%	1152	66.09%	38	2.18%
1C	2314	-109	-4.50%	1764	384	21.77%	1287	72.96%	64	3.63%
2	2156	-267	-11.02%	1672	154	9.21%	1455	87.02%	25	1.50%
3	2577	154	6.36%	1871	175	9.35%	1603	85.68%	54	2.89%
4A	2311	-112	-4.62%	1733	894	51.59%	776	44.78%	38	2.19%
4B	2216	-207	-8.54%	1662	939	56.50%	677	40.73%	27	1.62%
4C	2487	64	2.64%	1899	1260	66.35%	597	31.44%	26	1.37%
4D	2305	-118	-4.87%	1737	1066	61.37%	635	36.56%	35	2.01%
5	2842	419	17.29%	2164	532	24.58%	1551	71.67%	53	2.45%
6	2536	113	4.66%	1827	1011	55.34%	780	42.69%	28	1.53%
<b>Total 2010 Pop.</b>	<b>26,656</b>		<b>28.31%</b>	<b>20,006</b>	<b>7,495</b>	<b>37.46%</b>	<b>11,812</b>	<b>59.04%</b>	<b>442</b>	<b>2.21%</b>

# COOPER

# EXHIBIT B-4

User:

Plan Name: Desoto\_Benchmark\_2011\_Plan

Plan Type:

## Communities of Interest (Condensed)

Friday, July 7, 2023

4:40 PM

**Whole Census Place : 483**

**Census Place Splits: 14**

**Zero Population Census Place Splits: 0**

District	Census Place	Population	% Pop	District	Census Place	Population	% Pop
1A	Longstreet	79	68.70%				
1C	Longstreet	36	31.30%				
2	Stonewall	1,437	63.22%				
3	Gloster	36	67.92%				
3	Stonewall	802	35.28%				
4A	Gloster	17	32.08%				
4A	Mansfield	421	8.93%				
4B	South	4	1.20%				
	Mansfield						
4B	Mansfield	1,139	24.16%				
4C	Mansfield	1,211	25.69%				
4D	South	329	98.80%				
	Mansfield						
4D	Mansfield	1,157	24.54%				
5	Stonewall	34	1.50%				
6	Mansfield	786	16.67%				

# COOPER

# EXHIBIT B-5

User:

Plan Name: Desoto\_Benchmark\_2011\_Plan

Plan Type:

## Measures of Compactness Report

Friday, July 7, 2023

4:44 PM

	<b>Reock</b>	<b>Polsby-Popper</b>	<b>Length-Width</b>
Mean	0.37	0.25	2.90
Min	0.17	0.15	0.57
Max	0.51	0.37	8.80
Std. Dev.	0.10	0.08	2.61
Sum			

Higher Number is Better

Lower Number is Better

<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>	<b>Length-Width</b>
1A	0.39	0.37	3.55
1B	0.17	0.17	8.80
1C	0.51	0.23	2.08
2	0.30	0.25	2.08
3	0.42	0.23	1.73
4A	0.50	0.37	0.64
4B	0.35	0.16	0.79
4C	0.34	0.26	6.72
4D	0.32	0.21	2.67
5	0.34	0.35	0.57
6	0.43	0.15	2.24

## Measures of Compactness Report

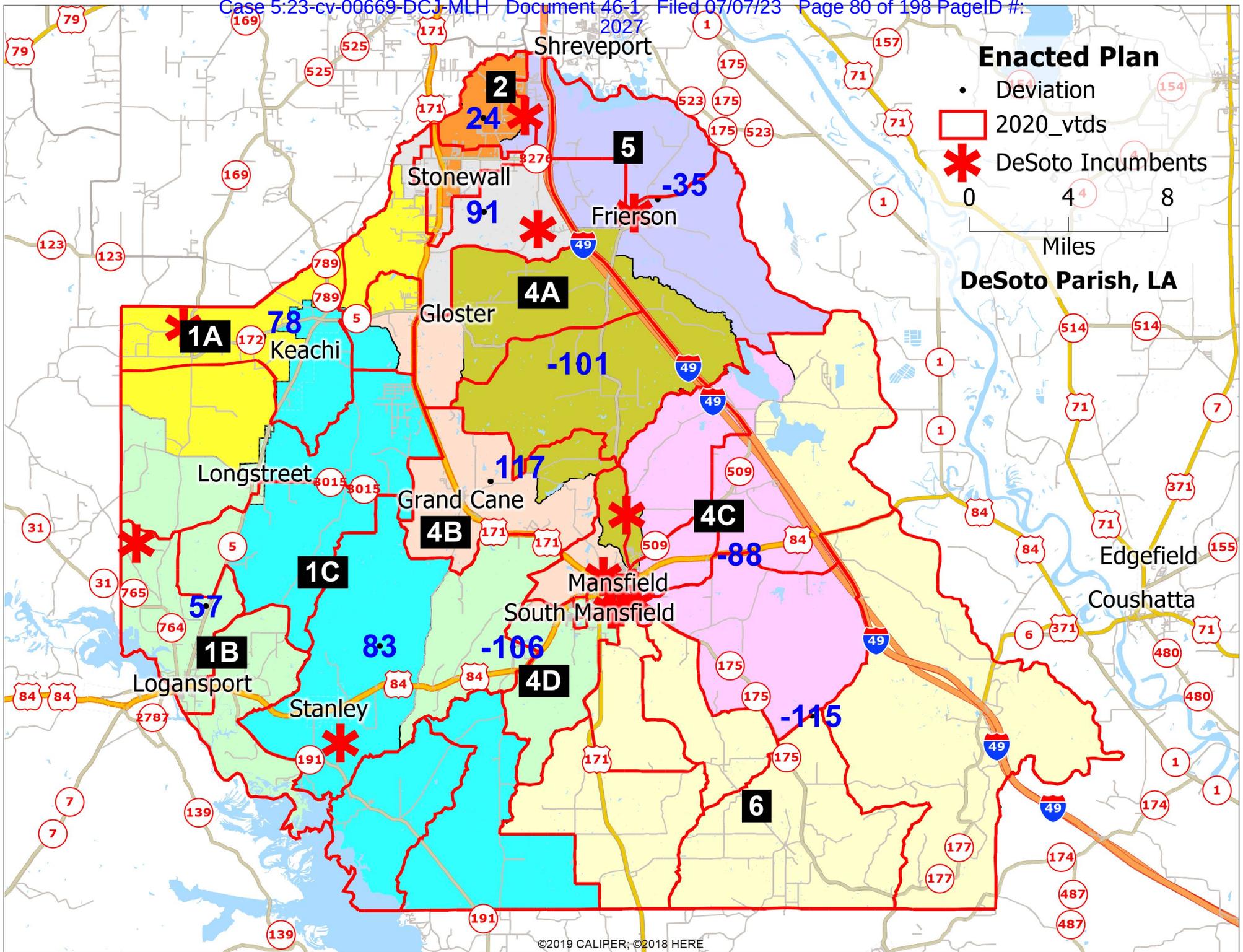
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Desoto\_Benchmark\_2011\_Pla

### Measures of Compactness Summary

<b>Reock</b>	The measure is always between 0 and 1, with 1 being the most compact.
<b>Polsby-Popper</b>	The measure is always between 0 and 1, with 1 being the most compact.
<b>Length-Width</b>	A lower number indicates better length-width compactness.

# COOPER EXHIBIT C-1



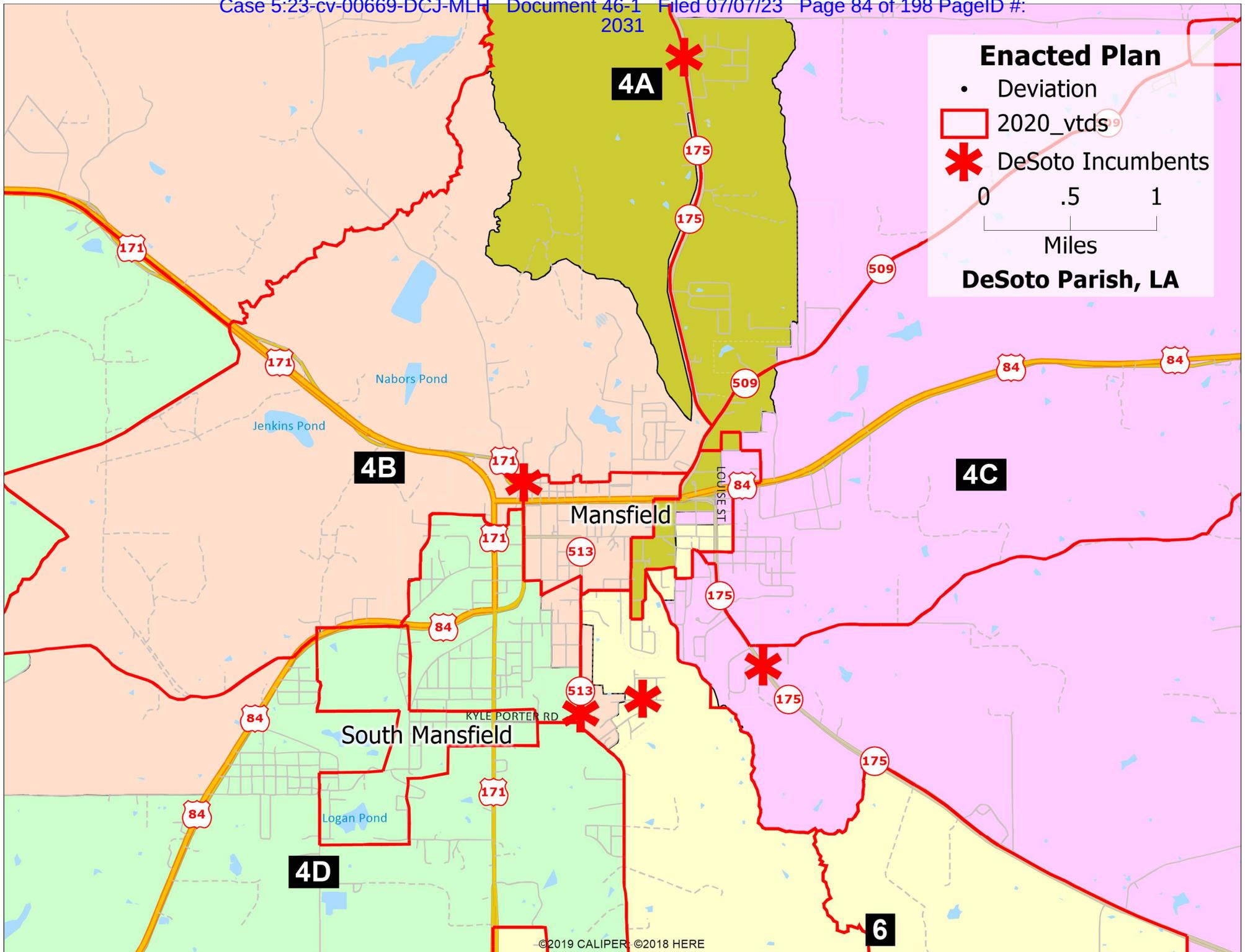
# COOPER EXHIBIT C-2

**Population Summary Report**  
**DeSoto Parish -- Enacted Police Jury Plan 2020 Census**

<b>District</b>	<b>2020 Pop.</b>	<b>Deviation</b>	<b>% Deviation</b>	<b>18+ Pop</b>	<b>18+ AP Black</b>	<b>% 18+ AP Black</b>	<b>18+_NH White</b>	<b>% 18+ NH White</b>	<b>18+ Latine</b>	<b>% 18+ Latine</b>
1A	2515	78	3.20%	1781	194	10.89%	1470	82.54%	44	2.47%
1B	2494	57	2.34%	1924	517	26.87%	1304	67.78%	39	2.03%
1C	2520	83	3.41%	2005	259	12.92%	1655	82.54%	37	1.85%
2	2461	24	0.98%	1775	156	8.79%	1471	82.87%	57	3.21%
3	2528	91	3.73%	1857	200	10.77%	1490	80.24%	63	3.39%
4A	2336	-101	-4.14%	1767	1097	62.08%	609	34.47%	32	1.81%
4B	2554	117	4.80%	2033	1237	60.85%	671	33.01%	64	3.15%
4C	2349	-88	-3.61%	1847	1120	60.64%	653	35.35%	29	1.57%
4D	2331	-106	-4.35%	1798	1195	66.46%	509	28.31%	70	3.89%
5	2402	-35	-1.44%	1855	388	20.92%	1314	70.84%	36	1.94%
6	2322	-115	-4.72%	1798	1062	59.07%	656	36.48%	24	1.33%
<b>Total 2020 Pop.</b>	<b>26,812</b>		<b>9.52%</b>	<b>20,440</b>	<b>7,425</b>	<b>36.33%</b>	<b>11,802</b>	<b>57.74%</b>	<b>495</b>	<b>2.42%</b>

# COOPER EXHIBIT C-3

2031



# COOPER

# EXHIBIT C-4

User:

Plan Name: Desoto\_Plan\_H\_Revised

Plan Type:

## Communities of Interest (Condensed)

Friday, July 7, 2023

4:49 PM

**Whole Census Place : 485**

**Census Place Splits: 13**

**Zero Population Census Place Splits: 1**

District	Census Place	Population	% Pop	District	Census Place	Population	% Pop
PJ1A	Stonewall	289	12.71%				
PJ2	Stonewall	637	28.02%				
PJ3	Gloster	36	67.92%				
PJ3	Stonewall	1,347	59.26%				
PJ4A	Gloster	6	11.32%				
PJ4A	Mansfield	566	12.01%				
PJ4B	South	0	0.00%				
	Mansfield						
PJ4B	Gloster	11	20.75%				
PJ4B	Mansfield	1,364	28.94%				
PJ4C	Mansfield	902	19.13%				
PJ4D	South	333	100.00%				
	Mansfield						
PJ4D	Mansfield	1,053	22.34%				
PJ6	Mansfield	829	17.59%				

# COOPER

# EXHIBIT C-5

User:

Plan Name: Desoto\_Plan\_H\_Revised

Plan Type:

# Measures of Compactness Report

Friday, July 7, 2023

4:51 PM

	Reock	Polsby-Popper	Length-Width
Mean	0.35	0.23	3.23
Min	0.24	0.13	0.36
Max	0.51	0.36	9.40
Std. Dev.	0.09	0.07	3.27
Sum			

Higher Number is Better

Lower Number is Better

District	Reock	Polsby-Popper	Length-Width
PJ1A	0.31	0.26	0.37
PJ1B	0.25	0.18	8.80
PJ1C	0.29	0.17	9.40
PJ2	0.30	0.33	2.27
PJ3	0.40	0.22	0.36
PJ4A	0.43	0.20	2.68
PJ4B	0.24	0.13	1.94
PJ4C	0.44	0.36	5.85
PJ4D	0.51	0.19	1.55
PJ5	0.29	0.29	1.16
PJ6	0.39	0.20	1.17

## Measures of Compactness Report

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Desoto\_Plan\_H\_Revised

### Measures of Compactness Summary

<b>Reock</b>	The measure is always between 0 and 1, with 1 being the most compact.
<b>Polsby-Popper</b>	The measure is always between 0 and 1, with 1 being the most compact.
<b>Length-Width</b>	A lower number indicates better length-width compactness.

# COOPER

# EXHIBIT C-6

User:

Plan Name: Desoto\_Plan\_H\_Revised

Plan Type:

## Political Subdivison Splits Between Districts

Friday, July 7, 2023

4:52 PM

### Split Counts

Number of subdivisions split into more than one district:      Number of splits involving no population:

County	1	County	0
Voting District	22	Voting District	2

Number of times a subdivision is split into multiple districts:

County	10
Voting District	28

County	Voting District	District	Population
--------	-----------------	----------	------------

*Split Counties:*

De Soto LA		PJ1A	2,515
De Soto LA		PJ1B	2,494
De Soto LA		PJ1C	2,520
De Soto LA		PJ2	2,461
De Soto LA		PJ3	2,528
De Soto LA		PJ4A	2,336
De Soto LA		PJ4B	2,554
De Soto LA		PJ4C	2,349
De Soto LA		PJ4D	2,331
De Soto LA		PJ5	2,402
De Soto LA		PJ6	2,322

*Split VTDs:*

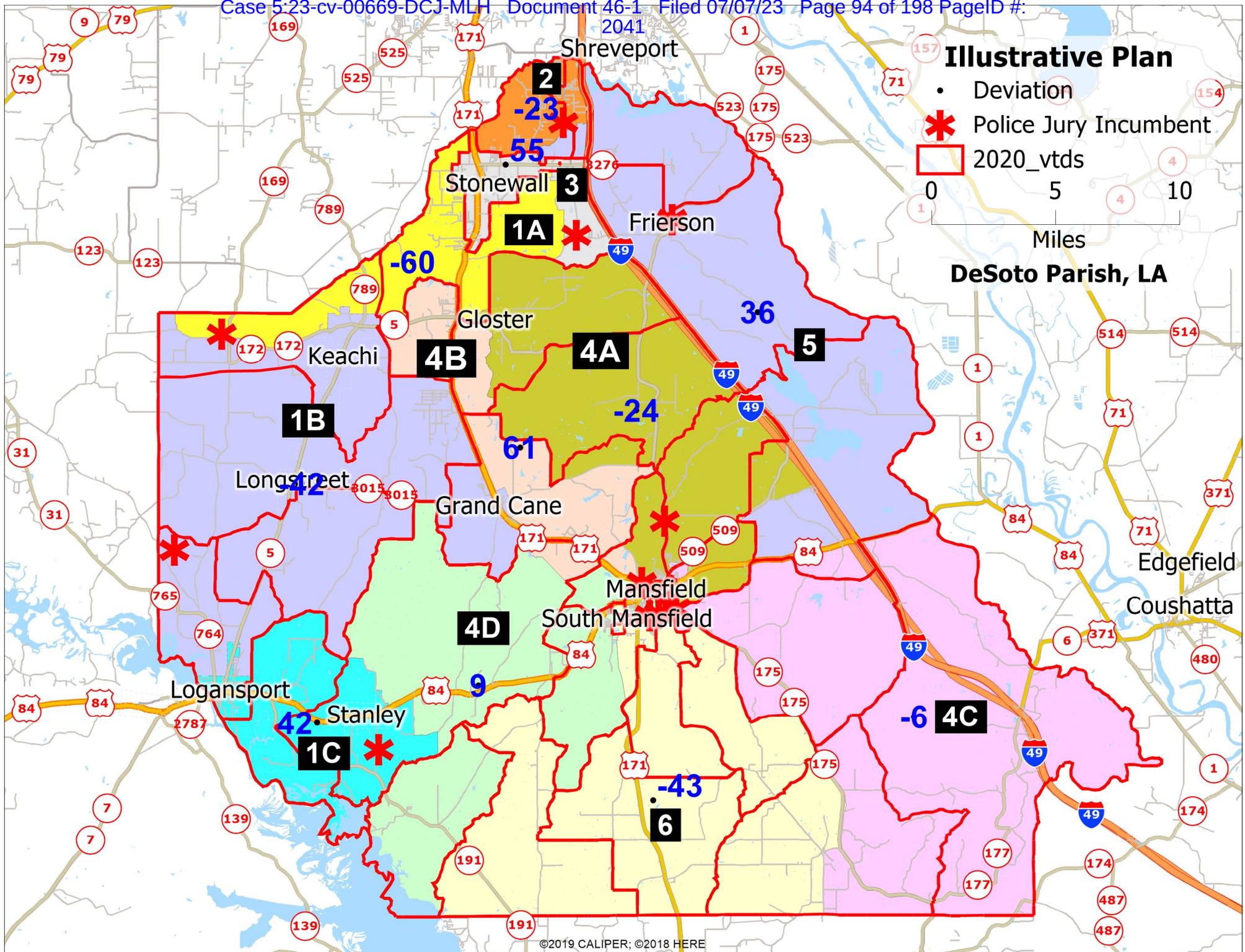
De Soto LA	11	PJ1A	106
De Soto LA	11	PJ1B	174
De Soto LA	11	PJ1C	485
De Soto LA	16	PJ1A	289
De Soto LA	16	PJ2	637
De Soto LA	16	PJ3	1,347
De Soto LA	22	PJ2	383
De Soto LA	22	PJ5	590
De Soto LA	23	PJ1A	1,387
De Soto LA	23	PJ1C	0
De Soto LA	23	PJ3	1,175
De Soto LA	26	PJ4C	384
De Soto LA	26	PJ6	131
De Soto LA	28	PJ1B	100
De Soto LA	28	PJ1C	316
De Soto LA	30	PJ2	1,441
De Soto LA	30	PJ3	6
De Soto LA	30	PJ5	136
De Soto LA	31	PJ4A	500
De Soto LA	31	PJ4B	80
De Soto LA	33	PJ4A	316

**Political Subdivison Splits Between Districts**

Desoto\_Plan\_H\_Revised

<b>County</b>	<b>Voting District</b>	<b>District</b>	<b>Population</b>
De Soto LA	33	PJ5	955
De Soto LA	34	PJ1A	466
De Soto LA	34	PJ1C	29
De Soto LA	34	PJ4B	341
De Soto LA	35	PJ1A	267
De Soto LA	35	PJ1C	293
De Soto LA	37	PJ4A	61
De Soto LA	37	PJ4B	536
De Soto LA	38	PJ4A	387
De Soto LA	38	PJ4C	356
De Soto LA	4	PJ4B	0
De Soto LA	4	PJ4D	333
De Soto LA	44	PJ4B	38
De Soto LA	44	PJ4D	589
De Soto LA	46	PJ1C	829
De Soto LA	46	PJ4D	331
De Soto LA	5	PJ4A	185
De Soto LA	5	PJ4C	921
De Soto LA	59	PJ4B	99
De Soto LA	59	PJ6	888
De Soto LA	6	PJ4A	393
De Soto LA	6	PJ4C	160
De Soto LA	6	PJ6	109
De Soto LA	60	PJ4A	26
De Soto LA	60	PJ4B	678
De Soto LA	63	PJ4B	170
De Soto LA	63	PJ4D	1,078
De Soto LA	9	PJ4C	528
De Soto LA	9	PJ6	33

# COOPER EXHIBIT D-1



# COOPER

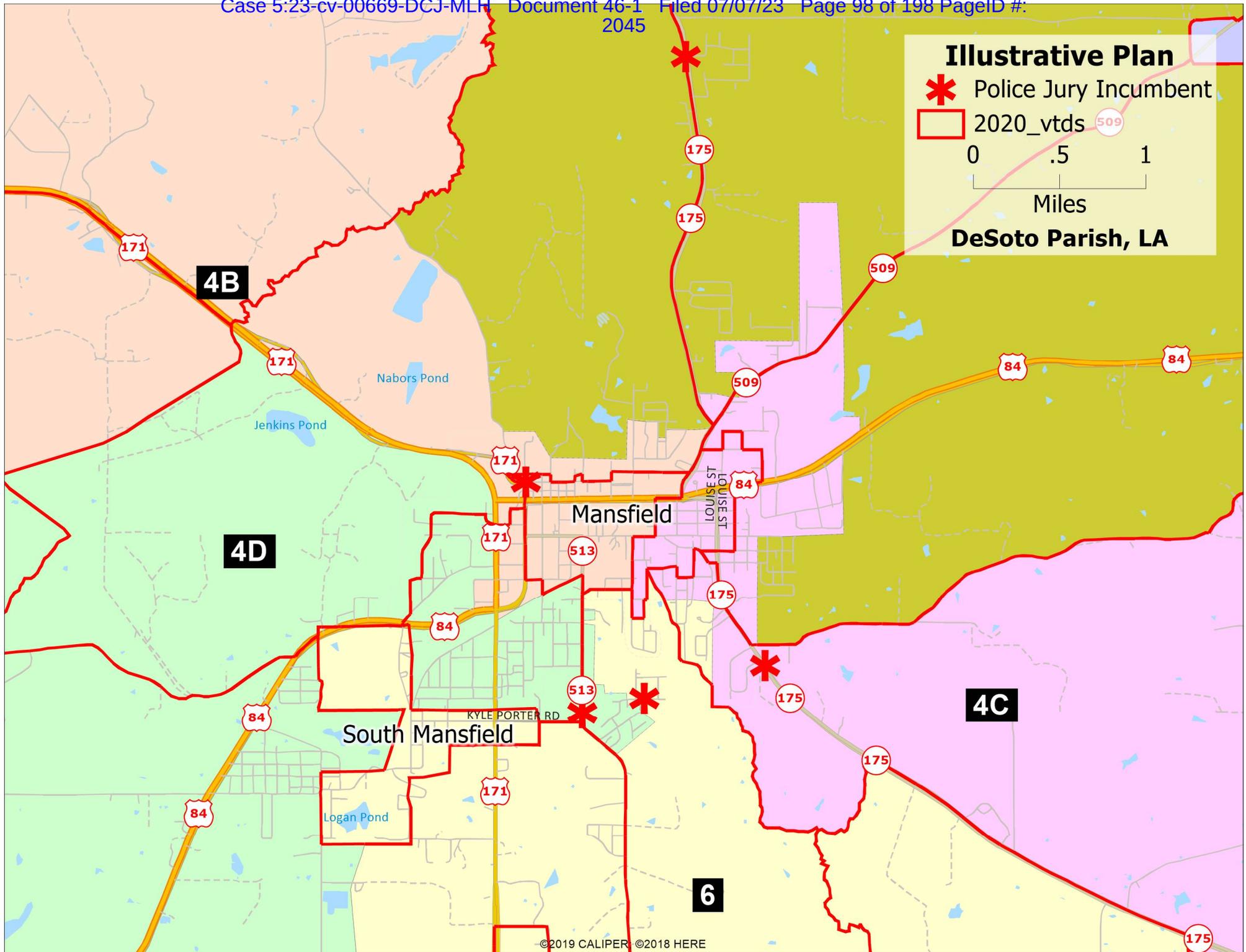
# EXHIBIT D-2

**Population Summary Report  
DeSoto Parish -- Illustrative Plan**

<b>District</b>	<b>2020 Pop.</b>	<b>Deviation</b>	<b>% Deviation</b>	<b>18+ Pop</b>	<b>18+ AP Black</b>	<b>% 18+ AP Black</b>	<b>18+_NH White</b>	<b>% 18+ NH White</b>	<b>18+ Latine</b>	<b>% 18+ Latine</b>
1A	2377	-60	-2.46%	1662	157	9.45%	1409	84.78%	47	2.83%
1B	2395	-42	-1.72%	1959	328	16.74%	1501	76.62%	57	2.91%
1C	2479	42	1.72%	1872	434	23.18%	1370	73.18%	27	1.44%
2	2414	-23	-0.94%	1730	139	8.03%	1397	80.75%	68	3.93%
3	2492	55	2.26%	1885	141	7.48%	1578	83.71%	55	2.92%
4A	2413	-24	-0.98%	1884	1065	56.53%	737	39.12%	45	2.39%
4B	2498	61	2.50%	1948	1110	56.98%	696	35.73%	66	3.39%
4C	2431	-6	-0.25%	1906	1241	65.11%	602	31.58%	20	1.05%
4D	2446	9	0.37%	1868	1145	61.30%	646	34.58%	51	2.73%
5	2473	36	1.48%	1918	578	30.14%	1218	63.50%	27	1.41%
6	2394	-43	-1.76%	1808	1087	60.12%	648	35.84%	32	1.77%
<b>Total 2020 Pop.</b>	<b>26,812</b>		<b>4.96%</b>	<b>20,440</b>	<b>7,425</b>	<b>36.33%</b>	<b>11,802</b>	<b>57.74%</b>	<b>495</b>	<b>2.42%</b>

# COOPER

# EXHIBIT D-3



# COOPER EXHIBIT D-4

User:

Plan Name: DeSoto\_Illustrative\_Plan

Plan Type:

# Communities of Interest (Condensed)

Friday, July 7, 2023

5:19 PM

**Whole Census Place : 487**

**Census Place Splits: 4**

**Zero Population Census Place Splits: 0**

District	Census Place	Population	% Pop	District	Census Place	Population	% Pop
PJ4B	Mansfield	1,248	26.47%				
PJ4C	Mansfield	1,610	34.15%				
PJ4D	Mansfield	1,260	26.73%				
PJ6	Mansfield	596	12.64%				

# COOPER EXHIBIT D-5

User:  
 Plan Name: DeSoto\_Illustrative\_Plan  
 Plan Type:

## Measures of Compactness Report

Friday, July 7, 2023

5:21 PM

	<b>Reock</b>	<b>Polsby-Popper</b>	<b>Length-Width</b>
Sum	N/A	N/A	N/A
Min	0.16	0.12	0.01
Max	0.54	0.45	6.89
Mean	0.40	0.25	2.43
Std. Dev.	0.14	0.10	2.26
<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>	<b>Length-Width</b>
PJ1A	0.16	0.12	6.89
PJ1B	0.54	0.31	0.01
PJ1C	0.54	0.28	0.37
PJ2	0.50	0.45	0.51
PJ3	0.28	0.16	1.60
PJ4A	0.46	0.31	0.07
PJ4B	0.20	0.17	1.34
PJ4C	0.45	0.32	4.31
PJ4D	0.41	0.13	3.87
PJ5	0.29	0.28	4.00
PJ6	0.53	0.25	3.77

## Measures of Compactness Report

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DeSoto\_Illustrative\_Plan

### Measures of Compactness Summary

<b>Reock</b>	The measure is always between 0 and 1, with 1 being the most compact.
<b>Polsby-Popper</b>	The measure is always between 0 and 1, with 1 being the most compact.
<b>Length-Width</b>	A lower number indicates better length-width compactness.

# COOPER EXHIBIT D-6

User:

Plan Name: DeSoto\_Illustrative\_Plan

Plan Type:

## Political Subdivison Splits Between Districts

Friday, July 7, 2023

5:22 PM

### Split Counts

Number of subdivisions split into more than one district:      Number of splits involving no population:

County	1	County	0
Voting District	18	Voting District	2

Number of times a subdivision is split into multiple districts:

County	10
Voting District	25

County	Voting District	District	Population
--------	-----------------	----------	------------

*Split Counties:*

De Soto LA		PJ1A	2,377
De Soto LA		PJ1B	2,395
De Soto LA		PJ1C	2,479
De Soto LA		PJ2	2,414
De Soto LA		PJ3	2,492
De Soto LA		PJ4A	2,413
De Soto LA		PJ4B	2,498
De Soto LA		PJ4C	2,431
De Soto LA		PJ4D	2,446
De Soto LA		PJ5	2,473
De Soto LA		PJ6	2,394

*Split VTDs:*

De Soto LA	10	PJ1B	392
De Soto LA	10	PJ1C	1,120
De Soto LA	22	PJ2	973
De Soto LA	22	PJ5	0
De Soto LA	23	PJ1A	2,313
De Soto LA	23	PJ1B	0
De Soto LA	23	PJ3	213
De Soto LA	23	PJ4A	36
De Soto LA	26	PJ4A	107
De Soto LA	26	PJ4C	63
De Soto LA	26	PJ5	345
De Soto LA	30	PJ2	1,441
De Soto LA	30	PJ3	6
De Soto LA	30	PJ5	136
De Soto LA	31	PJ4A	542
De Soto LA	31	PJ4B	38
De Soto LA	34	PJ1B	4
De Soto LA	34	PJ4B	832
De Soto LA	35	PJ1A	64
De Soto LA	35	PJ1B	496
De Soto LA	37	PJ1B	322

**Political Subdivison Splits Between Districts**

DeSoto\_Illustrative\_Plan

<b>County</b>	<b>Voting District</b>	<b>District</b>	<b>Population</b>
De Soto LA	37	PJ4A	35
De Soto LA	37	PJ4B	240
De Soto LA	38	PJ4A	637
De Soto LA	38	PJ4C	106
De Soto LA	44	PJ4D	465
De Soto LA	44	PJ6	162
De Soto LA	46	PJ1C	651
De Soto LA	46	PJ4B	133
De Soto LA	46	PJ4D	376
De Soto LA	5	PJ4A	431
De Soto LA	5	PJ4C	675
De Soto LA	55	PJ4C	181
De Soto LA	55	PJ6	192
De Soto LA	59	PJ4D	190
De Soto LA	59	PJ6	797
De Soto LA	60	PJ4A	157
De Soto LA	60	PJ4B	413
De Soto LA	60	PJ4D	134
De Soto LA	63	PJ4B	230
De Soto LA	63	PJ4D	1,018
De Soto LA	9	PJ4C	395
De Soto LA	9	PJ6	166

# COOPER EXHIBIT E

## **Selected Socio-Economic Data**

### **De Soto Parish, Louisiana**

#### **Single-Race African Americans and Latinos vis-à-vis Non-Hispanic Whites**

#### **Data Set: 2015-2019 American Community Survey 5-Year Estimates**

[20-Jun-21](#)

**C02003.DETAILED RACE - Universe: TOTAL POPULATION**  
 Data Set: 2015-2019 American Community Survey 5-Year Estimates

	De Soto Parish, Louisiana		
	Population	Margin of Error (+/-)	% of Total
<b>Total:</b>	<b>27,289</b>	<b>*****</b>	<b>100.0%</b>
Population of one race:	26,751	217	98.0%
White	16,770	50	61.5%
Black or African American	9,663	183	35.4%
American Indian and Alaska Native	254	130	0.9%
Asian alone	27	30	0.1%
Native Hawaiian and Other Pacific Islander	11	18	0.0%
Some other race	26	39	0.1%
Population of two or more races:	538	217	2.0%
Two races including Some other race	9	17	0.0%
Two races excluding Some other race, and three or more races	529	217	1.9%
Population of two races:	523	216	1.9%
White; Black or African American	301	163	1.1%
White; American Indian and Alaska Native	134	121	0.5%
White; Asian	10	11	0.0%
Black or African American; American Indian and Alaska Native	69	45	0.3%
All other two race combinations	9	17	0.0%
Population of three races	15	18	0.1%
Population of four or more races	0	24	0.0%

Note: Hispanics may be of any race. See Table B03002 and chart.

Source: U.S. Census Bureau, 2015-2019 American Community Survey

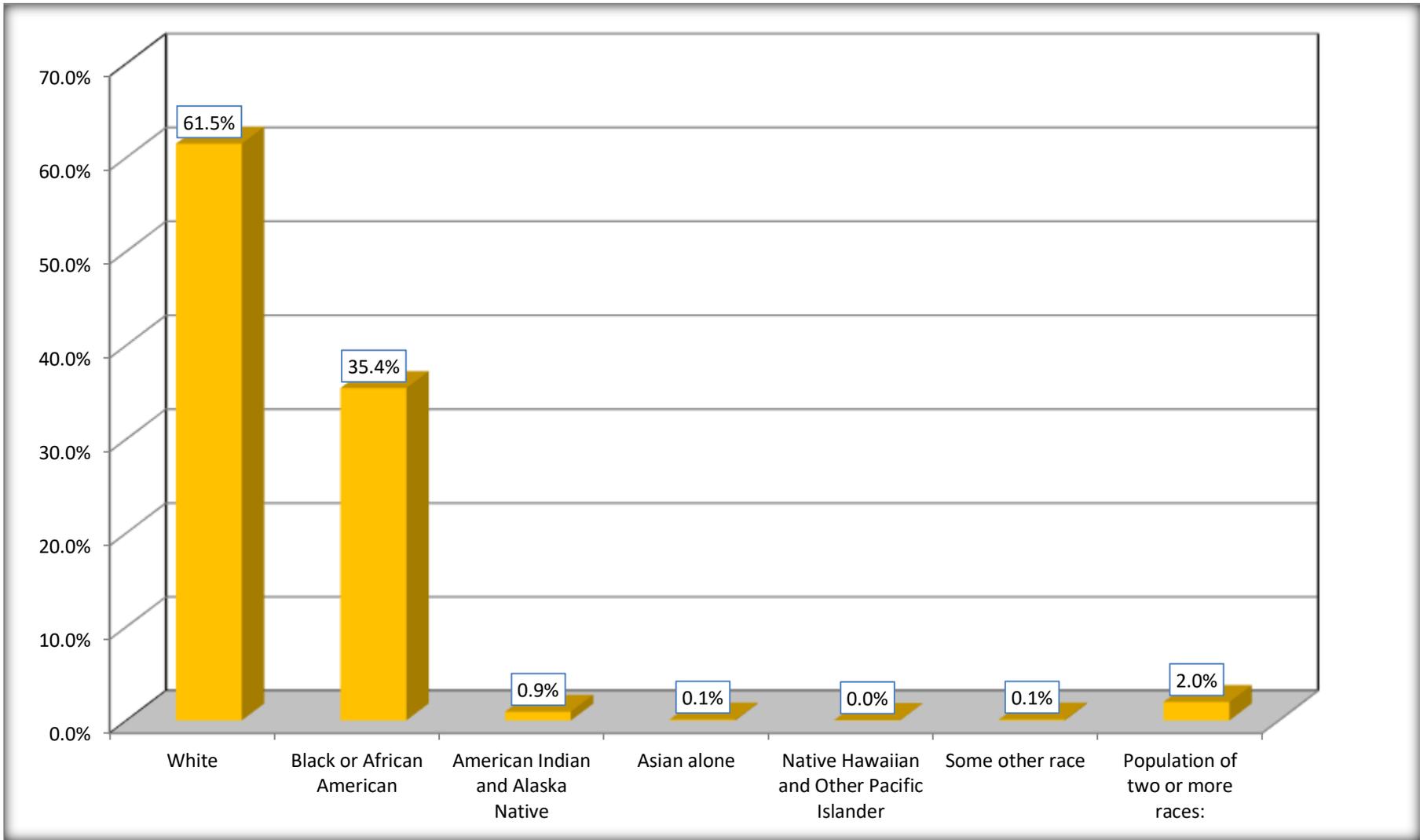
Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

### Population by Race

#### De Soto Parish, Louisiana



Source: C02003.DETAILED RACE - Universe: TOTAL POPULATION  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B03002. HISPANIC OR LATINO ORIGIN BY RACE - Universe: TOTAL POPULATION**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

	De Soto Parish, Louisiana		
	Population	Margin of Error (+/-)	% of Total
<b>Total:</b>	27,289	*****	<b>100.0%</b>
Not Hispanic or Latino:	26,504	*****	97.1%
White alone	16,039	3	58.8%
Black or African American alone	9,643	178	35.3%
American Indian and Alaska Native alone	245	119	0.9%
Asian alone	27	30	0.1%
Native Hawaiian and Other Pacific Islander alone	11	18	0.0%
Some other race alone	24	38	0.1%
Two or more races:	515	217	1.9%
Two races including Some other race	0	24	0.0%
Two races excluding Some other race, and three or more races	515	217	1.9%
Hispanic or Latino	785	*****	2.9%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

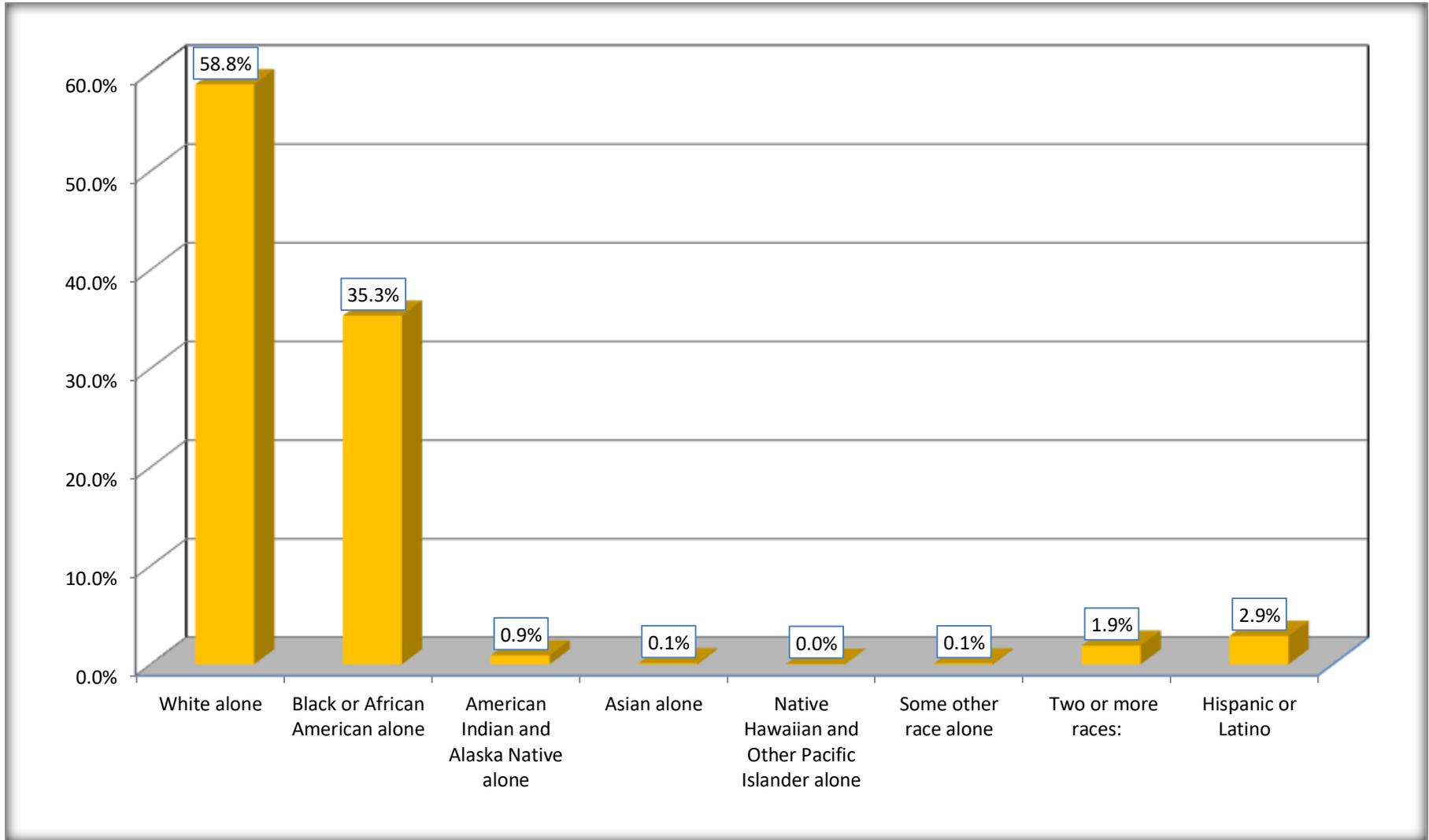
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<http://www.census.gov/acs/www/UseData/index.htm>

### Non-Hispanic by Race and Hispanic Population

#### De Soto Parish, Louisiana



Source: B03002. HISPANIC OR LATINO ORIGIN BY RACE - Universe: TOTAL POPULATION  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B03002. HISPANIC OR LATINO ORIGIN BY RACE**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

	De Soto Parish, Louisiana		
	Population	Margin of Error (+/-)	% of Total
Hispanic or Latino:	785	*****	<b>100.0%</b>
White alone	731	49	93.1%
Black or African American alone	20	30	2.5%
American Indian and Alaska Native alone	9	32	1.1%
Asian alone	0	24	0.0%
Native Hawaiian and Other Pacific Islander alone	0	24	0.0%
Some other race alone	2	5	0.3%
Two or more races:	23	31	2.9%
Two races including Some other race	9	17	1.1%
Two races excluding Some other race, and three or more races	14	26	1.8%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

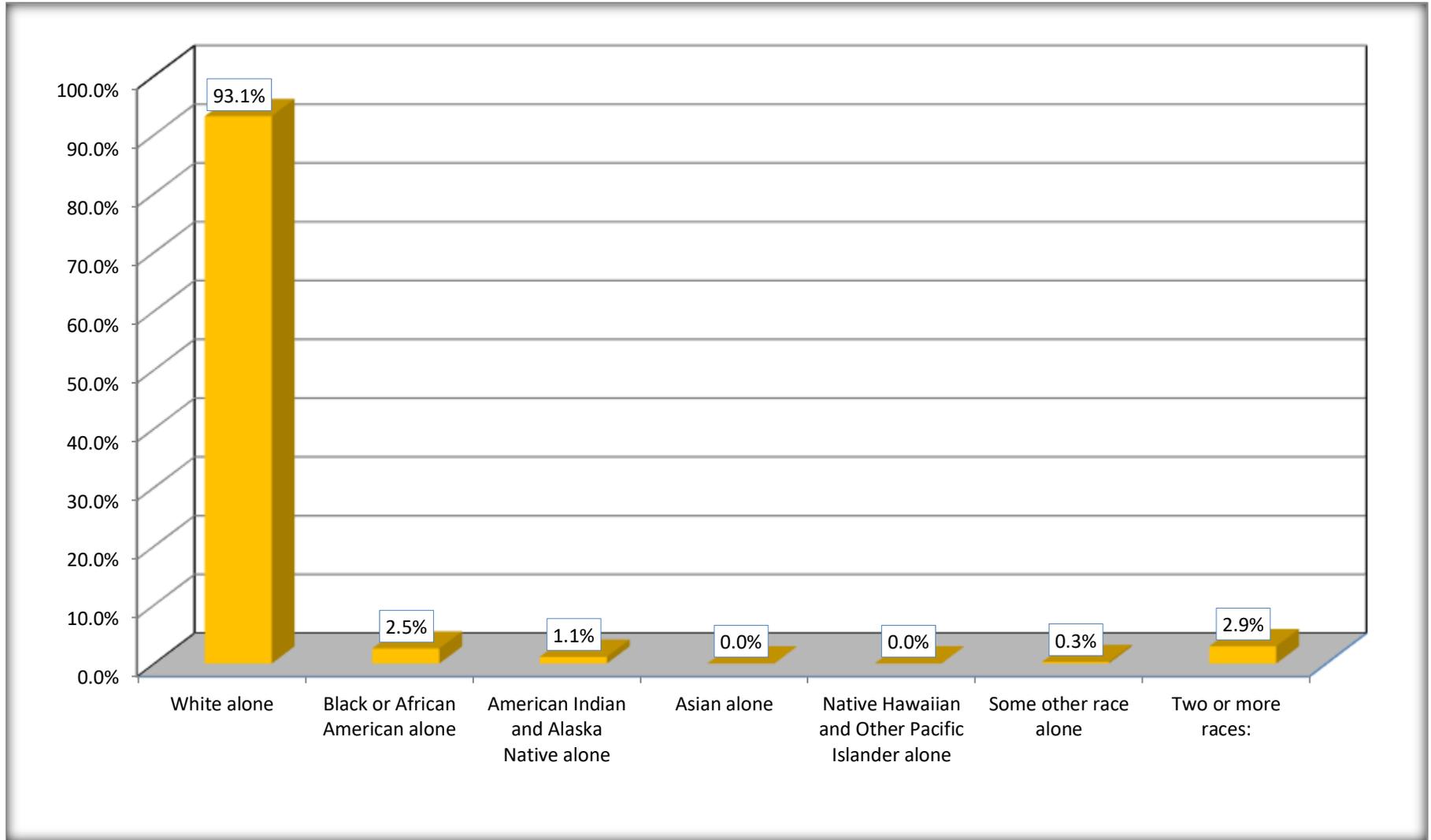
Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

### Hispanic or Latino Origin by Race

#### De Soto Parish, Louisiana



Source: B03002. HISPANIC OR LATINO ORIGIN BY RACE  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B01001. SEX BY AGE**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>9,663</b>	<b>100.0%</b>	<b>785</b>	<b>100.0%</b>	<b>16,039</b>	<b>100.0%</b>
Under 18 years	2,287	23.7%	270	34.4%	3,617	22.6%
18 to 64 years	5,941	61.5%	443	56.4%	9,294	57.9%
65 years and over	1,435	14.9%	72	9.2%	3,128	19.5%
Male:	4,462	46.2%	420	53.5%	7,879	49.1%
Under 18 years	1,107	11.5%	142	18.1%	1,874	11.7%
18 to 64 years	2,768	28.6%	230	29.3%	4,589	28.6%
65 years and over	587	6.1%	48	6.1%	1,416	8.8%
Female:	5,201	53.8%	365	46.5%	8,160	50.9%
Under 18 years	1,180	12.2%	128	16.3%	1,743	10.9%
18 to 64 years	3,173	32.8%	213	27.1%	4,705	29.3%
65 years and over	848	8.8%	24	3.1%	1,712	10.7%

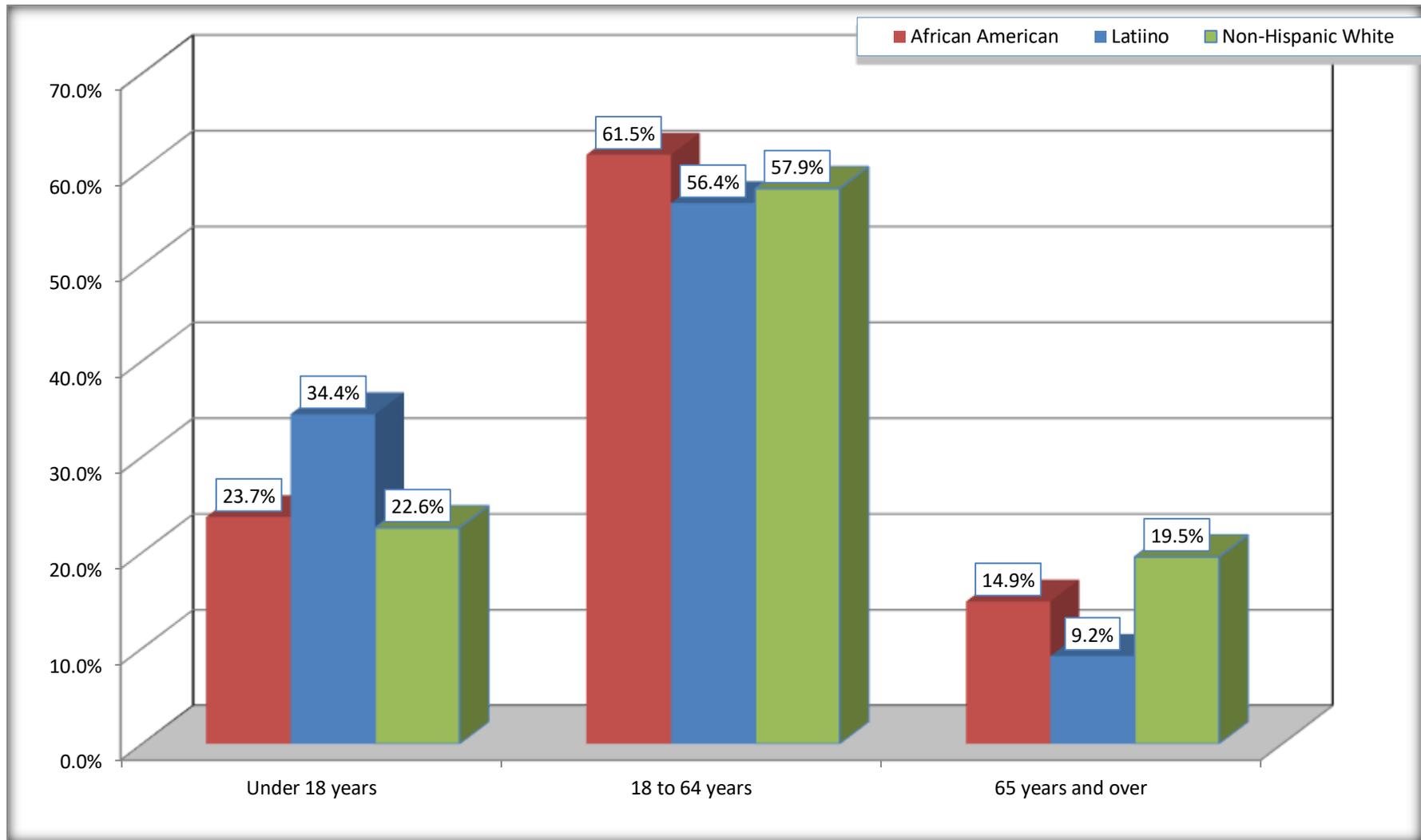
Source: U.S. Census Bureau, 2015-2019 American Community Survey

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Population by Age

### De Soto Parish, Louisiana



Source: B01001. SEX BY AGE  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B05003. SEX BY AGE BY CITIZENSHIP STATUS**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

	De Soto Parish, Louisiana					
	African American	% of AA Total by Age	Latino	% of Latino Total by Age	White, Not Hispanic	% of NHW Total by Age
<b>Total:</b>	<b>9,663</b>	<b>100.0%</b>	<b>785</b>	<b>100.0%</b>	<b>16,039</b>	<b>100.0%</b>
<b>Under 18 years:</b>	<b>2,287</b>	<b>100.0%</b>	<b>270</b>	<b>100.0%</b>	<b>3,617</b>	<b>100.0%</b>
Native	2,287	100.0%	270	100.0%	3,612	99.9%
Foreign born:	0	0.0%	0	0.0%	5	0.1%
Naturalized U.S. citizen	0	0.0%	0	0.0%	5	0.1%
Not a U.S. citizen	0	0.0%	0	0.0%	0	0.0%
<b>18 years and over:</b>	<b>7,376</b>	<b>100.0%</b>	<b>515</b>	<b>100.0%</b>	<b>12,422</b>	<b>100.0%</b>
Native	7,365	99.9%	384	74.6%	12,372	99.6%
Foreign born:	11	0.1%	131	25.4%	50	0.4%
Naturalized U.S. citizen	11	0.1%	46	8.9%	50	0.4%
Not a U.S. citizen	0	0.0%	85	16.5%	0	0.0%
<b>Male:</b>	<b>4,462</b>	<b>46.2%</b>	<b>420</b>	<b>53.5%</b>	<b>7,879</b>	<b>49.1%</b>
<b>Under 18 years:</b>	<b>1,107</b>	<b>100.0%</b>	<b>142</b>	<b>100.0%</b>	<b>1,874</b>	<b>100.0%</b>
Native	1,107	100.0%	142	100.0%	1,869	99.7%
Foreign born:	0	0.0%	0	0.0%	5	0.3%
Naturalized U.S. citizen	0	0.0%	0	0.0%	5	0.3%
Not a U.S. citizen	0	0.0%	0	0.0%	0	0.0%
<b>18 years and over:</b>	<b>3,355</b>	<b>100.0%</b>	<b>278</b>	<b>100.0%</b>	<b>6,005</b>	<b>100.0%</b>
Native	3,355	100.0%	220	79.1%	5,997	99.9%
Foreign born:	0	0.0%	58	20.9%	8	0.1%
Naturalized U.S. citizen	0	0.0%	2	0.7%	8	0.1%
Not a U.S. citizen	0	0.0%	56	20.1%	0	0.0%

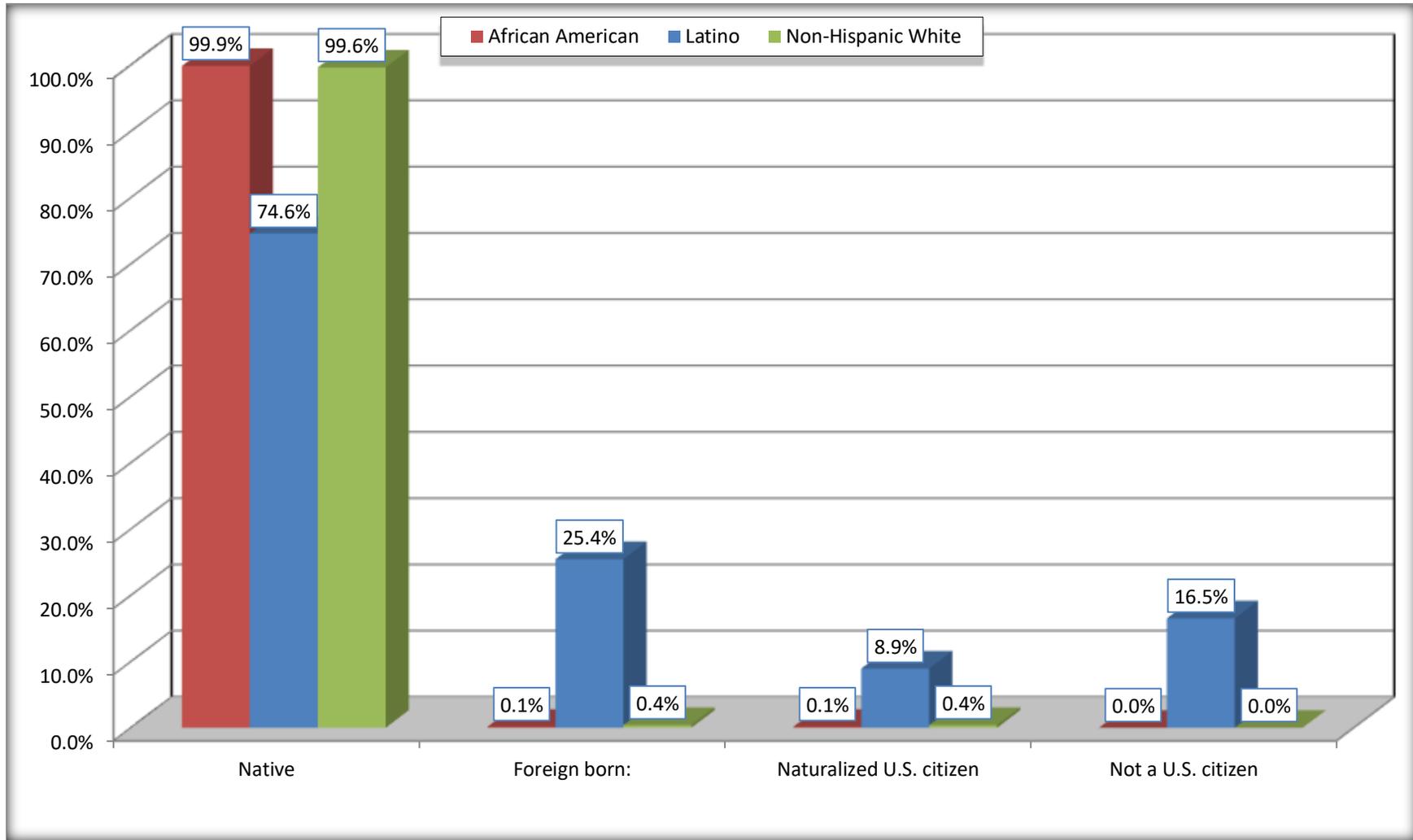
	<b>De Soto Parish, Louisiana</b>					
	African American	% of AA by Age	Latino	% of Latino by Age	White, Not Hispanic	% of NHW by Age
<b>Female:</b>	5,201	53.8%	365	46.5%	8,160	50.9%
<b>Under 18 years:</b>	<b>1,180</b>	<b>100.0%</b>	<b>128</b>	<b>100.0%</b>	<b>1,743</b>	<b>100.0%</b>
Native	1,180	100.0%	128	100.0%	1,743	100.0%
Foreign born:	0	0.0%	0	0.0%	0	0.0%
Naturalized U.S. citizen	0	0.0%	0	0.0%	0	0.0%
Not a U.S. citizen	0	0.0%	0	0.0%	0	0.0%
<b>18 years and over:</b>	<b>4,021</b>	<b>100.0%</b>	<b>237</b>	<b>100.0%</b>	<b>6,417</b>	<b>100.0%</b>
Native	4,010	99.7%	164	69.2%	6,375	99.3%
Foreign born:	11	0.3%	73	30.8%	42	0.7%
Naturalized U.S. citizen	11	0.3%	44	18.6%	42	0.7%
Not a U.S. citizen	0	0.0%	29	12.2%	0	0.0%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

### Citizenship Status of Voting Age Population (18 and Over)

#### De Soto Parish, Louisiana



Source: B05003. SEX BY AGE BY CITIZENSHIP STATUS  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B07004. GEOGRAPHICAL MOBILITY IN THE PAST YEAR BY RACE FOR CURRENT RESIDENCE IN THE UNITED STATES - Universe: POPULATION 1 YEAR AND OVER**  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

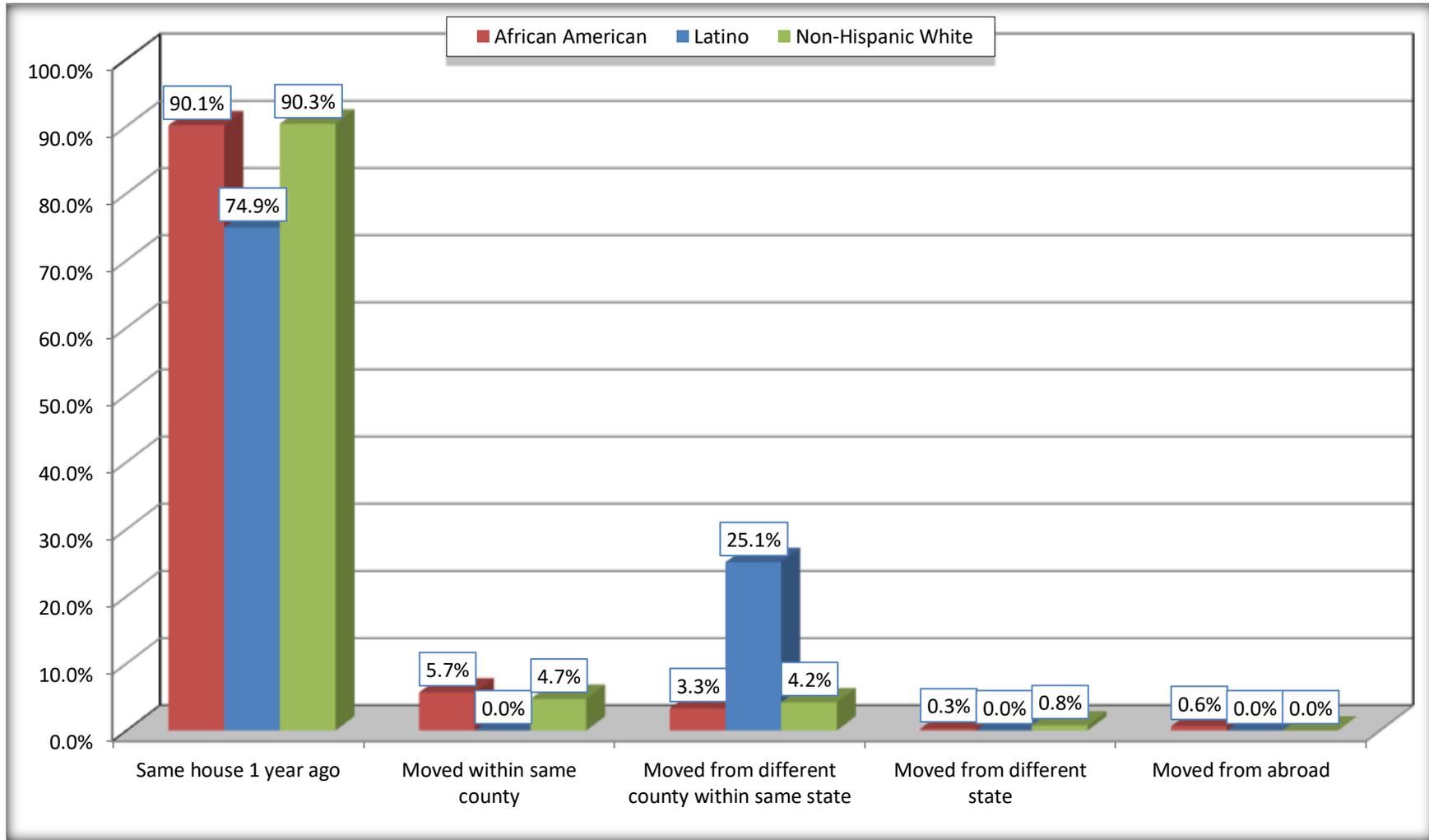
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
Total:	<b>9,473</b>	<b>100.0%</b>	<b>782</b>	<b>100.0%</b>	<b>15,949</b>	<b>100.0%</b>
Same house 1 year ago	8,537	90.1%	586	74.9%	14,409	90.3%
Moved within same county	537	5.7%	0	0.0%	750	4.7%
Moved from different county within same state	313	3.3%	196	25.1%	669	4.2%
Moved from different state	26	0.3%	0	0.0%	121	0.8%
Moved from abroad	60	0.6%	0	0.0%	0	0.0%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Geographical Mobility in the Past Year (Population 1 Year and Over)

### De Soto Parish, Louisiana



Source: B07004. GEOGRAPHICAL MOBILITY IN THE PAST YEAR BY RACE FOR CURRENT RESIDENCE IN THE UNITED STATES - Universe: POPULATION 1 YEAR AND OVER  
 Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B08105. MEANS OF TRANSPORTATION TO WORK - Universe: WORKERS 16 YEARS AND OVER**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

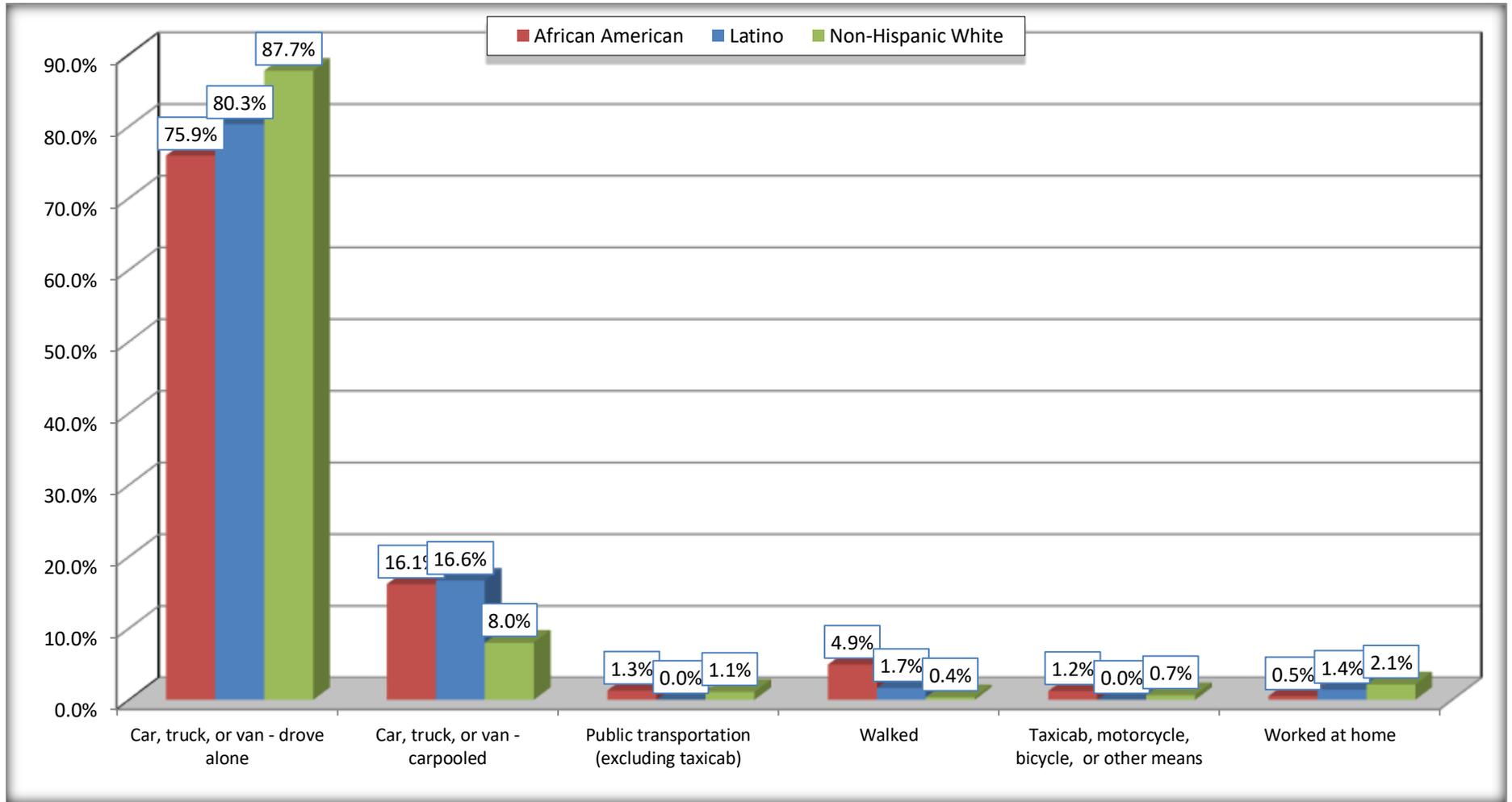
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	3,313	<b>100.0%</b>	421	<b>100.0%</b>	6,839	<b>100.0%</b>
Car, truck, or van - drove alone	2,515	75.9%	338	80.3%	6,001	87.7%
Car, truck, or van - carpooled	534	16.1%	70	16.6%	545	8.0%
Public transportation (excluding taxicab)	43	1.3%	0	0.0%	76	1.1%
Walked	163	4.9%	7	1.7%	25	0.4%
Taxicab, motorcycle, bicycle, or other means	41	1.2%	0	0.0%	45	0.7%
Worked at home	17	0.5%	6	1.4%	147	2.1%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey <http://www.census.gov/acs/www/UseData/index.htm>

## Means of Transportation to Work (Workers 16 Years and Over)

### De Soto Parish, Louisiana



Source: B08105. MEANS OF TRANSPORTATION TO WORK - Universe: WORKERS 16 YEARS AND OVER  
 Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B11002. HOUSEHOLD TYPE BY RELATIVES AND NONRELATIVES FOR POPULATION IN HOUSEHOLDS**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

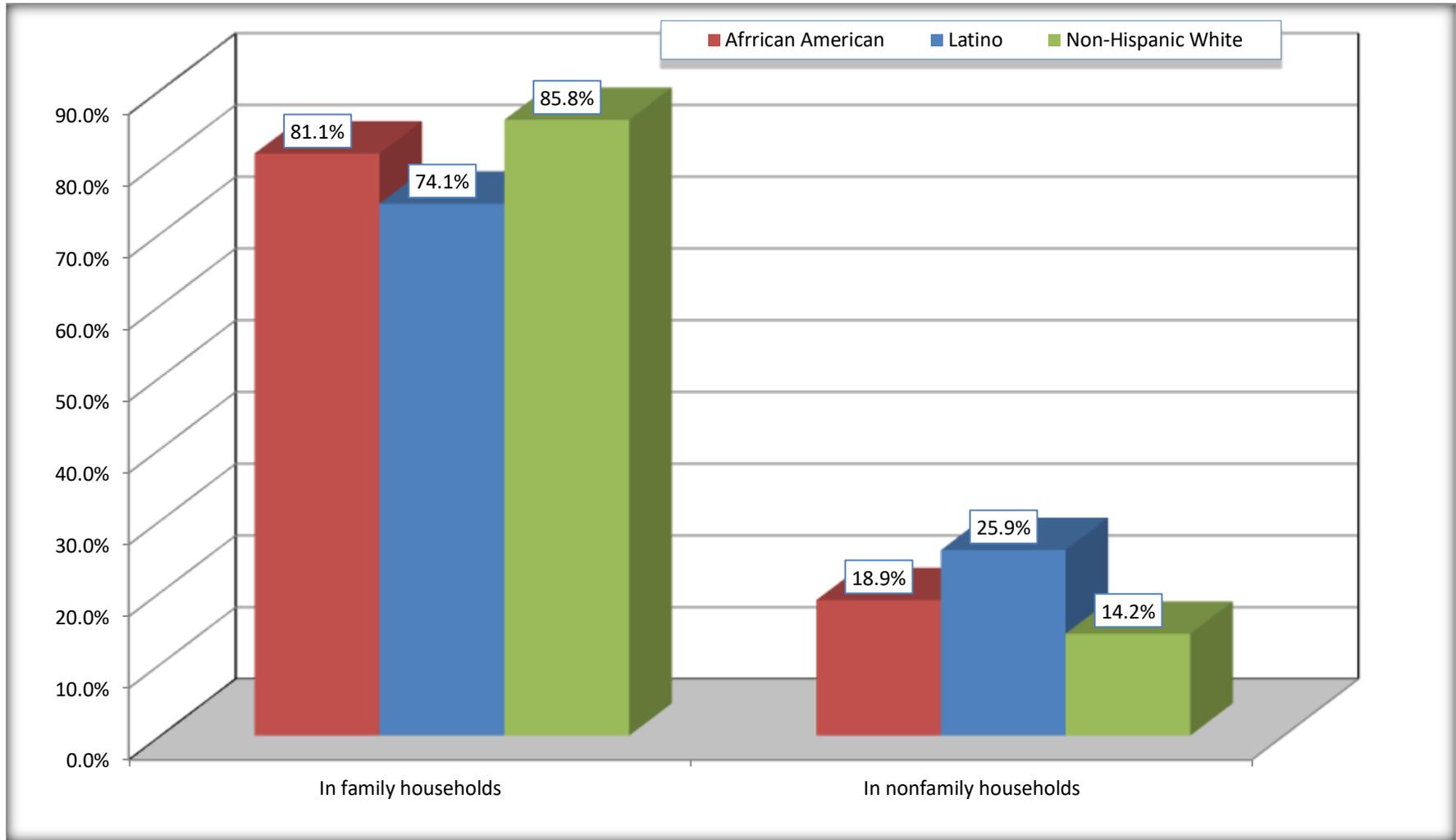
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	9,498	<b>100.0%</b>	522	<b>100.0%</b>	16,380	<b>100.0%</b>
In family households	7,704	81.1%	387	74.1%	14,055	85.8%
In nonfamily households	1,794	18.9%	135	25.9%	2,325	14.2%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Household Type for Population in Households

### De Soto Parish, Louisiana



Source: B11002. HOUSEHOLD TYPE BY RELATIVES AND NONRELATIVES FOR POPULATION IN HOUSEHOLDS  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B12002. MARITAL STATUS FOR THE POPULATION 15 YEARS AND OVER**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

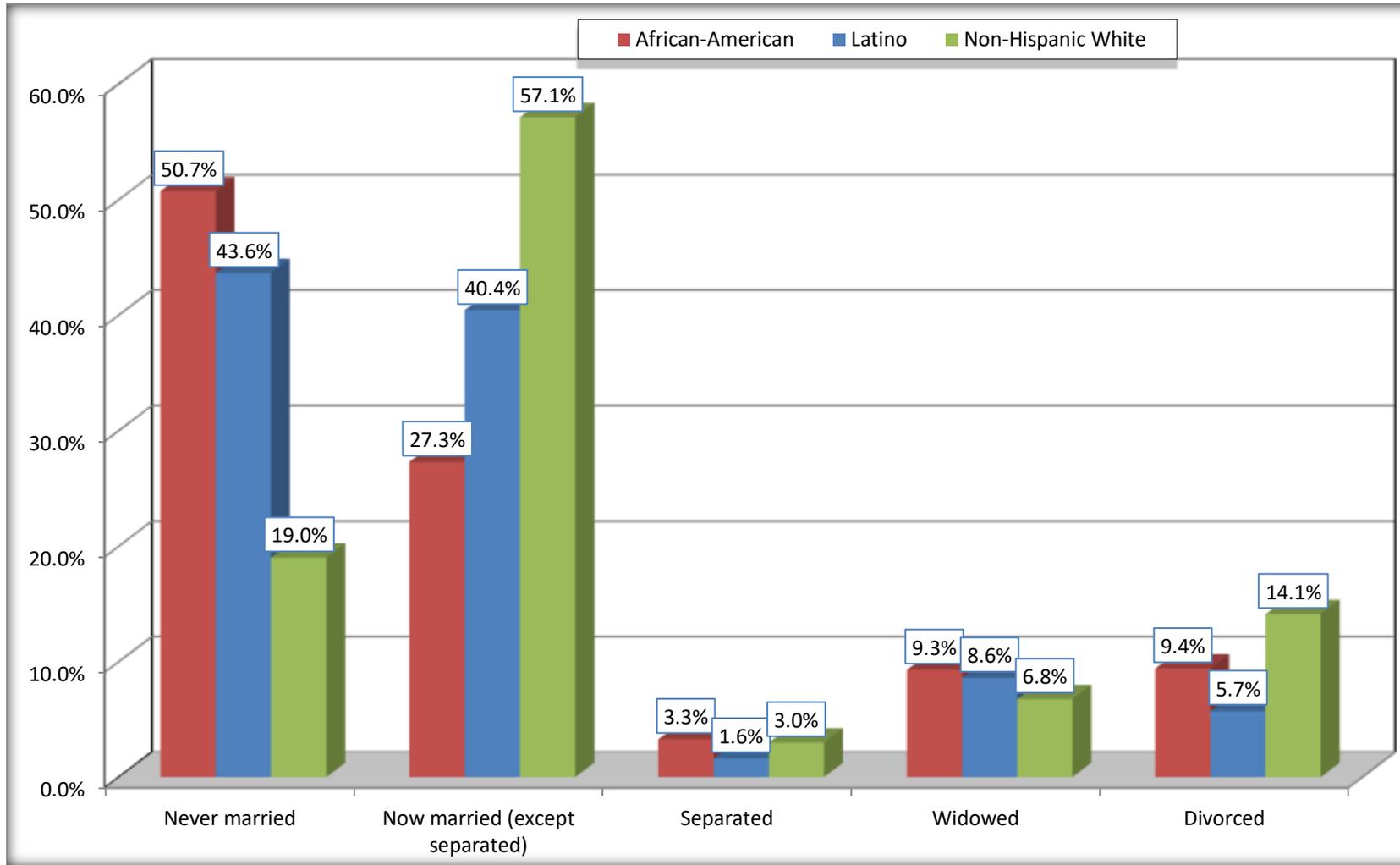
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>7,781</b>	<b>100.0%</b>	<b>559</b>	<b>100.0%</b>	<b>13,050</b>	<b>100.0%</b>
Never married	3,947	50.7%	244	43.6%	2,480	19.0%
Now married (except separated)	2,124	27.3%	226	40.4%	7,456	57.1%
Separated	255	3.3%	9	1.6%	391	3.0%
Widowed	723	9.3%	48	8.6%	882	6.8%
Divorced	732	9.4%	32	5.7%	1,841	14.1%
<b>Male:</b>	<b>3,549</b>	<b>45.6%</b>	<b>278</b>	<b>49.7%</b>	<b>6,322</b>	<b>48.4%</b>
Never married	2,002	25.7%	147	26.3%	1,348	10.3%
Now married (except separated)	1,026	13.2%	63	11.3%	3,789	29.0%
Separated	91	1.2%	0	0.0%	201	1.5%
Widowed	151	1.9%	40	7.2%	121	0.9%
Divorced	279	3.6%	28	5.0%	863	6.6%
<b>Female:</b>	<b>4,232</b>	<b>54.4%</b>	<b>281</b>	<b>50.3%</b>	<b>6,728</b>	<b>51.6%</b>
Never married	1,945	25.0%	97	17.4%	1,132	8.7%
Now married (except separated)	1,098	14.1%	163	29.2%	3,667	28.1%
Separated	164	2.1%	9	1.6%	190	1.5%
Widowed	572	7.4%	8	1.4%	761	5.8%
Divorced	453	5.8%	4	0.7%	978	7.5%

Source: U.S. Census Bureau, 2015-2019 American Community

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Marital Status for the Population 15 Years and Over

### De Soto Parish, Louisiana



Source: B12002. MARITAL STATUS FOR THE POPULATION 15 YEARS AND OVER  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**C15002. SEX BY EDUCATIONAL ATTAINMENT FOR THE POPULATION 25 YEARS AND OVER**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

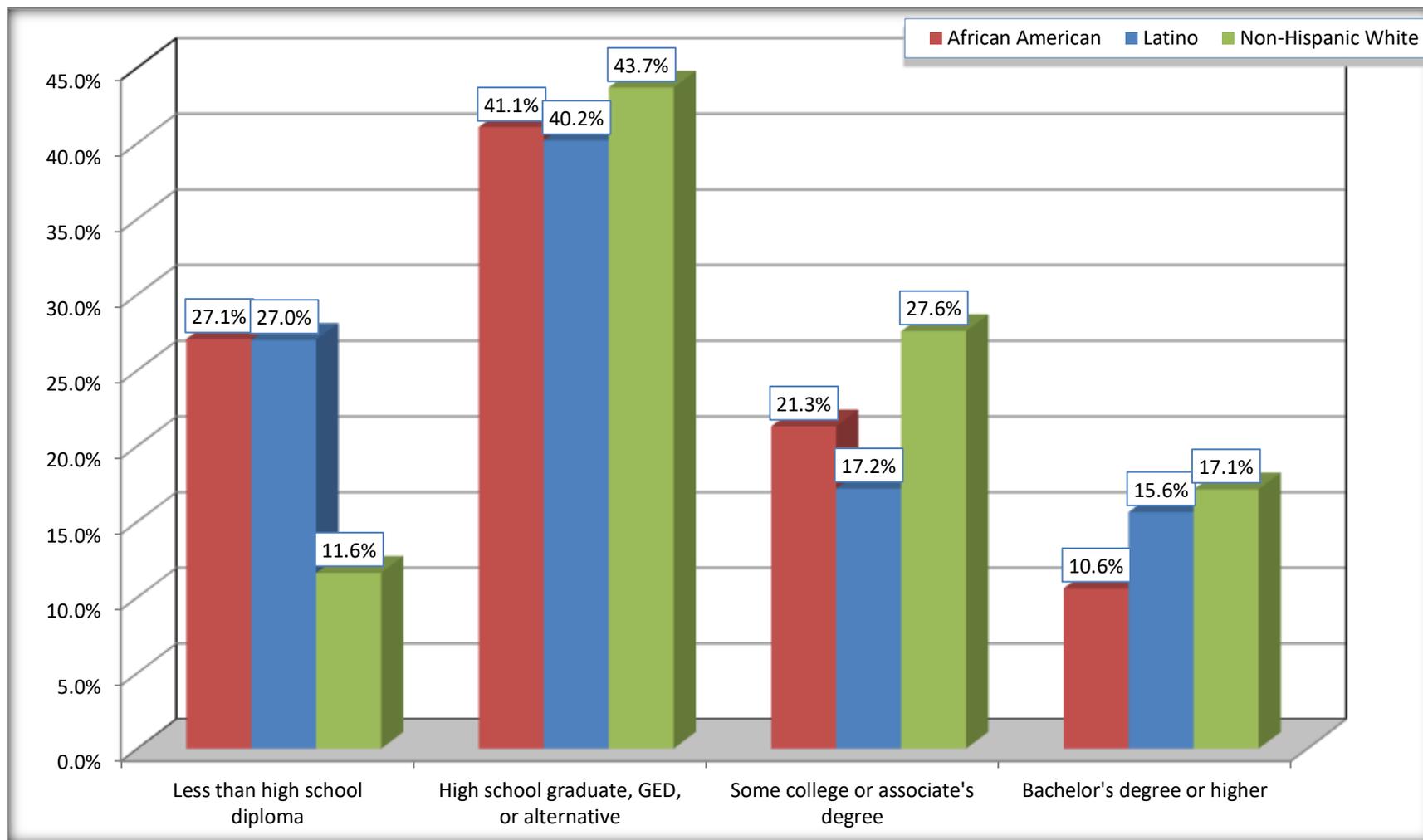
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>6,435</b>	<b>100.0%</b>	<b>448</b>	<b>100.0%</b>	<b>11,400</b>	<b>100.0%</b>
Less than high school diploma	1,742	27.1%	121	27.0%	1,324	11.6%
High school graduate, GED, or alternative	2,642	41.1%	180	40.2%	4,979	43.7%
Some college or associate's degree	1,370	21.3%	77	17.2%	3,145	27.6%
Bachelor's degree or higher	681	10.6%	70	15.6%	1,952	17.1%
Male:	2,899	45.1%	251	56.0%	5,468	48.0%
Less than high school diploma	974	15.1%	108	24.1%	491	4.3%
High school graduate, GED, or alternative	1,224	19.0%	79	17.6%	2,835	24.9%
Some college or associate's degree	489	7.6%	42	9.4%	1,460	12.8%
Bachelor's degree or higher	212	3.3%	22	4.9%	682	6.0%
Female:	3,536	54.9%	197	44.0%	5,932	52.0%
Less than high school diploma	768	11.9%	13	2.9%	833	7.3%
High school graduate, GED, or alternative	1,418	22.0%	101	22.5%	2,144	18.8%
Some college or associate's degree	881	13.7%	35	7.8%	1,685	14.8%
Bachelor's degree or higher	469	7.3%	48	10.7%	1,270	11.1%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Educational Attainment for the Population 25 Years and Older

### De Soto Parish, Louisiana



Source: C15002. SEX BY EDUCATIONAL ATTAINMENT FOR THE POPULATION 25 YEARS AND OVER  
 Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B16005. NATIVITY BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

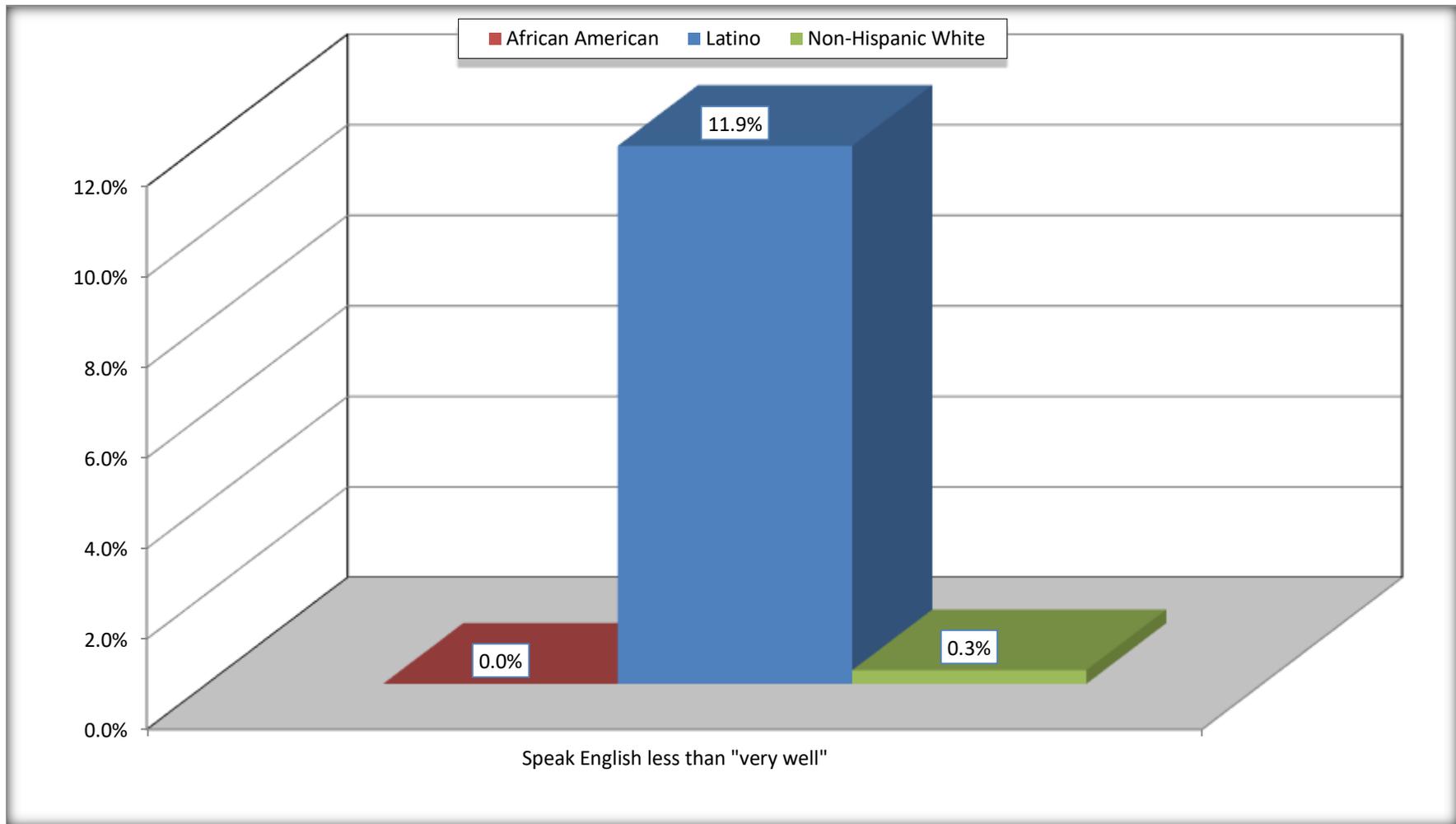
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>9,082</b>	<b>100.0%</b>	<b>648</b>	<b>100.0%</b>	<b>15,150</b>	<b>100.0%</b>
Speak only English	8,936	98.4%	480	74.1%	14,949	98.7%
Speak another language	146	1.6%	168	25.9%	201	1.3%
Speak English "very well"	146	1.6%	91	14.0%	155	1.0%
Speak English less than "very well"	0	0.0%	77	11.9%	46	0.3%
Native:	9,071	99.9%	517	79.8%	15,095	99.6%
Speak only English	8,925	98.3%	444	68.5%	14,941	98.6%
Speak another language	146	1.6%	73	11.3%	154	1.0%
Speak English "very well"	146	1.6%	51	7.9%	127	0.8%
Speak English less than "very well"	0	0.0%	22	3.4%	27	0.2%
Foreign born:	11	0.1%	131	20.2%	55	0.4%
Speak only English	11	0.1%	36	5.6%	8	0.1%
Speak another language	0	0.0%	95	14.7%	47	0.3%
Speak English "very well"	0	0.0%	40	6.2%	28	0.2%
Speak English less than "very well"	0	0.0%	55	8.5%	19	0.1%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Speak English Less than "Very Well" (Population 5 Years and Over)

### De Soto Parish, Louisiana



Source: B16005. NATIVITY BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER

Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B17010. POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES BY FAMILY TYPE BY PRESENCE OF RELATED CHILDREN UNDER 18 YEARS**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

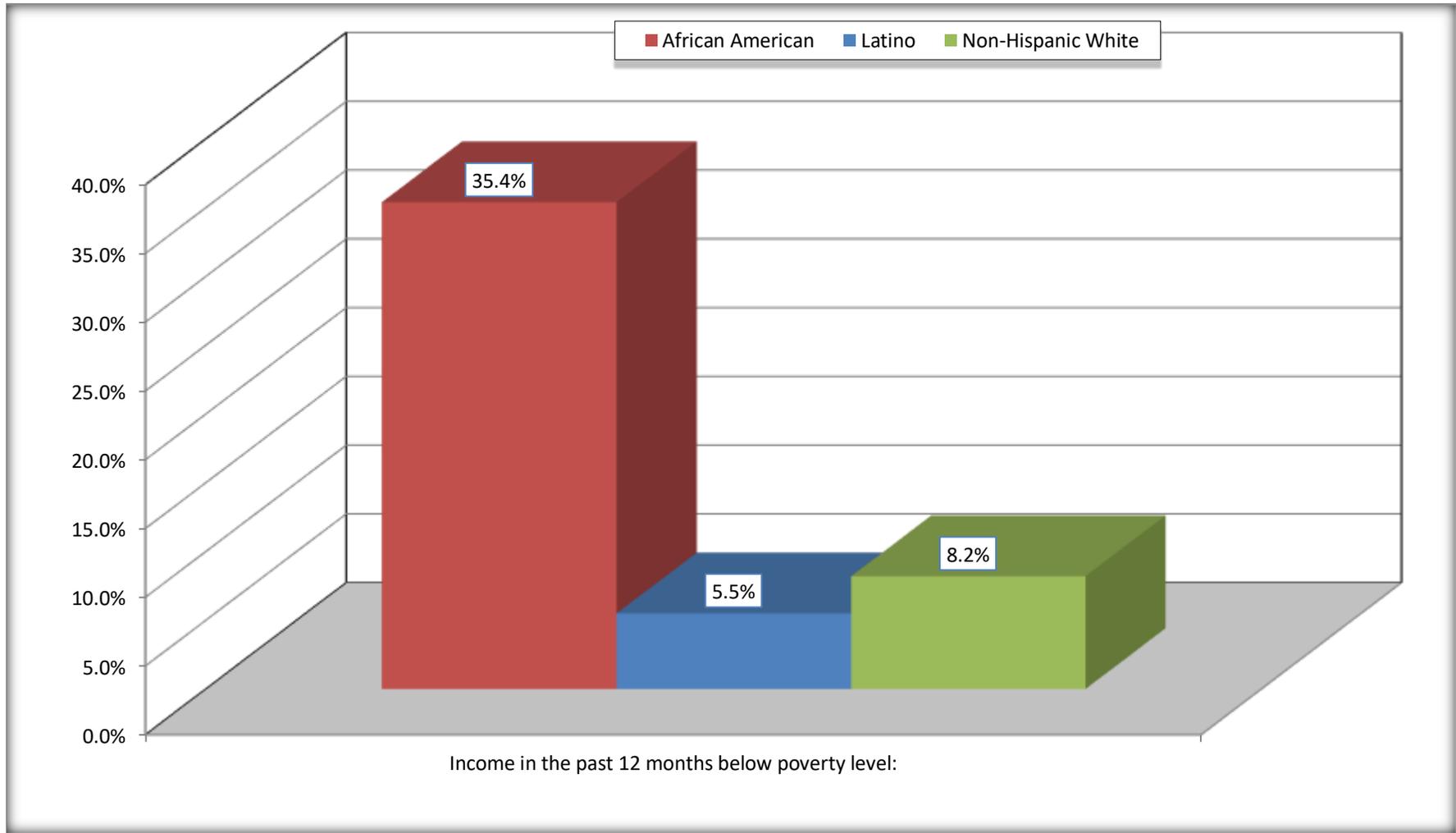
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>2,412</b>	<b>100.0%</b>	<b>146</b>	<b>100.0%</b>	<b>4,608</b>	<b>100.0%</b>
Income in the past 12 months below poverty level:	855	35.4%	8	5.5%	376	8.2%
Married-couple family:	60	2.5%	0	0.0%	128	2.8%
With related children under 18 years	13	0.5%	0	0.0%	68	1.5%
Other family:	795	33.0%	8	5.5%	248	5.4%
Male householder, no wife present	50	2.1%	0	0.0%	54	1.2%
With related children under 18 years	44	1.8%	0	0.0%	0	0.0%
Female householder, no husband present	745	30.9%	8	5.5%	194	4.2%
With related children under 18 years	553	22.9%	8	5.5%	191	4.1%
level:	1,557	64.6%	138	94.5%	4,232	91.8%
Married-couple family:	808	33.5%	126	86.3%	3,492	75.8%
With related children under 18 years	309	12.8%	81	55.5%	1,461	31.7%
Other family:	749	31.1%	12	8.2%	740	16.1%
Male householder, no wife present	161	6.7%	0	0.0%	299	6.5%
With related children under 18 years	62	2.6%	0	0.0%	228	4.9%
Female householder, no husband present	588	24.4%	12	8.2%	441	9.6%
With related children under 18 years	274	11.4%	0	0.0%	315	6.8%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Family Households Below Poverty in the Past 12 Months

### De Soto Parish, Louisiana

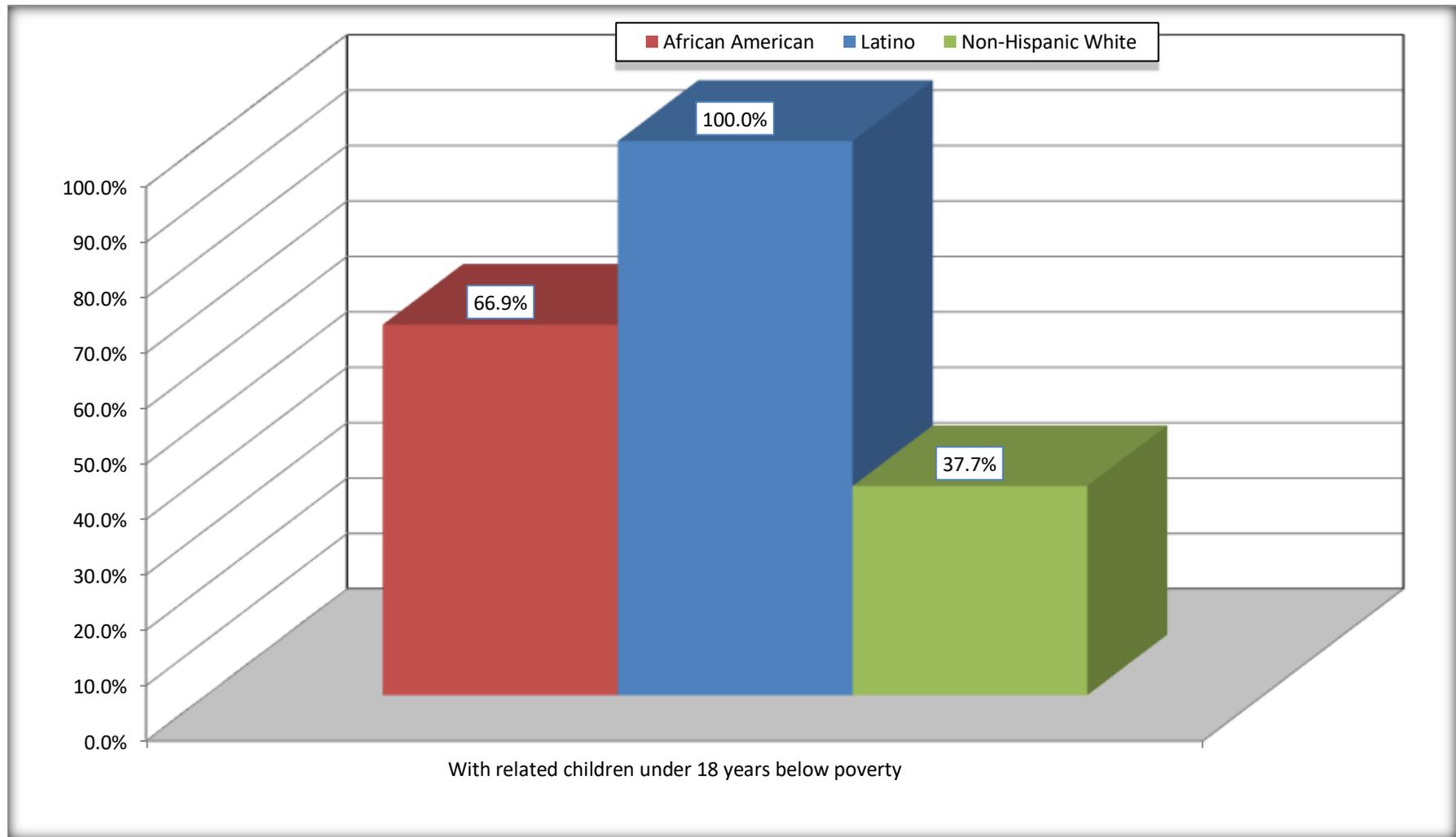


Source: B17010. POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES BY FAMILY TYPE BY PRESENCE OF RELATED CHILDREN UNDER 18 YEARS

Data Set: 2015-2019 American Community Survey 5-Year Estimates

## Female-headed Households with Related Children Below Poverty in the Past 12 Months

### De Soto Parish, Louisiana



Source: B17010. POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES BY FAMILY TYPE BY PRESENCE OF RELATED CHILDREN UNDER 18 YEARS  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B17020 POVERTY STATUS IN THE PAST 12 MONTHS BY AGE - Universe: POPULATION FOR WHOM****POVERTY STATUS IS DETERMINED**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

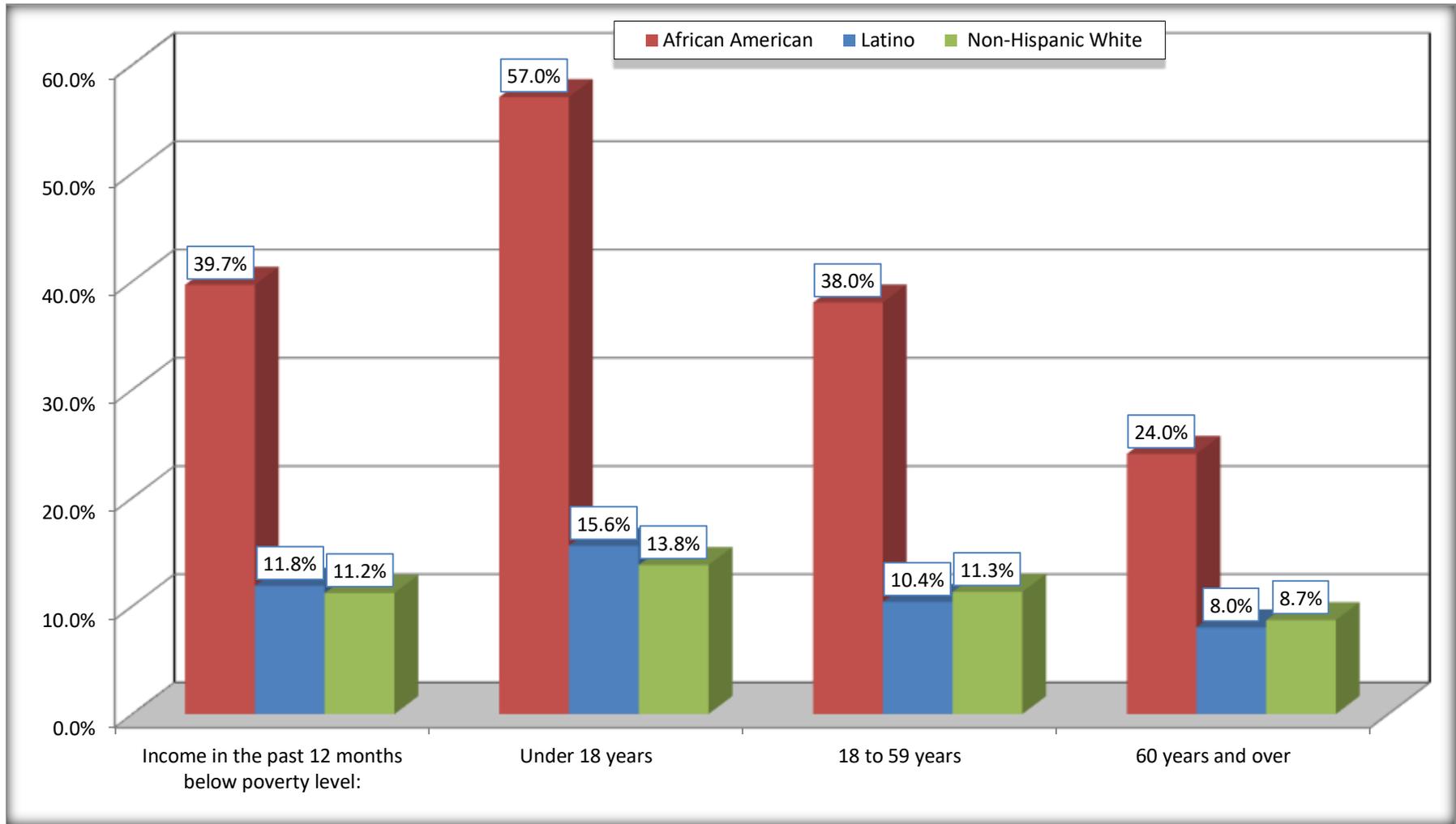
	De Soto Parish, Louisiana					
	African American	% of AA By Age	Latino	% of Latino Total	White, Not Hispanic	% of NHW By Age
<b>Total:</b>	<b>9,541</b>	<b>100.0%</b>	<b>785</b>	<b>100.0%</b>	<b>15,942</b>	<b>100.0%</b>
Income in the past 12 months below poverty level:	3,784	39.7%	93	11.8%	1,782	11.2%
<b>Under 18 years</b>	1,295	57.0%	42	15.6%	497	13.8%
<b>18 to 59 years</b>	2,016	38.0%	43	10.4%	929	11.3%
<b>60 years and over</b>	473	24.0%	8	8.0%	356	8.7%
Income in the past 12 months at or above poverty	5,757	60.3%	692	88.2%	14,160	88.8%
<b>Under 18 years</b>	977	43.0%	228	84.4%	3,112	86.2%
<b>18 to 59 years</b>	3,285	62.0%	372	89.6%	7,303	88.7%
<b>60 years and over</b>	1,495	76.0%	92	92.0%	3,745	91.3%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

### Population Below Poverty in the Past 12 Months

#### De Soto Parish, Louisiana



Source: B17020 POVERTY STATUS IN THE PAST 12 MONTHS BY AGE - Universe: POPULATION FOR WHOM POVERTY STATUS IS DETERMINED  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B19001. HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS)**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

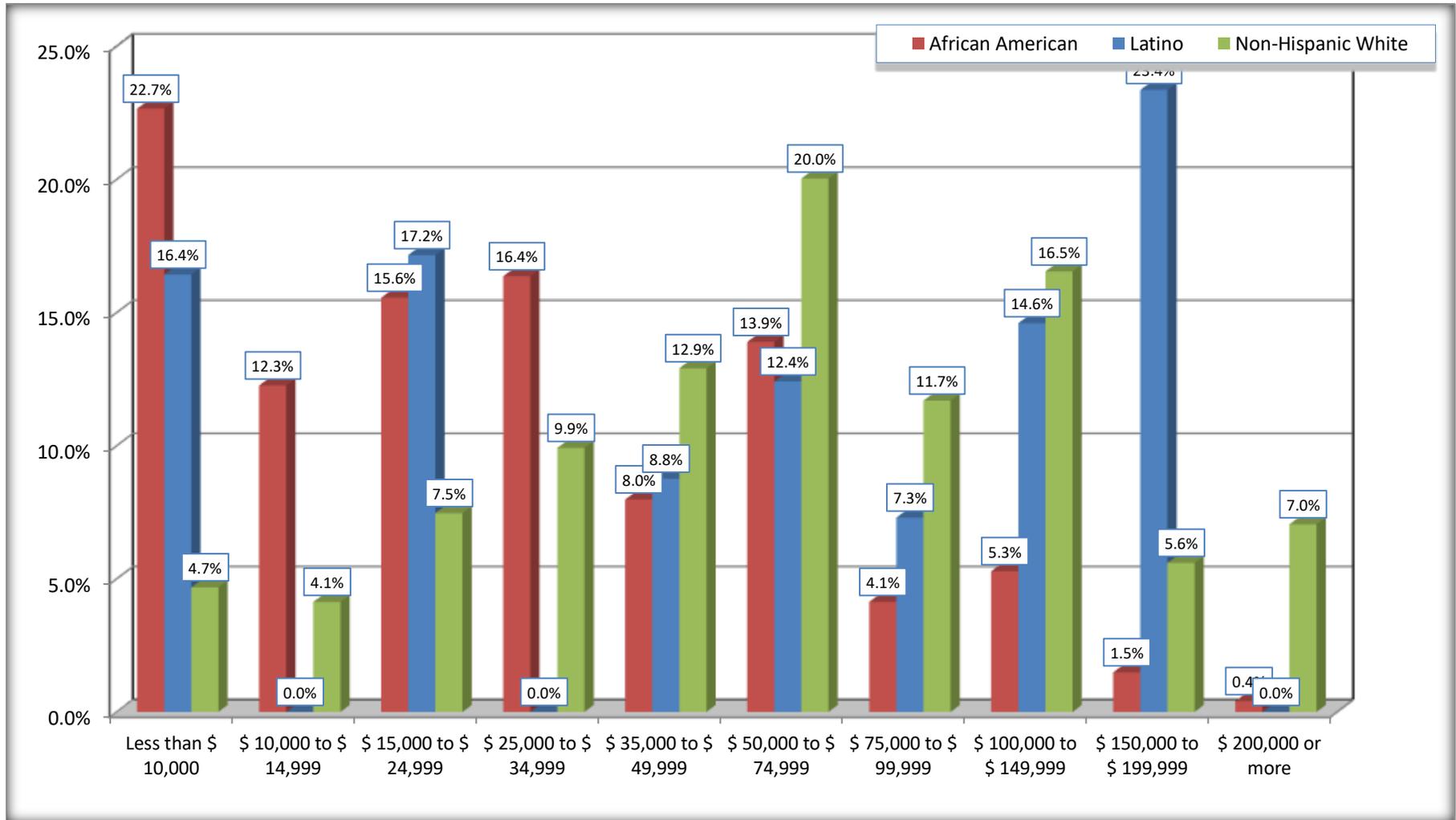
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>3,973</b>	<b>100.0%</b>	<b>274</b>	<b>100.0%</b>	<b>6,415</b>	<b>100.0%</b>
Less than \$ 10,000	900	22.7%	45	16.4%	300	4.7%
\$ 10,000 to \$ 14,999	487	12.3%	0	0.0%	265	4.1%
\$ 15,000 to \$ 24,999	618	15.6%	47	17.2%	479	7.5%
\$ 25,000 to \$ 34,999	650	16.4%	0	0.0%	636	9.9%
\$ 35,000 to \$ 49,999	317	8.0%	24	8.8%	828	12.9%
\$ 50,000 to \$ 74,999	552	13.9%	34	12.4%	1,285	20.0%
\$ 75,000 to \$ 99,999	164	4.1%	20	7.3%	750	11.7%
\$ 100,000 to \$ 149,999	210	5.3%	40	14.6%	1,061	16.5%
\$ 150,000 to \$ 199,999	59	1.5%	64	23.4%	359	5.6%
\$ 200,000 or more	16	0.4%	0	0.0%	452	7.0%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Household Income in the Past 12 Months

### De Soto Parish, Louisiana



Source: B19001. HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS)  
 Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B19013. MEDIAN HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS)**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

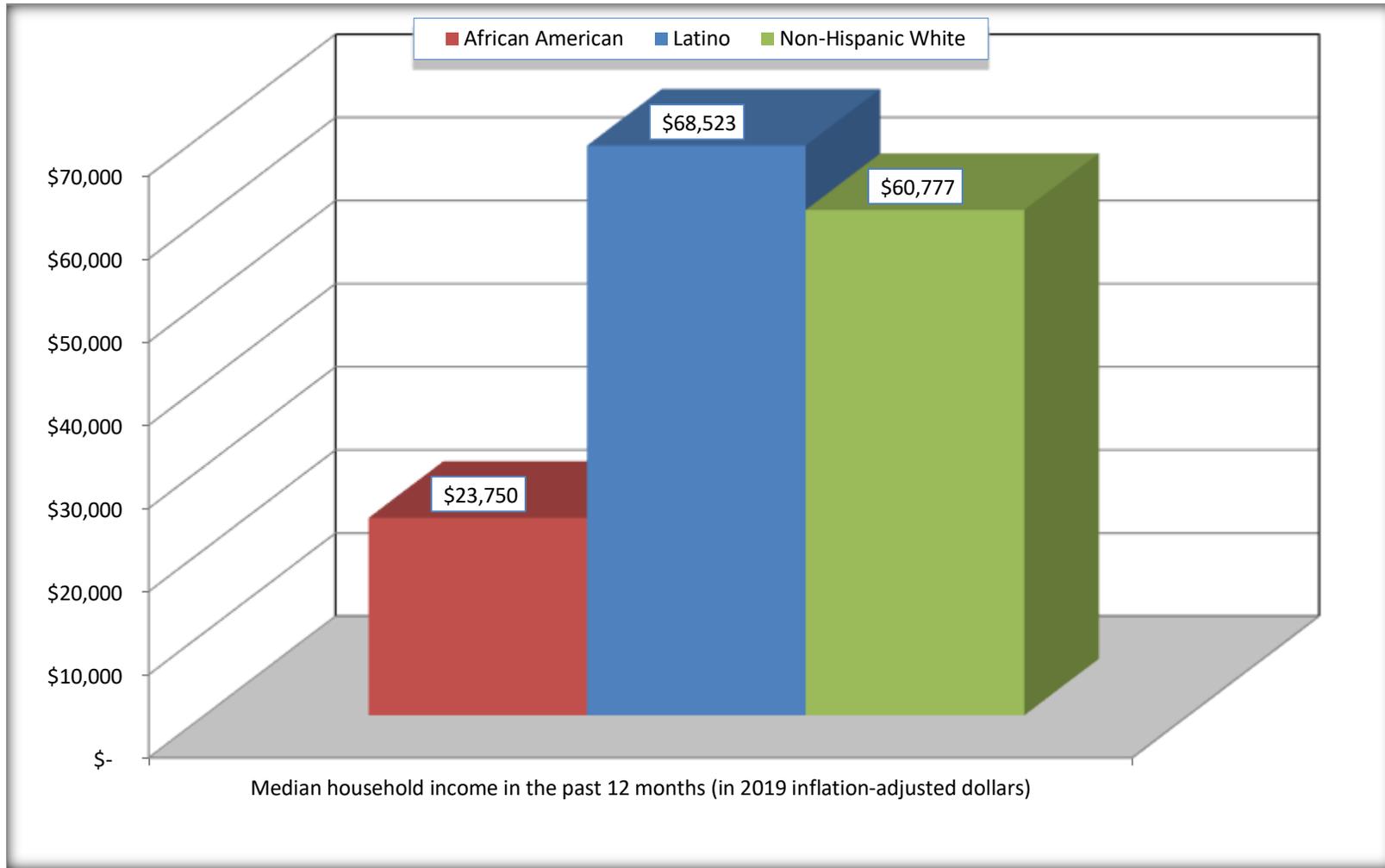
	De Soto Parish, Louisiana		
	African American	Latino	White, Not Hispanic
Median household income in the past 12 months (in 2019 inflation-adjusted dollars)	\$ 23,750	\$ 68,523	\$ 60,777

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Median Household Income in the Past 12 Months

### De Soto Parish, Louisiana



Source: B19013. MEDIAN HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS)  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B19101. FAMILY INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS)**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

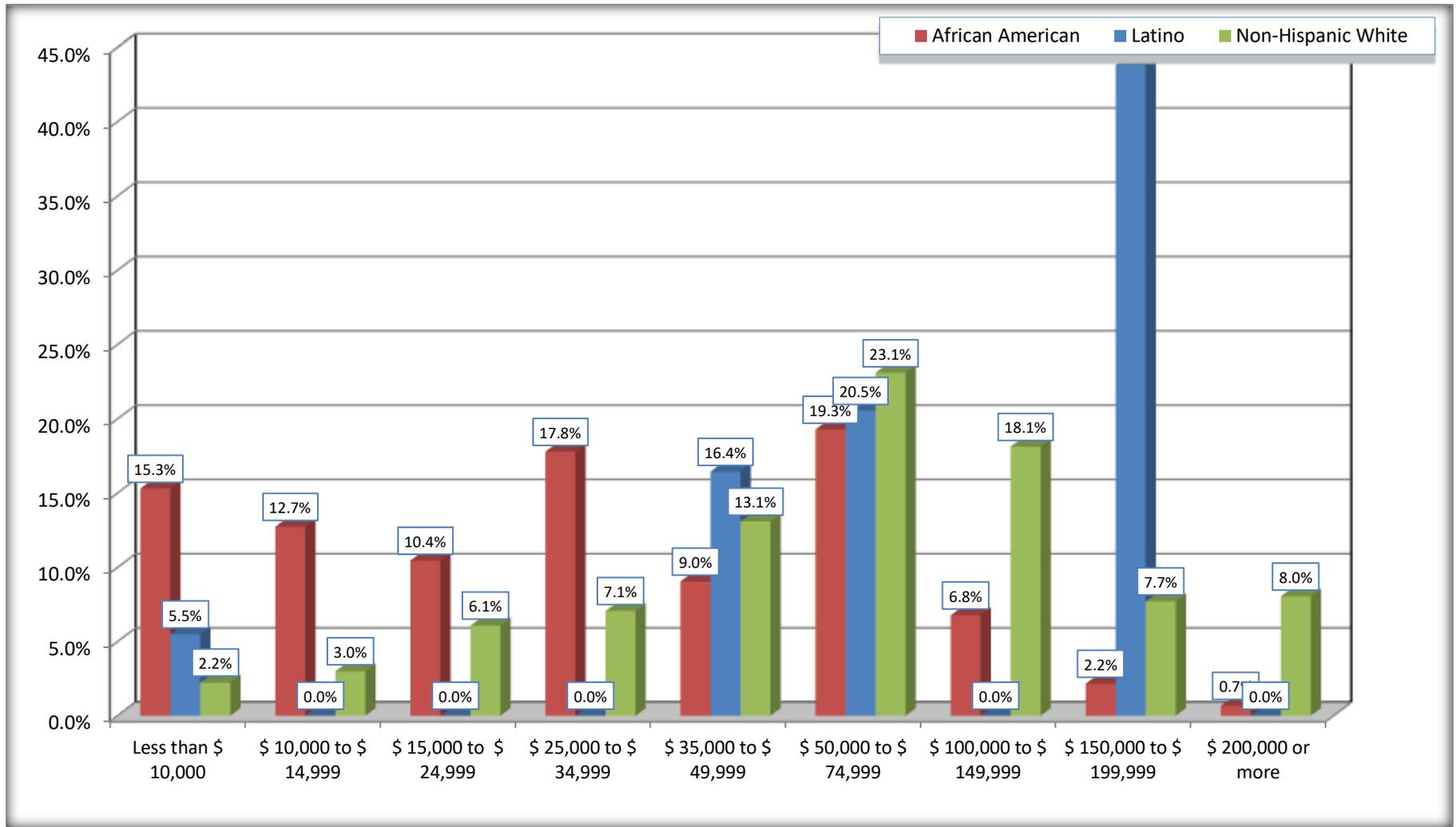
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>2,412</b>	<b>100.0%</b>	<b>146</b>	<b>100.0%</b>	<b>4,608</b>	<b>100.0%</b>
Less than \$ 10,000	369	15.3%	8	5.5%	103	2.2%
\$ 10,000 to \$ 14,999	307	12.7%	0	0.0%	138	3.0%
\$ 15,000 to \$ 24,999	<b>252</b>	<b>10.4%</b>	<b>0</b>	<b>0.0%</b>	<b>280</b>	<b>6.1%</b>
\$ 25,000 to \$ 34,999	<b>429</b>	<b>17.8%</b>	<b>0</b>	<b>0.0%</b>	<b>325</b>	<b>7.1%</b>
\$ 35,000 to \$ 49,999	<b>218</b>	<b>9.0%</b>	<b>24</b>	<b>16.4%</b>	<b>603</b>	<b>13.1%</b>
\$ 50,000 to \$ 74,999	<b>465</b>	<b>19.3%</b>	<b>30</b>	<b>20.5%</b>	<b>1,064</b>	<b>23.1%</b>
\$ 100,000 to \$ 149,999	<b>163</b>	<b>6.8%</b>	-	<b>0.0%</b>	<b>835</b>	18.1%
\$ 150,000 to \$ 199,999	52	2.2%	64	43.8%	355	7.7%
\$ 200,000 or more	16	0.7%	0	0.0%	370	8.0%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Family Income in the Past 12 Months

### De Soto Parish, Louisiana



Source: B19101. FAMILY INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS)  
 Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B19202. MEDIAN NONFAMILY HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS)**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

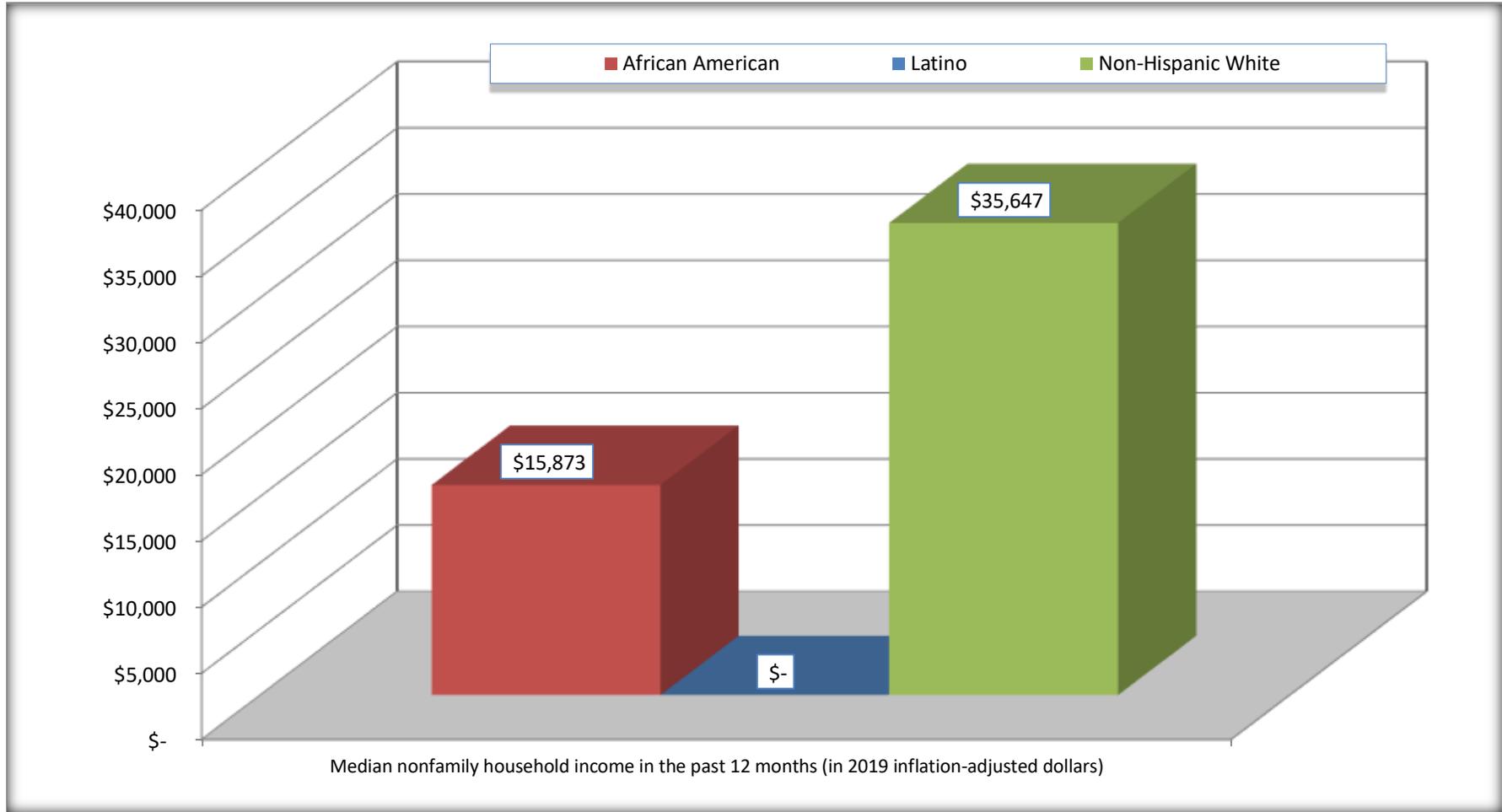
	De Soto Parish, Louisiana		
	African American	Latino	White, Not Hispanic
Median nonfamily household income in the past 12 months (in 2019 inflation-adjusted dollars)	\$ 15,873	-	\$ 35,647

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Median Non-Family Income in the Past 12 Months

### De Soto Parish, Louisiana



Source: B19202. MEDIAN NONFAMILY HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS)  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B19301. PER CAPITA INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS)**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

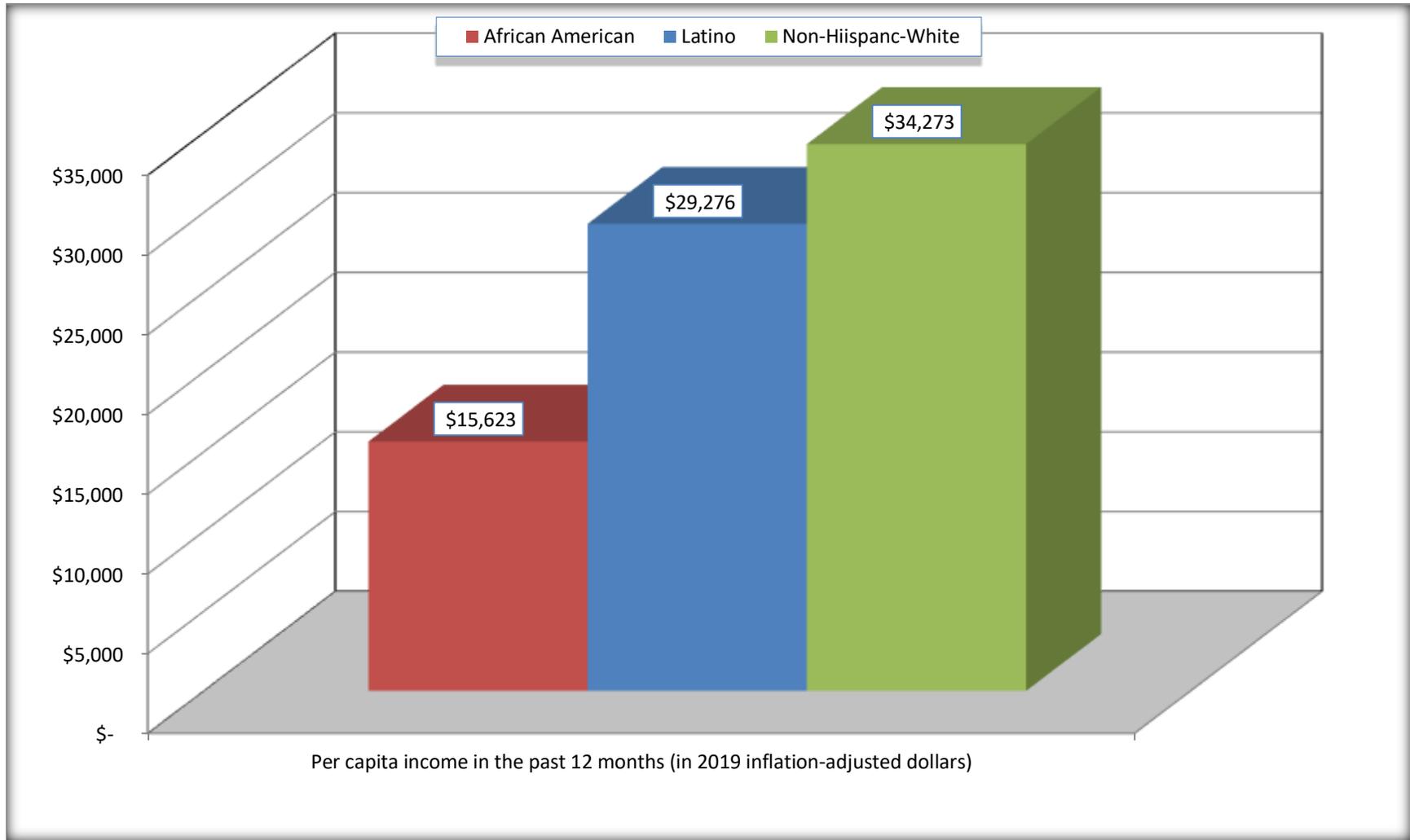
	De Soto Parish, Louisiana		
	African American	Latino	White, Not Hispanic
Per capita income in the past 12 months (in 2019 inflation-adjusted dollars)	\$ 15,623	\$ 29,276	\$ 34,273

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

### Per capita Income in the Past 12 Months

#### De Soto Parish, Louisiana



Source: B19301. PER CAPITA INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS)  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B20017. MEDIAN EARNINGS IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS) BY SEX BY WORK EXPERIENCE IN THE PAST 12 MONTHS FOR THE POPULATION 16 YEARS AND OVER WITH EARNINGS IN THE PAST 12 MONTHS**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

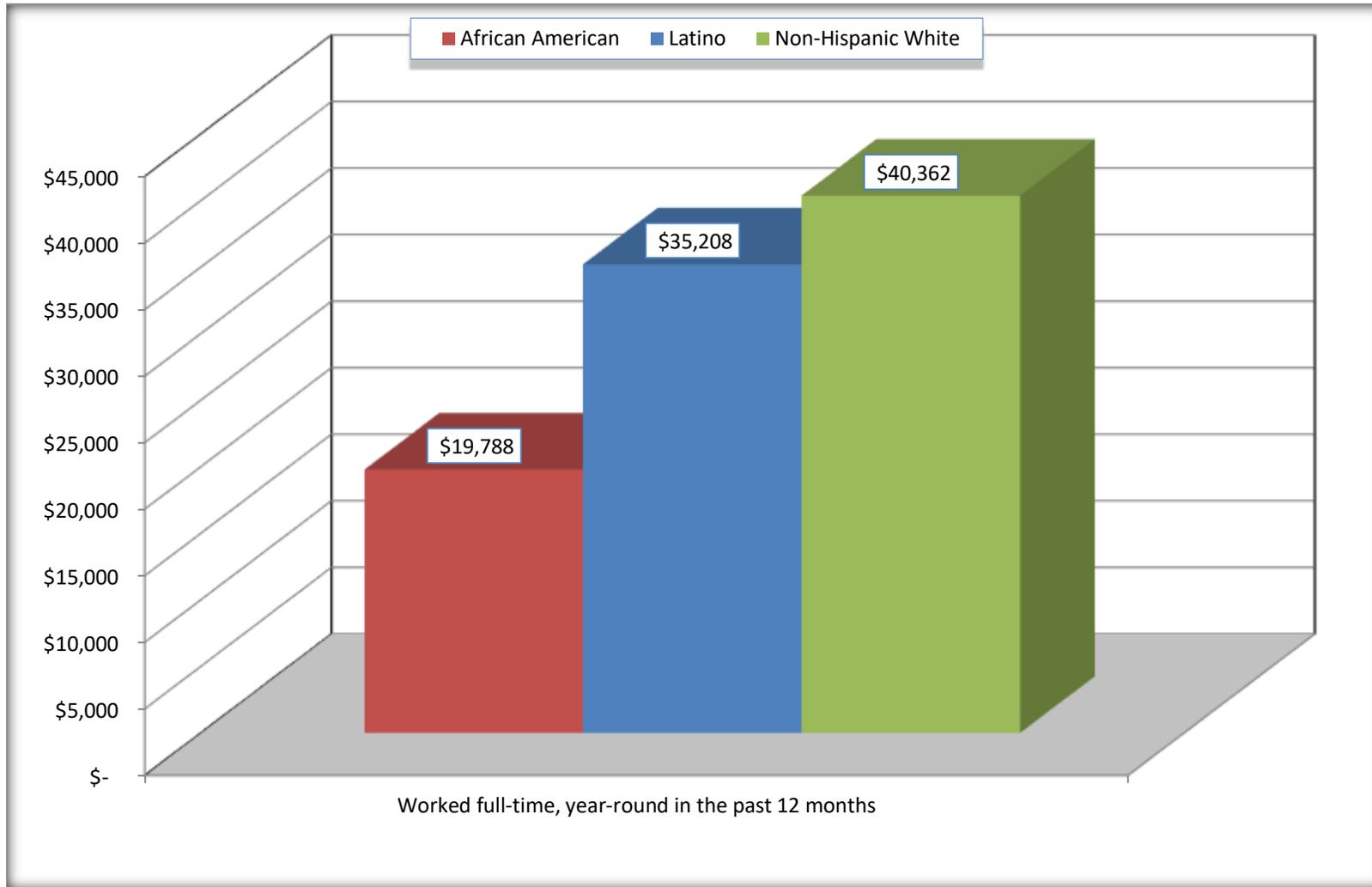
	De Soto Parish, Louisiana		
	African American	Latino	White, Not Hispanic
Median earnings in the past 12 months (in 2019 inflation-adjusted dollars) --			
Total:	\$ 19,788	\$ 35,208	\$ 40,362
Male --			
Total	\$ 24,095	\$ -	\$ 50,550
Worked full-time, year-round in the past 12 months	\$ 34,042	\$ -	\$ 57,784
Other	\$ 10,194	\$ 20,357	\$ 13,784
Female --			
Total	\$ 16,407	\$ 55,729	\$ 29,400
Worked full-time, year-round in the past 12 months	\$ 23,851	\$ 59,167	\$ 47,620
Other	\$ 7,160	\$ -	\$ 11,087

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

### Median earnings in the Past 12 Months (16 Years and Over with Earnings)

#### De Soto Parish, Louisiana



Source: B2017. MEDIAN EARNINGS IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS) BY SEX BY WORK EXPERIENCE IN THE PAST  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B20005. SEX BY WORK EXPERIENCE IN THE PAST 12 MONTHS BY EARNINGS IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS) FOR THE POPULATION 16 YEARS AND OVER**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>7,623</b>	<b>100.0%</b>	<b>559</b>	<b>100.0%</b>	<b>12,747</b>	<b>100.0%</b>
Worked full-time, year-round in the past 12 months:	2,336	30.6%	338	60.5%	5,257	41.2%
No earnings	0	0.0%	0	0.0%	0	0.0%
With earnings:	2,336	30.6%	338	60.5%	5,257	41.2%
\$ 1 to \$ 9,999 or loss	54	0.7%	0	0.0%	14	0.1%
\$ 10,000 to \$ 19,999	513	6.7%	19	3.4%	143	1.1%
\$ 20,000 to \$ 29,999	617	8.1%	71	12.7%	911	7.1%
\$ 30,000 to \$ 49,999	652	8.6%	45	8.1%	1,240	9.7%
\$ 50,000 to \$ 74,999	269	3.5%	139	24.9%	1,618	12.7%
\$ 75,000 or more	231	3.0%	64	11.4%	1,331	10.4%
Other:	5,287	69.4%	221	39.5%	7,490	58.8%
No earnings	3,461	45.4%	132	23.6%	5,102	40.0%
With earnings: less than full time, year-round	1,826	24.0%	89	15.9%	2,388	18.7%
<b>Male:</b>	<b>3,465</b>	<b>45.5%</b>	<b>278</b>	<b>49.7%</b>	<b>6,199</b>	<b>48.6%</b>
Worked full-time, year-round in the past 12 months:	999	13.1%	186	33.3%	3,054	24.0%
No earnings	0	0.0%	0	0.0%	0	0.0%
With earnings:	999	13.1%	186	33.3%	3,054	24.0%
\$ 1 to \$ 9,999 or loss	38	0.5%	0	0.0%	11	0.1%
\$ 10,000 to \$ 19,999	97	1.3%	19	3.4%	42	0.3%
\$ 20,000 to \$ 29,999	182	2.4%	59	10.6%	367	2.9%
\$ 30,000 to \$ 49,999	389	5.1%	17	3.0%	717	5.6%
\$ 50,000 to \$ 74,999	116	1.5%	91	16.3%	891	7.0%
\$ 75,000 or more	177	2.3%	0	0.0%	1,026	8.0%

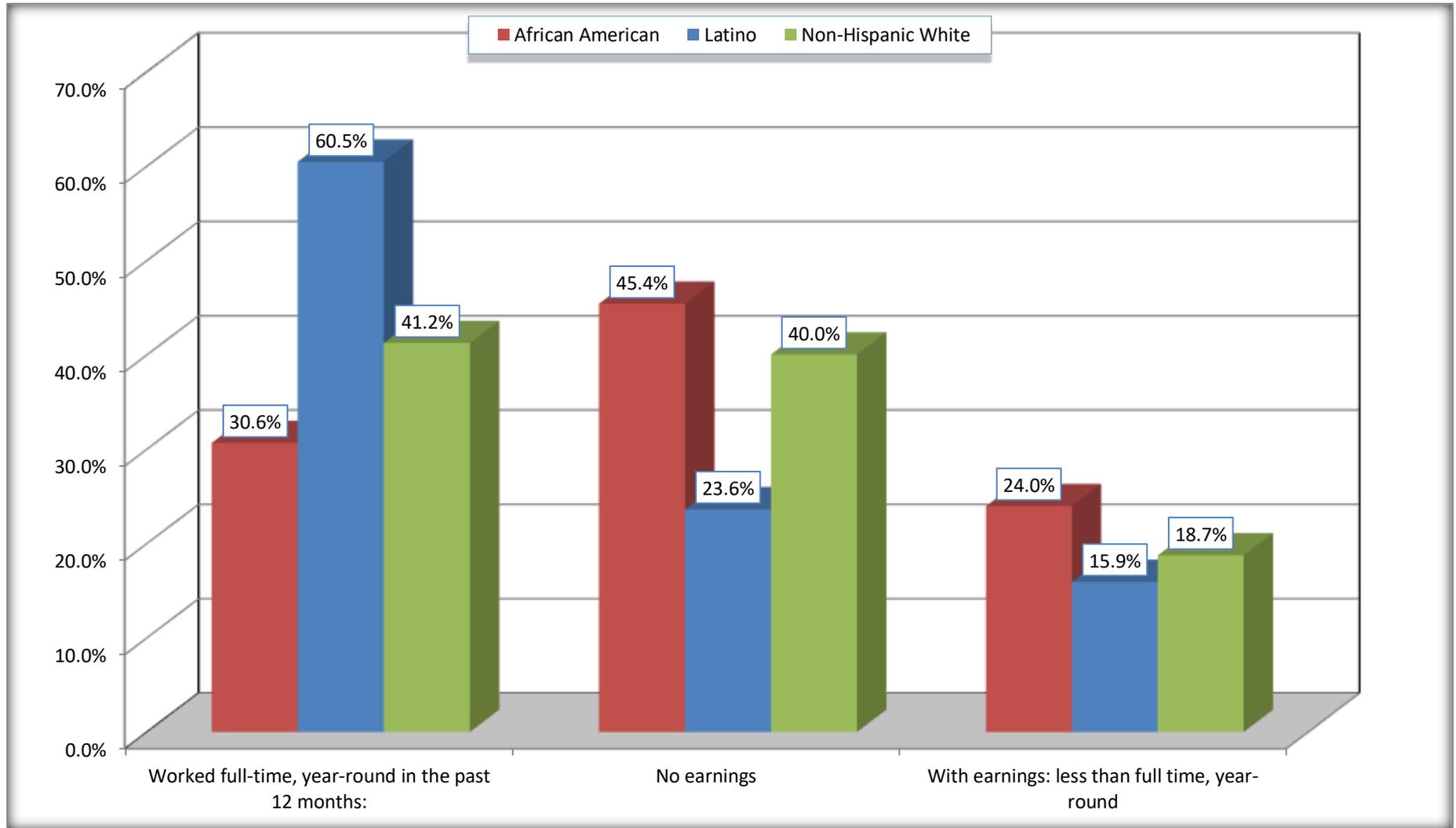
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
Other:	2,466	32.3%	92	16.5%	3,145	24.7%
No earnings	1,729	22.7%	68	12.2%	2,119	16.6%
With earnings:	737	9.7%	24	4.3%	1,026	8.0%
Female:	4,158	54.5%	281	50.3%	6,548	51.4%
Worked full-time, year-round in the past 12 months:	1,337	17.5%	152	27.2%	2,203	17.3%
No earnings	0	0.0%	0	0.0%	0	0.0%
With earnings:	1,337	17.5%	152	27.2%	2,203	17.3%
\$ 1 to \$ 9,999 or loss	16	0.2%	0	0.0%	3	0.0%
\$ 10,000 to \$ 19,999	416	5.5%	0	0.0%	101	0.8%
\$ 20,000 to \$ 29,999	435	5.7%	12	2.1%	544	4.3%
\$ 30,000 to \$ 49,999	263	3.5%	28	5.0%	523	4.1%
\$ 50,000 to \$ 74,999	153	2.0%	48	8.6%	727	5.7%
\$ 75,000 or more	54	0.7%	64	11.4%	305	2.4%
Other:	2,821	37.0%	129	23.1%	4,345	34.1%
No earnings	1,732	22.7%	64	11.4%	2,983	23.4%
With earnings:	1,089	14.3%	65	11.6%	1,362	10.7%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey <http://www.census.gov/acs/www/UseData/index.htm>

## Employment and Earnings in the Past 12 Months (16 Years and Over)

### De Soto Parish, Louisiana



Source: B20005. SEX BY WORK EXPERIENCE IN THE PAST 12 MONTHS BY EARNINGS IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS) FOR THE POPULATION 16 YEARS AND OVER  
 Data Set: 2015-2019 American Community Survey 5-Year Estimates

**C21001. SEX BY AGE BY VETERAN STATUS FOR THE CIVILIAN POPULATION 18 YEARS****AND OVER**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

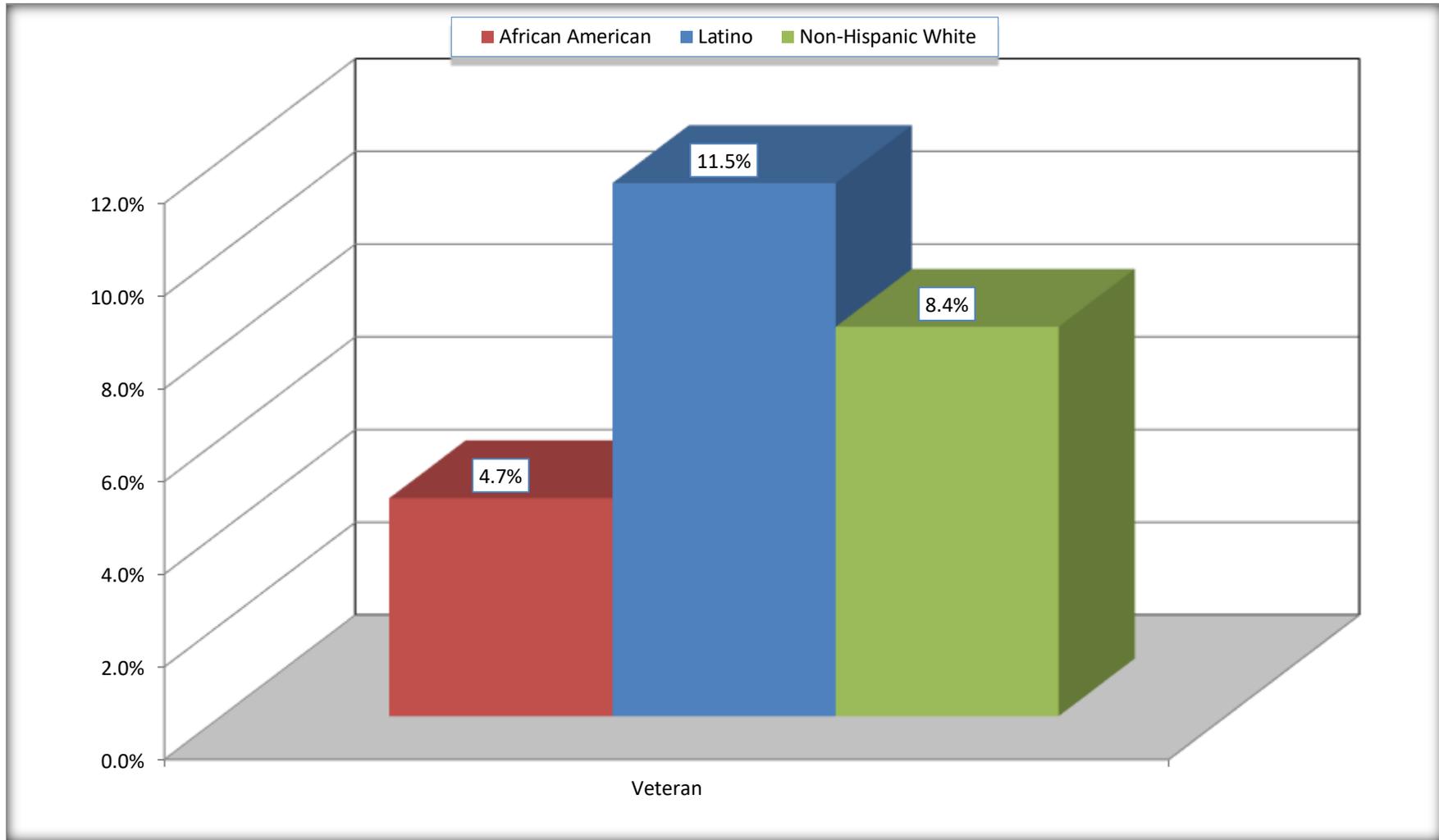
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>7,376</b>	<b>100.0%</b>	<b>515</b>	<b>100.0%</b>	<b>12,418</b>	<b>100.0%</b>
Veteran	348	4.7%	59	11.5%	1,038	8.4%
Nonveteran	7,028	95.3%	456	88.5%	11,380	91.6%
Male:	3,355	45.5%	278	54.0%	6,001	48.3%
18 to 64 years:	2,768	37.5%	230	44.7%	4,585	36.9%
Veteran	128	1.7%	15	2.9%	395	3.2%
Nonveteran	2,640	35.8%	215	41.7%	4,190	33.7%
65 years and over:	587	8.0%	48	9.3%	1,416	11.4%
Veteran	184	2.5%	0	0.0%	577	4.6%
Nonveteran	403	5.5%	48	9.3%	839	6.8%
Female:	4,021	54.5%	237	46.0%	6,417	51.7%
18 to 64 years:	3,173	43.0%	213	41.4%	4,705	37.9%
Veteran	36	0.5%	36	7.0%	41	0.3%
Nonveteran	3,137	42.5%	177	34.4%	4,664	37.6%
65 years and over:	848	11.5%	24	4.7%	1,712	13.8%
Veteran	0	0.0%	8	1.6%	25	0.2%
Nonveteran	848	11.5%	16	3.1%	1,687	13.6%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

### Veterans in the Civilian Population 18 Years and Over

#### De Soto Parish, Louisiana



Source: C21001. SEX BY AGE BY VETERAN STATUS FOR THE CIVILIAN POPULATION 18 YEARS AND OVER  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B22005. RECEIPT OF FOOD STAMPS/SNAP IN THE PAST 12 MONTHS BY RACE OF HOUSEHOLDER**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

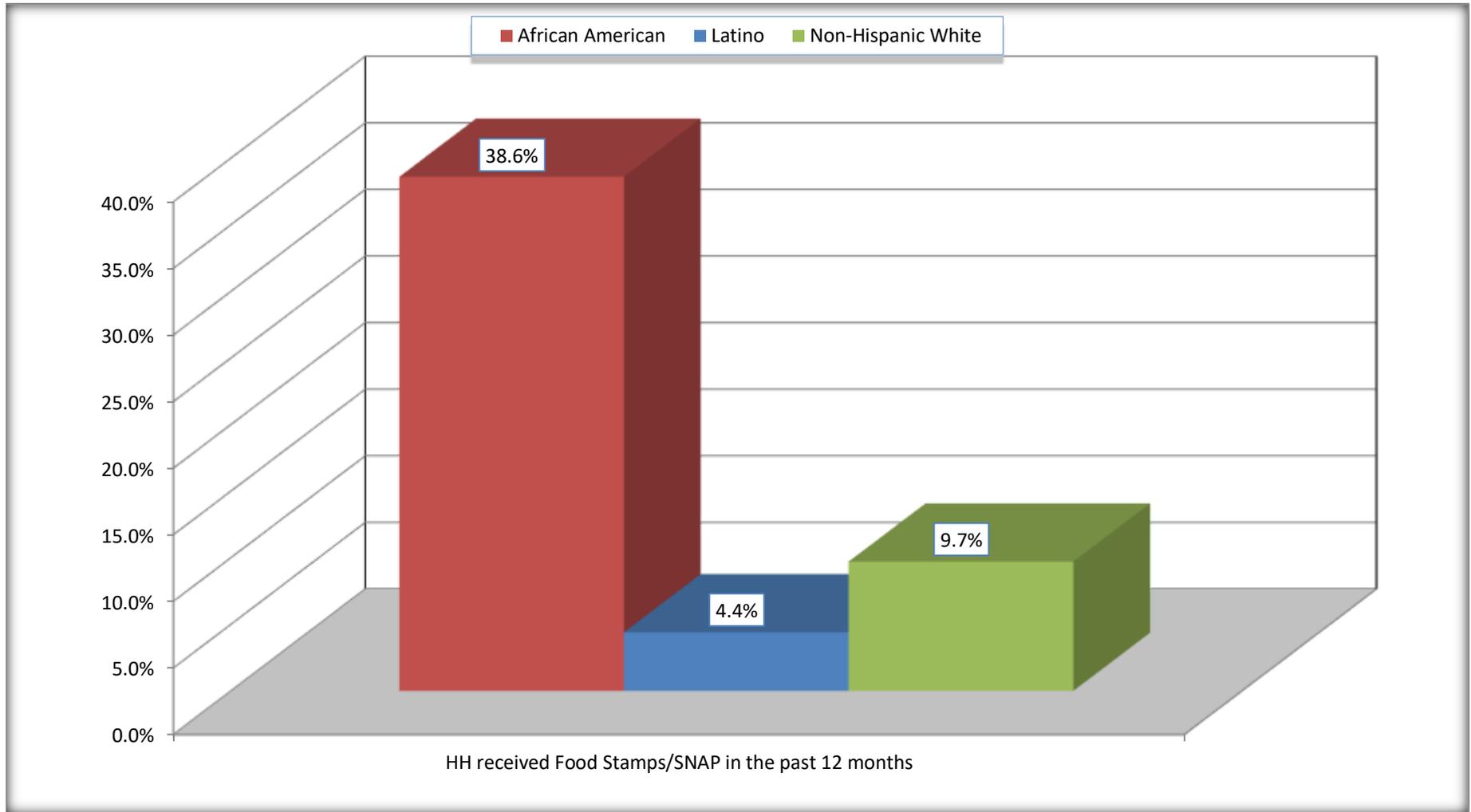
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>3,973</b>	<b>100.0%</b>	<b>274</b>	<b>100.0%</b>	<b>6,415</b>	<b>100.0%</b>
HH received Food Stamps/SNAP in the past 12 months	1,534	38.6%	12	4.4%	622	9.7%
HH did not receive Food Stamps/SNAP in the past 12 months	2,439	61.4%	262	95.6%	5,793	90.3%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey <http://www.census.gov/acs/www/UseData/index.htm>

# Receipt of Food Stamps/SNAP in the Past 12 Months by Household

## De Soto Parish, Louisiana



Source: B22005. RECEIPT OF FOOD STAMPS/SNAP IN THE PAST 12 MONTHS BY RACE OF HOUSEHOLDER  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**C23002. SEX BY AGE BY EMPLOYMENT STATUS FOR THE POPULATION 16 YEARS AND OVER**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>7,623</b>	<b>100.0%</b>	<b>559</b>	<b>100.0%</b>	<b>12,747</b>	<b>100.0%</b>
In labor force:	4,257	55.8%	421	75.3%	7,281	57.1%
In Armed Forces	0	0.0%	0	0.0%	4	0.0%
Civilian:	3,987	52.3%	421	75.3%	6,797	53.3%
Employed	3,347	43.9%	421	75.3%	6,940	54.4%
Unemployed	910	11.9%	0	0.0%	337	2.6%
Not in labor force	3,366	44.2%	138	24.7%	5,466	42.9%
Male:	3,465	45.5%	278	49.7%	6,199	48.6%
16 to 64 years:	2,878	37.8%	230	41.1%	4,783	37.5%
In labor force:	1,755	23.0%	204	36.5%	3,655	28.7%
In Armed Forces	0	0.0%	0	0.0%	4	0.0%
Civilian:	1,755	23.0%	204	36.5%	3,651	28.6%
Employed	1,379	18.1%	204	36.5%	3,432	26.9%
Unemployed	376	4.9%	0	0.0%	219	1.7%
Not in labor force	1,123	14.7%	26	4.7%	1,128	8.8%
65 years and over:	587	7.7%	48	8.6%	1,416	11.1%
In labor force:	78	1.0%	0	0.0%	209	1.6%
Employed	46	0.6%	0	0.0%	209	1.6%
Unemployed	32	0.4%	0	0.0%	0	0.0%
Not in labor force	509	6.7%	48	8.6%	1,207	9.5%

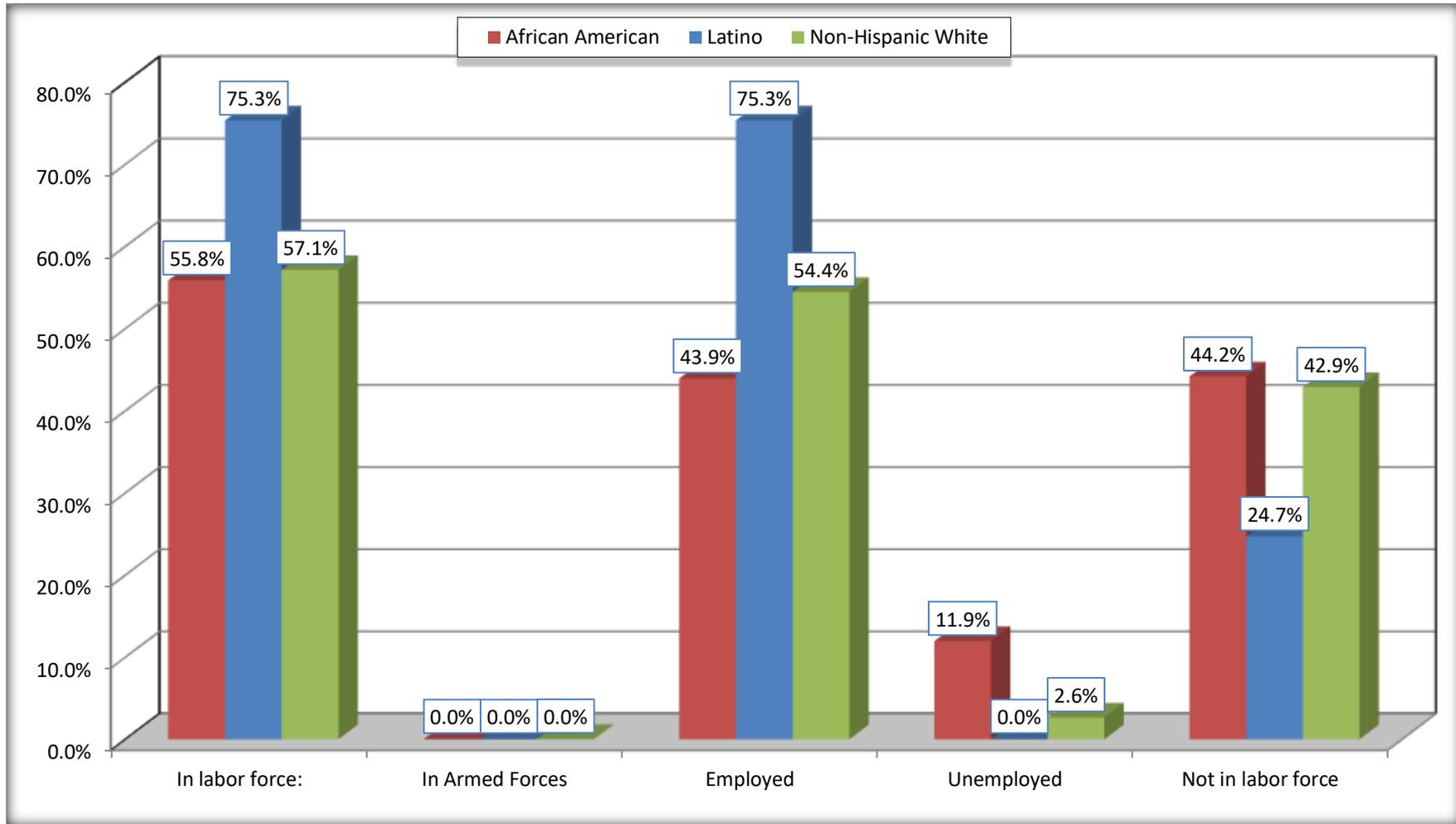
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
Female:	4,158	54.5%	281	50.3%	6,548	51.4%
16 to 64 years:	3,310	43.4%	257	46.0%	4,836	37.9%
In labor force:	2,232	29.3%	217	38.8%	3,146	24.7%
In Armed Forces	0	0.0%	0	0.0%	0	0.0%
Civilian:	2,232	29.3%	217	38.8%	3,146	24.7%
Employed	1,730	22.7%	217	38.8%	3,028	23.8%
Unemployed	502	6.6%	0	0.0%	118	0.9%
Not in labor force	1,078	14.1%	40	7.2%	1,690	13.3%
65 years and over:	848	11.1%	24	4.3%	1,712	13.4%
In labor force:	192	2.5%	0	0.0%	271	2.1%
Employed	192	2.5%	0	0.0%	271	2.1%
Unemployed	0	0.0%	0	0.0%	0	0.0%
Not in labor force	656	8.6%	24	4.3%	1,441	11.3%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Employment Status for the Population 16 years and over

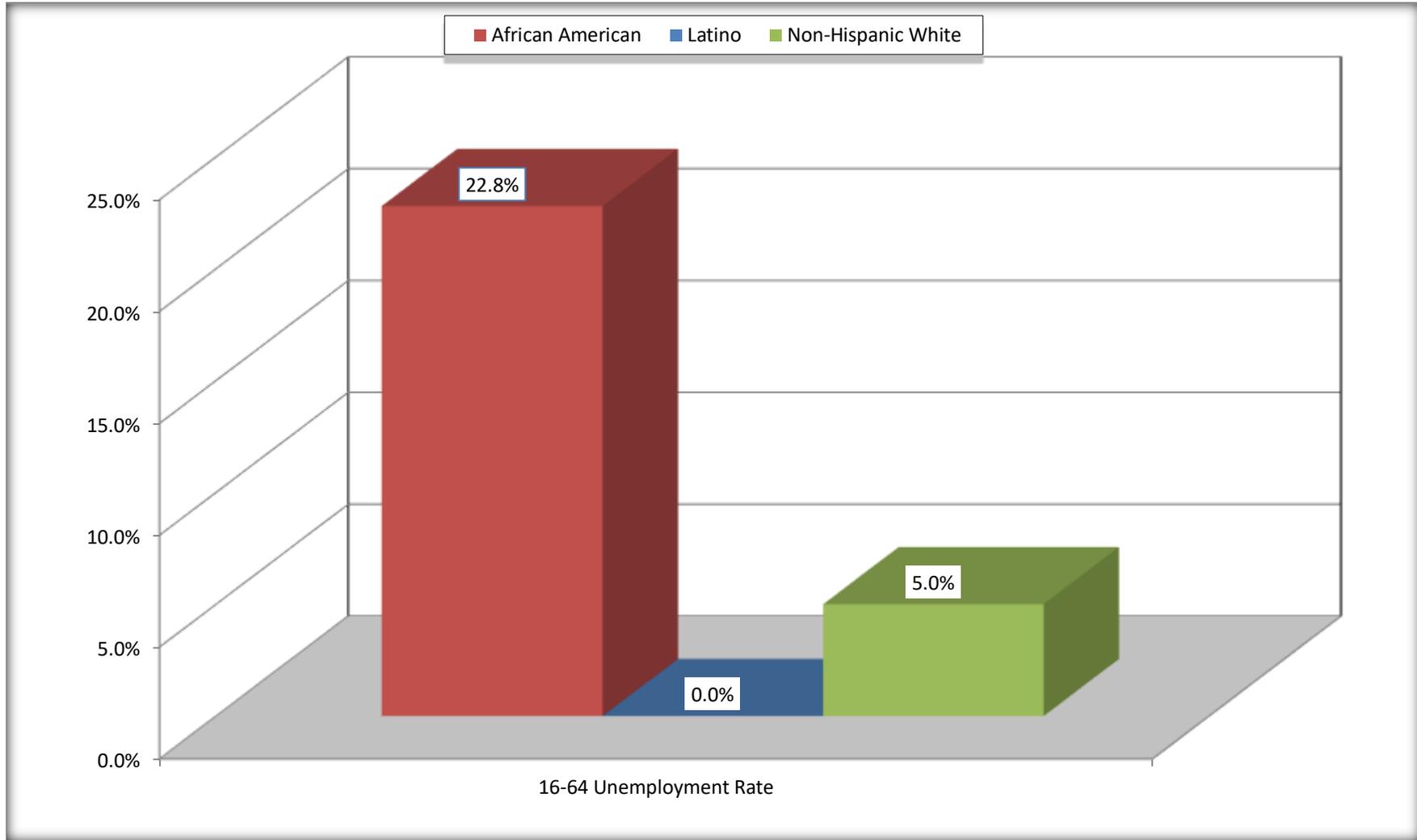
### De Soto Parish, Louisiana



Source: C23002. SEX BY AGE BY EMPLOYMENT STATUS FOR THE POPULATION 16 YEARS AND OVER  
 Data Set: 2015-2019 American Community Survey 5-Year Estimates

### Unemployment of Working Age Population (Ages 16 to 64) (As a Percent of 16-64 Civilian Labor Force)

#### De Soto Parish, Louisiana



Source: C23002. SEX BY AGE BY EMPLOYMENT STATUS FOR THE POPULATION 16 YEARS AND OVER  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**C24010. SEX BY OCCUPATION FOR THE CIVILIAN EMPLOYED POPULATION 16 YEARS AND OVER**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

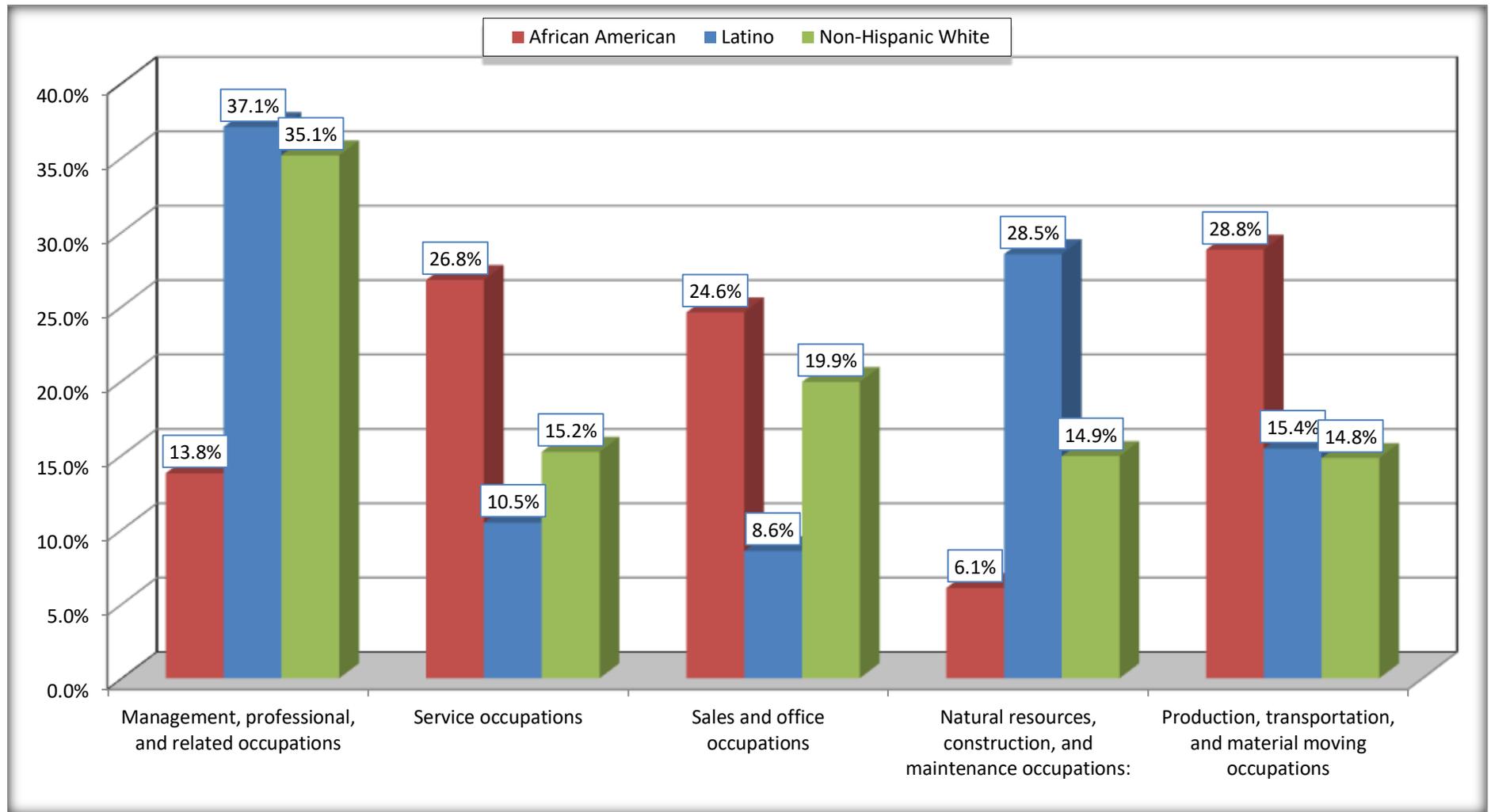
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>3,347</b>	<b>100.0%</b>	<b>421</b>	<b>100.0%</b>	<b>6,940</b>	<b>100.0%</b>
Management, professional, and related occupations	461	13.8%	156	37.1%	2,439	35.1%
Service occupations	896	26.8%	44	10.5%	1,056	15.2%
Sales and office occupations	823	24.6%	36	8.6%	1,382	19.9%
Natural resources, construction, and maintenance occupations:	203	6.1%	120	28.5%	1,036	14.9%
Production, transportation, and material moving occupations	964	28.8%	65	15.4%	1,027	14.8%
Male:	1,425	42.6%	204	48.5%	3,641	52.5%
Management, business, science, and arts occupations:	60	1.8%	22	5.2%	1,085	15.6%
Service occupations	382	11.4%	0	0.0%	431	6.2%
Sales and office occupations	115	3.4%	24	5.7%	275	4.0%
Natural resources, construction, and maintenance occupations:	203	6.1%	120	28.5%	1,012	14.6%
Production, transportation, and material moving occupations	665	19.9%	38	9.0%	838	12.1%
Female:	1,922	57.4%	217	51.5%	3,299	47.5%
Management, professional, and related occupations	401	12.0%	134	31.8%	1,354	19.5%
Service occupations	514	15.4%	44	10.5%	625	9.0%
Sales and office occupations	708	21.2%	12	2.9%	1,107	16.0%
Natural resources, construction, and maintenance occupations:	0	0.0%	0	0.0%	24	0.3%
Production, transportation, and material moving occupations	299	8.9%	27	6.4%	189	2.7%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey <http://www.census.gov/acs/www/UseData/index.htm>

## Occupation for the Civilian Employed 16 Years and Over Population

### De Soto Parish, Louisiana



Source: C24010. SEX BY OCCUPATION FOR THE CIVILIAN EMPLOYED POPULATION 16 YEARS AND OVER  
 Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B25003. TENURE - Universe: OCCUPIED HOUSING UNITS**  
 Data Set: 2015-2019 American Community Survey 5-Year Estimates

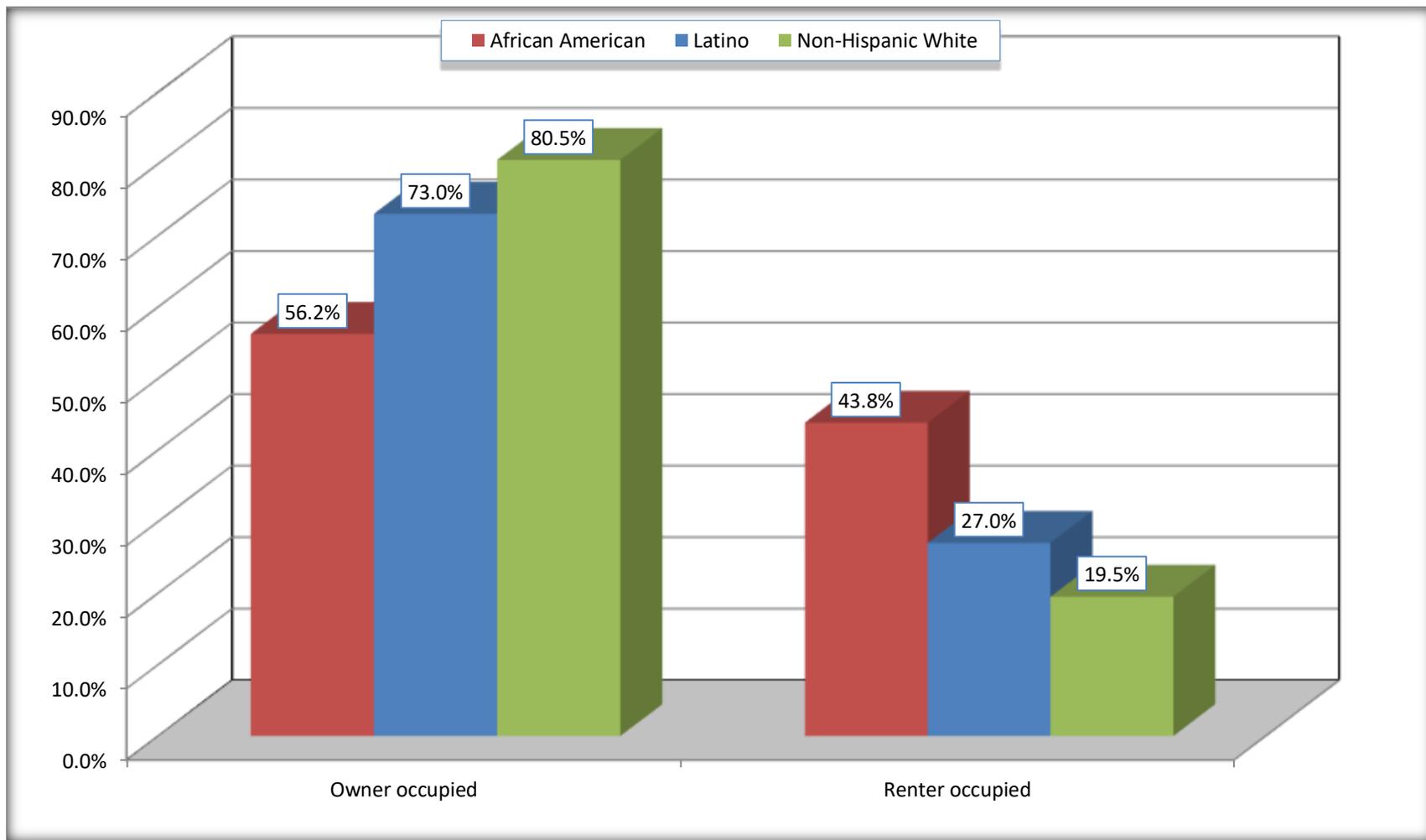
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>3,973</b>	<b>100.0%</b>	<b>274</b>	<b>100.0%</b>	<b>6,415</b>	<b>100.0%</b>
Owner occupied	2,233	56.2%	200	73.0%	5,166	80.5%
Renter occupied	1,740	43.8%	74	27.0%	1,249	19.5%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions,  
<http://www.census.gov/acs/www/UseData/index.h>

## Home Owners and Renters by Household

### De Soto Parish, Louisiana



Source: B25003. TENURE - Universe: OCCUPIED HOUSING UNITS  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B25014. OCCUPANTS PER ROOM - Universe: OCCUPIED HOUSING UNITS**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

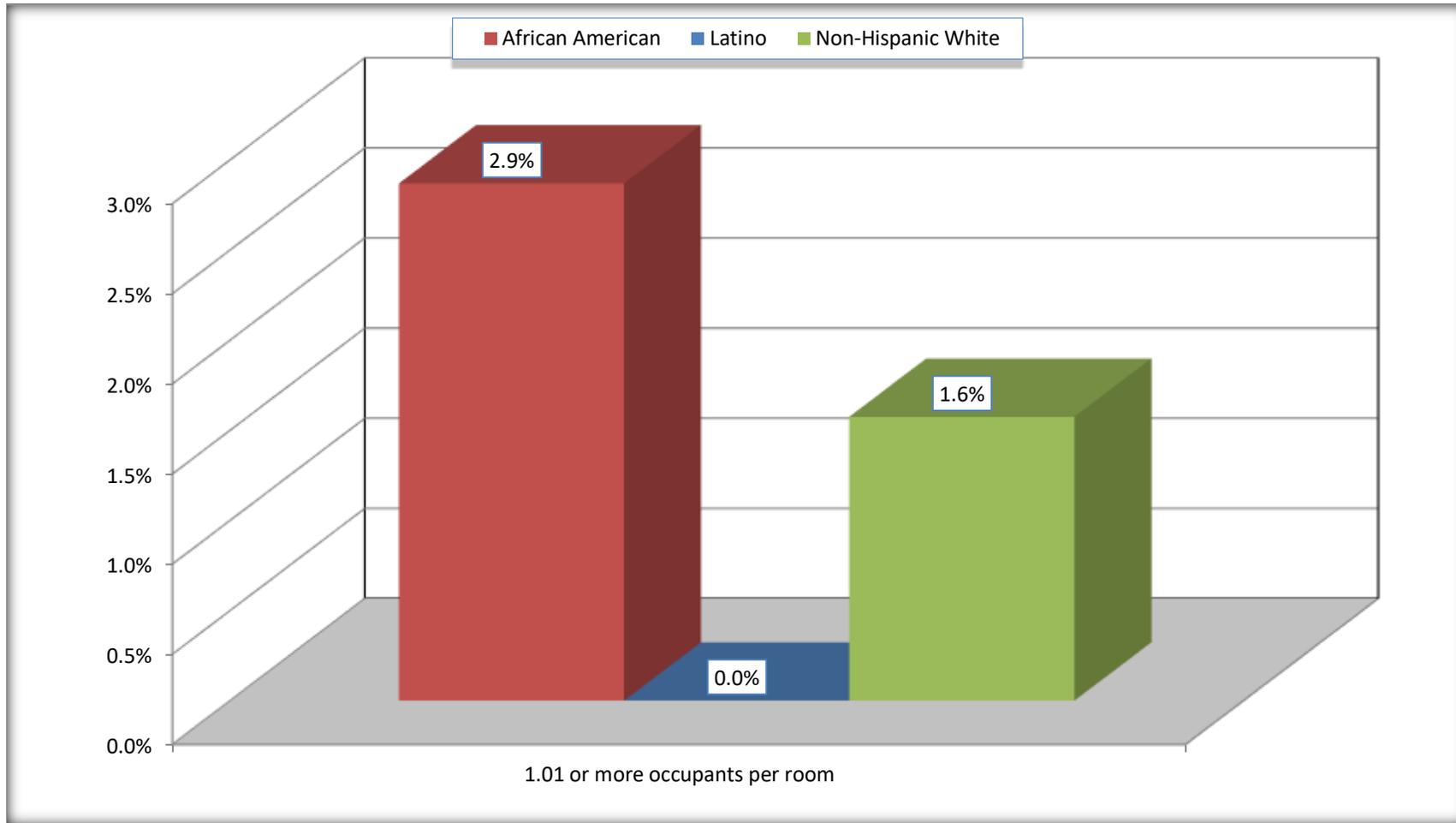
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>3,973</b>	<b>100.0%</b>	<b>274</b>	<b>100.0%</b>	<b>6,415</b>	<b>100.0%</b>
1.00 or less occupants per room	3,859	97.1%	274	100.0%	6,314	98.4%
1.01 or more occupants per room	114	2.9%	0	0.0%	101	1.6%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, <http://www.census.gov/acs/www/UseData/index.ht>

### More than One Person per Room (Crowding) by Household

#### De Soto Parish, Louisiana



Source: B25014. OCCUPANTS PER ROOM - Universe: OCCUPIED HOUSING UNITS  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B18101. AGE BY DISABILITY STATUS**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

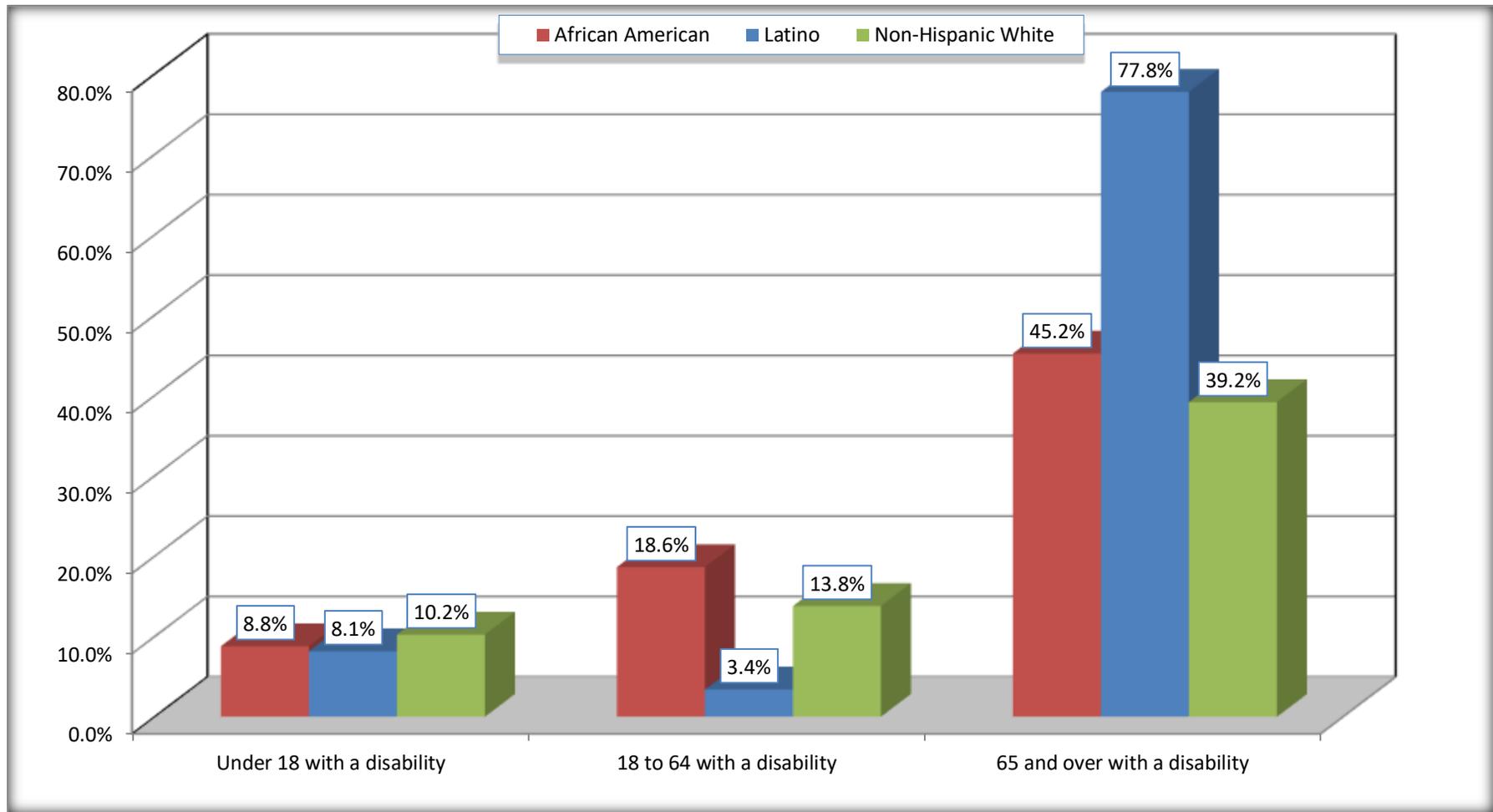
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>9,548</b>	<b>100.0%</b>	<b>785</b>	<b>100.0%</b>	<b>15,942</b>	<b>100.0%</b>
Under 18 years:	2,279	23.9%	270	34.4%	3,613	22.7%
With a disability	200	2.1%	22	2.8%	369	2.3%
No disability	2,079	21.8%	248	31.6%	3,244	20.3%
18 to 64 years:	5,853	61.3%	443	56.4%	9,242	58.0%
With a disability	1,090	11.4%	15	1.9%	1,274	8.0%
No disability	4,763	49.9%	428	54.5%	7,968	50.0%
65 years and over:	1,416	14.8%	72	9.2%	3,087	19.4%
With a disability	640	6.7%	56	7.1%	1,209	7.6%
No disability	776	8.1%	16	2.0%	1,878	11.8%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Disability by Age

### De Soto Parish, Louisiana



Source: B18101. AGE BY DISABILITY STATUS  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**C27001B. HEALTH INSURANCE COVERAGE STATUS BY AGE**

Data Set: 2014-2018 American Community Survey 5-Year Estimates

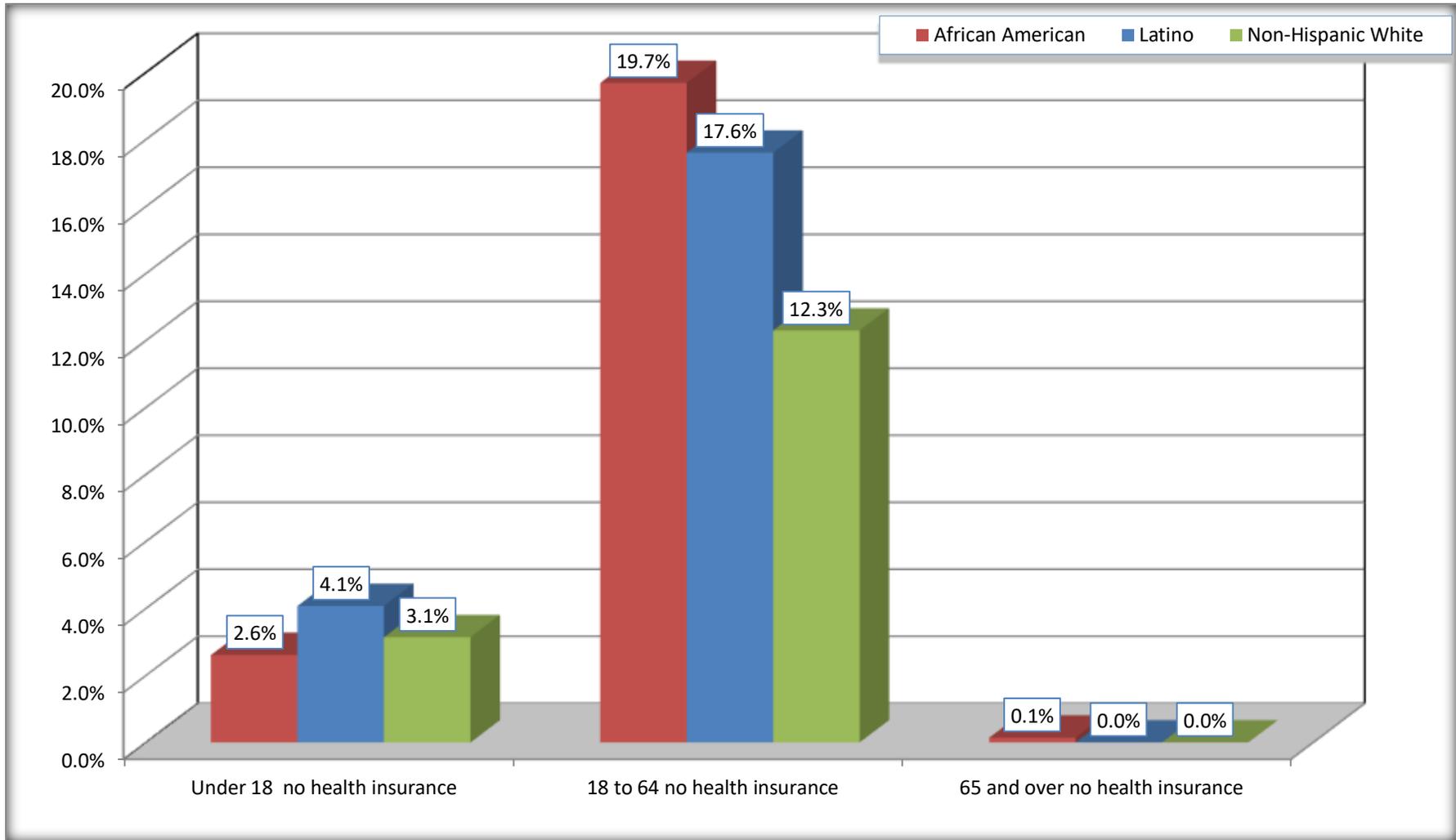
	<b>De Soto Parish, Louisiana</b>					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>9,548</b>	<b>100.0%</b>	<b>785</b>	<b>100.0%</b>	<b>15,942</b>	<b>100.0%</b>
Under 18 years:	2,413	25.3%	270	34.4%	3,821	24.0%
With health insurance coverage	2,350	24.6%	259	33.0%	3,701	23.2%
No health insurance coverage	63	0.7%	11	1.4%	120	0.8%
18 to 64 years:	5,719	59.9%	443	56.4%	9,034	56.7%
With health insurance coverage	4,593	48.1%	365	46.5%	7,923	49.7%
No health insurance coverage	1,126	11.8%	78	9.9%	1,111	7.0%
65 years and over:	1,416	14.8%	72	9.2%	3,087	19.4%
With health insurance coverage	1,414	14.8%	72	9.2%	3,087	19.4%
No health insurance coverage	2	0.0%	0	0.0%	0	0.0%

Source: U.S. Census Bureau, 2014-2018 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

### Lack of Health Insurance Coverage by Age

#### De Soto Parish, Louisiana



Source: C27001B. HEALTH INSURANCE COVERAGE STATUS BY AGE  
Data Set: 2014-2018 American Community Survey 5-Year Estimates

**B28009. PRESENCE OF A COMPUTER AND TYPE OF INTERNET SUBSCRIPTION IN HOUSEHOLD**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
Total:	<b>9,534</b>	<b>100.0%</b>	<b>785</b>	<b>100.0%</b>	<b>15,937</b>	<b>100.0%</b>
Has a computer:	7,841	82.2%	662	84.3%	15,080	94.6%
With dial-up Internet subscription alone	61	0.6%	11	1.4%	80	0.5%
With a broadband Internet subscription	5,725	60.0%	474	60.4%	13,327	83.6%
Without an Internet subscription	2,055	21.6%	177	22.5%	1,673	10.5%
No Computer	1,693	17.8%	123	15.7%	857	5.4%

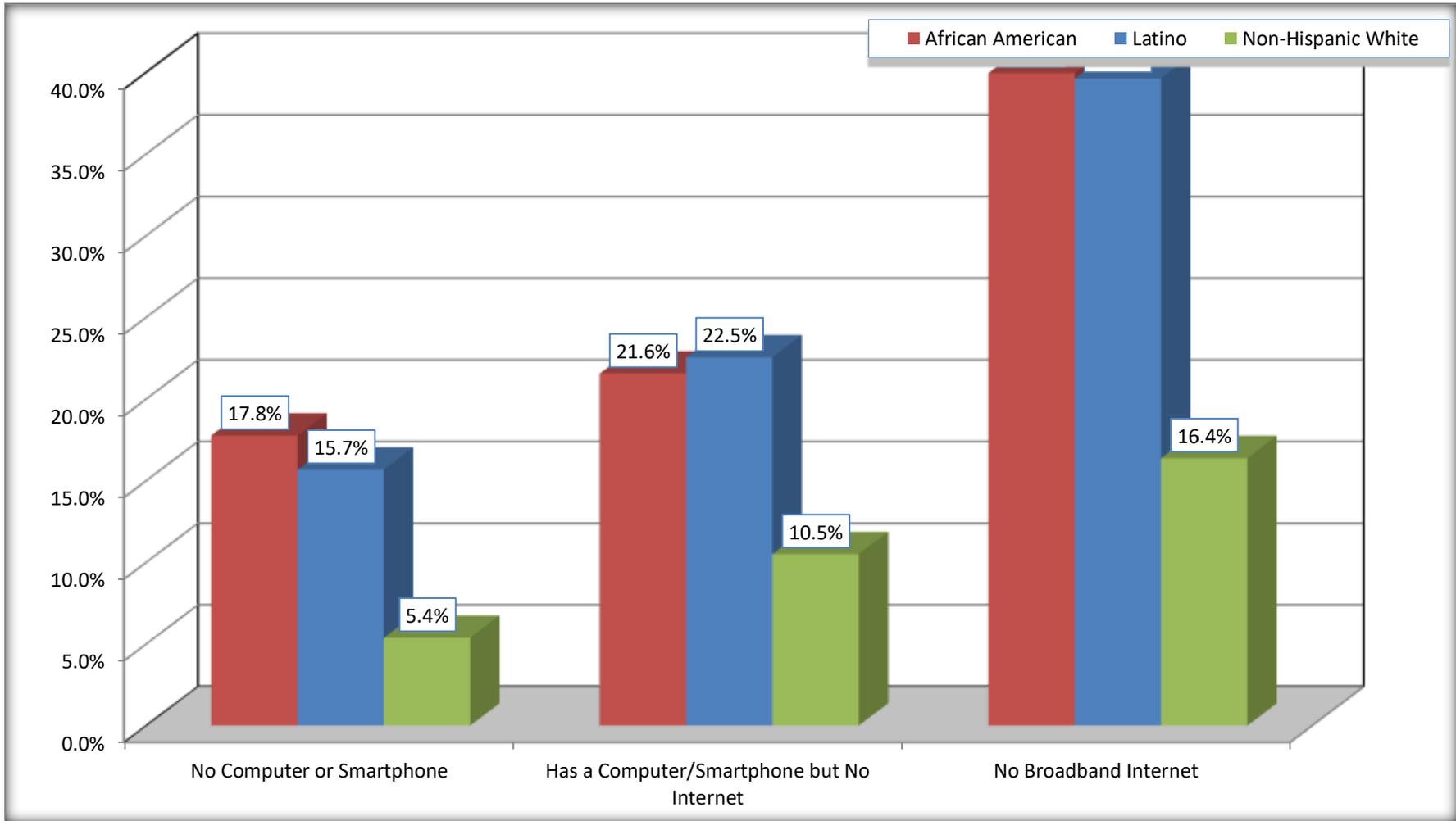
Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

### Computer/Smartphone and Internet Access

#### De Soto Parish, Louisiana



Source: B28009. PRESENCE OF A COMPUTER AND TYPE OF INTERNET SUBSCRIPTION IN HOUSEHOLD  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

# EXHIBIT 2

**UNITED STATES DISTRICT COURT WESTERN  
DISTRICT OF LOUISIANA SHREVEPORT DIVISION**

DAVID B. MEANS, ET AL.

CIVIL ACTION NO. 5:23-cv-00669

VERSUS

JUDGE DAVID C. JOSEPH

DESOTO PARISH, ET AL.

MAGISTRATE JUDGE HORNSBY

**DECLARATION OF DR. LISA HANDLEY**

**I. Summary**

At the request of the amici curiae in this case, I conducted an analysis of voting patterns by race in recent elections in DeSoto Parish. On the basis of this analysis, I have concluded that voting in DeSoto Parish is consistently and starkly racially polarized. In every one of the 16 elections analyzed, Black voters provided cohesive support for their preferred candidates and White voters strongly favored opponents of these candidates. This racial polarization impedes the ability of Black voters to elect candidates of their choice unless districts are drawn that provide Black voters with an opportunity to elect their preferred candidates to the DeSoto Parish Police Jury.

Incorporating turnout data and the estimates of votes by race produced by the racial bloc voting analysis, I calculated the Black voting age population (BVAP) that would be needed for the Black-preferred candidate to win each of the elections I analyzed. Based on this analysis, I have concluded that a district would need to have a BVAP of between 50 and 55 percent to provide Black voters with an opportunity to elect their candidates of choice to the DeSoto Parish Police Jury.

**II. Professional Background and Experience**

I have over thirty-five years of experience as a voting rights and redistricting expert. I have advised scores of jurisdictions and other clients on minority voting rights and redistricting-related issues. I have served as an expert in dozens of voting rights cases. My clients have included state and local jurisdictions, independent redistricting commissions (Arizona, Colorado, Michigan), the U.S. Department of Justice, national civil rights organizations, and such international organizations as the United Nations.

I have been actively involved in researching, writing, and teaching on subjects relating to voting rights, including minority representation, electoral system design, and redistricting. I co-authored a book, *Minority Representation and the Quest for Voting Equality* (Cambridge

University Press, 1992), and co-edited a volume, *Redistricting in Comparative Perspective* (Oxford University Press, 2008), on these subjects. In addition, my research on these topics has appeared in peer-reviewed journals such as *Journal of Politics*, *Legislative Studies Quarterly*, *American Politics Quarterly*, *Journal of Law and Politics*, and *Law and Policy*, as well as law reviews (e.g., *North Carolina Law Review*) and a number of edited books. I hold a Ph.D. in political science from The George Washington University.

I have been a principal of Frontier International Electoral Consulting since co-founding the company in 1998. Frontier IEC specializes in providing electoral assistance in transitional democracies and post-conflict countries. In addition, I am a Visiting Research Academic at Oxford Brookes University in Oxford, United Kingdom.

### **III. Analyzing Voting Patterns by Race**

An analysis of voting patterns by race serves as the foundation of two of the three elements of the “results test” as outlined in *Thornburg v. Gingles*: a racial bloc voting analysis is needed to determine whether the minority group is politically cohesive; and the analysis is required to determine if Whites are voting sufficiently as a bloc to usually defeat the candidates preferred by minority voters. The voting patterns of White and minority voters must be estimated using statistical techniques because direct information about the race of the voters is not, of course, available on the ballots cast.

To carry out an analysis of voting patterns by race, an aggregate level database must be constructed because individual level data is not available. The aggregate data relied on is usually election precinct data. Information relating to the demographic composition and election results in the precincts is collected, merged, and statistically analyzed to determine if there is a relationship between the racial composition of the precincts and support for specific candidates across the precincts.

***Standard Statistical Techniques*** Three standard statistical techniques have been developed over time to estimate vote choices by race: homogeneous precinct analysis, ecological regression, and ecological inference.<sup>1</sup> Two of these analytic procedures—homogeneous precinct

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<sup>1</sup> For a detailed explanation of homogeneous precinct analysis and ecological regression, see Bernard Grofman, Lisa Handley, and Richard Niemi, *Minority Representation and the Quest for Voting Equality* (Cambridge University Press, 1992). See Gary King, *A Solution to the Ecological Inference Problem* (Princeton University Press, 1997) for a more detailed explanation of ecological inference.

analysis and ecological regression—were employed by the plaintiffs’ expert in *Thornburg v. Gingles*, have the benefit of the Supreme Court’s approval in that case, and have been used in most subsequent voting rights cases. The third technique, ecological inference, was developed after the *Gingles* decision and was designed, in part, to address some of the disadvantages associated with ecological regression analysis. Ecological inference analysis has been introduced and accepted in numerous district court proceedings.

*Homogeneous precinct* (HP) analysis is the simplest technique. It involves comparing the percentage of votes received by each of the candidates in precincts that are racially or ethnically homogeneous. The general practice is to label a precinct as homogeneous if at least 90 percent of the voters or voting age population is composed of a single race. (In Louisiana, where turnout data by race is available, a homogenous precinct is defined as a precinct in which 90 percent or more of the voters were Black or White.) In fact, the homogeneous results reported are not estimates—they are the actual precinct results. However, most voters in DeSoto Parish do not reside in homogeneous precincts, and voters who reside in homogeneous precincts may not be representative of voters who live in more racially diverse precincts. For this reason, I refer to these percentages as estimates.

The second statistical technique employed, *ecological regression* (ER), uses information from all precincts, not simply the homogeneous ones, to derive estimates of the voting behavior of minorities and Whites. If there is a strong linear relationship across precincts between the percentage of minorities and the percentage of votes cast for a given candidate, this relationship can be used to estimate the percent of minority and White voters supporting the candidate.

The third technique, *ecological inference* (EI 2x2), was developed by Harvard Professor Gary King. This approach also uses information from all precincts but, unlike ecological regression, it does not rely on an assumption of linearity. Instead, it incorporates maximum likelihood statistics to produce estimates of voting patterns by race. In addition, it utilizes the method of bounds, which uses more of the available information from the precinct returns than ecological regression.<sup>2</sup> Unlike ecological regression, which can produce percentage estimates of

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<sup>2</sup> The following is an example of how the method of bounds works: if a given precinct has 100 voters, of whom 75 are Black and 25 are White, and the Black candidate received 80 votes, then at least 55 of the Black voters voted for the Black candidate and at most all 75 did. (The method of bounds is less useful for calculating estimates for White voters because as few as five of the White voters and as many as all of the White voters could have voted for the candidate.)

less than 0 or more than 100 percent, ecological inference was designed to produce only estimates that fall within the possible limits. However, EI does not guarantee that the estimates for all of the candidates add to 100 percent for each of the racial groups examined.

In conducting my analysis of voting patterns by race in recent elections in DeSoto Parish, I also used a more recently developed version of ecological inference, which I have labeled “EI RxC” in the summary table. One advantage of EI RxC is that it produces generally accepted confidence intervals for the estimates of minority and White voters supporting each of the candidates. I have included these confidence intervals in the summary table.

**Database** To analyze voting patterns by race using aggregate level information, a database that combines election results with demographic information is required. This database is almost always constructed using election precincts as the unit of analysis. The demographic composition of the precincts is based on voter registration or turnout by race if this information is available. Because Louisiana collects voter registration data by race (registering voters self-identify their race), and tallies and provides precinct-level turnout by race data, I was able to use turnout by race to denote the demographic composition of the precincts.

The 2015–2022 election results and turnout by race data, for all precincts and election cycles, are publicly available on the Louisiana Secretary of State’s website. In addition, in order to produce participation rates (turnout as a percentage of voting age population), census population data was obtained from the Census FTP portal.

Early votes are reported only at the parish level in Louisiana—they are not allocated back to the precinct where the voter resides. The percentage of DeSoto Parish votes that were cast early ranged from approximately 25% (2015) to as high as slightly over 58% in the 2020 presidential contest. Rather than simply ignore these votes, they have been allocated to the parish precincts proportionally based on the votes received by each of the candidates on Election Day.<sup>3</sup>

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<sup>3</sup> An example of the allocation process is as follows: Candidate X received 80% of her Election Day parish-wide vote in two-precinct Parish Z from Precinct A and 20% from Precinct B. Therefore, 80% of her early votes are allocated to Precinct A and 20% to Precinct B. Allocating early votes in this manner depresses the amount of racial polarization since the methodology does not take into account the race of the voter.

*Elections analyzed* All recent statewide election contests that included Black candidates were analyzed.<sup>4</sup> These elections are listed in Table 1, below.<sup>5</sup>

**Table 1: Elections Analyzed**

<b>Election Cycle</b>	<b>Office</b>	<b>Black Candidate(s)</b>
November 2022	U.S. Senator	Gary Chambers, Jr.
November 2020	U.S. President/Vice President	Kamala Harris
	U.S. Senator	Adrian Perkins Derrick Edwards
November 2019	Secretary of State	Gwen Collins-Greenup
October 2019	Lieutenant Governor	Willie Jones
	Attorney General	Ike Jackson
	Treasurer	Derrick Edwards
	Secretary of State	Gwen Collins-Greenup
December 2018	Secretary of State	Gwen Collins-Greenup
November 2018	Secretary of State	Gwen Collins-Greenup
November 2017	Treasurer	Derrick Edwards
October 2017	Treasurer	Derrick Edwards
November 2015	Lieutenant Governor	Kip Holden
October 2015	Lieutenant Governor	Kip Holden
	Attorney General	Ike Jackson Geri Broussard Baloney
	Secretary of State	Chris Tyson

Although endogenous elections (elections for the office at issue) are probative in determining if voting is racially polarized, I was not able to analyze recent DeSoto Parish police

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<sup>4</sup> Courts consider election contests that include minority candidates more probative than contests that include only White candidates for determining if voting is racially polarized. This is because it is not sufficient for minority voters to be able to elect their candidates of choice only if these candidates are White. On the other hand, it is important to recognize that not all minority candidates are the preferred candidates of minority voters.

<sup>5</sup> In one of the elections analyzed—the November 2020 election for U.S. President—it was the running mate, Kamala Harris, who is Black.

jury elections. There are two reasons for this. First, there are only a very small number of precincts in each policy jury district (three to eight precincts) and many of these “precincts” are actually split portions of precincts with no associated turnout by race data. Second, the exercise of apportioning the early votes cast in the police jury elections across the very limited number of precincts and split precincts is too prone to erroneous precinct level vote estimates.

#### **IV. Voting Is Racially Polarized in DeSoto Parish**

Voting is consistently and starkly racially polarized in DeSoto Parish. The Appendix, attached to the end of this report, provides the estimates of the percentage of Black and White voters supporting each of the candidates in the 16 statewide elections examined, using the four statistical methods discussed above.

As the Appendix clearly shows, Black and White voters supported different candidates in every election contest analyzed. Black voters were cohesive in support of their preferred candidates and the White voters consistently bloc voted against these candidates. Moreover, the candidates preferred by Black voters consistently failed to win elections in the parish – although some candidates supported by Black voters succeeded in advancing to a runoff, none of these candidates actually won the election contest parish-wide.

Black voters support for their preferred candidates (“Black-preferred candidates”) average 82.2% across all 16 contests.<sup>6</sup> When contests with only two candidates are considered, the level of cohesion was even higher, with Black voters’ support averaging 93.0% for the Black-preferred candidates across these eight elections. The average percentage of White voter support for the Black-preferred candidate, on the other hand, was 9.7% across all 16 contests and rose to only 12.4% when contests with only two candidates are considered.

#### **V. Calculating the Black VAP Needed to Elect Black-Preferred Candidates**

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<sup>6</sup> In all 16 of the contests analyzed, the Black candidate or, if there was more than one Black candidate, one of the Black candidates, was the candidate of choice of Black voters. This means that in the two-candidate contests the candidate of choice of Black voters received more than 50% of the vote. However, in the eight (out of the 16 elections) in which more than two candidates competed, the candidate of choice of Black voters may have received only a plurality of the Black vote. I averaged the percentage of the vote received by the candidate of choice of Black voters in all 16 contests and in the eight contests with only two candidates. Although the Black-preferred candidate was always a Black candidate in the statewide elections, not all Black candidates who ran statewide were the candidates of choice of Black voters and hence have not been included in the averages.

The Black voting age population (BVAP) percentage needed in a district to elect Black-preferred candidates can be calculated by taking into account the relative participation rates of the Black and White age-eligible population, as well as the estimated level of Black voter support for the Black-preferred candidates (their “cohesiveness”), and the estimated level of White voters “crossover” voting for the Black-preferred candidates.

**Equalizing Black and White turnout** Because Black age-eligible voters often turn out to vote at lower rates than White age-eligible voters, the BVAP needed to ensure that Black voters comprise at least half of the voters in an election is often higher than 50 percent. This pattern of higher White participation than Black participation is true for recent statewide elections in DeSoto Parish. Using the respective turnout rates of the Black and White age-eligible population, I have calculated the percentage needed to equalize the number of Black and White voters in a given election.<sup>7</sup> Table 2 lists participation rates for Black and White voters in recent DeSoto Parish elections and the BVAP percentage that would be needed to produce an equal number of Black and White voters in the election.

**Table 2: Participation Rates by Race in Recent DeSoto Parish Elections**

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<sup>7</sup> The equalizing percentage is calculated mathematically by solving the following equation:

Let

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

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

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

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

Therefore,

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

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

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

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

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

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

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

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

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

Election Date	Total turnout/ Total VAP	Black turnout/ Black VAP	White turnout/ White VAP	BVAP Needed to Produce Equal Number of Black and White Voters
2022 November	46.5%	38.8%	54.7%	58.5%
2020 November	73.0%	69.4%	80.3%	53.7%
2019 November	52.1%	56.0%	53.9%	49.1%
2019 October	46.3%	46.8%	49.7%	51.5%
2018 December	13.8%	11.5%	16.3%	58.5%
2018 November	53.9%	50.3%	60.2%	54.5%
2017 November	10.7%	9.0%	12.6%	58.4%
2017 October	11.7%	8.8%	14.4%	62.2%
2015 November	39.3%	41.8%	40.8%	49.4%
2015 October	43.2%	41.7%	47.2%	53.1%

Equalizing turnout is only the first step in the process – it does not take into account the voting patterns of Black and White voters. If voting is racially polarized but a significant number of White voters typically “crossover” to vote for Black voters’ preferred candidate, it may be the case that this crossover voting can compensate for depressed Black turnout; it may even produce a situation in which Black voters need not comprise 50 percent of the voters in an election for the Black-preferred candidate to win.

***Incorporating Minority Cohesion and White Crossover Voting in the Equation*** A district-specific, functional analysis should take into account not only differences in the turnout rates of the age-eligible Black and White population, but also voting patterns by race.<sup>8</sup> To illustrate this mathematically, consider a district that has 1000 persons of voting age, 50% of whom are Black and 50% of whom are White. Let us begin by assuming that Black turnout is lower than White turnout in a two-candidate election. In our hypothetical election example, 42% of the Black voting age population (VAP) turn out to vote and 60% of the White VAP vote. This means that, for our illustrative election, there are 210 Black voters and 300 White voters. Further suppose that 96% of the Black voters supported their candidate of choice and 25% of the White voters cast their votes for this candidate (with the other 75% supporting her opponent in the

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<sup>8</sup> For an in-depth discussion of this approach to creating effective minority districts, see Bernard Grofman, Lisa Handley and David Lublin, “Drawing Effective Minority Districts: A Conceptual Framework and Some Empirical Evidence,” *North Carolina Law Review*, volume 79 (5), June 2001.

election contest). Thus, in our example, Black voters cast 200 of their 210 votes for the Black-preferred candidate and their other 8 votes for her opponent; White voters cast 75 of their 300 votes for the Black-preferred candidate and 225 votes for their preferred candidate:

	VAP	Turnout	Voters	Support for Black-preferred candidate	Votes for Black-preferred candidate	Support for White-preferred candidate	Votes for White-preferred candidate
Black	500	0.42	210	0.96	202	0.04	8
White	500	0.60	300	0.25	75	0.75	225
			510		277		233

The candidate of choice of Black voters would receive a total of 277 votes (202 from Black voters and 75 from White voters), while the candidate preferred by White voters would receive only 233 votes (8 from Black voters and 225 from White voters). The Black-preferred candidate would win the election with 55.4% (277/500) of the vote in this hypothetical 50% Black VAP district. And the Black-preferred candidate would be successful despite the fact that the election was racially polarized and that potential Black voters turned out to vote at a lower rate than potential White voters. In fact, in this hypothetical, the candidate of choice of Black voters would still win the election by a very small margin (50.9%) in a district that is 45% Black with these same voting patterns:

	VAP	Turnout	Voters	Support for Black-preferred candidate	Votes for Black-preferred candidate	Support for White-preferred candidate	Votes for White-preferred candidate
Black	450	0.42	189	0.96	181	0.04	8
White	550	0.60	330	0.25	83	0.75	248
			519		264		255

**VI. Majority BVAP Districts Needed to Elect Black-Preferred Candidates in DeSoto Parish**

Table 3, below, incorporates the turnout rates (found in Table 2) and the estimates of Black and White voters’ support for the candidates preferred by Black voters (found in the

Appendix) to calculate the percentage of the vote the Black-preferred candidates would receive given BVAP percents of 45%, 50%, and 55%. Although I have calculated these percentages for all 16 contests, it is only in the two-candidate contests that the percentage received by the Black-preferred candidate indicates whether this candidate would succeed in winning the election contest. (The failure of the Black-preferred candidate to receive more than 50% of the vote in a contest with more than two candidates does not tell us if the candidate would proceed to a runoff, let alone if the candidate would ultimately win the election.)

**Table 3: Percent of Vote Received by Black-Preferred Candidates**

	race of B-P candidate	Turnout rate for office and percent vote for Black-preferred candidates						percent of vote B-P cand would have received if district was 55% black VAP	percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP
		Black votes			White votes					
		votes cast for office	B-P	all others	votes cast for office	B-P	all others			
<b>2-candidate contests</b>										
Nov 2020 US President	W/B	69.4	85.1	14.9	80.3	14.2	85.8	50.6	47.1	43.6
Nov 2019 Sec of State	B	56.0	95.5	4.5	53.9	13.7	86.3	59.5	55.4	51.3
Oct 2019 Lieut Governor	B	46.8	96.6	3.4	49.7	8.8	91.2	55.8	51.4	47.0
Oct 2019 Attn General	B	46.8	91.9	8.1	49.7	7.4	92.6	52.6	48.4	44.2
Dec 2018 Sec of State	B	11.5	95.2	4.8	16.3	11.0	89.0	50.0	45.8	41.8
Nov 2017 Treasurer	B	9.0	95.2	4.8	12.6	12.2	87.8	50.9	46.8	42.8
Nov 2015 Lieut Governor	B	41.8	96.3	3.7	40.8	19.5	80.5	62.2	58.4	54.5
Oct 2015 Sec of State	B	41.7	88.4	11.6	47.2	12.4	87.6	51.9	48.0	44.3
<b>contests with more than 2 candidates</b>										
Nov 2022 US Senate	B	38.8	40.6	59.4	54.7	2.5	97.5	20.2	18.3	16.5
Nov 2020 US Senate	B	69.4	70.2	29.8	80.3	5.0	95.0	38.5	35.2	32.0
Oct 2019 Sec of State	B	46.8	90.3	9.7	49.7	9.8	90.2	52.9	48.8	44.8
Oct 2019 Treasurer	B	46.8	93.8	6.2	49.7	10.8	89.2	55.2	51.1	46.9
Nov 2018 Sec of State	B	50.3	61.3	38.7	60.2	4.5	95.5	33.2	30.4	27.6
Oct 2017 Treasurer	B	8.8	87.1	12.9	14.4	8.9	91.1	42.3	38.6	35.0
Oct 2015 Lieut Gov	B	41.7	90.0	10.0	47.2	8.7	91.3	50.9	46.8	42.8
Oct 2015 Attn General	B	41.7	37.6	62.4	47.2	5.5	94.5	22.2	20.6	19.0

Looking down the final three columns of Table 3, it is apparent that the Black-preferred candidates wins very few (only two out of the eight contests) of the two-candidate contests in a district with a BVAP of 45%, and would still not win a majority of the contests with a BVAP of 50% (three out of the eight contests). However, a BVAP of 55% produces a win for the Black-preferred candidate in seven of the eight two-candidate contests and a tie in the eighth contest (December 2018 election for Secretary of State). On the basis of this analysis, I conclude that a

district with a BVAP between 50 and 55% is necessary to provide Black voters with an opportunity to elect their candidates of choice in DeSoto Parish.

## **VII. Conclusion**

My analysis of voting patterns by race found that the Black community in DeSoto Parish is cohesive in supporting their preferred candidates and that White voters consistently bloc vote to defeat these candidates. This racial polarization substantially impedes the ability of Black voters to elect candidates of their choice to the DeSoto Parish Police Jury unless districts are drawn to provide Black voters with this opportunity. Given the participation rates and voting patterns of Black and White voters, only a majority BVAP district is likely to provide Black voters with opportunity to elect their candidates of choice to the Parish Police Jury.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

A handwritten signature in blue ink that reads "Lisa Handley". The signature is written in a cursive, flowing style.

July 4, 2023

# HANDLEY APPENDIX

Voting patterns in DeSoto Parish in recent statewide elections	Estimates for Black Voters									Estimates for White Voters					
	Party	Race	Actual Votes	95% confidence interval			EI 2x2	ER	HP	95% confidence interval			EI 2x2	ER	HP
				EI	RxC	interval				EI	RxC	interval			
<b>2022 November</b>															
<b>U.S. Senator</b>															
John Kennedy	R	W	68.0	4.9	2.3, 8.2	6.4	-0.3	7.9	92.4	90.8, 93.9	92.5	95.3	89.7		
Gary Chambers, Jr	D	B	13.4	40.6	37.3, 43.8	45.5	44.7	32.1	2.5	1.4, 3.8	0.5	0.2	3.3		
Luke Mixon	D	W	8.2	20.0	16.8, 23.2	20.6	17.5	17.3	3.0	1.8, 4.5	0.6	4.7	3.1		
Others			10.4	34.4	31.3, 37.4	33.4	38.6	42.7	2.0	1.0, 3.2	1.4	-0.2	3.9		
<b>2020 November</b>															
<b>U.S. President</b>															
Biden/Harris	D	W/B	37.0	85.1	68.5, 90.3	97.1	105.0	-	14.2	9.7, 16.2	7.0	6.1	-		
Trump/Pence	R	W/W	61.8	13.5	6.5, 16.9	2.3	-5.3	-	85.2	75.9, 87.9	91.8	93.2	-		
Others			1.1	1.4	.7, 1.7	0.9	1.0	-	0.7	.2, .8	1.1	0.9	-		
<b>U.S. Senator</b>															
Adrian Perkins	D	B	26.1	70.2	66.3, 73.9	73.0	75.0	-	5.0	2.9, 7.0	4.3	5.0	-		
Derrick Edwards	D	B	4.5	9.3	7.1, 11.3	10.1	11.1	-	1.5	.6, 2.6	0.9	1.2	-		
Bill Cassidy	R	W	61.0	4.1	2.0, 7.0	3.8	-4.9	-	90.6	88.7, 92.2	90.8	91.2	-		
Others			8.4	16.4	13.3, 19.3	16.8	18.7	-	3.0	1.5, 4.7	3.0	2.9	-		
<b>2019 October</b>															
<b>Lieutenant Governor</b>															
Willie Jones	D	B	36.3	96.6	93.1, 98.8	98.2	105.1	-	8.8	6.6, 11.4	7.1	8.7	10.4		
Billy Nungesser	R	W	63.8	3.4	1.2, 6.9	1.9	-5.1	-	91.2	88.6, 93.4	92.9	91.4	89.6		
<b>Attorney General</b>															
Ike Jackson	D	B	33.9	91.9	87.1, 95.4	91.4	96.3	-	7.4	5.1, 10.5	6.9	9.7	10.5		
Jeff Landry	R	W	66.1	8.1	4.6, 12.9	8.8	4.1	-	92.6	89.5, 94.9	92.9	90.1	89.5		
<b>Secretary of State</b>															
Gwen Collins-Greenup	D	B	34.2	90.3	86.0, 93.7	93.5	97.5	-	9.8	7.6, 12.5	7.0	9.9	10.8		
Kyle Ardoin	R	W	36.7	3.1	1.1, 6.2	1.2	-1.9	-	51.5	49.3, 53.5	54.0	49.2	52.4		
Thomas Kennedy III	R	W	22.1	4.2	2.1, 7.2	4.3	2.9	-	30.5	28.2, 32.3	30.7	31.6	26.5		
Amanda Smith	R	W	7.0	2.5	1.1, 4.5	2.7	1.4	-	8.2	6.7, 9.5	8.3	9.1	10.3		
<b>Treasurer</b>															
Derrick Edwards	D	B	35.8	93.8	90.3, 96.4	-	101.6	-	10.8	8.7, 13.0	7.4	10.0	10.5		
John Schroder	R	W	60.3	2.7	.8, 5.8	-	-5.4	-	87.0	84.8, 88.9	88.7	86.3	85.1		
Teresa Kenny		W	3.9	3.6	1.9, 5.5	-	4.0	-	2.2	.9, 3.6	4.0	3.7	4.4		

Voting patterns in DeSoto Parish in recent statewide elections	Estimates for Black Voters						Estimates for White Voters								
	Party	Race	Actual Votes	95% confidence interval			EI 2x2	ER	HP	95% confidence interval			EI 2x2	ER	HP
				EI	RxC	interval				EI	RxC	interval			
<b>2019 November</b>															
<b>Secretary of State</b>															
Gwen Collins-Greenup	D	B	40.6	95.5	91.7, 98.0	97.0	106.4	-	13.7	11.3, 16.5	11.2	9.9	14.4		
Kyle Ardoin	R	W	59.4	4.5	2.0, 8.3	3.0	-6.2	-	86.3	83.5, 88.7	88.8	90.3	85.6		
<b>2018 November</b>															
<b>Secretary of State</b>															
Gwen Collins-Greenup	D	B	20.8	61.3	57.2, 65.1	64.7	66.0	-	4.5	2.6, 6.7	1.5	3.5	4.7		
Renee Fontenot Free	D	W	12.0	26.8	23.0, 30.4	28.8	30.3	-	6.0	4.1, 8.0	4.7	6.5	5.9		
Julie Stokes	R	W	4.6	1.8	.7, 3.2	0.8	0.9	-	5.6	4.7, 6.5	6.7	5.4	5.6		
Kyle Ardoin	R	W	19.8	3.3	1.4, 5.8	2.6	2.5	-	26.8	25.2, 28.3	27.0	26.3	25.6		
Rick Edmonds	R	W	19.4	1.4	.5, 2.9	0.8	-4.4	-	26.2	24.9, 27.4	27.7	26.0	29.2		
Thomas Kennedy III	R	W	13.5	2.6	1.2, 4.7	2.3	2.0	-	18.2	16.8, 19.5	18.3	19.1	16.5		
Others			9.9	2.8	1.2, 4.9	2.6	3.0	-	12.6	11.2, 13.8	12.9	13.3	12.5		
<b>2018 December</b>															
<b>Secretary of State</b>															
Gwen Collins-Greenup	D	B	34.8	95.2	90.1, 98.3	98.2	103.8	-	11.0	8.1, 14.2	10.4	12.2	12.4		
Kyle Ardoin	R	W	65.2	4.8	1.7, 9.9	1.8	-3.6	-	89.0	85.8, 91.9	89.7	88.0	87.6		
<b>2017 October</b>															
<b>Treasurer</b>															
Derrick Edwards	D	B	29.3	87.1	81.2, 91.8	92.5	105.0	-	8.9	6.3, 11.7	8.8	2.3	7.8		
Angele Davis	R	W	20.6	2.8	1.0, 6.0	2.2	-4.6	-	27.2	24.8, 29.6	27.4	30.4	24.4		
Neil Riser	R	W	17.5	4.7	1.9, 8.6	0.0	-2.8	-	22.3	19.9, 24.7	23.7	27.6	22.5		
John Schroder	R	W	28.3	3.4	1.1, 7.0	3.1	3.6	-	36.8	34.1, 39.4	36.0	33.9	38.9		
Others			4.3	2.0	.7, 3.9	1.6	-1.5	-	4.9	3.5, 6.2	5.7	6.0	6.5		
<b>2017 November</b>															
<b>Treasurer</b>															
Derrick Edwards	D	B	35.9	95.2	89.4, 98.7	94.3	110.7	-	12.2	9.0, 15.7	13.1	8.8	11.6		
John Schroder	R	W	64.1	4.8	1.3, 10.6	5.9	-10.6	-	87.8	84.3, 91.0	86.7	91.2	88.4		
<b>2015 October</b>															
<b>Lieutenant Governor</b>															
Kip Holden	D	B	33.3	90.0	85.9, 93.4	95.1	95.3	-	8.7	6.5, 11.1	5.2	8.2	12.9		
Billy Nungesser	R	W	24.7	3.0	1.2, 5.6	0.0	-0.3	-	34.1	32.0, 36.0	34.8	35.1	34.7		

Voting patterns in DeSoto Parish in recent statewide elections	Estimates for Black Voters						Estimates for White Voters						
	Party	Race	Actual Votes	95% confidence			95% confidence						
				EI RxC	interval	EI 2x2	ER	HP	EI RxC	interval	EI 2x2	ER	HP
John Young	R	W	31.4	4.4	2.1, 7.5	3.4	4.0	-	43.6	41.3, 45.6	44.4	42.6	39.5
Elbert Guillory	R	B	10.6	2.6	1.0, 5.0	1.3	1.0	-	13.7	12.0, 15.2	14.9	14.0	12.8
<b>Attorney General</b>													
Ike Jackson	D	B	13.1	37.5	28.7, 41.5	40.0	38.8	-	2.8	1.0, 7.6	0.5	3.3	2.8
Geri Broussard Baloney	D	B	15.4	37.6	32.7, 41.6	40.6	43.2	-	5.5	3.6, 7.9	4.3	4.4	6.2
Buddy Caldwell	R	W	42.1	17.5	12.0, 25.8	15.4	15.6	-	53.5	49.1, 56.9	54.5	52.7	53.6
Jeff Landry	R	W	27.3	5.8	3.2, 10.1	3.2	1.6	-	36.5	34.4, 38.4	38.2	37.5	35.2
Marty Maley	R	W	2.1	1.5	.6, 2.6	0.6	1.1	-	1.6	.9, 2.4	2.7	2.4	2.2
<b>Secretary of State</b>													
Chris Tyson	D	B	35.6	88.4	82.0, 93.3	91.2	90.6	-	12.4	9.5, 16.0	10.5	15.8	17.5
Tom Schedler	R	W	64.4	11.6	6.7, 18.0	8.4	9.7	-	87.6	84.0, 90.6	89.4	84.4	82.5
<b>2015 November</b>													
<b>Lieutenant Governor</b>													
Kip Holden	D	B	46.3	96.3	92.8, 98.6	98.7	105.6	-	19.5	17.0, 22.4	16.6	16.7	21.3
Billy Nungesser	R	W	53.7	3.7	1.4, 7.2	0.5	-5.6	-	80.5	77.6, 83.0	83.4	83.3	78.7

# EXHIBIT 3

December 5, 2022

*Sent via email*

DeSoto Parish Police Jury  
101 Franklin Street  
Mansfield, LA 71052

Re: DeSoto Parish Policy Jury Redistricting

Dear Members of the DeSoto Parish Police Jury,

The NAACP Legal Defense and Educational Fund, Inc. (“LDF”) writes to correct certain misleading information contained in a letter to the DeSoto Parish Police Jury, dated November 18, 2022, from attorneys at the John D. and Eric G. Johnson Law Firm, LLC and Holzman Vogel Baran Torchinsky & Josefiak, PLLC (the “November 18 Letter”). The November 18 Letter accuses the Police Jury of intentionally discriminating against DeSoto Parish’s white population and threatens litigation based on inaccurate and misleading assertions concerning the Police Jury redistricting plan adopted in April 2022 (“Plan C”). While we do not object to efforts to reduce the population deviations that appear in Plan C, we believe that this can be accomplished with minimal additional changes to district lines. Moreover, we believe the arbitrary elimination of existing majority-Black Police Jury districts, as the November 18 Letter advocates, would itself constitute intentional racial discrimination and may also amount to vote dilution in violation of Section 2 of the Voting Rights Act of 1965.

### **I. Complying with “One Person, One Vote.”**

The Equal Protection Clause of the Fourteenth Amendment requires “equal representation for equal numbers of people” in the apportionment of state and local legislative districts, such as the districts from which members of the DeSoto Parish Police Jury are elected.<sup>1</sup> This “One Person, One Vote” principle provides that maps that weaken the voting power and representation of residents of one legislative district compared to other residents of another district in the same body are

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<sup>1</sup> See *Reynolds v. Sims*, 377 U.S. 533, 559-60 (1964) (citing *Wesberry v. Sanders*, 376 U.S. 1, 18 (1964)).

unconstitutional.<sup>2</sup> The Supreme Court has held that population deviations within plus or minus 5% of the mathematical mean—that is, a total deviation of no more than 10%—are presumptively constitutional.<sup>3</sup> Redistricting plans that exceed this standard are not automatically invalid if the jurisdiction can show that an adopted plan legitimately advances a rational governmental policy formulated “free from any taint of arbitrariness or discrimination.”<sup>4</sup>

Adherence to traditional redistricting principles, the set of general criteria that guide redistricting, may be sufficient to justify greater deviations.<sup>5</sup> These principles serve important democratic purposes. For example, ensuring contiguity and compactness in district maps helps to unify communities and support effective representation. It also importantly limits the ability of map drawers to improperly manipulate lines, helping to prevent the practice of gerrymandering.

Contrary to the November 18 Letter and the attached complaint, it appears that Plan C was drawn according to traditional redistricting principles and goals, and not predominantly on the basis of race or with the intent to discriminate against white voters. Rather, it appears that it was drawn primarily to preserve, to the extent practicable, the existing district boundaries while substantially correcting for changes in the population. Maintaining districts as previously drawn, where deviation from those historical boundaries is not required by the Voting Rights Act or other principles, can serve voters by maintaining continuity of representation. This principle aims to ensure that redistricting does not introduce radical changes to maps and to voters’ elected representatives unnecessarily.

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<sup>2</sup> See *Reynolds*, 377 U.S. at 567–68.

<sup>3</sup> See *Reynolds*, 377 U.S. at 568 (“The Equal Protection Clause demands no less than substantially equal state legislative representation for all citizens, of all places as well as of all races.”); see also *Gaffney v. Cummings*, 412 U.S. 735, 744–45 (1973) (explaining that “minor deviations from mathematical equality among state legislative districts” are not constitutionally suspect, but “larger variations from substantial equality are too great to be justified by any state interest”); *Brown v. Thomson*, 462 U.S. 835, 842 (1983) (holding that apportionment plans with a maximum population deviation among districts of less than 10% are generally permissible, whereas disparities in excess of 10% most likely violate the “one person, one vote” principle).

<sup>4</sup> *Roman v. Sincock*, 377 U.S. 695, 710 (1964); see *Brown*, 462 U.S. at 847–48 (stating that “substantial deference” should be given to a state’s political decisions, provided that “there is no ‘taint of arbitrariness or discrimination’”); see also *Brown*, 462 U.S. at 852 (Brennan, J., dissenting) (“Acceptable reasons . . . must be ‘free from any taint of arbitrariness or discrimination . . . .’”).

<sup>5</sup> E.g., *Brown*, 462 U.S. at 847-48 (principle of preserving county boundaries could justify deviation as high as 13%); see generally *Shaw v. Reno*, 509 U.S. 630, 647, 651 (1993).

Other traditional redistricting principles may also justify the larger than normal deviations found in Plan C. For example, the U.S. Supreme Court has recognized the importance of keeping communities of interest whole in the map-drawing process.<sup>6</sup> Communities of interest can be defined as a neighborhood or group of people with common policy concerns that would benefit from being maintained in a single district. While race cannot be the sole factor, race is one factor that can help define a community of interest in tandem with other considerations such as population deviations, contiguity, and maintaining the cores of prior districts. Indeed, it is critical that no one factor outweighs all others.

Even if the Police Jury is inclined to redraw the redistricting plan to reduce the population deviation to within the presumptively valid 10% threshold, there is no reason for the radical departure from historic district lines advocated by the November 18 Letter or for disregarding other traditional redistricting principles without any justification other than changing the racial composition of the districts. By way of example, attached to this letter is an alternative plan that reduces the overall deviation to approximately 4.7% while making minimal additional changes to Plan C.

## **II. The November 18 Letter Is Misleading.**

The authors of the November 18 Letter make a number of misleading assertions to support the flawed argument that Plan C constitutes a racial gerrymander and is the product of racial discrimination.

Racial gerrymandering occurs where race is the predominant reason for drawing district lines in a particular manner.<sup>7</sup> Where reasons other than race predominantly drove the line drawing, there has been no racial gerrymandering, even if race was a secondary consideration. The complainants assert that Plan C is a racial gerrymander because the districts have purportedly bizarre shapes and boundaries. They ignore that Plan C's districts largely follow the same lines as in the prior plans, with some departure from the old lines to reduce the deviation. Thus, any awkwardness in the district lines can better be explained by adherence to the traditional principle of preserving the prior district lines than by the race of individual voters.

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<sup>6</sup> *Karcher v. Daggett*, 462 U.S. 725 (1983).

<sup>7</sup> See *Miller v. Johnson*, 515 U.S. 900, 909 (1995).

Likewise, the November 18 letter asserts that the fact that the predominantly white Police Jury districts have greater than average population while the predominantly Black districts have lower than average population is evidence that this honorable body intentionally discriminated against DeSoto Parish's white voters. That contention is flawed for the same reason that the complainants' racial gerrymandering argument fails: The deviations are better explained by the map drawer's attempt to preserve the existing district lines while taking into account where the population growth had occurred. Moreover, as the alternative plan attached hereto shows, these deviations can be rendered de minimis with minor adjustments to Plan C.

The November 18 Letter suggests that the Police Jury should have endeavored to eliminate one or more existing majority-Black districts ostensibly in the name of avoiding racial gerrymandering and discrimination—regardless of the impact on existing district lines, the relationships between voters and their elected representatives, or the demands of traditional redistricting principles. Doing as the complainants ask, however, could place the Policy Jury in significant legal jeopardy. Indeed, it is difficult to imagine a starker example of intentional discrimination than purposely eliminating an existing majority-minority district for no other reason than to achieve a desired racial composition for the overall plan. Yet that is exactly what the complainants would have this body do.

### **III. The DeSoto Parish Police Jury Must Comply with Section 2 of the Voting Rights Act.**

The November 18 Letter also suggest that the Police Jury lacked sufficient evidence that the Voting Rights Act required race-based line drawing. Putting aside that, as explained above, Plan C was not drawn predominantly on the basis of race, there is substantial evidence that a DeSoto Parish Police Jury map that dilutes the voting strength of Black community members and/or eliminates majority-Black districts that have historically existed could run afoul of federal law. Removal of these districts would likely violate Section 2.

To ensure that racial minority voters have an equal opportunity to elect their preferred candidates, Section 2 prohibits states and localities from drawing electoral lines with the intent or effect of diluting the voting strength of voters of color. That is, the Voting Rights Act requires that voters of color be provided equal opportunities to elect representatives of their choice not only for state-level representative bodies,

but also for local elected bodies including parish governing boards, school boards, and city councils.

Section 2 prohibits minority vote dilution and requires you to ensure that racial minority voters have an equal opportunity “to participate in the political process and elect candidates of their choice,” in light of the Parish’s demographics, voting patterns, history, and other factors under the “totality of circumstances.”<sup>8</sup>

Redistricting maps may dilute the voting strength of people of color if: (1) a district can be drawn in which the minority community is sufficiently large and geographically compact to constitute a majority; (2) the minority group is politically cohesive; and (3) in the absence of a majority-minority district, candidates preferred by the minority group would usually be defeated due to the political cohesion of non-minority voters for their preferred candidates.<sup>9</sup> After establishing these three preconditions, a “totality of circumstances” analysis determines whether minority voters “have less opportunity than other members of the electorate to participate in the political process and to elect representatives of their choice.”<sup>10</sup>

Recent election results demonstrate stark patterns of voting along racial lines in the State of Louisiana,<sup>11</sup> and DeSoto Parish specifically. In a study of 11 recent elections encompassing DeSoto Parish, LDF found strong patterns of racial polarized voting wherein Black voters in the parish supported a common preferred candidates

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<sup>8</sup> See *Thornburg v. Gingles*, 478 U.S. 30, 34 (1986).

<sup>9</sup> *Id.*

<sup>10</sup> 52 U.S.C. § 10301(b); *Colleton Cty. Council v. McConnell*, 201 F. Supp. 2d 618, 632 (D.S.C. 2002) (quoting *Gingles*, 478 U.S. at 47) (“[Section] 2 prohibits the implementation of an electoral law that ‘interacts with social and historical conditions to cause an inequality in the opportunities enjoyed by black and white voters to elect their preferred representatives.’”); see also *LULAC v. Perry*, 548 U.S. 399, 425 (2006) (describing the operation of the “totality of the circumstances” standard in the vote-dilution claims).

<sup>11</sup> A district court recently found that there was sufficient preliminary evidence of racially polarized voting statewide to support plaintiffs’ challenge to Louisiana’s Supreme Court district map. *Louisiana State Conference of NAACP v. Louisiana*, 490 F. Supp. 3d 982, 1019 (M.D. La. 2020). In *St. Bernard Citizens For Better Government*, the district court found racially polarized voting patterns in statewide gubernatorial elections, as well as local parish elections. *St. Bernard Citizens For Better Gov’t*, 2002 WL 2022589, at \*7 (E.D. La. Aug. 26, 2002). See, e.g., *Terrebonne Par. Branch NAACP v. Jindal*, 274 F. Supp. 3d 395, 436-37 (M.D. La. 2017), rev’d sub nom. *Fusilier v. Landry*, 963 F.3d 447 (5th Cir. 2020) (The district court found that there were racially polarized voting patterns in the parish’s judicial elections, and although the Fifth Circuit reversed the district court’s decision, it held that the district court did not err in its finding of racially polarized voting); *Citizens for a Better Gretna v. City of Gretna*, 636 F. Supp. 1113, 1124 (E.D. La. 1986); *Major v. Treen*, 574 F. Supp. 325, 337 (E.D. La. 1983) (The court held that there was racial polarization in Orleans Parish).

by substantial margins, ranging from approximately 60 to over 90 percent, while white voters preferred different candidates by similar margins. At a parish-wide level, the candidates preferred by Black voters were generally outvoted compared to preferred by white voters. Such patterns form the heart of a potential minority vote dilution claim.<sup>12</sup> The Parish Police Jury must therefore be well attuned to your obligations under Section 2 of the Voting Rights Act and must not arbitrarily eliminate districts that have historically provided Black voters in the parish an opportunity to elect candidates of their choice. Should you consider a new map, Section 2 compels you to preserve effective majority-minority opportunity districts that remain necessary and effective for Black voters to elect candidates of their choice.

\* \* \*

In conclusion, we hope to be a resource in your efforts to ensure the map ultimately enacted for the DeSoto Parish Police Jury complies with the U.S. Constitution and both federal and state statutes. We provide this guidance to help you mitigate the risk of costly and unnecessary litigation. States and localities that fail to adhere to federal law in the redistricting process risk exposure to extremely burdensome legal fees—including both defense costs and the costs of prevailing plaintiffs—and for this reason it is critical that you take steps to ensure that your plan complies with federal law.<sup>13</sup> We would encourage caution against adopting the

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<sup>12</sup> *Gingles*, 478 U.S. at 48 n.15; see also *Johnson v. De Grandy*, 512 U.S. 997, 1007 (1994) (explaining that racially polarized voting increases the potential for discrimination in redistricting, because “manipulation of district lines can dilute the voting strength of politically cohesive minority group members”); *N. Carolina State Conf. of NAACP v. McCrory*, 831 F.3d 204, 221 (4th Cir. 2016) (noting that racially polarized voting is “[o]ne of the critical background facts of which a court must take notice” in Section 2 cases); *Collins v. City of Norfolk, Va.*, 816 F.2d 932, 936-38 (4th Cir. 1987) (emphasizing that racially polarized voting is a “cardinal factor[]” that “weigh[s] very heavily” in determining whether redistricting plans violate Section 2 by denying Black voters equal access to the political process).

<sup>13</sup> Last year, a small school district in New York State paid more than \$11 million dollars in attorneys’ fees after losing a Section 2 lawsuit brought by a local NAACP branch. See Jennifer Korn, *ERCSD Threatens to Fire Teachers if Legal Fees Not Cut to \$1: NAACP Leaders Respond*, ROCKLAND COUNTY TIMES, Jan. 21, 2020, <https://bit.ly/39dKvij>; Report and Recommendation, NAACP, *Spring Valley Branch v. East Ramapo Central School Dist.*, No. 7:17-08943-CS-JCM, 2020 WL 7706783 at \*12 (S.D.N.Y. Dec. 29, 2020) (finding that the school district should pay over \$4 million in plaintiffs’ attorneys’ fees and costs).

Lawmakers in Charleston County, South Carolina, following the 2000 redistricting cycle, spent \$2 million unsuccessfully defending against a Section 2 claim and an additional \$712,027 in plaintiffs’ attorneys’ fees and costs. Order Granting Attorneys’ Fees, *Moultrie v. Charleston Cty.*, No. 2:01-cv-00562-PMD (D.S.C. Aug. 8, 2005); Congressional Authority to Protect Voting Rights After Shelby

flawed reading of federal statutory and constitutional requirements contained in the November 18 Letter, and urge you to disregard the complainants' calls to engage in discriminatory map-making.

Our organization has authored a guidebook, *Power on the Line(s): Making Redistricting Work for Us*, which further expands upon the principles defined above that can be accessed online at [bit.ly/LDFRedistrictingGuide](https://bit.ly/LDFRedistrictingGuide). Please also feel free to contact Stuart Naifeh, [snaifeh@naacpldf.org](mailto:snaifeh@naacpldf.org), with any questions or to discuss these issues in more detail.

We appreciate your consideration and time and wish you best of luck in enacting a fair and equitable map.

Sincerely,

/s/ Stuart Naifeh

Stuart Naifeh, Manager of the Redistricting Project  
Victoria Wenger, Attorney  
NAACP Legal Defense & Educational Fund, Inc.  
40 Rector Street, 5th Fl.  
New York, NY 10006

/s/ Sara Rohani

Sara Rohani, Redistricting Fellow  
NAACP Legal Defense & Educational Fund, Inc.  
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Washington, D.C. 20005

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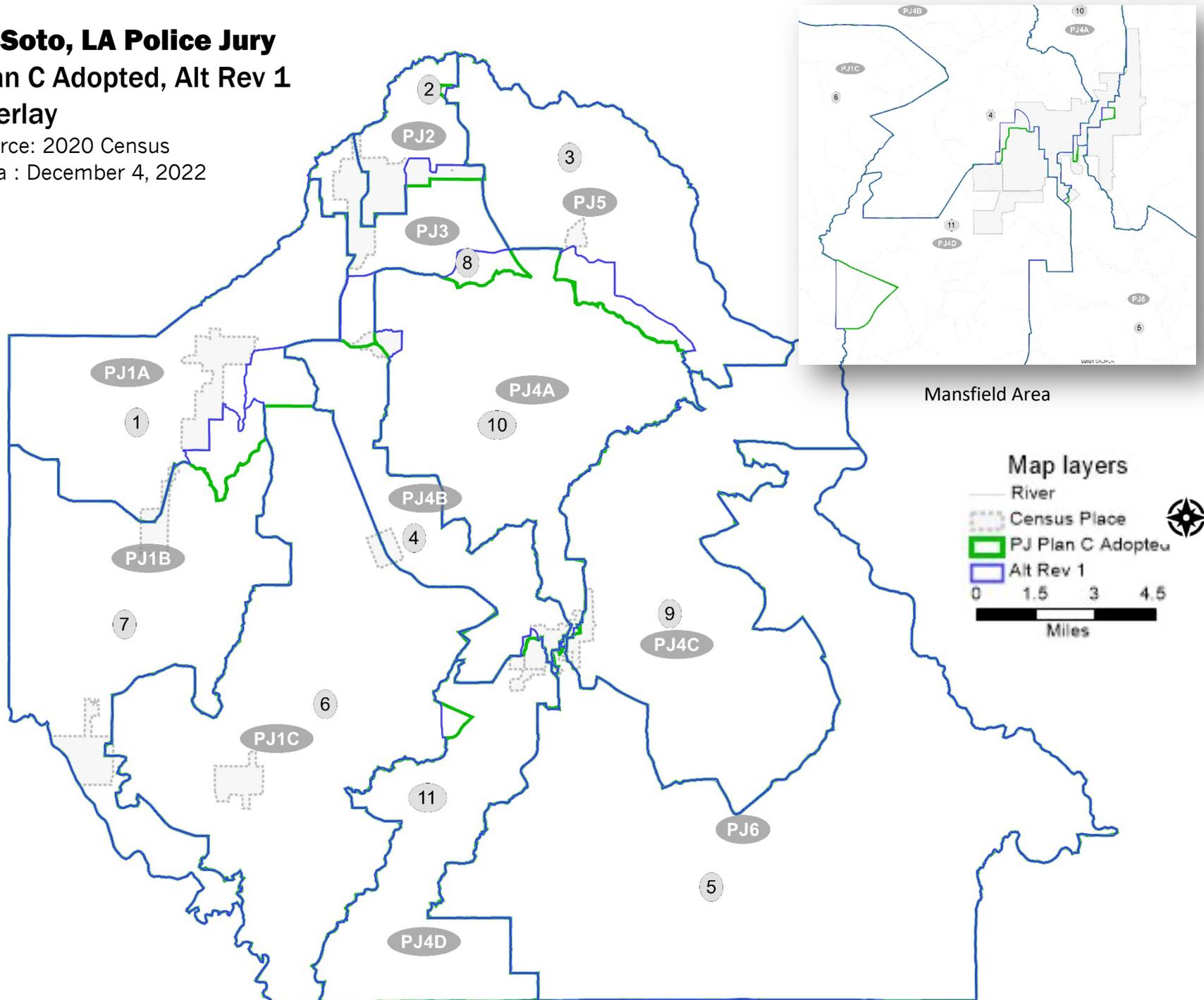
NAACP Legal Defense and Educational Fund, Inc. (“LDF”)

Since its founding in 1940, LDF has used litigation, policy advocacy, public education, and community organizing strategies to achieve racial justice and equity in political participation, education, economic justice, and criminal justice. Throughout its history, LDF has worked to enforce and promote laws and policies that increase access to the electoral process and prohibit voter discrimination, intimidation, and suppression. LDF has been fully separate from the National Association for the Advancement of Colored People (“NAACP”) since 1957, though LDF was originally founded by the NAACP and

**Appendix I**

**DeSoto, LA Police Jury  
Plan C Adopted, Alt Rev 1  
Overlay**

Source: 2020 Census  
Data : December 4, 2022





UNITED STATES DISTRICT COURT WESTERN DISTRICT  
OF LOUISIANA SHREVEPORT DIVISION

DAVID B. MEANS, ET AL.

CIVIL ACTION NO. 5:23-cv-00669

VERSUS

JUDGE DAVID C. JOSEPH

DESOTO PARISH, ET AL.

MAGISTRATE JUDGE HORNSBY

**[PROPOSED] BRIEF FOR *AMICI CURIAE*  
LEGAL DEFENSE FUND, LOUISIANA STATE  
CONFERENCE OF THE NAACP, AND DESOTO PARISH  
BRANCH OF THE NAACP**

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## STATEMENT OF INTEREST

*Amici curiae* are nonprofit, nonpartisan organizations that have a demonstrated interest in protecting the fundamental rights of Black voters under the Voting Rights Act of 1965 (“VRA”). In pursuit of that interest, the Legal Defense Fund (“LDF”) has used litigation, policy advocacy, public education, and community organizing strategies to enforce and promote policies that increase access to the electoral process and prohibit voter discrimination. LDF has litigated precedent-setting lawsuits relating to representation and voting rights of Black people and other people of color before courts nationwide, including VRA lawsuits challenging racially-discriminatory redistricting plans in Louisiana and elsewhere. *See, e.g., Allen v. Milligan*, 143 S. Ct. 1487 (2023); *Shelby Cnty. v. Holder*, 570 U.S. 529 (2013); *Chisom v. Roemer*, 501 U.S. 380 (1991); *Thornburg v. Gingles*, 478 U.S. 30 (1986); *Gomillion v. Lightfoot*, 364 U.S. 339 (1960); *Robinson v. Ardoin*, 37 F.4th 208 (5th Cir. 2022); *Major v. Treen*, 574 F. Supp. 325 (E.D. La. 1983).

The Louisiana State Conference of the National Association for the Advancement of Colored People (the “Louisiana NAACP”) is a state subsidiary of the National Association for the Advancement of Colored People (“NAACP”). For decades, the Louisiana NAACP has worked to ensure the political and social equity of Black people. The Louisiana NAACP’s mission includes eliminating racial discrimination in the democratic process and protecting the voting rights of its members, including Black voters residing throughout Louisiana and in DeSoto Parish. The Louisiana NAACP has been a party in multiple voting rights lawsuits and has a strong interest in ensuring that its members and other Black voters are not denied an equal opportunity to participate in the political process due to the enactment of any unfair or unlawful map. *See, e.g., La. State Conf. of the NAACP v. Louisiana*, No. 3:19-479-JWD-SDJ (M.D. La. 2019); *Robinson v. Ardoin*, Nos. 3:22-cv-211-SDD-SDJ & 3:22-cv-214-SDD-SDJ (M.D. La. filed Mar. 30, 2022); *Nairne v. Ardoin*, 3:22-cv-00178-SDD-SDJ (M.D. La. filed Mar. 14, 2022).

The DeSoto Parish NAACP is a regional branch of the NAACP. Its core mission and purpose mirrors that of the Louisiana NAACP. The DeSoto Parish NAACP monitored the redistricting process in DeSoto Parish to ensure the passage of a fair and representative Police Jury map. The DeSoto Parish NAACP has members living in the districts challenged in this matter, who risk having their voting strength diluted if Plaintiffs' requested relief is granted.

Together, *Amici* have a strong interest in ensuring maps in DeSoto Parish comply with the Voting Rights Act ("VRA") and do not undermine the voting strength of Black voters.

### **PRELIMINARY STATEMENT**

Plaintiffs in this action seek to replace DeSoto Parish's Police Jury map with a new map with the express purpose of weakening Black voters' representation. Plaintiffs' requested relief threatens to violate the rights of the members of the Louisiana and Desoto Parish NAACP and other Black voters under Section 2 of the VRA, which prohibits maps enacted with the intent or effect of diluting minority voting strength. 52 U.S.C. § 10301. *Amici* offer a robust analysis of Section 2, including expert declarations, to aid the Court's understanding of the legal flaws in Plaintiffs' claim and the risk of future liability under Section 2 if the proposed injunction is granted.

### **ARGUMENT**

Plaintiffs' preliminary injunction should be denied because they fail to account for compliance with the VRA, which negates their entitlement to injunction and renders the relief they seek unlawful. A preliminary injunction is "an extraordinary remedy never awarded as of right." *Benisek v. Lamone*, 138 S. Ct. 1942, 1943 (2018) (citation omitted). The movant must successfully establish four elements: "(1) a substantial likelihood of success on the merits, (2) a substantial threat of irreparable injury if the injunction is not issued, (3) that the threatened injury if the injunction is denied outweighs any harm that will result if the injunction is granted, and (4) that

the grant of an injunction will not disserve the public interest.” *Jiao v. Xu*, 28 F.4th 591, 597–98 (5th Cir. 2022) (citations omitted).

As detailed below, the high level of racially polarized voting (“RPV”) that persists in DeSoto Parish and the totality of the circumstances together mean that, to satisfy the requirements of Section 2, DeSoto Parish must maintain five districts with a majority-Black voting age population (“BVAP”) in which Black voters have an equal opportunity to elect candidates of their choice to the Police Jury. The necessity to comply with Section 2 precludes Plaintiffs from satisfying three of the four preliminary injunction requirements and renders injunction untenable.

*First*, Plaintiffs are not likely to succeed on the merits because they cannot show that an injunction would be compatible with Section 2, and they fail to offer sufficient evidence of racial gerrymandering. *Second*, the Supreme Court has made clear that a jurisdiction’s compelling interest in remedying the harms of vote dilution prohibited by Section 2 defeats a claim of racial gerrymandering and, therefore, as a matter of law, outweighs any harm that might result from the predominant use of race in redistricting. *See Cooper v. Harris*, 581 U.S. 285, 292 (2017). *Third*, granting a preliminary injunction in this case will disserve the public interest, because Plaintiffs’ desired injunction, mandating a map that eliminates multiple existing majority-Black districts, would violate the Section 2 rights of NAACP members and other Black voters in DeSoto Parish.

Finally, even if Plaintiffs could satisfy the injunction standard, the relief they seek is improper because it disregards Desoto Parish’s obligations under the VRA by failing to include any provision to ensure a remedial map complies with Section 2. If the Court concludes Plaintiffs are entitled to relief, it should mandate analysis of the VRA’s requirements in the remedial process.

**I. Plaintiffs Cannot Demonstrate a Likelihood of Success on the Merits Because the VRA Requires Preservation of Black Voters’ Electoral Opportunities and Because a VRA-Compliant Map Can Be and Has Been Drawn Without Race Predominating.**

Plaintiffs cannot show a likelihood of success on the merits for at least two reasons. First,

even if race had predominated in the creation of the Adopted Plan, Plaintiffs cannot succeed on their racial gerrymandering claim because the VRA requires DeSoto Parish maintain five majority-Black districts, like those enacted in the Adopted Plan. Second, the inference of racial predominance Plaintiffs ask the Court to draw is unsupported by the direct and circumstantial evidence they rely on. Specifically, the assertion that the districting choices DeSoto Parish made in the Adopted Plan can only be explained by race is belied by the evidence showing that five majority-Black districts can be created to satisfy the VRA without any of the purportedly race-based departures from traditional redistricting principles Plaintiffs cite.

**A. Plaintiffs’ Racial Gerrymandering Claim Fails Because a Map That Eliminates Existing Majority-Black Districts Would Likely Violate the Rights of Black Voters in DeSoto Parish Under Section 2.**

Plaintiffs claim that the Parish used race as the predominant factor in redistricting, and request that the Court dismantle as many as three of the Police Jury’s five majority-Black districts. The Parish has already demonstrated that race was not the predominant factor, Defs’ Opp., ECF No. 32, at 16–22, and the inadequacy of Plaintiffs’ evidence of racial predominance is further highlighted below. Even if Plaintiffs had a likelihood of success on that point, however, they would not be entitled to an injunction because the relief they seek is foreclosed by Section 2. There is a substantial likelihood that a map for the Police Jury that does not provide five majority-Black districts, as the Adopted Plan does, will violate the rights of NAACP members and other Black voters under Section 2. The risk of violation is apparent based on analysis under the clear framework established in *Thornburg v. Gingles*, 478 U.S. 30 (1986), and reaffirmed in *Allen v. Milligan*, 143 S. Ct. 1487 (2023).

Section 2 prohibits vote dilution by ensuring racial minority voters have an equal opportunity “to participate in the political process and to elect candidates of their choice,” based on demographics, voting trends, and other factors considered under the “totality of circumstances.”

See *Gingles*, 478 U.S. at 34, 36. A Section 2 violation occurs when a person is “disabled from ‘enter[ing] into the political process in a reliable and meaningful manner’ ‘in the light of past and present reality, political and otherwise.’” *Milligan*, 143 S. Ct. at 1507 (citation omitted).

In evaluating whether Section 2 has been violated, courts begin by assessing whether the three “*Gingles* Preconditions” are satisfied: (1) “the minority group must be sufficiently large and geographically compact to constitute a majority in a reasonably configured district”; (2) “the minority group must be able to show that it is politically cohesive”; and (3) “the minority must be able to demonstrate that the white majority votes sufficiently as a bloc to enable it to defeat the minority’s preferred candidate” in the absence of a majority-minority district. *Milligan*, 143 S. Ct. at 1503 (cleaned up). The first *Gingles* precondition (“*Gingles* 1”) shows the existence of a viable remedy to address the vote dilution; and, together, the second precondition (“*Gingles* 2”) and third precondition (“*Gingles* 3”) demonstrate the existence of racially polarized voting (“RPV”).<sup>1</sup> Where all three *Gingles* preconditions exist, the analysis proceeds to an examination of the “totality of circumstances” to determine whether Black voters in DeSoto Parish “have less opportunity than other members of the electorate to participate in the political process and to elect representatives of their choice.” 52 U.S.C. § 10301(b); see also *Milligan*, 143 S. Ct. at 1503.

As explained below and demonstrated by declarations from *Amici*’s two experts, Dr. Lisa Handley and William Cooper, any map that fails to include five majority-Black districts would likely violate the rights of DeSoto Parish’s Black voters under Section 2. Each of the *Gingles* preconditions are present. *Gingles* 1 is satisfied because, as the Adopted Plan and the plan included in Mr. Cooper’s declaration demonstrate, it is possible to draw a Police Jury map with five

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<sup>1</sup> Racially polarized voting occurs when different racial groups vote for different candidates. In a racially polarized election, for example, Black people vote together for their preferred (frequently Black) candidate, and white voters vote for the opposing (typically white) candidate. See, e.g., *Gingles*, 478 U.S. at 52–53.

reasonably configured majority-Black districts. *Gingles* 2 and 3 are satisfied because, as Dr. Handley’s declaration shows, there is overwhelming evidence of RPV within DeSoto Parish, and without majority-Black districts, candidates supported by Black voters would invariably be defeated by candidates supported by white voters. Finally, based on the “totality of circumstances,” Black voters in DeSoto Parish have less opportunity to participate in the political process and elect candidates of their choice.

**1. *Gingles* Precondition 1 Is Satisfied.**

All that is needed to satisfy *Gingles* 1 is “at least one illustrative map” with one or more reasonably configured majority-minority districts. *Milligan*, 143 S. Ct. at 1512. A district is “reasonably configured” where “it comports with traditional districting criteria, such as being contiguous and reasonably compact.” *Id.* at 1503. Here, the public record is replete with maps showing that the Desoto Parish Police Jury could, and did, draw a redistricting plan with five majority-Black districts in a manner that satisfies traditional redistricting principles. The map adopted by the Parish (“Adopted Plan”) satisfies *Gingles* 1. The Adopted Plan contains five districts with a Black VAP between 59 percent and 66.5 percent. Ex. 1 ¶ 36 (correcting errors in Plaintiffs’ calculations). The districts in the Adopted Plan are roughly as compact as the map enacted in 2011 by two standard measures, do not pair incumbents, and keep whole many small municipalities. *Id.* ¶ 51 & Fig. 11.

Beyond the Adopted Plan, the record contains other examples of maps drawn with five majority-Black districts that adhere to traditional redistricting principles. In a letter to the Police Jury on December 5, 2022, *Amicus* LDF provided the Parish with an illustrative map that satisfied the “one person, one vote” requirement of the Equal Protection Clause, contained five majority-Black districts, was even more compact than the Adopted Plan, did not pair incumbents, and largely respected boundaries of political subdivisions. *See* Ex. 3. In addition, at a hearing on February 21,

2023, demographer Cedric Floyd, who has drawn the DeSoto Parish Police Jury plans in prior cycles, presented another plan with five majority-Black districts that addressed the population deviations Plaintiffs had raised in their November letter. Pls.' Ex. 3, ECF No. 10-5, at 1–4.

Another plan illustrating the feasibility of creating five reasonably configured majority-Black districts for the Police Jury is provided in Mr. Cooper's declaration. The districts in Mr. Cooper's plan are as compact on average as the 2011 benchmark plan and more compact than the Adopted Plan. *See* Ex. 1 ¶ 51 & Fig. 11. The population of all districts is balanced consistent with one-person-one-vote, with an overall deviation of less than 5 percent. *Id.* ¶ 49.<sup>2</sup> No incumbents are paired. *Id.* ¶ 48. The plan contains approximately the same number of voting precinct as the Adopted Plan, containing 23 precinct splits, as compared to 26 for the Adopted Plan. *Id.*, Fig. 12. Further, it splits no municipality other than Mansfield, which it splits among four of the five majority Black districts. *Id.*, Fig. 12, Ex. D-4 to Ex. 1.

In any event, a redistricting plan need not score highly on every traditional redistricting principle to satisfy *Gingles* 1. *See Milligan*, 143 S. Ct. at 1504–05 (holding that an illustrative plan satisfied *Gingles* 1 despite failure to preserve all communities of interest or retain the cores of prior maps). The examples described above all maintain five majority-Black districts and reasonably adhere to traditional redistricting principles. *Gingles* 1 is satisfied.

## **2. *Gingles* Preconditions 2 and 3 Are Satisfied.**

The second and third *Gingles* preconditions assess whether Black and white voters have different electoral preferences and whether the redistricting scheme permits the white majority to regularly defeat the preferred candidates of Black voters. *See Milligan*, 143 S. Ct. at 1503

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<sup>2</sup> Although not relevant to the Section 2 analysis, it bears remarking that in Mr. Cooper's plan, two of the majority-Black districts are overpopulated compared to the ideal district size, while the three that are underpopulated are barely so, with deviations ranging from -0.25% to -0.53%.

(explaining that RPV analysis tests whether districting scheme “thwarts a distinctive minority vote at least plausibly on account of race”) (cleaned up). In this case, *Gingles 2* requires evidence that Black voters in DeSoto Parish are “politically cohesive,” which is demonstrated by “showing that a significant number of minority group members usually vote for the same candidates.” *Gingles*, 478 U.S. at 56. *Gingles 3* requires that the majority has different candidate preferences than Black voters and votes sufficiently cohesively to “enable it usually to defeat the minority’s preferred candidate.” *League of United Latin Am. Citizens v. Perry*, 548 U.S. 399, 425 (2006) (cleaned up).

No party can seriously dispute that DeSoto Parish’s elections are racially polarized. For example, *Amicus* LDF’s December letter to the Police Jury explained that a study of 11 recent elections in DeSoto Parish showed strong patterns of RPV, with Black voters supporting a common candidate by margins ranging from 60 percent to over 90 percent, while white voters preferred different candidates by similar margins. *See* Ex. 3 at 5–6.

Dr. Handley, *Amici*’s expert, found a similar pattern of RPV across 16 statewide elections from 2015 to 2022 between a Black and a white candidate. *See generally* Ex. 2. Evidence from elections between Black and white candidates is more probative of the existence of RPV. *See Gingles*, 478 U.S. at 68 (“Because both minority and majority voters often select members of their own race as their preferred representatives, it will frequently be the case that a black candidate is the choice of blacks, while a white candidate is the choice of whites”). Dr. Handley found that Black voters vote cohesively, with an average of 82.2 percent supporting the same candidate across all the elections studied, and 93 percent of Black voters supporting the same candidate in races involving only two candidates. Ex. 2 at 6. White voters, in contrast, supported the Black-preferred candidate at a rate of only 9.7 percent, which rose to only 12.4 percent in two-way contests. *Id.* at 6. As can be seen in Figure 1, below, Dr. Handley found that Black-preferred candidates received

fewer votes in DeSoto Parish than their opponents, with the share of votes cast for Black-preferred candidates in the Parish ranging from 13.4 percent to 46.3 percent. *Id.* (Appendix). That is, without exception, the candidate of choice of Black voters was defeated at a Parish-wide level. Moreover, Dr. Handley concluded that if districts were drawn with less than a majority-BVAP, white bloc-voting would result in the usual defeat of Black-preferred candidates. *Id.* at 1, 10–11.

**FIGURE 1: Estimates of Black and White Support for Black Candidates of Choice in DeSoto Parish**

Election	Black candidate of choice	Race	Share of votes cast in DeSoto Parish	Est. for Black voters		Est. for White voters	
				Vote share	95% conf. interval	Vote share	95% conf. interval
2022 U.S. Senate	Gary Chambers, Jr	B	13.4%	40.6%	37.3%, 43.8%	2.5%	1.4%, 3.8%
2020 U.S. President	Biden/Harris	W/B	37.0%	85.1%	68.5%, 90.3%	14.2%	9.7%, 16.2%
2020 U.S. Senate	Adrian Perkins	B	26.1%	70.2%	66.3%, 73.9%	5.0%	2.9%, 7.0%
2019 Lt. Gov.*	Willie Jones	B	36.3%	96.6%	93.1%, 98.8%	8.8%	6.6%, 11.4%
2019 AG*	Ike Jackson	B	33.9%	91.9%	87.1%, 95.4%	7.4%	5.1%, 10.5%
2019 SOS	Gwen Collins-Greenup	B	34.2%	90.3%	86.0%, 93.7%	9.8%	7.6%, 12.5%
2019 Treasurer	Derrick Edwards	B	35.8%	93.8%	90.3%, 96.4%	10.8%	8.7%, 13.0%
2019 SOS Runoff*	Gwen Collins-Greenup	B	40.6%	95.5%	91.7%, 98.0%	13.7%	11.3%, 16.5%
2018 SOS	Gwen Collins-Greenup	B	20.8%	61.3%	57.2%, 65.1%	4.5%	2.6%, 6.7%
2018 SOS Runoff*	Gwen Collins-Greenup	B	34.8%	95.2%	90.1%, 98.3%	11.0%	8.1%, 14.2%
2017 Treasurer	Derrick Edwards	B	29.3%	87.1%	81.2%, 91.8%	8.9%	6.3%, 11.7%
2017 Treas. Runoff*	Derrick Edwards	B	35.9%	95.2%	89.4%, 98.7%	12.2%	9.0%, 15.7%
2015 Lt. Gov.	Kip Holden	B	33.3%	90.0%	85.9%, 93.4%	8.7%	6.5%, 11.1%
2015 AG	Geri Broussard Baloney	B	15.4%	37.6	32.7%, 41.6%	5.5%	3.6%, 7.9%
2015 SOS*	Chris Tyson	B	35.6%	88.4	82.0%, 93.3%	12.4%	9.5%, 16.0%
2015 Lt. Gov. Runoff*	Kip Holden	B	46.3%	96.3	92.8%, 98.6%	19.5%	17.0%, 22.4%

\* Race featuring only two candidates

Accordingly, as the U.S. Department of Justice concluded in 2002, “elections in DeSoto Parish are marked by a pattern of racially polarized voting.”<sup>3</sup> Moreover, in line with these findings, courts evaluating Section 2 claims over the past five years have consistently found high levels of RPV in other parishes and Louisiana statewide, mirroring levels demonstrated here.<sup>4</sup>

<sup>3</sup> Letter from Andrew E. Lelling, Acting Assistant Att’y Gen., C.R. Div., U.S. Dep’t of Just., to Walter C. Lee, Superintendent, Par. Sch. Bd. and B.D. Mitchell, President, Par. Police Jury (Dec. 31, 2002), [bit.ly/DOJDeSoto2002](https://bit.ly/DOJDeSoto2002) (“Objection Letter 2002-2926 (DeSoto Parish School District (DeSoto Parish))”).

<sup>4</sup> See, e.g., *Robinson v. Ardoin*, 37 F.4th 208, 224-27 (5th Cir. 2022); *Fusilier v. Landry*, 963 F.3d 447, 458–59 (5th Cir. 2020); *La. State Conf. of the NAACP v. Louisiana*, 490 F. Supp. 3d 982, 1019 (M.D. La. 2020).

### 3. There Is Ample Evidence to Satisfy the Totality of the Circumstances.

In addition to establishing the *Gingles* preconditions, under Section 2, a court must determine whether under the “totality of circumstances” Black voters “have less opportunity than other members of the electorate to participate in the political process and to elect representatives of their choice.” 52 U.S.C. § 10301(b); *Gingles*, 478 U.S. at 36–38. The Senate Report accompanying the 1982 amendments to the VRA identified “typical factors,” now known as the “Senate Factors,” that are relevant in analyzing the totality of circumstances and determining whether Section 2 is violated. *Id.* (citing S. Rep. No. 97-417, at 28–29 (hereinafter “Senate Report”)). The Senate Factors consist of nine factors for courts to consider, addressed in turn below. *Id.* The existence of RPV (Factor 2) and the extent to which minorities are elected to public office (Factor 7) are the “two most important factors considered in the totality-of-circumstances inquiry.” *Clark v. Calhoun Cnty*, 88 F.3d 1393, 1397 (5th Cir. 1996) (citations omitted). To establish a Section 2 violation, it is not necessary to prove “any particular number of factors . . . or that a majority of them point one way or the other.” *Gingles*, 478 U.S. at 45. In DeSoto Parish nearly every Senate Factor applies.<sup>5</sup>

**Senate Factor 1: Historic Voting Discrimination.** Senate Factor 1 addresses the “history of official [voting-related] discrimination in the state or political subdivision.” *Gingles*, 478 U.S. at 36 (quoting Senate Report at 28–29). In DeSoto Parish, a legacy of violent voter intimidation marks the historic experiences of Black voters. “Following the Civil War, southern whites . . . used violence and intimidation to reestablish their economic, political, and social dominance over the

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<sup>5</sup> Senate Factor 4 regarding “whether members of the minority group have been denied access to [the candidate slating] process,” *Gingles*, 478 U.S. at 37 (quoting Senate Report at 28–29), is the only factor not discussed as slating processes are not readily apparent in DeSoto Parish.

recently freed black population.”<sup>6</sup> DeSoto Parish became an epicenter of racial violence in Louisiana during this period, with numerous documented lynchings and a record-breaking murder rate.<sup>7</sup> “[S]waths of the white population, particularly veterans of the Civil War, waged an ongoing guerrilla war against Republican regimes and the mostly black electorate that supported them.”<sup>8</sup> When former Confederates and their heirs “failed to carry elections, they turned to extra-legal, often violent, devices.”<sup>9</sup> Jim Crow voter suppression mechanisms soon took hold in DeSoto Parish and across the State of Louisiana. Black voting rates “plummeted” across Louisiana from 130,334 to less than 5,320 in just two years at the end of the 1800s.<sup>10</sup> From Louisiana “pioneering the grandfather clause” to enforcing literacy tests and white-only primaries, Black voter disenfranchisement marked every contour of 20<sup>th</sup> century state history.<sup>11</sup>

Racial discrimination in voting continued through the turn of the 21<sup>st</sup> century, even as the Civil Rights Movement led to the passage of the Voting Rights Act in 1965 and new mechanisms to facilitate federal oversight and intervention. For example, in 1994, the U.S. Department of Justice found that the DeSoto Parish School Board held sham public hearings on a map members had already settled on.<sup>12</sup> In 2002, the Department again faulted the School Board, rejecting a map that reduced the number of Black-majority districts from five to four, and asserting that the Parish had not met its burden to prove the plan was enacted with “neither a discriminatory purpose nor a

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<sup>6</sup> Mark Leon De Vries, *Between Equal Justice and Racial Terror: Freedpeople and the District Court of DeSoto Parish During Reconstruction*, 56 J. La. Hist. Ass’n 261, 262 (2015).

<sup>7</sup> See, e.g., *id.* at 262–63. See also Equal Just. Initiative, *Lynching in America: Confronting the Legacy of Racial Terror, County Data Supplement 8* (2022), [bit.ly/EJIDataJan22](https://bit.ly/EJIDataJan22) (recording multiple lynchings of Black people in the small Parish between 1877 and 1950).

<sup>8</sup> Leon De Vries, *supra* note 6, at 263.

<sup>9</sup> *Id.* at 264.

<sup>10</sup> Preliminary Expert Report of Dr. R. Blakeslee Gilpin at 29, *Robinson v. Ardoin*, No. 3:22-cv-00211-SDD-SDJ (M.D. La. Apr. 15, 2022), ECF No. 41-3 (“Gilpin Report”).

<sup>11</sup> *Id.* at 21.

<sup>12</sup> Letter from Deval L. Patrick, Assistant Att’y Gen., C.R. Div., U.S. Dep’t of Just., to Walter Lee, Superintendent of DeSoto Schs. (Apr. 25, 1994).

discriminatory effect.”<sup>13</sup> The Supreme Court’s 2013 *Shelby County v. Holder* decision, 570 U.S. 529 (2013), which undermined the federal government’s ability to intervene before the enactment of discriminatory maps or other voting policies, further unleashed a wave of suppression attempts across the jurisdictions previously subject to the VRA’s “preclearance” process—including DeSoto Parish.<sup>14</sup>

As courts have acknowledged, racial discrimination in voting persists today from “modern day practices such as restricting access to polling places, restrictions on early voting, and limited mail voting.”<sup>15</sup> These systems are present in DeSoto. For example, many DeSoto voters are subject to limits on mail voting eligibility, which was only temporarily expanded for high-vulnerability voters by court order during the peak of the COVID-19 pandemic that disproportionately plagued Black communities. *Harding v. Edwards*, 487 F. Supp. 3d 498 (M.D. La. 2020). In ordering the temporary expansion of early voting days and absentee-by-mail qualifications, the Court then noted the “significant evidence that the Virus, and therefore the need to vote in person, impose[d] a disproportionate burden on Black voters in Louisiana.” *Id.* at 520 n.156. Intimidation tactics targeting Black DeSoto community members also persist today. In a recent report submitted to the U.S. House Committee on the Judiciary, a Black voter in DeSoto Parish described her “disturbing” and “extremely intimidating” experience at a polling site when she, her mother, and an older Black gentleman were loudly confronted by a white man who identified himself as an “investigator.”<sup>16</sup> The man reprimanded her for telling the older man, who was a new voter, about his rights at the polls and then suggested, improperly, that she could not discuss such things.<sup>17</sup> The voter noted the

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<sup>13</sup> Objection Letter 2002-2926 (DeSoto Parish School District (DeSoto Parish)), *supra* note 3.

<sup>14</sup> Caren E. Short, Rachel Knowles, & Liza Weisberg, S. Poverty L. Ctr., *Fight For Representation: Louisiana’s Pervasive Record of Racial Discrimination in Voting, the Steadfast Louisianans Who Battle Onward, & the Urgent Need to Restore the Voting Rights Act* 28–84 (2021), [bit.ly/SPLC2021Report](https://bit.ly/SPLC2021Report).

<sup>15</sup> See, e.g., *Robinson v. Ardoin*, 605 F. Supp. 3d 759, 846–48 (M.D. La. 2022).

<sup>16</sup> Short, Knowle & Weisberg, *Fight for Representation*, *supra* note 14, at 77.

<sup>17</sup> *Id.*

deterrent effects intimidation efforts like these have on Black DeSoto residents, stating, “In my community, there are a number of people, like my mother, who are afraid to go to their polling place alone, and who are concerned that there may be people at the polling place who will try to keep them from voting.”<sup>18</sup> Citing “evidence of Louisiana’s long and ongoing history of voting-related discrimination,” the Middle District of Louisiana recently found there can be “no sincere dispute regarding Senate Factor 1.”<sup>19</sup> The same is true here: Senate Factor 1 is met.

**Senate Factor 2: Extent of Racially Polarized Voting.** Senate Factor 2 investigates “the extent to which voting in the elections of the state or political subdivision is racially polarized.” *Gingles*, 478 U.S. at 37 (quoting Senate Report at 28–29). Based on Dr. Handley’s analysis, there can be no doubt as to the presence of this factor in DeSoto Parish. Voting has been and remains severely polarized along racial lines in DeSoto Parish today. *See* Ex. 2. Senate Factor 2 is met.

**Senate Factor 3: Voting Discrimination Enhancing Factors.** Senate Factor 3 measures “the extent to which the state or political subdivision has used unusually large election districts, majority vote requirements, anti-single shot provisions, or other voting practices or procedures that may enhance the opportunity for discrimination against the minority group.” *Gingles*, 478 U.S. at 37 (quoting Senate Report at 28–29). Enhancing factors such as these are present in DeSoto Parish and throughout Louisiana. For example, the open primary and runoff system necessitates that candidates win a majority rather than plurality vote share to succeed.<sup>20</sup> This means even when their preferred candidates receive the most votes, Black voters cannot effectively determine the outcomes of at-large or district races where they do not constitute a majority population, as in

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<sup>18</sup> *Id.*

<sup>19</sup> *Robinson v. Ardoin*, 605 F. Supp. 3d 759, 848 (M.D. La. 2022), *cert. granted before judgment*, 213 L. Ed. 2d 1107, 142 S. Ct. 2892 (2022), and *cert. dismissed as improvidently granted sub nom. Ardoin v. Robinson*, No. 21-1596, 2023 WL 4163160 (Sup. Ct. June 26, 2023).

<sup>20</sup> Expert Report of Allan J. Lichtman at 33–35, *Robinson v. Ardoin*, No. 3:22-cv-00178-SDD-SDJ (M.D. La. Apr. 15, 2022) (“Lichtman Report”).

DeSoto Parish, absent rare alignment with a sufficient number of white “crossover” voters. Because of evidence like this, Senate Factor 3 is met.

**Senate Factor 5: Discrimination in Other Areas of Life.** Senate Factor 5 addresses “the extent to which minority group members bear the effects of discrimination in such areas as education, employment and health, which hinder their ability to participate effectively in the political process.” *Gingles*, 478 U.S. at 37 (quoting Senate Report at 28–29). DeSoto Parish exhibits stark disparities across these measures.<sup>21</sup>

Black DeSoto community members conspicuously bear the effects of discrimination in education. The DeSoto Parish school system is marked by a legacy of segregation and, to this day, is subject to federal court monitoring under desegregation litigation filed in 1967 by the U.S. Department of Justice.<sup>22</sup> This history has ongoing effects. According to American Community Survey (“ACS”) estimates, white people in DeSoto over 25 years of age are more than twice as likely to have at least a high school diploma than Black residents—11.6 percent of white residents have less than a high school education, compared to 27.1 percent of Black adults in DeSoto. Ex. 1 ¶ 53; Ex. E to Ex. 1 at 21-22. Representation for Black voters on the DeSoto Parish School Board also consistently necessitated federal intervention.<sup>23</sup> More recently, there have also been lawsuits threatened regarding racial discrimination in hiring and employee treatment in the school system.<sup>24</sup>

With respect to employment, *Amici* NAACP has received decades of complaints regarding racially-biased hiring and practices in the DeSoto Parish school system, including failures to hire

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<sup>21</sup> See, e.g., Kristen Lewis, Measure of Am., *The Measure of America Series: A Portrait of Louisiana 2020, Human Development in an Age of Uncertainty* 29–30 (2020), [bit.ly/LewisRep2020](https://bit.ly/LewisRep2020).

<sup>22</sup> See *United States v. DeSoto Par. Sch. Bd.*, No 5:67-cv-12589 (W.D. La. filed Jan. 17, 1967).

<sup>23</sup> See, e.g., Letter from Deval L. Patrick, Assistant Att’y Gen., C.R. Div., Dep’t of Just., to Walter Lee, Superintendent of DeSoto Schs. (Apr. 25, 1994); Objection Letter 2002-2926 (DeSoto Parish School District (DeSoto Parish)), *supra* note 3.

<sup>24</sup> Lynn Vance, *De Soto Parish NAACP Accuses School District of Racially Biased Hiring and Personnel Practices*, KTAL (Sept. 2, 2021), [bit.ly/KTAL2021](https://bit.ly/KTAL2021).

and promote Black teachers and inequitable discipline and retaliation against Black employees.<sup>25</sup> These accusations are particularly concerning given the school system is the third-largest employer in the Parish.<sup>26</sup> The effects of discrimination are evident in employment figures in DeSoto Parish, which are also wrought with racial inequities. According to ACS estimates, per capita income over a twelve-month period among Black DeSoto residents is less than half that of white residents—\$15,623 compared to \$34,273. Ex. E to Ex. 1 at 39-40. Unemployment rates are also highly disparate, with Black DeSoto residents ages 16 to 64 reporting rates of joblessness over four times as high as white residents. *Id.* ¶ 53; Ex. E to Ex. 1, at 51-52. Black DeSoto residents, 16 years and older, are less likely to have access to full-time, year-round work and more likely to have less than full-time earnings or no earnings at all compared to white residents in the span of 12 months. Ex. E to Ex. 1 at 44. Finally, Black adults are more likely to experience disabilities than white adults in DeSoto Parish, and are less likely to have access to health insurance. Ex. E to Ex. 1 at 61-62. The quantitative ACS estimate data, expanded upon in Mr. Cooper’s Report, see Ex. 1 ¶ 53 & Ex. E, and qualitative accounts above make clear that Senate Factor 5 is met.

**Senate Factor 6: Racial Campaign Appeals.** Senate Factor 6 investigates “whether political campaigns have been characterized by overt or subtle racial appeals.” *Gingles*, 478 U.S. at 37 (quoting Senate Report at 28–29). Both implicit and explicit appeals evoking racial animus and stereotypes have pervaded political messaging for generations across Louisiana.<sup>27</sup> In recent years, opposing candidates have attacked Black voters’ candidates of choice by evoking tropes of

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<sup>25</sup> Vance, *supra* note 24.

<sup>26</sup> N. La. Econ. Partnership, *Leading Employers in DeSoto Parish*, [bit.ly/NLEPDeSoto](https://bit.ly/NLEPDeSoto) (last visited July 3, 2023) (citing “NLEP Employers surveys; Louisiana Economic Development - Info for Partners and Allies (2016)”).

<sup>27</sup> See generally Expert Report of Dr. Traci Burch at 22–25, *Robinson v. Ardoin*, No. 3:22-cv-00211-SDD-SDJ (M.D. La. Apr. 15, 2022), ECF No. 41-3 (hereinafter “Burch Report”) (“Implicit racial appeals make racial attitudes and concerns more salient in the minds of voters, even without explicitly mentioning or referring to a particular race or group. Implicit racial appeals may rely on certain code words or issues, use images of Black exemplars, or a combination of both, to make race more salient to voters.”) (Internal citations omitted). See also Lichtman Report.

Black criminality through their campaign messages and imagery.<sup>28</sup> These messages were echoed in DeSoto Parish Sheriff Jayson Richardson’s recent endorsement of gubernatorial candidate Jeff Landry, citing the need to “fix the crime problem in our state” and “prioritize the law abiding citizens.”<sup>29</sup> Notably, Landry’s own record of evoking racialized attitudes includes accusing Black Lives Matter protesters of being “armed thugs.”<sup>30</sup> As racial appeals saturate political discourse in DeSoto Parish, Senate Factor 6 is met.

**Senate Factor 7: Black Candidates’ Representation in Elected Office.** Senate Factor 7 measures “the extent to which members of the minority group have been elected to public office in the jurisdiction.” *Gingles*, 478 U.S. at 37 (quoting Senate Report at 28–29). In every statewide election reviewed by Dr. Handley, the candidate of choice of DeSoto Parish’s Black voters lost the Parish. No Black person has been elected to a statewide office in Louisiana since Reconstruction.<sup>31</sup> There is not one Black elected official serving in the Parish now in at-large position or in any Police Jury district that is not majority-Black.<sup>32</sup> Senate Factor 7 is met.

**Senate Factor 8: Responsiveness of Elected Officials.** Senate Factor 8 concerns whether there is a lack of responsiveness from elected officials to the unique needs of minority group members in the jurisdiction. *Gingles*, 478 U.S. at 37 (citing Senate Report at 28–29). In DeSoto Parish, the unique concerns of Black community have been conspicuously neglected by Parish

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<sup>28</sup> Burch Report, *supra* note 27, at 22–25.

<sup>29</sup> The Hayride, *Landry’s Picking Up Endorsements from Sheriffs and DA’s; Clancy DuBos Hardest Hit* (May 31, 2023), [bit.ly/Hayride2023](https://bit.ly/Hayride2023). Of note, Sheriff Richardson’s tenure as Sheriff has also been marked by major accusations of racialized violence—in 2019, Sheriff’s deputies under Richardson’s charge “punched a Black man so brutally . . . they broke his nose and left eye socket,” sparking later civil litigation from the ACLU of Louisiana. See *ACLU Lawsuit: Louisiana Deputies Punched Black Man in 2019*, Associated Press (Sept. 30, 2021), [bit.ly/APress2021](https://bit.ly/APress2021).

<sup>30</sup> Wesley Muller, *Attorney General Jeff Landry Declines to Join Other AGs in Singling Out U.S. Capitol Attack for Condemnation*, La. Illuminator (Jan. 14, 2021), [bit.ly/Illumin2021](https://bit.ly/Illumin2021).

<sup>31</sup> See, e.g., Debo P. Adegbile, *Voting Rights in Louisiana: 1982–2006*, 17 S. Cal. Rev. L. & Soc. Just. 413, 461 (2008) (citing *Clark v. Edwards*, 725 F. Supp. 285 (M.D. La. 1988)).

<sup>32</sup> See La. Sec’y of State, *Elected Officials, By Parish, De Soto – 16*, [voterportal.sos.la.gov/electedofficials](https://voterportal.sos.la.gov/electedofficials) (last visited July 2, 2023).

leadership. In addition to the underlying policy considerations that perpetuate social and economic disparities discussed above regarding Senate Factor 5, qualitative evidence further supports this finding. For example, in 2020, northern neighboring Caddo Parish responded to calls from Black community members to remove a Confederate monument at the Parish courthouse.<sup>33</sup> Rather than similarly respecting the concerns of Black residents in DeSoto Parish,<sup>34</sup> leaders failed to intervene to prevent the statue from being relocated to Mansfield. Evidence like this supports a finding of Senate Factor 8 here.

**Senate Factor 9: Tenuousness of the Policy Justifications.** Senate Factor 9 addresses whether the policy underlying the state or political subdivision's use of the challenged standard, practice, or procedure is “tenuous.” *Gingles*, 478 U.S. at 37 (quoting Senate Report at 28–29). Throughout the map-drawing process and in this litigation, Plaintiffs, their experts, and legal representatives have made their intentions clear—to achieve a Police Jury map that dramatically reduces representation for Black voters, forsaking other redistricting criteria and compliance with the VRA. *See, e.g.*, Am. Compl., ECF No. 8, at 10–11; Pls.’ Ex. 5, ECF No. 10-7; Pls.’ Ex. 6, ECF No. 10-7. There is no valid policy rationale that would justify such a map. Nevertheless, Plaintiffs attempt to justify this baldly discriminatory goal by suggesting that population shifts and avoiding precinct and municipal splits necessitate drawing fewer majority-Black districts. *See id.* at ¶¶ 58–90. The tenuousness of these justifications is evident from the fact that, as discussed above, it is possible to enact a map with five majority-Black districts that balances the population, splits only Mansfield, and has fewer precinct splits than any recent map adopted by the Parish. When

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<sup>33</sup> Deborah Bayliss, *Caddo Parish Confederate Monument to be Moved to DeSoto Parish*, Shreveport Times (Sept. 12, 2020), [bit.ly/ShreveTimes2020](https://www.shreveporttimes.com/story/news/local/2020/09/12/caddo-parish-confederate-monument-to-be-moved-desoto-parish/). Notably, Plaintiffs’ expert, Dr. Gary Joiner, was a vocal opponent of the relocations of the monument, advocating that the calls of Black Shreveport residents should be ignored, and the statue should remain at the courthouse. *See, e.g.*, Sarah Crawford, *Divided Caddo Panel Picks Compromise for Confederate Monument*, Shreveport Times (Aug. 11, 2017), [bit.ly/ShreveTimes2017](https://www.shreveporttimes.com/story/news/local/2017/08/11/divided-caddo-panel-picks-compromise-for-confederate-monument/).

<sup>34</sup> Destinee Patterson, *Caddo’s Confederate Statue to Be Moved to DeSoto Parish*, KSLA (Sept. 12, 2020), <https://www.ksla.com/2020/09/12/caddo-parish-confederate-monument-be-moved-desoto-parish/>.

Plaintiffs' expert, Dr. Joiner, offered a map during the redistricting process that purportedly addressed these policy considerations, Juror Gerri Burrell noted Dr. Joiner's attention to keeping subcommunities whole where white voters benefitted, while neglecting similar care for DeSoto's Black communities. Pls.' Ex. 3, ECF No. 10-5, at 7. Had the Police Jury relied on these policy assertions to justify a map that eliminated as many as two or three majority-Black districts out of five, Senate Factor 9 would be easily satisfied.

**4. Plaintiffs' Failure to Account for the Parish's Need to Comply with Voting Rights Act Precludes a Finding that They are Likely to Prevail.**

Even assuming the Plaintiffs can establish that race predominated in the development of the Adopted Plan (which, for the reasons explained by the Parish and elaborated on below, they cannot), the Police Jury did not violate the Fourteenth Amendment. As Plaintiffs acknowledge, compliance with the VRA is a compelling interest sufficient to justify race-based line drawing. *See Milligan*, 143 S. Ct. at 1516–17 (“under certain circumstances, [the Court] ha[s] authorized race-based redistricting as a remedy for state districting maps that violate § 2”); *Shaw v. Hunt*, 517 U.S. 899, 909–910 (1996) (same); *see* Mem. in Supp. of Pls' Am. Mot. for Prelim. Inj., ECF No. 10-1, at 32 (“Pls.' Mem.”). As explained above, Section 2 requires the preservation of five majority-Black districts in the Police Jury plan. The Adopted Plan protects those districts without using race more than necessary. As Defendants explain, most of Mr. Hefner's line-drawing decisions were made to balance the population or to protect incumbents. Defs.' Opp., ECF No. 32, at 16–22. To the extent race was a factor, Plaintiffs have pointed to no evidence that Mr. Hefner chose an arbitrary racial target for the majority-Black districts. *See, e.g., Ala. Black Legis. Caucus v. Alabama*, 575 U.S. 254, 267 (2015) (prohibiting targets higher than are necessary to satisfy the VRA). In fact, the Adopted Plan reduces the BVAP in the majority-Black districts from the levels in the 2011 plan. *See* Pls.' Ex. 12, ECF No. 10-14, at 8. Thus, the Adopted Plan is narrowly tailored

to avoid a violation of Section 2, and Plaintiffs are not likely to succeed on their racial gerrymandering claim.

There is a second reason the need for VRA compliance precludes Plaintiffs from demonstrating a likelihood of success on the merits: They have not and cannot articulate any lawful remedy for their claims. Plaintiffs have made clear that the harm they allegedly suffer is a consequence of the Parish’s decision to draw five majority-Black districts, and their goal is to eliminate as many as three of those districts. *See, e.g.*, Am. Compl. ¶ 96 (Plaintiffs’ harm is the result of the Police Jury’s decision to “preserv[e] these five majority-Black districts[.]”); Pls.’ Mem. at 21 (describing plan to “divid[e] Mansfield between just two police jury districts rather than five”). But as detailed above, Plaintiffs’ desired goal of eliminating existing majority-Black districts would violate Section 2. Plaintiffs have not shown—and cannot show—they are entitled to the relief they seek because their desired remedy is barred by Section 2.

**B. Plaintiffs Do Not Have a Likelihood of Success on the Merits Because Race Need Not and Did Not Predominate in the Creation of Five Majority-Black Districts.**

In support of their motion, Plaintiffs point to what they call direct and circumstantial evidence of racial predominance in the Adopted Plan district lines. First, they argue that statements by parish demographer Mr. Hefner that he sought to maintain five majority-Black districts constitute “*prima facie* evidence of predominant racial intent.” Pls.’ Mem. at 19. Second, they cite what they describe as departures from traditional district criteria that can only be explained by race. Neither form of purported evidence is enough to show a likelihood of success on the merits.

With respect to the acknowledged goal of maintaining Black electoral opportunity, contrary to Plaintiffs’ argument, consciousness of race in devising a map does not automatically show racial predominance. *See North Carolina v. Covington*, 138 S. Ct. 2548, 2554 (2018) (“[T]his Court has long recognized the distinction between being aware of racial considerations and being motivated

by them.”) (cleaned up). Race may be considered along with other redistricting criteria without becoming the predominant factor. *See Covington*, 138 S. Ct. at 2554; *Shaw v. Hunt*, 509 U.S. 899, 646 (1996) (“race consciousness does not lead inevitably to impermissible race discrimination”); *Chen v. City of Houston*, 206 F.3d 502, 514 (5th Cir. 2000) (“[T]he mere presence of race in the mix of decision making factors, and even the desire to craft majority-minority districts, does not alone automatically trigger strict scrutiny.”). Indeed, even the deliberate creation of majority-minority districts is not *per se* evidence of racial predominance. *Bush v. Vera*, 517 U.S. 952, 958 (1996) (plurality opinion) (“Strict scrutiny does not apply merely because redistricting is performed with consciousness of race.... Nor does it apply to all cases of intentional creation of majority-minority districts.”). Thus, racial predominance cannot be presumed simply because a majority-minority district is drawn for the purpose of complying with the VRA. *Theriot v. Par. of Jefferson*, 185 F.3d 477, 488 (5th Cir. 1999) (“Issues of race were relevant, inasmuch as the Parish Council was directed to remedy a Section 2 violation, yet did not predominate.”); *accord Milligan*, 146 S. Ct. at 1512 n.7 (“The very reason a plaintiff adduces a map at the first step of *Gingles* is precisely because of its racial composition—that is, because it creates an additional majority-minority district that does not then exist.”). In sum, the racial predominance inquiry is not a test to be applied mechanically to a single fact, as Plaintiffs would have it, but requires a “holistic” analysis of all the relevant facts. *See Bethune-Hill v. Va. State Bd. of Elections*, 580 U.S. 178, 192 (2017).

Here, as the Parish has explained, maintaining existing majority-Black districts was one consideration among many, along with avoiding incumbent pairings (for all incumbents, not only Black incumbents, as Plaintiffs assert, *e.g.*, Pls.’ Mem. at 16, 18), maintaining the cores of prior districts to avoid a complete reconfiguration of the map, and balancing the population to

constitutional standards. Pls.’ Ex. 2, ECF No. 10-4, at 12 (statement of M. Hefner). Thus, the mere fact that the Police Jury sought to preserve its existing majority-Black districts—even if they stated that goal repeatedly—is insufficient to establish that the Adopted Plan is a racial gerrymander.

Plaintiffs’ contention that circumstantial evidence gives rise to an inference of racial predominance fares no better. Plaintiffs identify four ways in which, according to them, the Adopted Plan departs from traditional redistricting principles: the deviation in population among districts, the splitting of precincts purportedly on racial lines, the allegedly irregular shapes of the districts, and the splitting of certain municipalities in predominantly white parts of the Parish. At the outset, it must be observed that, as the illustrative plan offered by *Amici* demonstrates, it is possible to create a DeSoto Police Jury plan that includes five majority-Black districts and adheres to traditional redistricting principles in the ways Plaintiffs say the Adopted Plan does not. For example, Mr. Cooper’s plan does not split any of the towns or municipalities that Plaintiffs claim the Police Jury split for racial reasons. Ex. 1 ¶¶ 39–44 & Ex. D-4. Likewise, in Mr. Cooper’s plan, two of the five majority-Black districts are overpopulated, with one of them, District 4B, the most overpopulated district in the plan, while three of the six majority-white districts are underpopulated, with one of them, District 1A, the most underpopulated district in the plan. *Id.* ¶ 49 & Fig. 10. Mr. Cooper’s plan splits fewer precincts than either the Adopted Plan or the 2011 benchmark. *Id.* ¶ 52 & Fig. 12. Given that the departures from traditional redistricting principles in specific district lines highlighted by Plaintiffs were not necessary to achieve the Police Jury’s goal of maintaining the existing majority-Black districts, it would be dubious at best to infer from that race drove those departures or that race was the predominant factor in how each of those lines was drawn. It would be equally or more plausible to infer those departures were made for other reasons. See, e.g., Ex. 1 ¶¶ 43–44.

Additionally, the portions of the record Plaintiffs cite to support their claim that these line-drawing choices were race-based do not support their conclusions. For example, Plaintiffs point to a discussion of the boundaries in the northern part of the Parish as evidence that the decision to overpopulate those districts was race-based. *See* Pls.’ Mem. at 20 (citing Pls.’ Ex. 12, at 5–9). But as that discussion makes clear, the issue Mr. Hefner faced was the size of census blocks in that area, not their racial composition. Mr. Hefner explained that many census blocks in the northern part of the Parish have a population greater than the allowable deviation. Pls.’ Ex. 12, ECF No. 10-14, at 5–6 (observing that the census block Juror Kennington lives in has “814 people in it. That’s almost three times the – what your deviation allowances are,” and that moving “just that one block right there [in Juror Baker’s district] totally threw him off into double digits deviation.”).

Next, Plaintiffs assert that the precinct splits in the Adopted Plan are only explainable by race. But as Mr. Cooper explains, some precincts must be split to satisfy the population equality requirement, and compared to the benchmark 2011 plan, the Adopted Plan is not an outlier in the number of precincts split. Ex. 1 ¶ 43. Moreover, all of the VTD splits Plaintiffs identify are in or around Mansfield and divide population among the five majority-Black districts. Plaintiffs’ assertion that those splits were intended to carve white population out of majority-Black districts makes no sense. Take VTD 26, which Plaintiffs discuss in detail. Pls.’ Mem. at 27–28. Plaintiffs assert that the majority of VTD 26 north of Interstate 49 was carved off into VTD 26A, but a portion of the northern part of the VTD is retained and connected by a thread to the rest of VTD 26. This, the Plaintiffs assert, was done “to create a higher Black VAP VTD 26 that was then added to [majority-Black] District 4-A.” *Id.* at 27. There are two flaws in that claim: First, as Mr. Cooper explains, the portion of VTD 26 north of Interstate 49 is not majority Black so retaining it with the rest of VTD 26 has the net effect of *lowering* that VTD’s Black population. Second, VTD 26A, the

part that was carved out supposedly to increase VTD 26's Black VAP, was itself added to majority-Black District 6. *Id.* It is difficult to see how this supposedly surgical separation of voters by race served to maintain majority-Black districts rather than simple balance populations.

Finally, Plaintiffs assert that the shapes of the districts are unusual and only explainable by race. However, the Adopted Plan largely follows the outlines of the 2011 plan it replaces. For example, Plaintiffs complain that Mr. Hefner drew "District 6 to surround District 4-C on three sides," *Id.* at 31, but District 6 surrounded District 4-C on three sides in the 2011 map as well. This includes the feature of the plan that the Plaintiffs appear to find the most galling: that five districts extend out from the City of Mansfield. Those same five districts also include parts of Mansfield in the 2011 plan. Ex. B-4 to Ex. 1. Moreover, Plaintiffs make no attempt to argue that the 2011 district lines were unlawfully drawn with race as the predominant factor.

Plaintiffs also complain of what they call "tendrils," which they acknowledge keep current incumbent jurors in separate districts. Plaintiffs suggest this was done "to ensure that no African-American incumbents were forced to run against each other," Pls.' Mem. at 26, but in fact, the Adopted Plan pairs *no* incumbents, Black *or* white. So long as the Parish has not allowed race to predominate in their district lines or violated the VRA, they are free to adhere to the prior lines to avoid incumbent pairings while ensuring compliance with the "one person, one vote" principle. *See Theriot*, 185 F.3d at 484 (affirming finding that race did not predominate where "incumbency protection, maintaining communities of interest, addressing one-person, one-vote concerns and natural geographic conditions predominated in drawing District 3"); *accord Bush v. Vera*, 517 U.S. 952 (plurality opinion) ("In some circumstances, incumbency protection might explain as well as, or better than, race a State's decision to depart from other traditional districting principles, such as compactness, in the drawing of bizarre district lines.").

In sum, as Mr. Hefner explained and Mr. Cooper confirms, maintaining the existing majority-Black districts is easily accomplished while adhering to traditional redistricting principles. While race may be one consideration among many in the Adopted Plan, as the Constitution permits even without a compelling interest, it was not the predominant factor.

**C. The Harm to Black Voters That Will Result if Section 2 Is Violated Outweighs the Threatened Injury from the Alleged Racial Gerrymandering.**

Plaintiffs cannot meet their burden of demonstrating that the threatened injury if the injunction is denied outweighs any harm that will result if the injunction is granted. Even if Plaintiffs suffer some harm due to their allegations concerning DeSoto Parish’s map, such harm is, as a matter of law, outweighed by the harm that threatens DeSoto Parish’s Black voters—unlawful racial vote dilution prohibited by Section 2—if Plaintiffs are granted their desired relief. By “authoriz[ing] race-based redistricting as a remedy for state districting maps that violate § 2,” *Milligan*, 143 S. Ct at 1516–17, the Supreme Court has made clear that vote dilution harms prohibited under Section 2 of the VRA outweigh the types of harms arising from racial gerrymandering prohibited under the Equal Protection Clause.

**D. Plaintiffs’ Motion Will Disserve the Public Interest Because It Risks Violating the Rights of DeSoto Parish’s Black Voters Under Section 2.**

Plaintiffs also cannot meet their burden of demonstrating that the grant of an injunction is in the public interest, because granting a preliminary injunction would expose DeSoto Parish’s Black voters to an unacceptable risk of unlawful racial vote dilution under Section 2, in clear violation of the public interest. The public policy goal of combatting racial discrimination in voting, as enshrined in Section 2, is fundamentally tied to our nation’s history and remains a potent and relevant force today. As explained by the Supreme Court most recently in the *Milligan* opinion, the importance of ensuring compliance with Section 2 cannot be overstated as part of the ongoing work “to forever ‘banish the blight of racial discrimination in voting.’” 143 S. Ct. at 1499 (citing

*South Carolina v. Katzenbach*, 383 U.S. 301, 308 (1966)) Given the vital importance of Section 2 compliance, and the clear risk that Plaintiffs' desired relief will violate Section 2, Plaintiffs cannot meet their burden of establishing that the grant of an injunction will not disserve the public interest.

**II. If Plaintiffs' Motion Is Granted, a Remedial Map Must Comply with Section 2.**

Plaintiffs fault the Parish for allegedly failing to take needed steps to determine what Section 2 requires. *See* Am. Compl. ¶ 33. Yet Plaintiffs now ask this Court to order the Parish to draw a map that complies with the Fourteenth Amendment but omit any directive to ensure compliance with Section 2. Such an omission cannot stand. If the Court orders any relief in this matter, it should require that the Parish perform an RPV analysis and adopt a map that complies with Section 2, consistent with guidance in *Gingles* and *Milligan*.

**CONCLUSION**

For the foregoing reasons, this Court should deny Plaintiffs' motion for preliminary injunction.

Dated: July 7, 2023

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 7, 2023, I presented the foregoing to the Clerk of the Court for filing and uploading to the CM/ECF system which will send notification of such filing to all counsel of record registered with the CM/ECF system.

*s/ Allison Jones*

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# EXHIBIT 1

UNITED STATES DISTRICT COURT WESTERN  
DISTRICT OF LOUISIANA SHREVEPORT  
DIVISION

DAVID B. MEANS, ET AL.

VERSUS

DESOTO PARISH, ET AL.

CIVIL ACTION NO. 5:23-cv-  
00669

JUDGE DAVID C. JOSEPH

MAGISTRATE JUDGE  
HORNSBY

**DECLARATION OF WILLIAM S. COOPER**

WILLIAM S. COOPER, acting in accordance with 28 U.S.C. § 1746, Federal Rule of Civil Procedure 26(a)(2)(B), and Federal Rules of Evidence 702 and 703, does hereby declare and say:

**I. INTRODUCTION**

1. My name is William S. Cooper. I have a B.A. in Economics from Davidson College. As a private consultant, I serve as a demographic and redistricting expert for the amici curiae in the above-captioned case.

**A. Redistricting Experience**

2. I have testified at trial as an expert witness on redistricting and demographics in federal courts in about 55 voting rights cases since the late 1980s.

Five of these lawsuits resulted in changes to statewide legislative boundaries:

*Rural West Tennessee African-American Affairs Council, Inc. v. McWherter,*

No. 92-cv-2407 (W.D. Tenn.); *Old Person v. Brown*, No. 96-cv-0004 (D. Mont.);

*Bone Shirt v. Hazeltine*, No. 01-cv-3032 (D.S.D.); *Alabama Legislative Black Caucus v. Alabama*, No. 12-cv-691 (M.D. Ala.), and *Thomas v. Reeves*, No. 18-cv-441 (S.D. Miss.). In *Bone Shirt v. Hazeltine*, the court adopted the remedial plan I developed.<sup>1</sup> Approximately 25 of those cases led to changes in local election district plans.

3. In 2022 and 2023, I have testified at trial as an expert witness in redistricting and demographics in seven cases challenging district boundaries under Section 2 of the Voting Rights Act: *Caster v. Merrill*, No. 21-1356-AMM (N.D. Ala.); *Pendergrass v. Raffensperger*, No. 21-05337-SCJ (N.D. Ga.); *Alpha Phi Alpha Fraternity v. Raffensperger*, No. 21-05339-SCJ (N.D. Ga.); *NAACP v Baltimore County*, No.21-cv-03232-LKG (Md.); *Christian Ministerial Alliance v. Hutchinson* No. 4:19-cv-402-JM (E.D. Ar.); *Robinson v Ardoin*, No. 3:22-cv-00211-SDD-SDJ (M.D. La.); and *Caroline County Branch of the NAACP v Town of DeSoto Parish*, No. 23-00484-SAG (Md.). During that same timeframe, I also testified at trial as an expert in demographics in *NAACP v. Lee*, No. 4:21cv187-MW/MAF (N.D. Fla.).

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<sup>1</sup> I have also served as an expert witness on demographics in trials relating to issues other than voting and redistricting. For example, in an April 2017 opinion in *Stout v. Jefferson County Board of Education* (No.2:65-cv-00396-MHH), a school desegregation case involving the City of Gardendale, Alabama, the court made extensive reference to my testimony.

In 2023, I testified at trial in a school desegregation case involving the St. Martin Parish School Board – *Thomas v. St. Martin Parish School Board* (No. 6:65-cv-11314 (W.D. La.).

4. I have served as a redistricting and demographics consultant or expert in several local-level voting cases in Louisiana. In 1993, I developed illustrative Police Jury plans for the parishes of East Carroll, Madison, West Feliciana, and Point Coupee.<sup>2</sup> In 1994 and 1995, I developed illustrative school board plans for the parishes of Bossier, East Carroll, West Carroll, and Iberville.<sup>3</sup> In 1996, I served as a *Gingles I* expert for the plaintiffs and developed an illustrative plan for the Town Council in St. Francisville.<sup>4</sup> In 1998, I developed an illustrative plan for the 23<sup>rd</sup> Judicial District.<sup>5</sup>

5. In 2005, I served as an expert for the plaintiffs and developed an illustrative plan for the school board in St. Landry Parish.<sup>6</sup> In the 2010 redistricting cycle, I served as the *Gingles I* expert for the plaintiffs in a Section 2 lawsuit involving the 32<sup>nd</sup> Judicial District in Terrebonne Parish.<sup>7</sup>

6. As noted above, I serve as the *Gingles I* expert for the *Galmon* plaintiffs in *Robinson v. Ardoin*.

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<sup>2</sup> *Rodney v. McKeithen*, No. 3:1992-CV-735 (M.D. La.).

<sup>3</sup> *Knight v. McKeithen*, No. 3:1994-cv-00848 (M.D. La.) and *Reno v. Bossier Parish School Board*, 528 U.S. 320 (2000).

<sup>4</sup> *Wilson v. St. Francisville*, No. 92-765 (M.D. La.).

<sup>5</sup> *Prejean v. Foster*, No. 02-31065 (5th Cir. 2003).

<sup>6</sup> *NAACP v. St. Landry Parish Police Jury, et al.*, VR-LA-0097, No. 6:03-CV-00610 (W.D. La.).

<sup>7</sup> *Terrebonne Parish NAACP v. Jindal*, No. 3:14-cv-00069 (M.D. La.).

7. For additional historical information on my testimony as an expert witness and experience preparing and assessing proposed redistricting maps for Section 2 litigation, a summary of my redistricting work is attached as **Exhibit A**.

**B. Purpose of Report**

8. The attorneys for the *amici* in this matter have asked me to determine whether, consistent with traditional redistricting principles, the African-American<sup>8</sup> population in DeSoto Parish is “sufficiently large and geographically compact”<sup>9</sup> to allow for five majority-Black districts in an 11-district Police Jury Plan.

9. In addition, the attorneys for the *amici* asked me to develop an illustrative plan that would reduce the number of split VTDs and split communities as reflected in Enacted Plan H Revised (“Enacted Plan”) adopted by the DeSoto Parish Police Jury.

**C. Methodology**

10. I used the Maptitude software program as well as data and shapefiles from the U.S. Census Bureau and DeSoto Parish. *Maptitude* is deployed by many local and state governing bodies across the country for redistricting and other types

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<sup>8</sup> In this declaration, “African-American” refers to persons who are single-race Black or Any Part Black (*i.e.*, persons of two or more races and some part Black), including Hispanic Black. In some instances (*e.g.*, for historical comparisons) numerical or percentage references identify single-race Black as “SR Black” and Any Part Black as “AP Black.” Unless noted otherwise, “Black” means AP Black. It is my understanding that following the U.S. Supreme Court decision in *Georgia v. Ashcroft*, 539 U.S. 461 (2003), the “Any Part” definition is an appropriate Census classification to use in most Section 2 cases.

<sup>9</sup> *Thornburg v. Gingles*, 478 U.S. 30, 50 (1986).

of demographic analysis. The *Maptitude* software processes electronic Census Bureau geographic file information in order to produce a map for display on a computer screen. The software also merges demographic data and street address information to match the relevant decennial Census geography.

11. For purposes of the *Gingles I* analysis in this declaration, I define majority-Black districts as those that are majority-Black voting age (“BVAP”). Unless indicated otherwise, I use the Any Part Black census definition when discussing the Black population in DeSoto Parish.

12. In addition, as part of the analysis in this declaration, I review historical and current demographics reported in the decennial census published by the U.S. Census Bureau, as well as socioeconomic characteristics (reflecting communities of interest) reported in the American Community Survey (“ACS”) for African Americans and non-Hispanic Whites.<sup>10</sup>

13. In addition, I reviewed the May 2023 *Amended Complaint* filed by the Plaintiffs’ attorneys and a report prepared by Dr. Gary Joiner on behalf of the Plaintiffs.

14. The *amici* attorneys gave me a shapefile depicting the Enacted Plan and a spreadsheet identifying the addresses of the incumbent Police Jurors. The *amici* attorneys also gave me maps of the Enacted Plan and population summaries

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<sup>10</sup> In this report, “Latino” and “Hispanic” are synonymous. References to “non-Hispanic White” are abbreviated as “NH White” or “White”.

of Plan H prepared by Mr. Michael Hefner (redistricting consultant to the DeSoto Parish Police Jury).

15. I did not have access to shapefiles depicting plans prepared by Mr. Hefner other than the Enacted Plan. I did not have access to plans (disclosed or undisclosed) prepared by Dr. Joiner. I also did not have access to a shapefile for the new 2023 precinct boundaries. I rely on the 2020 VTDs as defined by the U.S. Census Bureau.

**D. Expert Summary Conclusions**

16. The Black population in DeSoto Parish is sufficiently numerous and geographically compact to allow for five majority-Black Police Jury districts, consistent with traditional redistricting principles and *Gingles I*.

17. As I explain *infra*, the *amici* Illustrative Plan that I have prepared is superior to the Enacted Plan across almost every metric that one could apply to local redistricting plans. Other district configurations, with similar metrics, would also contain five majority-Black districts.

18. I drew the Illustrative Plan based on traditional redistricting principles, including population equality, compactness, contiguity, respect for communities of interest, and the non-dilution of minority voting strength. I also took into account incumbent residences in order to avoid conflicts with district assignments.

19. In the *Amended Complaint*, the attorneys for the Plaintiffs misrepresent the demographic reality of DeSoto Parish. There is absolutely no need to systematically under-populate all five majority-Black districts in order to ensure that each majority-Black district is barely over 50% BVAP as the attorneys for the Plaintiffs imply in the *Amended Complaint*.

20. The Plaintiffs' under-population argument appears to rest on major calculation errors with respect to BVAP in a population table of the *Amended Complaint* (§65) and in Dr. Joiner's report (§44). Dr. Joiner erroneously calculated BVAP percentages, using Black population (all ages) in the denominator rather than Black voting age population. I report the correct figures in Figure 7 *infra*. With the correct figures, all five of the districts In the Enacted Plan have Black voting age populations in the 60% range. Given that level of Black voting age population, there would be no reason to systematically under-populate majority-Black districts to maintain a BVAP over 50%.

21. The Plaintiffs have failed to put forth an alternative plan that would comply with traditional redistricting principles – including the non-dilution of minority voting strength – even though they have had months to do so.

**E. Organization of Report**

22. The remainder of this declaration is organized as follows: **Section II** reviews parish population demographics from 2000 to 2020. **Section III** reviews

the Benchmark 2011 Plan. **Section IV** reviews the Enacted Plan. **Section V** presents a *Gingles I* Police Jury Plan based on the 2020 Census, containing five majority-Black districts. **Section VI** discusses charts and data summaries that I produced (from the American Community Survey published by the U.S. Census Bureau) – documenting socioeconomic disparities by race in DeSoto Parish.

**II. DEMOGRAPHIC PROFILE OF DESOTO PARISH**

**A. Decennial Census – 2000 to 2020**

23. The table in **Figure 1** presents the population of DeSoto Parish by race and ethnicity for the decennial censuses between 2000 and 2020. According to the 2020 Census, non-Hispanic Whites (“NH White”) comprise 56.4% of the population in Desoto Parish. African Americans are the next largest racial/ethnic category, representing 37.2% of the population.

**Figure 1: DeSoto Parish – 2000 to 2020 Census  
Population by Race and Ethnicity**

<b>All Ages</b>	<b>2000</b>	<b>% of Total Pop.</b>	<b>2010</b>	<b>% of Total Pop</b>	<b>2020</b>	<b>% of Total Pop.</b>	<b>Pop. Change 2000-2020</b>	<b>Pop. Change 2010-2020</b>
Total Population	25,494	100.00%	26,656	100.00%	26,812	100.00%	1,318	156
NH White*	14,089	55.26%	15,092	56.62%	15,122	56.40%	1,033	30
Total Minority Pop.	11,405	44.74%	11,564	43.38%	11,690	43.60%	285	126
Latino	396	1.55%	661	2.48%	762	2.84%	366	101
Any Part Black	10,814	42.42%	10,600	39.77%	9,973	37.20%	-841	-627

\*Single-race, non-Hispanic

24. As shown in **Figure 1**, the Any Part Black (“AP Black”) percentage in DeSoto Parish dropped from 42.42% in 2000 to 37.2% in 2020.<sup>11</sup> But the overall minority population held relatively constant — 44.74% in 2000 and 43.38% in 2020, bolstered by growth in the Latino population. The NH White population climbed slightly from 55.3% in 2000 to 56.6% in 2020.

25. Since 2010, the NH White population in DeSoto Parish has remained virtually unchanged – up by 30 persons. Over the course of the decade, the Black population fell by 622 persons. Overall, the minority population grew by 126 persons.

26. As shown in **Figure 2**, 2020 voting age and citizen voting age estimates (based on the 5-year 2017-21 ACS), generally track the overall population percentages.

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<sup>11</sup> In this declaration, “African American” or “Black” refers to persons who are Any Part Black (*i.e.*, persons of one or more races that are some part Black), including Hispanic Black, unless otherwise specified. It is my understanding that following the U.S. Supreme Court decision in *Georgia v. Ashcroft*, 539 U.S. 461 (2003), the “Any Part” definition is the appropriate Census classification to use in Section 2 cases.

**Figure 2: DeSoto Parish – Voting Age and Citizen Voting Age by Race and Ethnicity**

<b>Voting Age (VAP)</b>	<b>2020</b>	<b>% of VAP</b>	<b>% of Citizen VAP</b>
18+ Population	20,440	100%	100.0%
18+NH White*	11,802	57.74%	60.6%
18+ Minority Pop.	8,638	42.26%	39.4%
18+Latino	495	2.42%	2.3%
18+ Any Part Black	7,425	36.33%	NA
18 + NH DOJ Black*	7331	35.87%	35.0%

\* Includes persons who are NH SR Black plus of two races NH Black and NH White. Adding 2-race Black and Indigenous persons in the count yields 35.3%.

**B. 2010 to 2020 Population Change by Census Tract**

27. Beneath the stable overall population dynamics in DeSoto Parish since 2010, there has been a shift in population within the northwest quadrant of the Parish. This becomes apparent by comparing census tract<sup>12</sup> population change between 2010 and 2020.

28. The map in **Figure 3** illustrates that there was population growth in and around Stonewall between 2010 and 2020. (Bright green on the map identifies Stonewall area tract 950103 (up 1,493 persons since 2010 (+51%) and two adjacent tracts with modest growth. Pink to red shading depicts tract-level

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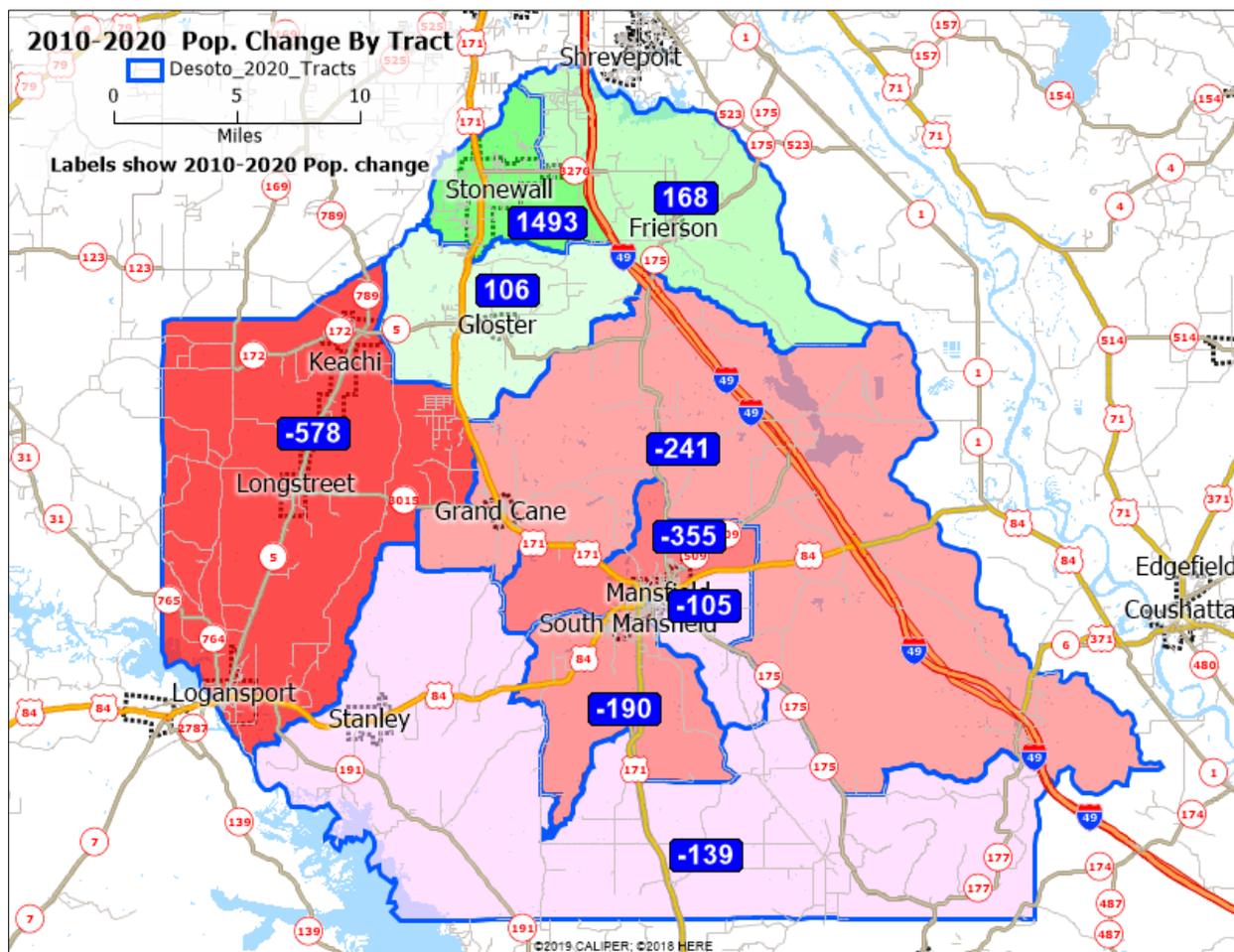
<sup>12</sup> “**Census Tracts** are small, relatively permanent statistical subdivisions of a county or statistically equivalent entity that can be updated by local participants prior to each decennial census.”

[https://www.census.gov/programs-surveys/geography/about/glossary.html#par\\_textimage\\_13](https://www.census.gov/programs-surveys/geography/about/glossary.html#par_textimage_13)

There were 11 tracts in DeSoto Parish under the 2010 Census. I merged 2010 census blocks into the corresponding 2020 Census tract boundaries...

population loss elsewhere. Labels show 2010 to 2020 population change. Growth in the northern section of the Parish means that population equating to about 75% of a single Police Jury district must be allocated to the Stonewall area compared to the population distribution under the 2010 Census.

**Figure 3: 2010 - 2020 Population Change by 2020 Census Tract**



29. As the map in **Figure 3** and accompanying table in **Figure 4** (below) reveal, the population loss in the predominantly White western part of the Parish (Tract 950200) offsets about a third of the growth in the three northern census

tracts. In the south, majority-White Tract 950700 lost 139 persons.

**Figure 4: 2010 - 2020 Population Change by 2020 Census Tract**

TRACT	2010 Census			2020 Census			2010 to 2020 Change		
	Pop.	AP Black	NH White	Pop	AP Black	NH White	Pop	AP Black	NH White
950101	2502	906	1490	2608	823	1598	106	-83	108
950102	3290	637	2520	3459	609	2506	168	-28	-14
950103	2902	221	2540	4396	388	3632	1493	167	1092
950200	4334	1137	2961	3755	940	2560	-578	-197	-401
950300	2726	1141	1503	2484	1001	1348	-241	-140	-155
950400	3140	1926	1081	2785	1817	805	-355	-109	-276
950500	2092	1538	533	1901	1440	396	-190	-98	-137
950600	2960	2499	416	2854	2478	316	-105	-21	-100
950700	2710	595	2048	2570	477	1961	-139	-118	-87
<b>Total</b>	<b>26,655</b>	<b>10,600</b>	<b>15,092</b>	<b>26,812</b>	<b>9,973</b>	<b>15,122</b>	<b>160</b>	<b>(627)</b>	<b>30</b>

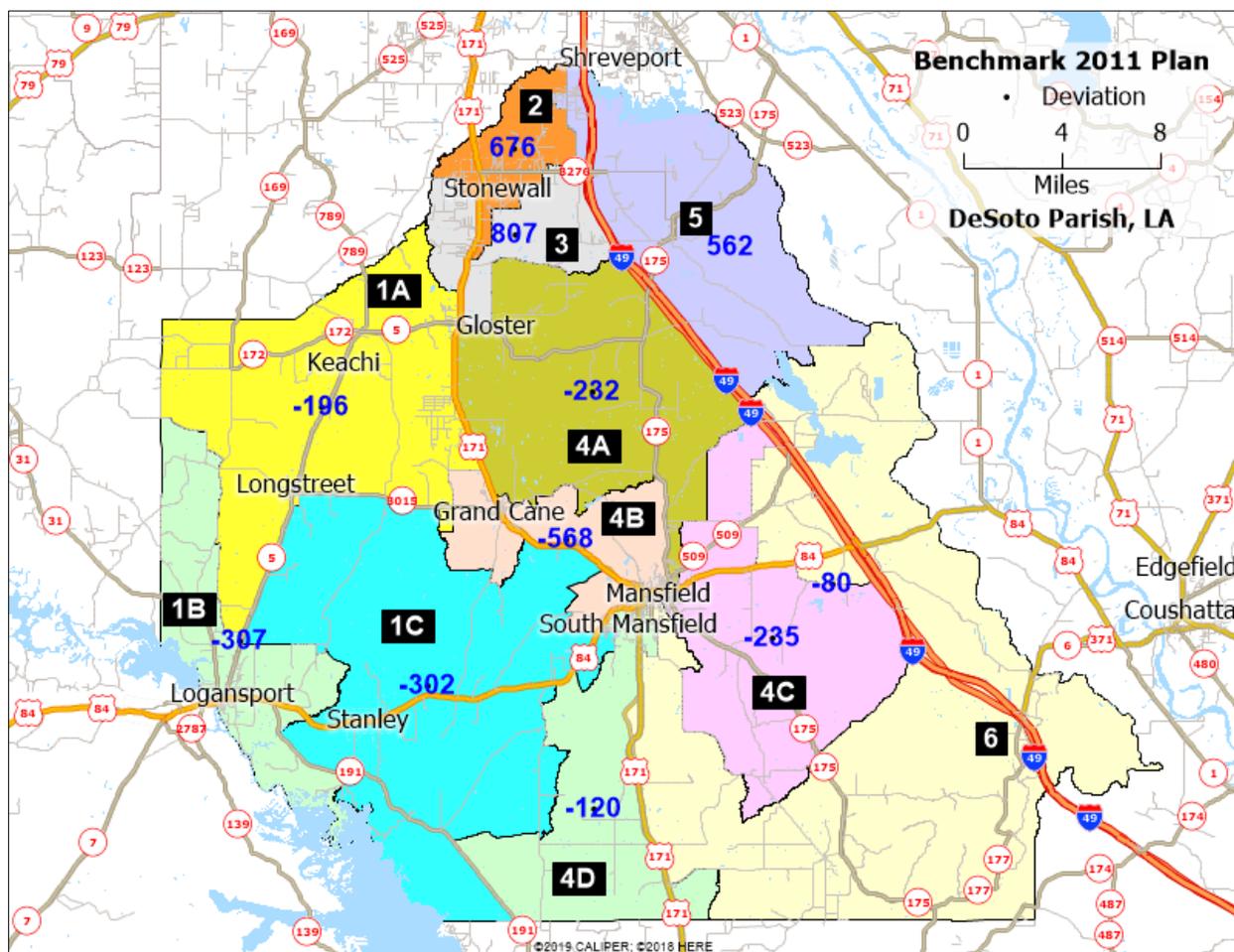
### III. BENCHMARK 2011 POLICE JURY PLAN

30. Under the 2020 Census, the ideal district size in an 11-district plan for DeSoto Parish is just 2,437 persons. This means that a district that is overpopulated or underpopulated by about 130 persons falls outside the +/- 5% deviation range necessary to meet one-person, one-vote requirements.

31. Consistent with relative volatility at the census tract level, by the time of the 2020 Census, the Benchmark 2011 Police Jury Plan (shown in **Figure 5** below) had become very malapportioned. Blue labels show population deviation by district. A higher resolution map is in **Exhibit B-1** with detailed population summary statistics is in **Exhibit B-2**. Of note, as shown in **Exhibit B-3**, the 2020

redistricting cycle was set for major changes because the 2011 Benchmark Plan was malapportioned when enacted under the 2010 Census, with an overall deviation of 28.31%.

**Figure 5: Benchmark 2011 Police Jury Plan**



32. As shown in **Figure 6**, nine of the 11 Police Jury districts were outside +/- 5% –ranging from 23.31% to 33.22%, resulting in an overall deviation of 56.42%. Three of the five majority-Black districts were underpopulated, with District 4B (in the Mansfield area) 568 persons short of the ideal district size. In

contrast, three of the six majority-White districts were extremely overpopulated – Districts 2, 3, and 5 in the north. This set the stage for major changes in district lines throughout the Parish in the 2022-23 redistricting process.

**Figure 6: Benchmark 2011 Plan --- 2020 Census**

District	2020 Pop.	Deviation	% Deviation	18+ Pop	% 18+ AP Black	% 18+ NH White
1A	2241	-196	-8.04%	1732	27.66%	65.36%
1B	2130	-307	-12.60%	1620	29.14%	66.67%
1C	2135	-302	-12.39%	1708	22.54%	72.42%
2	3113	676	27.74%	2276	9.80%	82.25%
3	3244	807	33.11%	2316	8.29%	84.84%
4A	2205	-232	-9.52%	1723	55.83%	40.57%
4B	1869	-568	-23.31%	1466	60.64%	33.90%
4C	2202	-235	-9.64%	1701	71.25%	25.57%
4D	2317	-120	-4.92%	1797	57.87%	36.06%
5	2999	562	23.06%	2285	23.11%	67.70%
6	2357	-80	-3.28%	1816	57.43%	38.00%

33. For reference, **Exhibit B-4** details the communities (incorporated and unincorporated) that are split under the 2011 Benchmark. **Exhibit B-5** reports compactness scores.<sup>13</sup>

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<sup>13</sup> “The Reock test is an area-based measure that compares each district to a circle, which is considered to be the most compact shape possible. For each district, the Reock test computes the ratio of the area of the district to the area of the minimum enclosing circle for the district. The measure is always between 0 and 1, with 1 being the most compact. The Reock test computes one number for each district and the minimum, maximum, mean and standard deviation for the plan.” *Maptitude For Redistricting* software documentation (authored by the Caliper Corporation).

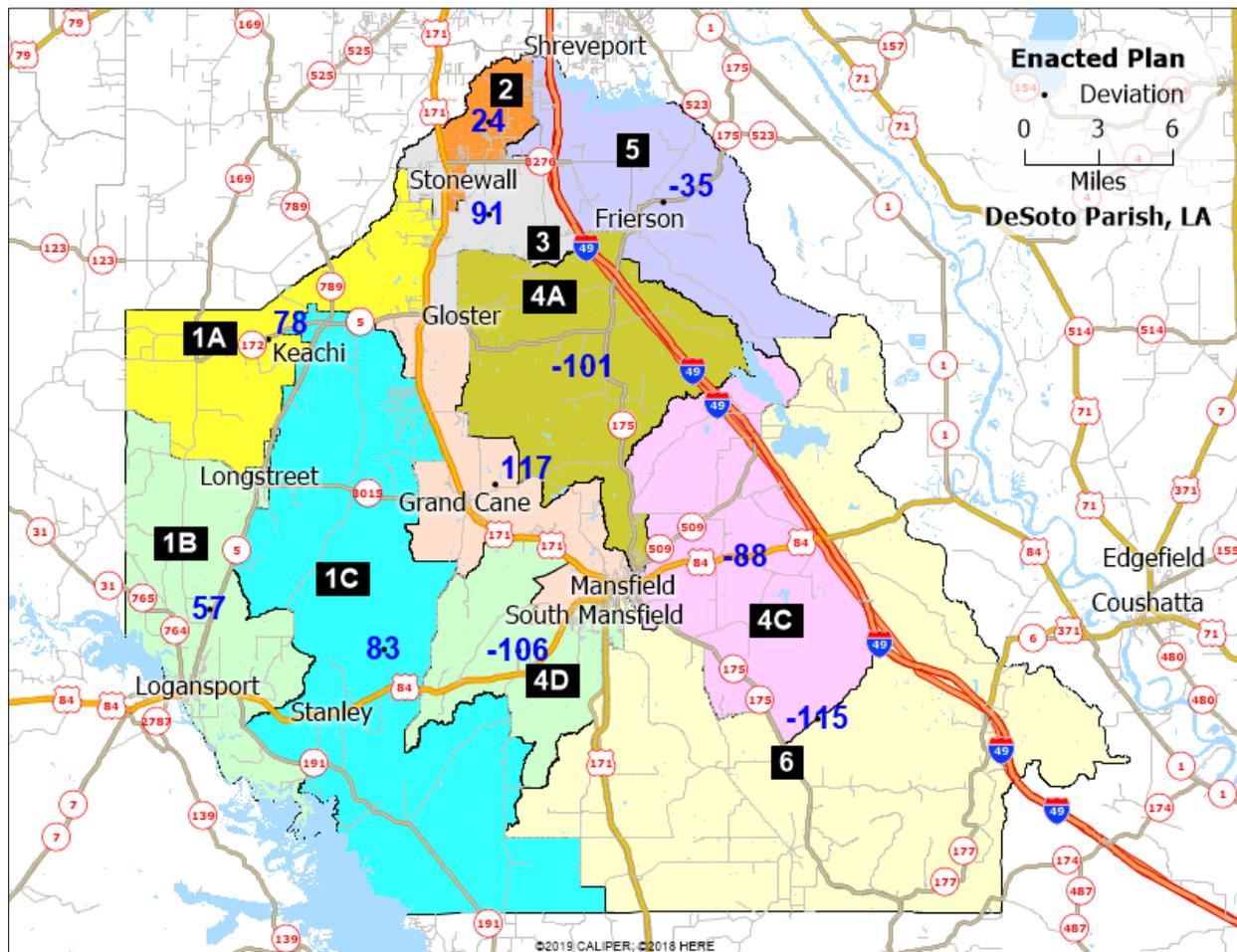
The Polsby-Popper test computes the ratio of the district area to the area of a circle with the same perimeter:  $4\pi \text{Area} / (\text{Perimeter}^2)$ . The measure is always between 0 and 1, with 1 being the most compact. The Polsby-Popper test computes one number for each district and the minimum, maximum, mean and standard deviation for the plan. *Id.*

The length-width test computes the absolute difference between the width (east-west) and the height (north-south) of each district. The bounding box of a district is computed in longitude-

#### IV ENACTED PLAN

34. The Enacted Plan (shown in **Figure 7**) brings all 11 districts into a +/- 5% range. Blue labels show population deviation by district.

**Figure 7: Enacted Police Jury Plan**



latitude space, and the height and width of the box through the center point are compared. The total is divided by the number of districts to create the average length-width compactness. A lower number indicates better length-width compactness. This measure of compactness is designed for contiguous districts, since the bounding box encloses the entire district.

35. A higher resolution map is in **Exhibit C-1** (also identifying incumbent residences) with detailed population summary statistics is in **Exhibit C-2**. **Exhibit C-3** zooms in on the Mansfield area... **Exhibit C-4** identifies split communities. **Exhibit C-5** reports compactness scores, **Exhibit C-6** identifies split VTDs.

36. As shown in **Figure 8**, the Enacted Plan contains five majority-Black districts – ranging from 59% to 66%. Four of the five are underpopulated but still within the +/-5% range. As I demonstrate by way of example in the Illustrative Plan *infra*, it was not necessary to under-populate the majority-Black districts. There are a number of different ways to configure five majority-Black districts, based on the 2020 Census, while adhering to traditional redistricting principles.

**Figure 8: Enacted Police Jury Plan – 2020 Census**

District	2020 Pop.	Deviation	% Deviation	18+ Pop	% 18+ AP Black	% 18+ NH White
1A	2515	78	3.20%	1781	10.89%	82.54%
1B	2494	57	2.34%	1924	26.87%	67.78%
1C	2520	83	3.41%	2005	12.92%	82.54%
2	2461	24	0.98%	1775	8.79%	82.87%
3	2528	91	3.73%	1857	10.77%	80.24%
4A	2336	-101	<b>-4.14%</b>	1767	<b>62.08%</b>	34.47%
4B	2554	117	4.80%	2033	<b>60.85%</b>	33.01%
4C	2349	-88	<b>-3.61%</b>	1847	<b>60.64%</b>	35.35%
4D	2331	-106	<b>-4.35%</b>	1798	<b>66.46%</b>	28.31%
5	2402	-35	-1.44%	1855	20.92%	70.84%
6	2322	-115	<b>-4.72%</b>	1798	<b>59.07%</b>	36.48%

37. Under the Enacted Plan, there are five majority-Black districts and six majority-White Districts. About three quarters of the Black population of voting

age resides in majority-Black districts (76.9%) and the same holds true for the White population of voting age living in majority-White districts (73.8%).

38. In my experience, having examined countless local plans throughout the nation, the Enacted Plan is within the normal range insofar as compactness scores are concerned. Whatever the reason for under-population of four of the five majority-Black districts in the Enacted Plan may be, it is clearly unrelated to whether or not five majority-Black districts out of 11 can be drawn in the Parish.

39. There are odd features in the Enacted Plan – e.g., a slice of District 2 extending into Stonewall in the center of town and several seemingly unnecessary splits of smaller communities (also present in the 2011 Plan). In the main, the Enacted Plan reflects incumbent preferences (Black and White) and is perhaps a product of too many cooks in the kitchen. There is a different set of incumbents in the 11-district DeSoto Parish School Board Plan, which may also have influenced how Policy Jury districts and new precincts are drawn.

40. The Plaintiffs complain about the division of Mansfield (pop. 4,714; 81% Black) into four districts, but five current incumbents live in the Mansfield area. Four live inside the City.

41. Unincorporated Gloster (Pop. 53; 15% Black) is split into three districts – perhaps for no reason other than it was split that way in the 2011 Plan, with three precincts converging on Gloster.

42. In his report, Dr. Joiner identifies a number of VTD/precinct splits that he views as problematic. His analysis is confusing and meaningless in isolation without a comparator map. He made no effort at a map that would correct these issues within the context of a “least change” or alternative plan. I examined a couple of the problematic splits singled out by Dr. Joiner.

43. For example, in ¶27 Dr. Joiner claims that by extending a split of VTD 26 across I-49, the map drawer intended to enhance the racial percentage of Enacted District 4C. How does he know that? An alternative and more likely explanation is that the extension was necessary in order to bring the deviation in District 4C below -5%. Without the extension, District 4C would have a deviation of -5.25%.

44. In ¶47 and ¶51, Dr. Joiner complains about a 5-way split affecting VTD 6 – a valid concern. But how does he propose to fix that given that four incumbents live in Mansfield? Well, one way is to assign all of VTD 6 to majority-Black District 4-C, as I do in the Illustrative Plan discussed in the next section.

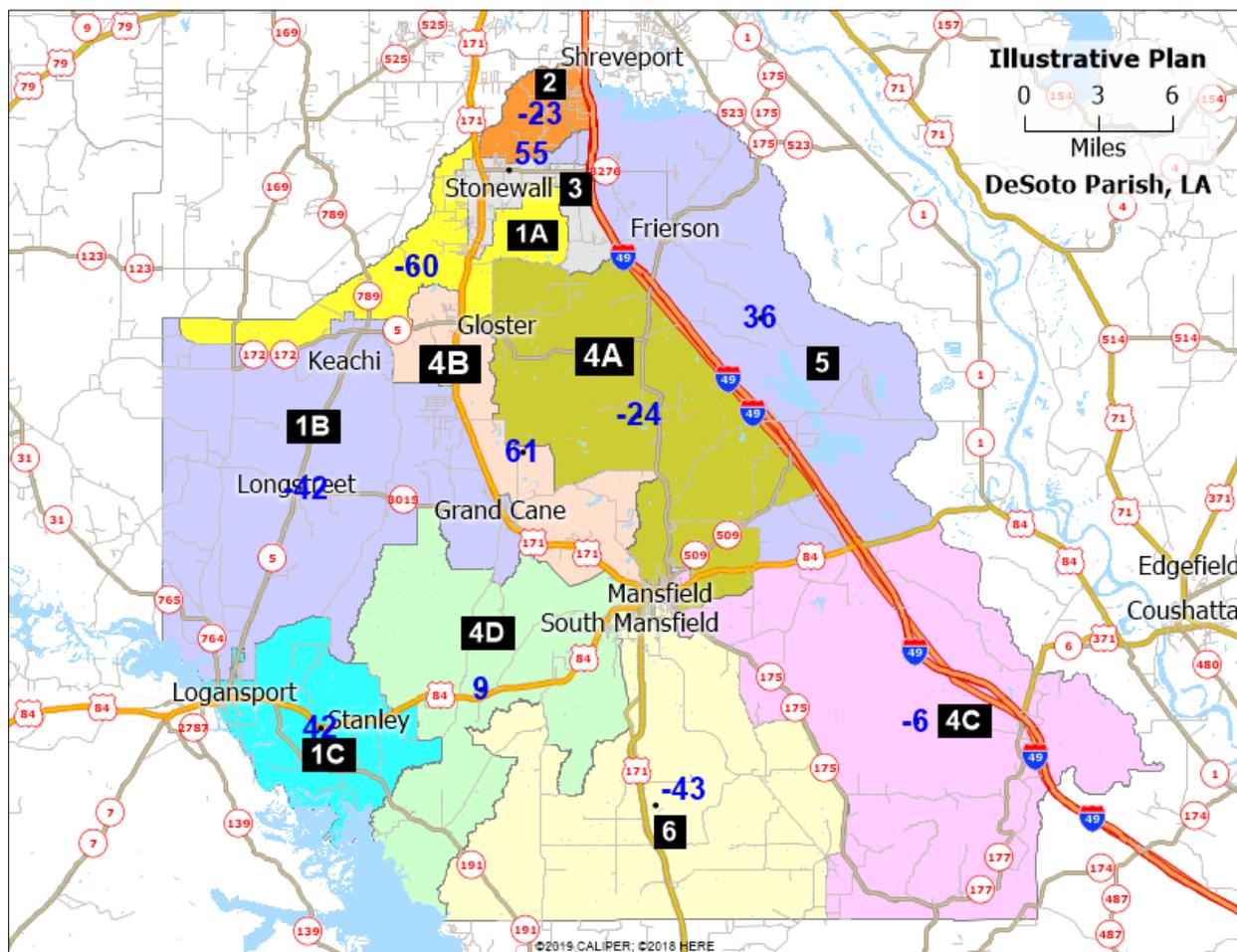
## **V. ILLUSTRATIVE PLAN**

45. I developed the Illustrative Plan to demonstrate that an 11-district Police Jury Plan in Desoto Parish can be drawn while adhering to traditional redistricting principles, including population equality, compactness, contiguity,

respect for communities of interest, and the non-dilution of minority voting strength.

46. The Illustrative Plan is shown in **Figure 9**. Blue labels show population deviation by district.

**Figure 9: Illustrative Police Jury Plan**



47. A higher resolution map is in **Exhibit D-1** (also identifying incumbent residences) with detailed population summary statistics is in **Exhibit D-2**. **Exhibit**

**D-3** zooms in on the Mansfield area. **Exhibit D-4** identifies split communities.

**Exhibit D-5** reports compactness scores, **Exhibit D-6** identifies split VTDs.

48. The Illustrative Plan is superior to the Enacted Plan with respect to key redistricting metrics – compactness, VTD splits, and community splits – while maintaining the relative level of minority voting strength found in the Benchmark 2011 Plan and reducing the overall deviation found in the Enacted Plan. There are no incumbent conflicts.

49. As shown in **Figure 10**, under the Illustrative Plan, there are five majority-Black districts and six majority-White Districts, with an overall deviation of 4.96%. Three of the majority-Black districts are slightly overpopulated and two are slightly underpopulated. Three of the majority-White districts are slightly overpopulated and three are slightly underpopulated.

**Figure 10: Illustrative Police Jury Plan -- 2020 Census**

District	2020 Pop.	Deviation	% Deviation	18+ Pop	% 18+ AP Black	% 18+ NH White
1A	2377	-60	-2.46%	1662	9.45%	84.78%
1B	2395	-42	-1.72%	1959	16.74%	76.62%
1C	2479	42	1.72%	1872	23.18%	73.18%
2	2414	-23	-0.94%	1730	8.03%	80.75%
3	2492	55	2.26%	1885	7.48%	83.71%
4A	2413	-24	-0.98%	1884	56.53%	39.12%
4B	2498	61	2.50%	1948	56.98%	35.73%
4C	2431	-6	-0.25%	1906	65.11%	31.58%
4D	2446	9	0.37%	1868	61.30%	34.58%
5	2473	36	1.48%	1918	30.14%	63.50%
6	2394	-43	-1.76%	1808	60.12%	35.84%

50. About three quarters of the Black population of voting age resides in majority-Black districts (76.1%) and the same holds true for the White population of voting age living in majority-White districts (71.8%).

51. **Figure 11** compares compactness scores for the Illustrative Plan against the 2011 Plan and the Enacted Plan. The Illustrative Plan is across-the-board superior to the Enacted Plan on the Reock, Polsby-Popper, and Length-Width scores. Reock and Polsby-Popper are the two most widely referenced compactness measures. Dr. Joiner’s preferred measure is the Length-Width.

**Figure 11: Compactness Scores**

	<b>Reock</b> higher is better	<b>Polsby- Popper</b> higher is better	<b>Length- Width</b> lower is better
<b>Illustrative Plan</b>			
All Districts	.40	.25	2.44
5 Majority-Black Districts	.41	.24	2.67
<b>2011 Benchmark Plan</b>			
All Districts	.37	.25	2.9
5 Majority-Black Districts	.39	.23	2.61
<b>Enacted Plan</b>			
All Districts	.35	.23	3.33
5 Majority-Black Districts	.40	.23	3.23

52. **Figure 12** compares VTD splits for the Illustrative Plan against the Enacted Plan. The Illustrative Plan is across-the-board superior.

**Figure 12: Political Subdivision Splits (excluding unpopulated areas)**

	<b>2020 VTD Splits</b>	<b>Total Place Splits</b>
Illustrative Plan	23	4*
2011 Benchmark Plan	NA	14
Enacted Plan	26	12

\*All 4 splits involve Mansfield where four incumbents live.

## **VI. SOCIO-ECONOMIC PROFILE OF DESOTO PARISH (2015-2019 ACS)**

53. Non-Hispanic Whites significantly outpace African Americans in DeSoto Parish across a broad range of socioeconomic measures, as reported in the 5-year 2015-2019 ACS. These disparities are summarized below and depicted with further detail in the charts and tables found in **Exhibit E**, which highlight Black, Latino, and White categories.<sup>14</sup>

### ***(a) Education***

- Of persons 25 years of age and over in DeSoto Parish, 27.1% of Black people have not finished high school. By contrast, 11.8% of their White counterparts are without a high school diploma. **Exhibit E, pp. 21-22.**
- For ages 25 and over in DeSoto Parish, 10.6% of Black people have a bachelor’s degree or higher – compared to a 17.1% rate achieved by White people. **Exhibit E, pp. 21-22.**

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<sup>14</sup> In this section, for simplicity, the term “White” refers to non-Hispanic White people. The term “Black” refers to single-race Black people, including people who identify as Black Hispanics. There is not a separate category for non-Hispanic Black or Any Part Black in the 5-Year American Community Survey.

*(b) Housing*

- Nearly half of Black households (43.8%) rent their residences in DeSoto Parish, as compared to a rental rate of 19.5% for White households. **Exhibit E, pp. 55-56.**

*(c) Income*

- In DeSoto Parish, Black median household income is \$23,750 – about 35% of the \$60,777 median income of White households. **Exhibit E, pp. 32-33.**
- Black people in DeSoto Parish experience a poverty rate that is about four times the poverty rate for White people -- 39.7% of Black people live below the poverty line, as compared to 8.7% of White people. **Exhibit E, pp. 28-29.**
- Reflecting the high Black poverty rate, more than twice as many Black households rely on food stamps compared to White households, with 38.6% of Black households participating in the Supplemental Nutrition Assistance Program (SNAP), as compared to 9.7% of White households in DeSoto Parish. **Exhibit E, pp. 47-48.**

*(d) Employment*

- The Black unemployment rate (for the working-age population ages 16-64, expressed as a percent of the civilian labor force) is 22.8%, which is four times the 5.0% unemployment rate recorded for Whites. **Exhibit E, pp. 51-52.**
- Just 13.8% of Black people in DeSoto Parish are employed in management or professional occupations, as compared to 37.1% of White people. **Exhibit E, pp.53-54.**

*(e) Communication*

- Nearly one in five Black-White gap households are without a computer (17.8%), as compared to 5.4% of White Households/

**Exhibit E, pp. 63-64.**

- With respect to broadband internet connections, African-American households trail White households – 60% versus 83.6%. **Exhibit E., pp. 63-64.**

# # #

I reserve the right to continue to supplement my reports in light of additional facts, testimony, and/or materials that may come to light during the pendency of the above-captioned case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on: July 7, 2023



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WILLIAM S COOPER

# COOPER EXHIBIT A

June 30, 2022

*William S. Cooper  
P.O. Box 16066  
Bristol, VA 24209  
276-669-8567  
bcooper@msn.com*

### **Summary of Redistricting Work**

I have a B.A. in Economics from Davidson College in Davidson, North Carolina.

Since 1986, I have prepared proposed redistricting maps of approximately 750 jurisdictions for Section 2 litigation, Section 5 comment letters, and for use in other efforts to promote compliance with the Voting Rights Act of 1965. I have analyzed and prepared election plans in over 100 of these jurisdictions for two or more of the decennial censuses – either as part of concurrent legislative reapportionments or, retrospectively, in relation to litigation involving many of the cases listed below.

From 1986 to 2022, I have prepared election plans for Section 2 litigation in Alabama, Connecticut, Florida, Georgia, Louisiana, Maryland, Mississippi, Missouri, Montana, Nebraska, New Jersey, New York, North Carolina, Ohio, Pennsylvania, South Carolina, South Dakota, Tennessee, Texas, Utah, Virginia, Washington, and Wyoming.

### **Post-2020 Redistricting Experience**

Since the release of the 2020 Census in August 2021, I have served as a redistricting/re-precincting consultant to the San Juan County, Utah Commission. On December 21, 2021, the San Juan County Commission adopted a three-district commission plan that I developed.

In October 2021, I briefly served as a consultant to the city council in Wenatchee, Washington and determined that the 2018 redistricting plan I drew is not malapportioned under the 2020 Census.

June 30, 2022

In 2022, I have testified at trial in five Sec. 2 lawsuits: Alabama (Congress), Florida (voter suppression), Georgia (State House, State Senate, and Congress), and Maryland (Baltimore County Commission).

**2010s Redistricting Experience**

I developed statewide legislative plans on behalf of clients in nine states (Alabama, Connecticut, Florida, Georgia, Kentucky, Mississippi, South Carolina, Texas, and Virginia), as well as over 150 local redistricting plans in approximately 30 states – primarily for groups working to protect minority voting rights. In addition, I have prepared congressional plans for clients in eight states (Alabama, Florida, Georgia, Louisiana, Maryland, Ohio, Pennsylvania, South Carolina, and Virginia).

In March 2011, I was retained by the Sussex County, Virginia Board of Supervisors and the Bolivar County, Mississippi Board of Supervisors to draft new district plans based on the 2010 Census. In the summer of 2011, both counties received Section 5 preclearance from the U.S. Department of Justice (DOJ).

Also in 2011, I was retained by way of a subcontract with Olmedillo X5 LLC to assist with redistricting for the Miami-Dade County, Florida Board of Commissioners and the Miami-Dade, Florida School Board. Final plans were adopted in late 2011 following public hearings.

In the fall of 2011, I was retained by the City of Grenada, Mississippi to provide redistricting services. The ward plan I developed received DOJ preclearance in March 2012.

In 2012 and 2013, I served as a redistricting consultant to the Tunica County, Mississippi Board of Supervisors and the Claiborne County, Mississippi Board of Supervisors.

June 30, 2022

In *Montes v. City of Yakima* (E.D. Wash. Feb. 17, 2015) the court adopted, as a remedy for the Voting Rights Act Section 2 violation, a seven single-member district plan that I developed for the Latino plaintiffs. I served as the expert for the Plaintiffs in the liability and remedy phases of the case.

In *Pope v. Albany County* (N.D.N.Y. Mar. 24, 2015), the court approved, as a remedy for a Section 2 violation, a plan drawn by the defendants, creating a new Black-majority district. I served as the expert for the Plaintiffs in the liability and remedy phases of the case.

In 2016, two redistricting plans that I developed on behalf of the plaintiffs for consent decrees in Section 2 lawsuits in Georgia were adopted (*NAACP v. Fayette County, Georgia* and *NAACP v. Emanuel County, Georgia*).

In 2016, two federal courts granted summary judgment to the plaintiffs based in part on my *Gingles I* testimony: *Navajo Nation v. San Juan County, Utah* (C.D. Utah 2016) and *NAACP v. Ferguson-Florissant School District, Missouri* (E. D. Mo. August 22, 2016).

Also in 2016, based in part on my analysis, the City of Pasco, Washington admitted to a Section 2 violation. As a result, in *Glatt v. City of Pasco* (E.D. Wash. Jan. 27, 2017), the court ordered a plan that created three Latino majority single-member districts in a 6 district, 1 at-large plan.

In 2018, I served as the redistricting consultant to the Governor Wolf interveners at the remedial stage of *League of Women Voters, et al. v. Commonwealth of Pennsylvania*.

In August 2018, the Wenatchee City Council adopted a hybrid election plan that I developed – five single-member districts with two members at-large. The Wenatchee election plan is the first plan adopted under the Washington Voting Rights Acts of 2018.

June 30, 2022

In February 2019, a federal court ruled in favor of the plaintiffs in a Section 2 case regarding Senate District 22 in Mississippi, based in part on my *Gingles* 1 testimony in *Thomas v. Bryant* (S.D. Ms. Feb 16, 2019).

In the summer of 2019, I developed redistricting plans for the Grand County (Utah) Change of Form of Government Study Committee.

In the fall of 2019, a redistricting plan I developed for a consent decree involving the Jefferson County, Alabama Board of Education was adopted *Traci Jones, et al. v. Jefferson County Board of Education, et al.*

In May 2020, a federal court ruled in favor of the plaintiffs in a Section 2 case in *NAACP et al. v. East Ramapo Central School District, NY*, based in part on my *Gingles* 1 testimony. In October 2020, the federal court adopted a consent decree plan I developed for elections to be held in February 2021.

In May and June of 2020, I served as a consultant to the City of Quincy, Florida – the Defendant in a Section 2 lawsuit filed by two Anglo voters (*Baroody v. City of Quincy*). The federal court for the Northern District of Florida ruled in favor of the Defendants. The Plaintiffs voluntarily dismissed the case.

In the summer of 2020, I provided technical redistricting assistance to the City of Chestertown, Maryland.

I am currently a redistricting consultant and expert for the plaintiffs in *Jayla Allen v. Waller County, Texas*. I testified remotely at trial in October 2020.

Since 2011, I have served as a redistricting and demographic consultant to the Massachusetts-based Prison Policy Initiative for a nationwide project to end prison-based gerrymandering. I have analyzed proposed and adopted election plans in about 25 states as part of my work.

June 30, 2022

In 2018 (Utah) and again in 2020 (Arizona), I have provided technical assistance to the Rural Utah Project for voter registration efforts on the Navajo Nation Reservation.

**Post-2010 Demographics Experience**

My trial testimony in Section 2 lawsuits usually includes presentations of U.S. Census data with charts, tables, and/or maps to demonstrate socioeconomic disparities between non-Hispanic Whites and racial or ethnic minorities.

I served as a demographic expert for plaintiffs in four state-level voting cases related to the Covid-19 pandemic (South Carolina, Alabama, and Louisiana) and state court in North Carolina.

I have also served as an expert witness on demographics in non-voting trials. For example, in an April 2017 opinion in *Stout v. Jefferson County Board of Education* (Case no.2:65-cv-00396-MHH), a school desegregation case involving the City of Gardendale, Ala., the court made extensive reference to my testimony.

I provide technical demographic and mapping assistance to the Food Research and Action Center (FRAC) in Washington D.C and their constituent organizations around the country. Most of my work with FRAC involves the Summer Food Program and Child and Adult Care Food Program. Both programs provide nutritional assistance to school-age children who are eligible for free and reduced price meals. As part of this project, I developed an online interactive map to determine site eligibility for the two programs that has been in continuous use by community organizations and school districts around the country since 2003. The map is updated annually with new data from a Special Tabulation of the American Community Survey prepared by the U.S. Census Bureau for the Food and Nutrition Service of the U.S. Department of Agriculture.

June 30, 2022

### **Historical Redistricting Experience**

In the 1980s and 1990s, I developed voting plans in about 400 state and local jurisdictions – primarily in the South and Rocky Mountain West. During the 2000s and 2010s, I prepared draft election plans involving about 350 state and local jurisdictions in 25 states. Most of these plans were prepared at the request of local citizens’ groups, national organizations such as the NAACP, tribal governments, and for Section 2 or Section 5 litigation.

Election plans I developed for governments in two counties – Sussex County, Virginia and Webster County, Mississippi – were adopted and precleared in 2002 by the U.S. Department of Justice. A ward plan I prepared for the City of Grenada, Mississippi was precleared in August 2005. A county supervisors’ plan I produced for Bolivar County, Mississippi was precleared in January 2006.

In August 2005, a federal court ordered the State of South Dakota to remedy a Section 2 voting rights violation and adopt a state legislative plan I developed (*Bone Shirt v. Hazeltine*).

A county council plan I developed for Native American plaintiffs in a Section 2 lawsuit (*Blackmoon v. Charles Mix County*) was adopted by Charles Mix County, South Dakota in November 2005. A plan I drafted for Latino plaintiffs in Bethlehem, Pennsylvania (*Pennsylvania Statewide Latino Coalition v. Bethlehem Area School District*) was adopted in March 2009. Plans I developed for minority plaintiffs in Columbus County, North Carolina and Montezuma- Cortez School District in Colorado were adopted in 2009.

Since 1986, I have testified at trial as an expert witness on redistricting and demographics in federal courts in the following voting rights cases (approximate most recent testimony dates are in parentheses). I also filed declarations and was deposed in

most of these cases.

**Alabama**

*Caster v. Merrill* (2022)

*Chestnut v Merrill* (2019)

*Alabama State Conference of the NAACP v. Alabama* (2018)

*Alabama Legislative Black Caucus et al. v. Alabama et al.* (2013)

**Arkansas**

*The Christian Ministerial Alliance v. Hutchinson* (2022)

**Colorado**

*Cuthair v. Montezuma-Cortez School Board* (1997)

**Florida**

*NAACP v. Lee* (2022)

*Baroody v. City of Quincy* (2020)

**Georgia**

*Pendergrass v. Raffensperger* (2022)

*Alpha Phi Alpha v. Raffensperger* (2022)

*Cofield v. City of LaGrange* (1996)

*Love v. Deal* (1995)

*Askew v. City of Rome* (1995)

*Woodard v. Lumber City* (1989)

**Louisiana**

*Galmon v. Ardoin* (2022)

*Terrebonne Parish NAACP v. Jindal, et al.* (2017)

*Wilson v. Town of St. Francisville* (1996)

*Reno v. Bossier Parish* (1995)

*Knight v. McKeithen* (1994)

**Maryland**

*NAACP v. Baltimore County* (2022)

*Cane v. Worcester County* (1994)

**Mississippi**

*Thomas v. Bryant* (2019)

*Fairley v. Hattiesburg* (2014)

*Boddie v. Cleveland School District* (2010)

*Fairley v. Hattiesburg* (2008)

*Boddie v. Cleveland* (2003)

*Jamison v. City of Tupelo* (2006)

*Smith v. Clark* (2002)

*NAACP v. Fordice* (1999)

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*Addy v Newton County (1995)*  
*Ewing v. Monroe County (1995)*  
*Gunn v. Chickasaw County (1995)*  
*Nichols v. Okolona (1995)*

**Montana**

*Old Person v. Brown (on remand) (2001)*  
*Old Person v. Cooney (1998)*

**Missouri**

*Missouri NAACP v. Ferguson-Florissant School District (2016)*

**Nebraska**

*Stabler v. Thurston County (1995)*

**New York**

*NAACP v. East Ramapo Central School District (2020)*  
*Pope v. County of Albany (2015)*  
*Arbor Hills Concerned Citizens v. Albany County (2003)*

**Ohio**

*A. Philip Randolph Institute, et al. v. Ryan (2019)*

**South Carolina**

*Smith v. Beasley (1996)*

**South Dakota**

*Bone Shirt v. Hazeltine (2004)*  
*Cottier v. City of Martin (2004)*

**Tennessee**

*Cousins v. McWherter (1994)*  
*Rural West Tennessee African American Affairs Council v. McWherter (1993)*

**Texas**

*Jayla Allen v. Waller County, Texas*

**Utah**

*Navajo Nation v. San Juan County (2017)*, brief testimony –11 declarations, 2 depositions

**Virginia**

*Smith v. Brunswick County (1991)*  
*Henderson v. Richmond County (1988)*  
*McDaniel v. Mehfoud (1988)*  
*White v. Daniel (1989)*

**Wyoming**

*Large v. Fremont County (2007)*

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In addition, I have filed expert declarations or been deposed in the following cases that did not require trial testimony. The dates listed indicate the deposition date or date of last declaration or supplemental declaration:

**Alabama**

*People First of Alabama v. Merrill* (2020), Covid-19 demographics only  
*Alabama State NAACP v. City of Pleasant Grove* (2019)  
*James v. Jefferson County Board of Education* (2019)  
*Voketz v. City of Decatur* (2018)

**Arkansas**

*Mays v. Thurston* (2020)-- Covid-19 demographics only)

**Connecticut**

*NAACP v. Merrill* (2020)

**Florida**

*Florida State Conference of the NAACP v. Lee, et al.*, (2021)  
*Calvin v. Jefferson County* (2016)  
*Thompson v. Glades County* (2001)  
*Johnson v. DeSoto County* (1999)  
*Burton v. City of Belle Glade* (1997)

**Georgia**

*Dwight v. Kemp* (2018)  
*Georgia NAACP et al. v. Gwinnett County, GA* (2018)  
*Georgia State Conference NAACP et al v. Georgia* (2018)  
*Georgia State Conference NAACP, et al. v. Fayette County* (2015)  
*Knighton v. Dougherty County* (2002)  
*Johnson v. Miller* (1998)  
*Jones v. Cook County* (1993)

**Kentucky**

*Herbert v. Kentucky State Board of Elections* (2013)

**Louisiana**

*Power Coalition for Equity and Justice v. Edwards* (2020), Covid-19 demographics only  
*Johnson v. Ardoin* (2019)  
*NAACP v. St. Landry Parish Council* (2005)  
*Prejean v. Foster* (1998)  
*Rodney v. McKeithen* (1993)

**Maryland**

*Baltimore County NAACP v. Baltimore County* (2022)  
*Benisek v. Lamone* (2017)

*Fletcher v. Lamone (2011)*

**Mississippi**

*Partee v. Coahoma County (2015)*

*Figgs v. Quitman County (2015)*

*West v. Natchez (2015)*

*Williams v. Bolivar County (2005)*

*Houston v. Lafayette County (2002)*

*Clark v. Calhoun County (on remand)(1993)*

*Teague v. Attala County (on remand)(1993)*

*Wilson v. Clarksdale (1992)*

*Stanfield v. Lee County(1991)*

**Montana**

*Alden v. Rosebud County (2000)*

**North Carolina**

*Lewis v. Alamance County (1991)*

*Gause v. Brunswick County (1992)*

*Webster v. Person County (1992)*

**Rhode Island**

*Davidson v. City of Cranston (2015)*

**South Carolina**

*Thomas v. Andino (2020), Covid-19 demographics only*

*Vander Linden v. Campbell (1996)*

**South Dakota**

*Kirkie v. Buffalo County (2004)*

*Emery v. Hunt (1999)*

**Tennessee**

*NAACP v. Frost, et al. (2003)*

**Virginia**

*Moon v. Beyer (1990)*

**Washington**

*Glatt v. City of Pasco (2016)*

*Montes v. City of Yakima (2014)*

###

# COOPER EXHIBIT B-1



# COOPER EXHIBIT B-2

**Population Summary Report  
DeSoto Parish -- 2011 Benchmrk 2020 Census**

<b>District</b>	<b>2020 Pop.</b>	<b>Deviation</b>	<b>% Deviation</b>	<b>18+ Pop</b>	<b>18+ AP Black</b>	<b>% 18+ AP Black</b>	<b>18+_NH White</b>	<b>% 18+ NH White</b>	<b>18+ Latine</b>	<b>% 18+ Latine</b>
1A	2241	-196	-8.04%	1732	479	27.66%	1132	65.36%	51	2.94%
1B	2130	-307	-12.60%	1620	472	29.14%	1080	66.67%	26	1.60%
1C	2135	-302	-12.39%	1708	385	22.54%	1237	72.42%	35	2.05%
2	3113	676	27.74%	2276	223	9.80%	1872	82.25%	53	2.33%
3	3244	807	33.11%	2316	192	8.29%	1965	84.84%	68	2.94%
4A	2205	-232	-9.52%	1723	962	55.83%	699	40.57%	34	1.97%
4B	1869	-568	-23.31%	1466	889	60.64%	497	33.90%	40	2.73%
4C	2202	-235	-9.64%	1701	1212	71.25%	435	25.57%	18	1.06%
4D	2317	-120	-4.92%	1797	1040	57.87%	648	36.06%	76	4.23%
5	2999	562	23.06%	2285	528	23.11%	1547	67.70%	66	2.89%
6	2357	-80	-3.28%	1816	1043	57.43%	690	38.00%	28	1.54%
<b>Total 2020 Pop.</b>	<b>26,812</b>		<b>56.42%</b>	<b>20,440</b>	<b>7,425</b>	<b>36.33%</b>	<b>11,802</b>	<b>57.74%</b>	<b>495</b>	<b>2.42%</b>

# COOPER

# EXHIBIT B-3

**Population Summary Report**  
**DeSoto Parish -- 2011 Benchmark 2010 Census**

District	2020 Pop.	Deviation	% Deviation	18+ Pop	18+ AP Black	% 18+ AP Black	18+_NH White	% 18+ NH White	18+ Latine	% 18+ Latine
1A	2501	78	3.22%	1934	549	28.39%	1299	67.17%	54	2.79%
1B	2411	-12	-0.50%	1743	531	30.46%	1152	66.09%	38	2.18%
1C	2314	-109	-4.50%	1764	384	21.77%	1287	72.96%	64	3.63%
2	2156	-267	-11.02%	1672	154	9.21%	1455	87.02%	25	1.50%
3	2577	154	6.36%	1871	175	9.35%	1603	85.68%	54	2.89%
4A	2311	-112	-4.62%	1733	894	51.59%	776	44.78%	38	2.19%
4B	2216	-207	-8.54%	1662	939	56.50%	677	40.73%	27	1.62%
4C	2487	64	2.64%	1899	1260	66.35%	597	31.44%	26	1.37%
4D	2305	-118	-4.87%	1737	1066	61.37%	635	36.56%	35	2.01%
5	2842	419	17.29%	2164	532	24.58%	1551	71.67%	53	2.45%
6	2536	113	4.66%	1827	1011	55.34%	780	42.69%	28	1.53%
<b>Total 2010 Pop.</b>	<b>26,656</b>		<b>28.31%</b>	<b>20,006</b>	<b>7,495</b>	<b>37.46%</b>	<b>11,812</b>	<b>59.04%</b>	<b>442</b>	<b>2.21%</b>

# COOPER EXHIBIT B-4

User:

Plan Name: Desoto\_Benchmark\_2011\_Plan

Plan Type:

## Communities of Interest (Condensed)

Friday, July 7, 2023

4:40 PM

**Whole Census Place : 483**

**Census Place Splits: 14**

**Zero Population Census Place Splits: 0**

District	Census Place	Population	% Pop	District	Census Place	Population	% Pop
1A	Longstreet	79	68.70%				
1C	Longstreet	36	31.30%				
2	Stonewall	1,437	63.22%				
3	Gloster	36	67.92%				
3	Stonewall	802	35.28%				
4A	Gloster	17	32.08%				
4A	Mansfield	421	8.93%				
4B	South	4	1.20%				
	Mansfield						
4B	Mansfield	1,139	24.16%				
4C	Mansfield	1,211	25.69%				
4D	South	329	98.80%				
	Mansfield						
4D	Mansfield	1,157	24.54%				
5	Stonewall	34	1.50%				
6	Mansfield	786	16.67%				

# COOPER

# EXHIBIT B-5

User:

Plan Name: **Desoto\_Benchmark\_2011\_Plan**

Plan Type:

## Measures of Compactness Report

Friday, July 7, 2023

4:44 PM

	<b>Reock</b>	<b>Polsby-Popper</b>	<b>Length-Width</b>
Mean	0.37	0.25	2.90
Min	0.17	0.15	0.57
Max	0.51	0.37	8.80
Std. Dev.	0.10	0.08	2.61
Sum			

Higher Number is Better

Lower Number is Better

<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>	<b>Length-Width</b>
1A	0.39	0.37	3.55
1B	0.17	0.17	8.80
1C	0.51	0.23	2.08
2	0.30	0.25	2.08
3	0.42	0.23	1.73
4A	0.50	0.37	0.64
4B	0.35	0.16	0.79
4C	0.34	0.26	6.72
4D	0.32	0.21	2.67
5	0.34	0.35	0.57
6	0.43	0.15	2.24

## Measures of Compactness Report

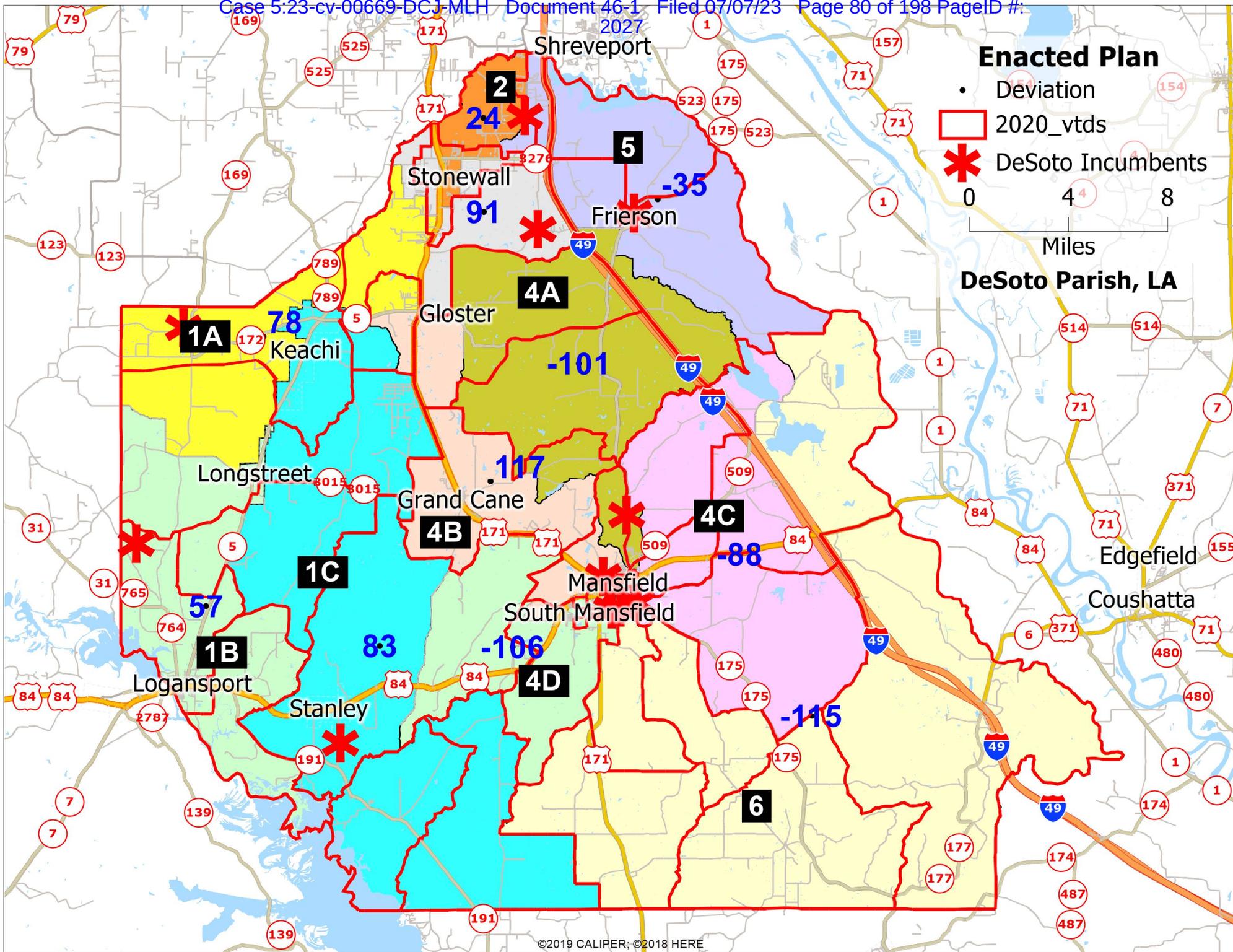
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Desoto\_Benchmark\_2011\_Pla

### Measures of Compactness Summary

<b>Reock</b>	The measure is always between 0 and 1, with 1 being the most compact.
<b>Polsby-Popper</b>	The measure is always between 0 and 1, with 1 being the most compact.
<b>Length-Width</b>	A lower number indicates better length-width compactness.

# COOPER EXHIBIT C-1



# COOPER EXHIBIT C-2

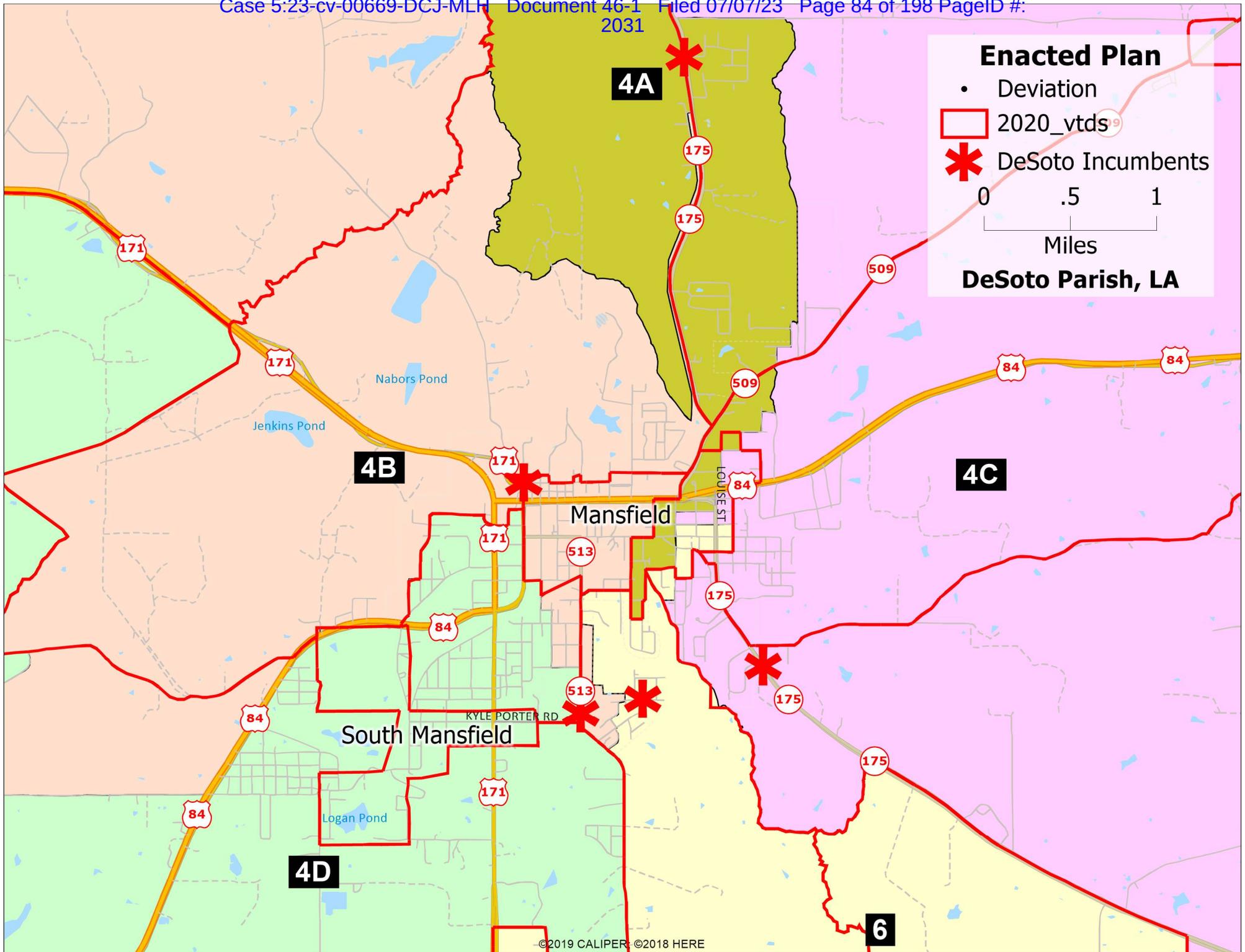
**Population Summary Report**  
**DeSoto Parish -- Enacted Police Jury Plan 2020 Census**

<b>District</b>	<b>2020 Pop.</b>	<b>Deviation</b>	<b>% Deviation</b>	<b>18+ Pop</b>	<b>18+ AP Black</b>	<b>% 18+ AP Black</b>	<b>18+_NH White</b>	<b>% 18+ NH White</b>	<b>18+ Latine</b>	<b>% 18+ Latine</b>
1A	2515	78	3.20%	1781	194	10.89%	1470	82.54%	44	2.47%
1B	2494	57	2.34%	1924	517	26.87%	1304	67.78%	39	2.03%
1C	2520	83	3.41%	2005	259	12.92%	1655	82.54%	37	1.85%
2	2461	24	0.98%	1775	156	8.79%	1471	82.87%	57	3.21%
3	2528	91	3.73%	1857	200	10.77%	1490	80.24%	63	3.39%
4A	2336	-101	-4.14%	1767	1097	62.08%	609	34.47%	32	1.81%
4B	2554	117	4.80%	2033	1237	60.85%	671	33.01%	64	3.15%
4C	2349	-88	-3.61%	1847	1120	60.64%	653	35.35%	29	1.57%
4D	2331	-106	-4.35%	1798	1195	66.46%	509	28.31%	70	3.89%
5	2402	-35	-1.44%	1855	388	20.92%	1314	70.84%	36	1.94%
6	2322	-115	-4.72%	1798	1062	59.07%	656	36.48%	24	1.33%
<b>Total 2020 Pop.</b>	<b>26,812</b>		<b>9.52%</b>	<b>20,440</b>	<b>7,425</b>	<b>36.33%</b>	<b>11,802</b>	<b>57.74%</b>	<b>495</b>	<b>2.42%</b>

# COOPER

# EXHIBIT C-3

2031



### Enacted Plan

- Deviation
- 2020\_vtds<sup>19</sup>
- DeSoto Incumbents



DeSoto Parish, LA

4A

4B

4C

4D

6

Mansfield

South Mansfield

# COOPER

# EXHIBIT C-4

User:

Plan Name: Desoto\_Plan\_H\_Revised

Plan Type:

## Communities of Interest (Condensed)

Friday, July 7, 2023

4:49 PM

**Whole Census Place : 485**

**Census Place Splits: 13**

**Zero Population Census Place Splits: 1**

District	Census Place	Population	% Pop	District	Census Place	Population	% Pop
PJ1A	Stonewall	289	12.71%				
PJ2	Stonewall	637	28.02%				
PJ3	Gloster	36	67.92%				
PJ3	Stonewall	1,347	59.26%				
PJ4A	Gloster	6	11.32%				
PJ4A	Mansfield	566	12.01%				
PJ4B	South	0	0.00%				
	Mansfield						
PJ4B	Gloster	11	20.75%				
PJ4B	Mansfield	1,364	28.94%				
PJ4C	Mansfield	902	19.13%				
PJ4D	South	333	100.00%				
	Mansfield						
PJ4D	Mansfield	1,053	22.34%				
PJ6	Mansfield	829	17.59%				

# COOPER

# EXHIBIT C-5

User:

Plan Name: Desoto\_Plan\_H\_Revised

Plan Type:

## Measures of Compactness Report

Friday, July 7, 2023

4:51 PM

	<b>Reock</b>	<b>Polsby-Popper</b>	<b>Length-Width</b>
Mean	0.35	0.23	3.23
Min	0.24	0.13	0.36
Max	0.51	0.36	9.40
Std. Dev.	0.09	0.07	3.27
Sum			

Higher Number is Better

Lower Number is Better

<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>	<b>Length-Width</b>
PJ1A	0.31	0.26	0.37
PJ1B	0.25	0.18	8.80
PJ1C	0.29	0.17	9.40
PJ2	0.30	0.33	2.27
PJ3	0.40	0.22	0.36
PJ4A	0.43	0.20	2.68
PJ4B	0.24	0.13	1.94
PJ4C	0.44	0.36	5.85
PJ4D	0.51	0.19	1.55
PJ5	0.29	0.29	1.16
PJ6	0.39	0.20	1.17

## Measures of Compactness Report

---

Desoto\_Plan\_H\_Revised

### Measures of Compactness Summary

<b>Reock</b>	The measure is always between 0 and 1, with 1 being the most compact.
<b>Polsby-Popper</b>	The measure is always between 0 and 1, with 1 being the most compact.
<b>Length-Width</b>	A lower number indicates better length-width compactness.

**COOPER**  
**EXHIBIT C-6**

User:

Plan Name: **Desoto\_Plan\_H\_Revised**

Plan Type:

## Political Subdivison Splits Between Districts

Friday, July 7, 2023

4:52 PM

### Split Counts

Number of subdivisions split into more than one district:      Number of splits involving no population:

County	1	County	0
Voting District	22	Voting District	2

Number of times a subdivision is split into multiple districts:

County	10
Voting District	28

County	Voting District	District	Population
--------	-----------------	----------	------------

*Split Counties:*

De Soto LA		PJ1A	2,515
De Soto LA		PJ1B	2,494
De Soto LA		PJ1C	2,520
De Soto LA		PJ2	2,461
De Soto LA		PJ3	2,528
De Soto LA		PJ4A	2,336
De Soto LA		PJ4B	2,554
De Soto LA		PJ4C	2,349
De Soto LA		PJ4D	2,331
De Soto LA		PJ5	2,402
De Soto LA		PJ6	2,322

*Split VTDs:*

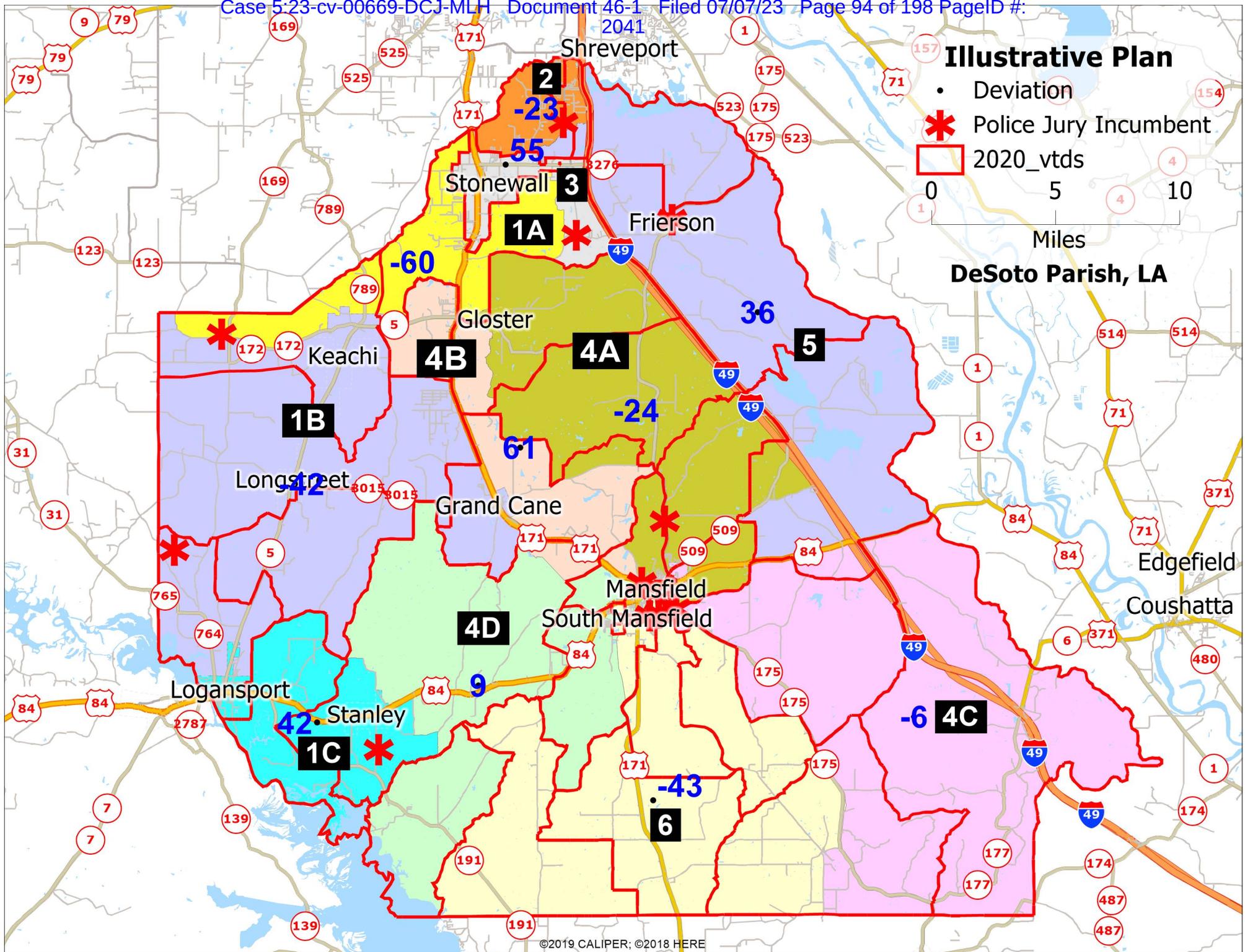
De Soto LA	11	PJ1A	106
De Soto LA	11	PJ1B	174
De Soto LA	11	PJ1C	485
De Soto LA	16	PJ1A	289
De Soto LA	16	PJ2	637
De Soto LA	16	PJ3	1,347
De Soto LA	22	PJ2	383
De Soto LA	22	PJ5	590
De Soto LA	23	PJ1A	1,387
De Soto LA	23	PJ1C	0
De Soto LA	23	PJ3	1,175
De Soto LA	26	PJ4C	384
De Soto LA	26	PJ6	131
De Soto LA	28	PJ1B	100
De Soto LA	28	PJ1C	316
De Soto LA	30	PJ2	1,441
De Soto LA	30	PJ3	6
De Soto LA	30	PJ5	136
De Soto LA	31	PJ4A	500
De Soto LA	31	PJ4B	80
De Soto LA	33	PJ4A	316

**Political Subdivison Splits Between Districts**

Desoto\_Plan\_H\_Revised

<b>County</b>	<b>Voting District</b>	<b>District</b>	<b>Population</b>
De Soto LA	33	PJ5	955
De Soto LA	34	PJ1A	466
De Soto LA	34	PJ1C	29
De Soto LA	34	PJ4B	341
De Soto LA	35	PJ1A	267
De Soto LA	35	PJ1C	293
De Soto LA	37	PJ4A	61
De Soto LA	37	PJ4B	536
De Soto LA	38	PJ4A	387
De Soto LA	38	PJ4C	356
De Soto LA	4	PJ4B	0
De Soto LA	4	PJ4D	333
De Soto LA	44	PJ4B	38
De Soto LA	44	PJ4D	589
De Soto LA	46	PJ1C	829
De Soto LA	46	PJ4D	331
De Soto LA	5	PJ4A	185
De Soto LA	5	PJ4C	921
De Soto LA	59	PJ4B	99
De Soto LA	59	PJ6	888
De Soto LA	6	PJ4A	393
De Soto LA	6	PJ4C	160
De Soto LA	6	PJ6	109
De Soto LA	60	PJ4A	26
De Soto LA	60	PJ4B	678
De Soto LA	63	PJ4B	170
De Soto LA	63	PJ4D	1,078
De Soto LA	9	PJ4C	528
De Soto LA	9	PJ6	33

# COOPER EXHIBIT D-1



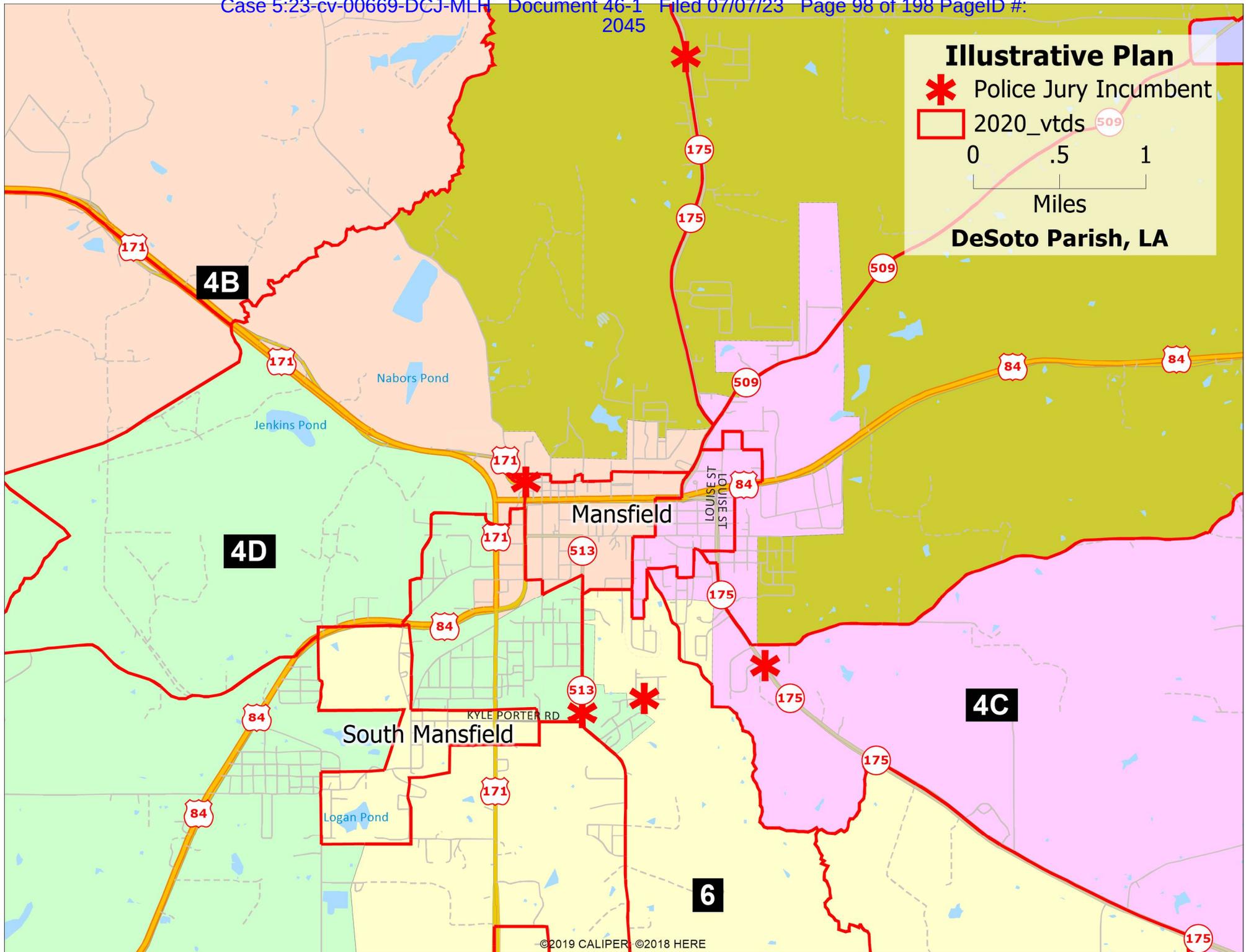
# COOPER

# EXHIBIT D-2

**Population Summary Report  
DeSoto Parish -- Illustrative Plan**

<b>District</b>	<b>2020 Pop.</b>	<b>Deviation</b>	<b>% Deviation</b>	<b>18+ Pop</b>	<b>18+ AP Black</b>	<b>% 18+ AP Black</b>	<b>18+_NH White</b>	<b>% 18+ NH White</b>	<b>18+ Latine</b>	<b>% 18+ Latine</b>
1A	2377	-60	-2.46%	1662	157	9.45%	1409	84.78%	47	2.83%
1B	2395	-42	-1.72%	1959	328	16.74%	1501	76.62%	57	2.91%
1C	2479	42	1.72%	1872	434	23.18%	1370	73.18%	27	1.44%
2	2414	-23	-0.94%	1730	139	8.03%	1397	80.75%	68	3.93%
3	2492	55	2.26%	1885	141	7.48%	1578	83.71%	55	2.92%
4A	2413	-24	-0.98%	1884	1065	56.53%	737	39.12%	45	2.39%
4B	2498	61	2.50%	1948	1110	56.98%	696	35.73%	66	3.39%
4C	2431	-6	-0.25%	1906	1241	65.11%	602	31.58%	20	1.05%
4D	2446	9	0.37%	1868	1145	61.30%	646	34.58%	51	2.73%
5	2473	36	1.48%	1918	578	30.14%	1218	63.50%	27	1.41%
6	2394	-43	-1.76%	1808	1087	60.12%	648	35.84%	32	1.77%
<b>Total 2020 Pop.</b>	<b>26,812</b>		<b>4.96%</b>	<b>20,440</b>	<b>7,425</b>	<b>36.33%</b>	<b>11,802</b>	<b>57.74%</b>	<b>495</b>	<b>2.42%</b>

# COOPER EXHIBIT D-3



# COOPER EXHIBIT D-4

User:

Plan Name: DeSoto\_Illustrative\_Plan

Plan Type:

# Communities of Interest (Condensed)

Friday, July 7, 2023

5:19 PM

**Whole Census Place : 487**

**Census Place Splits: 4**

**Zero Population Census Place Splits: 0**

District	Census Place	Population	% Pop	District	Census Place	Population	% Pop
PJ4B	Mansfield	1,248	26.47%				
PJ4C	Mansfield	1,610	34.15%				
PJ4D	Mansfield	1,260	26.73%				
PJ6	Mansfield	596	12.64%				

# COOPER EXHIBIT D-5

User:  
 Plan Name: DeSoto\_Illustrative\_Plan  
 Plan Type:

# Measures of Compactness Report

Friday, July 7, 2023

5:21 PM

	<b>Reock</b>	<b>Polsby-Popper</b>	<b>Length-Width</b>
Sum	N/A	N/A	N/A
Min	0.16	0.12	0.01
Max	0.54	0.45	6.89
Mean	0.40	0.25	2.43
Std. Dev.	0.14	0.10	2.26
<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>	<b>Length-Width</b>
PJ1A	0.16	0.12	6.89
PJ1B	0.54	0.31	0.01
PJ1C	0.54	0.28	0.37
PJ2	0.50	0.45	0.51
PJ3	0.28	0.16	1.60
PJ4A	0.46	0.31	0.07
PJ4B	0.20	0.17	1.34
PJ4C	0.45	0.32	4.31
PJ4D	0.41	0.13	3.87
PJ5	0.29	0.28	4.00
PJ6	0.53	0.25	3.77

## Measures of Compactness Report

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DeSoto\_Illustrative\_Plan

### Measures of Compactness Summary

<b>Reock</b>	The measure is always between 0 and 1, with 1 being the most compact.
<b>Polsby-Popper</b>	The measure is always between 0 and 1, with 1 being the most compact.
<b>Length-Width</b>	A lower number indicates better length-width compactness.

# COOPER

# EXHIBIT D-6

User:

Plan Name: DeSoto\_Illustrative\_Plan

Plan Type:

## Political Subdivison Splits Between Districts

Friday, July 7, 2023

5:22 PM

### Split Counts

Number of subdivisions split into more than one district:      Number of splits involving no population:

County	1	County	0
Voting District	18	Voting District	2

Number of times a subdivision is split into multiple districts:

County	10
Voting District	25

County	Voting District	District	Population
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*Split Counties:*

De Soto LA		PJ1A	2,377
De Soto LA		PJ1B	2,395
De Soto LA		PJ1C	2,479
De Soto LA		PJ2	2,414
De Soto LA		PJ3	2,492
De Soto LA		PJ4A	2,413
De Soto LA		PJ4B	2,498
De Soto LA		PJ4C	2,431
De Soto LA		PJ4D	2,446
De Soto LA		PJ5	2,473
De Soto LA		PJ6	2,394

*Split VTDs:*

De Soto LA	10	PJ1B	392
De Soto LA	10	PJ1C	1,120
De Soto LA	22	PJ2	973
De Soto LA	22	PJ5	0
De Soto LA	23	PJ1A	2,313
De Soto LA	23	PJ1B	0
De Soto LA	23	PJ3	213
De Soto LA	23	PJ4A	36
De Soto LA	26	PJ4A	107
De Soto LA	26	PJ4C	63
De Soto LA	26	PJ5	345
De Soto LA	30	PJ2	1,441
De Soto LA	30	PJ3	6
De Soto LA	30	PJ5	136
De Soto LA	31	PJ4A	542
De Soto LA	31	PJ4B	38
De Soto LA	34	PJ1B	4
De Soto LA	34	PJ4B	832
De Soto LA	35	PJ1A	64
De Soto LA	35	PJ1B	496
De Soto LA	37	PJ1B	322

**Political Subdivison Splits Between Districts**

DeSoto\_Illustrative\_Plan

<b>County</b>	<b>Voting District</b>	<b>District</b>	<b>Population</b>
De Soto LA	37	PJ4A	35
De Soto LA	37	PJ4B	240
De Soto LA	38	PJ4A	637
De Soto LA	38	PJ4C	106
De Soto LA	44	PJ4D	465
De Soto LA	44	PJ6	162
De Soto LA	46	PJ1C	651
De Soto LA	46	PJ4B	133
De Soto LA	46	PJ4D	376
De Soto LA	5	PJ4A	431
De Soto LA	5	PJ4C	675
De Soto LA	55	PJ4C	181
De Soto LA	55	PJ6	192
De Soto LA	59	PJ4D	190
De Soto LA	59	PJ6	797
De Soto LA	60	PJ4A	157
De Soto LA	60	PJ4B	413
De Soto LA	60	PJ4D	134
De Soto LA	63	PJ4B	230
De Soto LA	63	PJ4D	1,018
De Soto LA	9	PJ4C	395
De Soto LA	9	PJ6	166

# COOPER EXHIBIT E

## **Selected Socio-Economic Data**

### **De Soto Parish, Louisiana**

#### **Single-Race African Americans and Latinos vis-à-vis Non-Hispanic Whites**

#### **Data Set: 2015-2019 American Community Survey 5-Year Estimates**

[20-Jun-21](#)

**C02003.DETAILED RACE - Universe: TOTAL POPULATION**  
 Data Set: 2015-2019 American Community Survey 5-Year Estimates

	De Soto Parish, Louisiana		
	Population	Margin of Error (+/-)	% of Total
<b>Total:</b>	<b>27,289</b>	<b>*****</b>	<b>100.0%</b>
Population of one race:	26,751	217	98.0%
White	16,770	50	61.5%
Black or African American	9,663	183	35.4%
American Indian and Alaska Native	254	130	0.9%
Asian alone	27	30	0.1%
Native Hawaiian and Other Pacific Islander	11	18	0.0%
Some other race	26	39	0.1%
Population of two or more races:	538	217	2.0%
Two races including Some other race	9	17	0.0%
Two races excluding Some other race, and three or more races	529	217	1.9%
Population of two races:	523	216	1.9%
White; Black or African American	301	163	1.1%
White; American Indian and Alaska Native	134	121	0.5%
White; Asian	10	11	0.0%
Black or African American; American Indian and Alaska Native	69	45	0.3%
All other two race combinations	9	17	0.0%
Population of three races	15	18	0.1%
Population of four or more races	0	24	0.0%

Note: Hispanics may be of any race. See Table B03002 and chart.

Source: U.S. Census Bureau, 2015-2019 American Community Survey

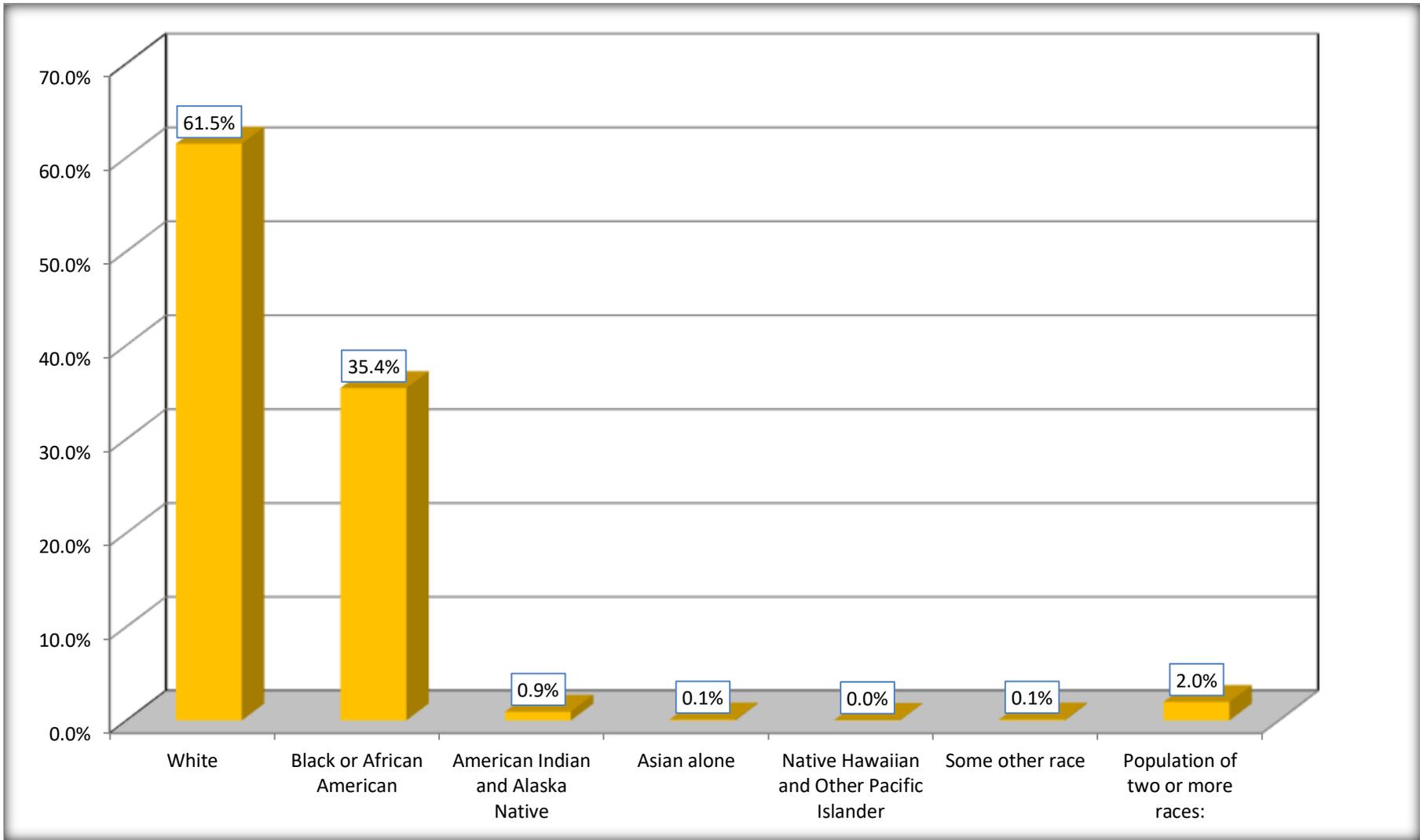
Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

### Population by Race

### De Soto Parish, Louisiana



Source: C02003.DETAILED RACE - Universe: TOTAL POPULATION  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B03002. HISPANIC OR LATINO ORIGIN BY RACE - Universe: TOTAL POPULATION**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

	De Soto Parish, Louisiana		
	Population	Margin of Error (+/-)	% of Total
<b>Total:</b>	27,289	*****	<b>100.0%</b>
Not Hispanic or Latino:	26,504	*****	97.1%
White alone	16,039	3	58.8%
Black or African American alone	9,643	178	35.3%
American Indian and Alaska Native alone	245	119	0.9%
Asian alone	27	30	0.1%
Native Hawaiian and Other Pacific Islander alone	11	18	0.0%
Some other race alone	24	38	0.1%
Two or more races:	515	217	1.9%
Two races including Some other race	0	24	0.0%
Two races excluding Some other race, and three or more races	515	217	1.9%
Hispanic or Latino	785	*****	2.9%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

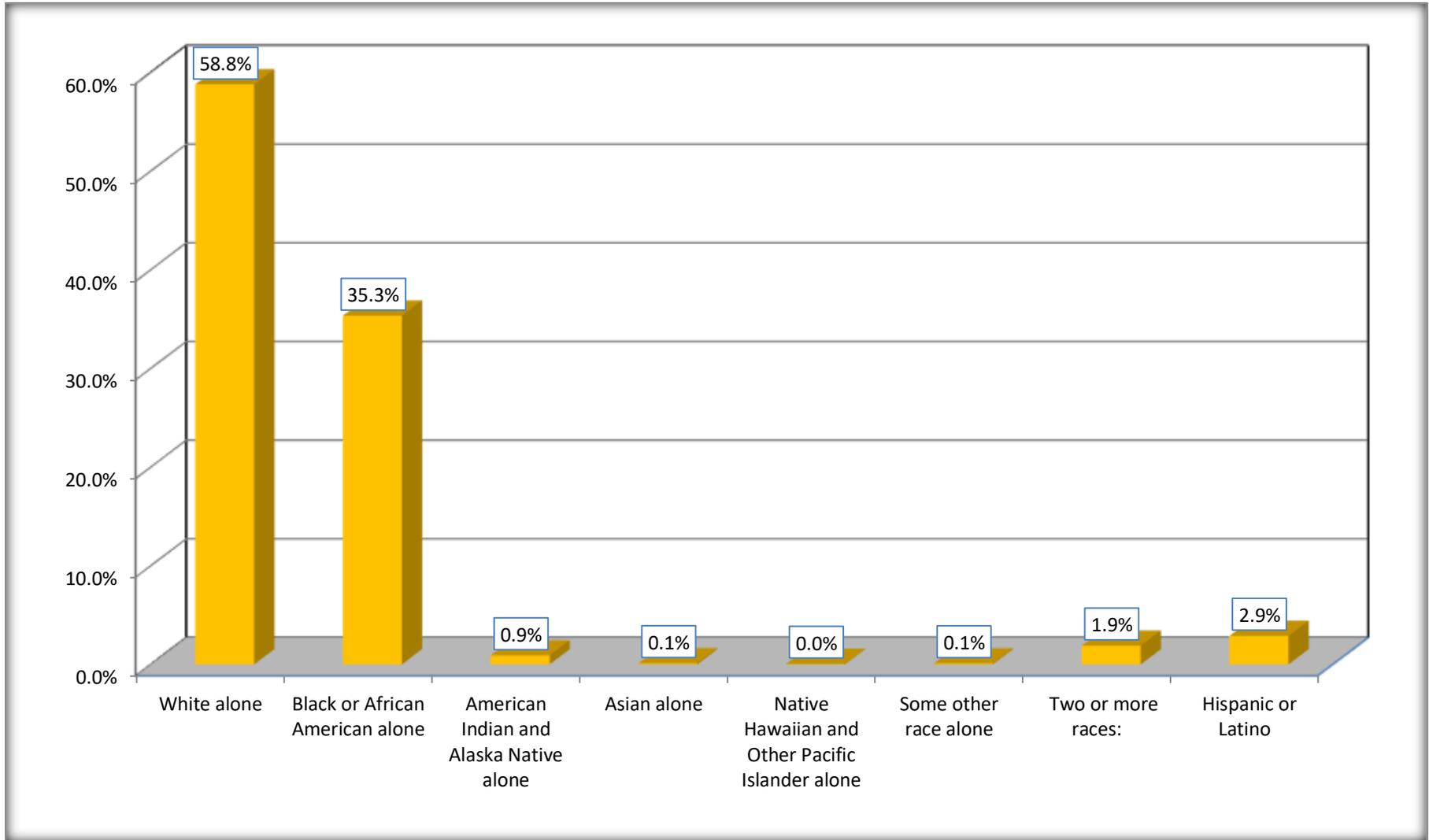
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For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

### Non-Hispanic by Race and Hispanic Population

#### De Soto Parish, Louisiana



Source: B03002. HISPANIC OR LATINO ORIGIN BY RACE - Universe: TOTAL POPULATION  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B03002. HISPANIC OR LATINO ORIGIN BY RACE**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

	De Soto Parish, Louisiana		
	Population	Margin of Error (+/-)	% of Total
Hispanic or Latino:	785	*****	<b>100.0%</b>
White alone	731	49	93.1%
Black or African American alone	20	30	2.5%
American Indian and Alaska Native alone	9	32	1.1%
Asian alone	0	24	0.0%
Native Hawaiian and Other Pacific Islander alone	0	24	0.0%
Some other race alone	2	5	0.3%
Two or more races:	23	31	2.9%
Two races including Some other race	9	17	1.1%
Two races excluding Some other race, and three or more races	14	26	1.8%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

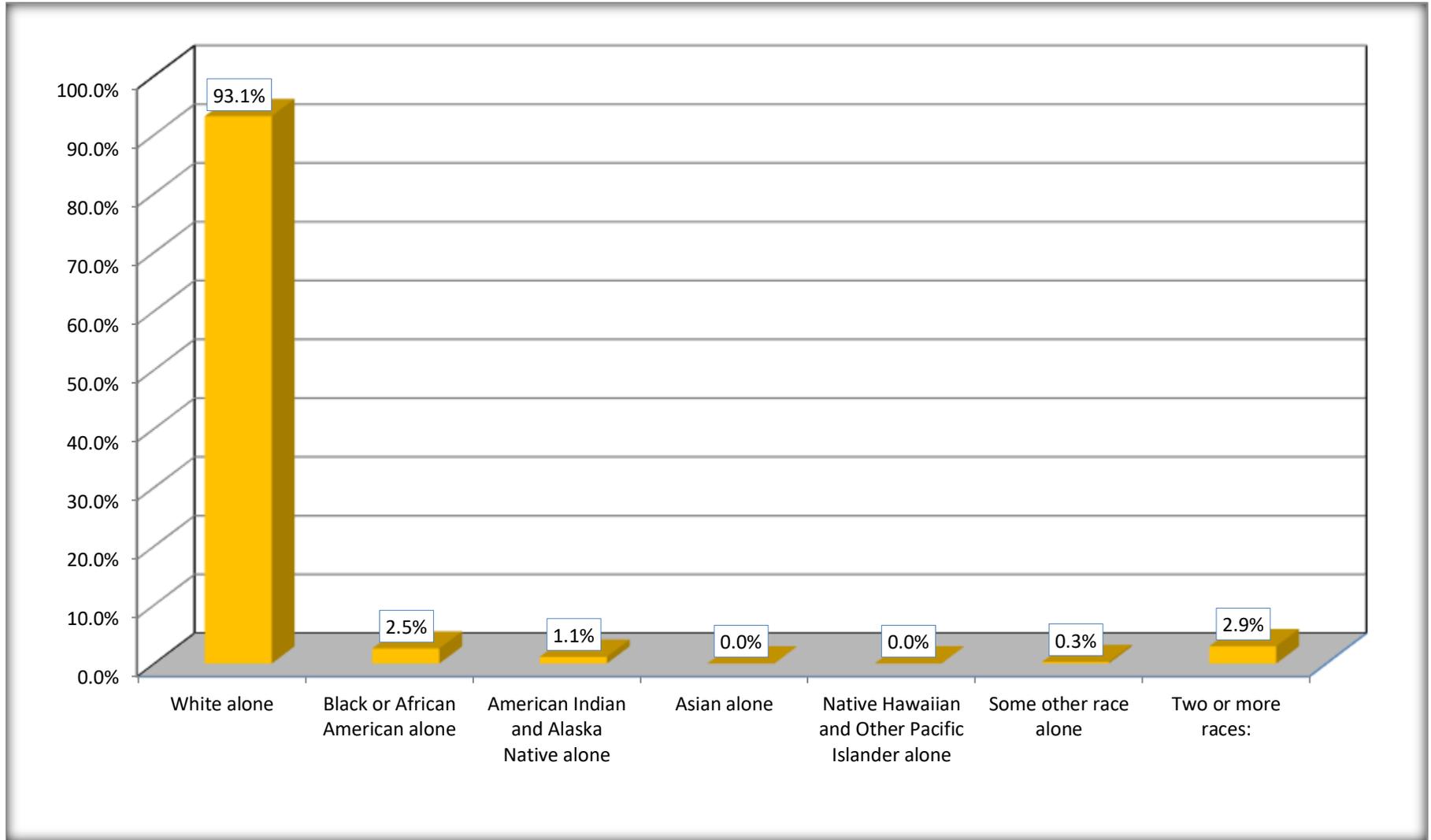
Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

### Hispanic or Latino Origin by Race

#### De Soto Parish, Louisiana



Source: B03002. HISPANIC OR LATINO ORIGIN BY RACE  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B01001. SEX BY AGE**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>9,663</b>	<b>100.0%</b>	<b>785</b>	<b>100.0%</b>	<b>16,039</b>	<b>100.0%</b>
Under 18 years	2,287	23.7%	270	34.4%	3,617	22.6%
18 to 64 years	5,941	61.5%	443	56.4%	9,294	57.9%
65 years and over	1,435	14.9%	72	9.2%	3,128	19.5%
Male:	4,462	46.2%	420	53.5%	7,879	49.1%
Under 18 years	1,107	11.5%	142	18.1%	1,874	11.7%
18 to 64 years	2,768	28.6%	230	29.3%	4,589	28.6%
65 years and over	587	6.1%	48	6.1%	1,416	8.8%
Female:	5,201	53.8%	365	46.5%	8,160	50.9%
Under 18 years	1,180	12.2%	128	16.3%	1,743	10.9%
18 to 64 years	3,173	32.8%	213	27.1%	4,705	29.3%
65 years and over	848	8.8%	24	3.1%	1,712	10.7%

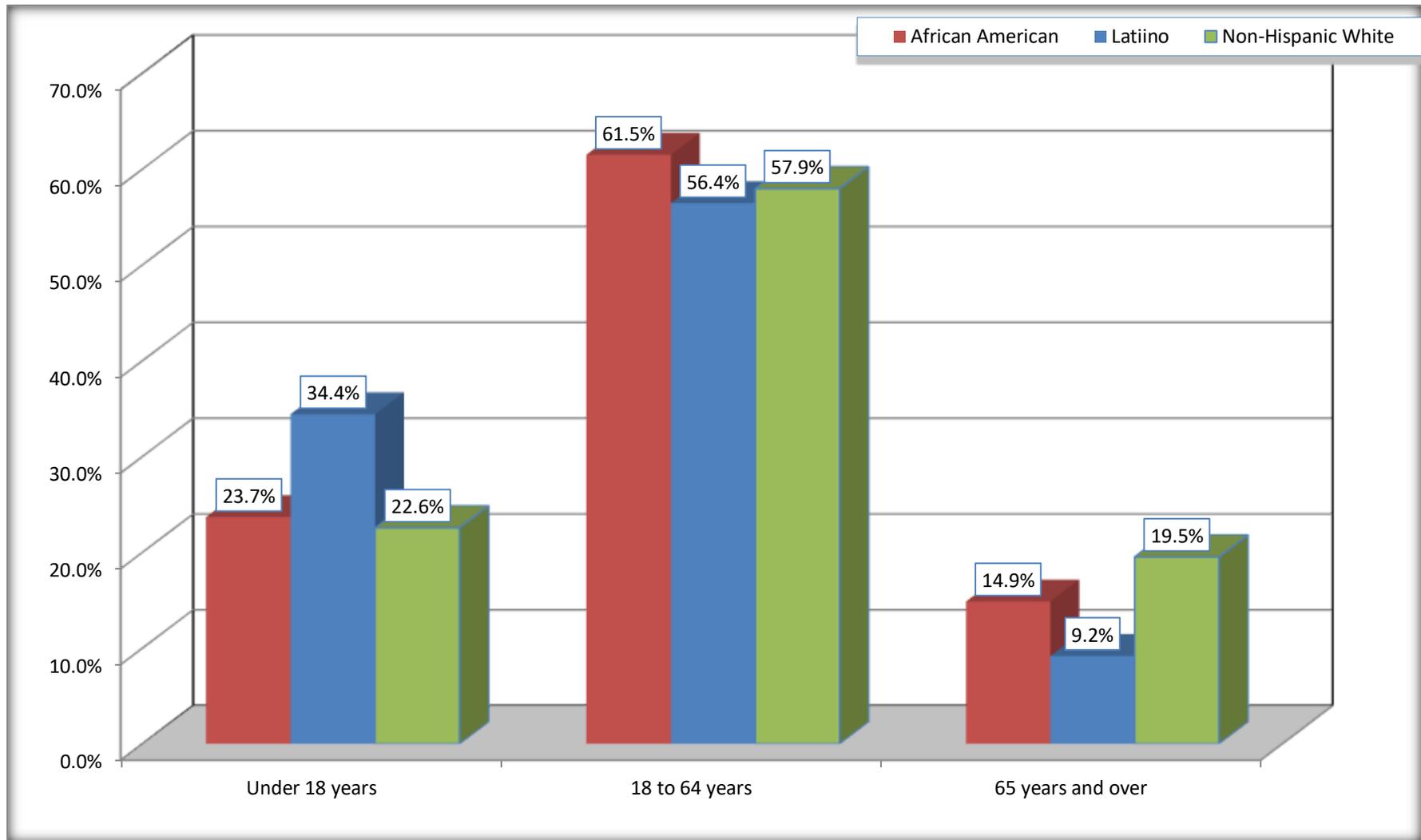
Source: U.S. Census Bureau, 2015-2019 American Community Survey

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

### Population by Age

### De Soto Parish, Louisiana



Source: B01001. SEX BY AGE  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B05003. SEX BY AGE BY CITIZENSHIP STATUS**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

	De Soto Parish, Louisiana					
	African American	% of AA Total by Age	Latino	% of Latino Total by Age	White, Not Hispanic	% of NHW Total by Age
<b>Total:</b>	<b>9,663</b>	<b>100.0%</b>	<b>785</b>	<b>100.0%</b>	<b>16,039</b>	<b>100.0%</b>
<b>Under 18 years:</b>	<b>2,287</b>	<b>100.0%</b>	<b>270</b>	<b>100.0%</b>	<b>3,617</b>	<b>100.0%</b>
Native	2,287	100.0%	270	100.0%	3,612	99.9%
Foreign born:	0	0.0%	0	0.0%	5	0.1%
Naturalized U.S. citizen	0	0.0%	0	0.0%	5	0.1%
Not a U.S. citizen	0	0.0%	0	0.0%	0	0.0%
<b>18 years and over:</b>	<b>7,376</b>	<b>100.0%</b>	<b>515</b>	<b>100.0%</b>	<b>12,422</b>	<b>100.0%</b>
Native	7,365	99.9%	384	74.6%	12,372	99.6%
Foreign born:	11	0.1%	131	25.4%	50	0.4%
Naturalized U.S. citizen	11	0.1%	46	8.9%	50	0.4%
Not a U.S. citizen	0	0.0%	85	16.5%	0	0.0%
<b>Male:</b>	<b>4,462</b>	<b>46.2%</b>	<b>420</b>	<b>53.5%</b>	<b>7,879</b>	<b>49.1%</b>
<b>Under 18 years:</b>	<b>1,107</b>	<b>100.0%</b>	<b>142</b>	<b>100.0%</b>	<b>1,874</b>	<b>100.0%</b>
Native	1,107	100.0%	142	100.0%	1,869	99.7%
Foreign born:	0	0.0%	0	0.0%	5	0.3%
Naturalized U.S. citizen	0	0.0%	0	0.0%	5	0.3%
Not a U.S. citizen	0	0.0%	0	0.0%	0	0.0%
<b>18 years and over:</b>	<b>3,355</b>	<b>100.0%</b>	<b>278</b>	<b>100.0%</b>	<b>6,005</b>	<b>100.0%</b>
Native	3,355	100.0%	220	79.1%	5,997	99.9%
Foreign born:	0	0.0%	58	20.9%	8	0.1%
Naturalized U.S. citizen	0	0.0%	2	0.7%	8	0.1%
Not a U.S. citizen	0	0.0%	56	20.1%	0	0.0%

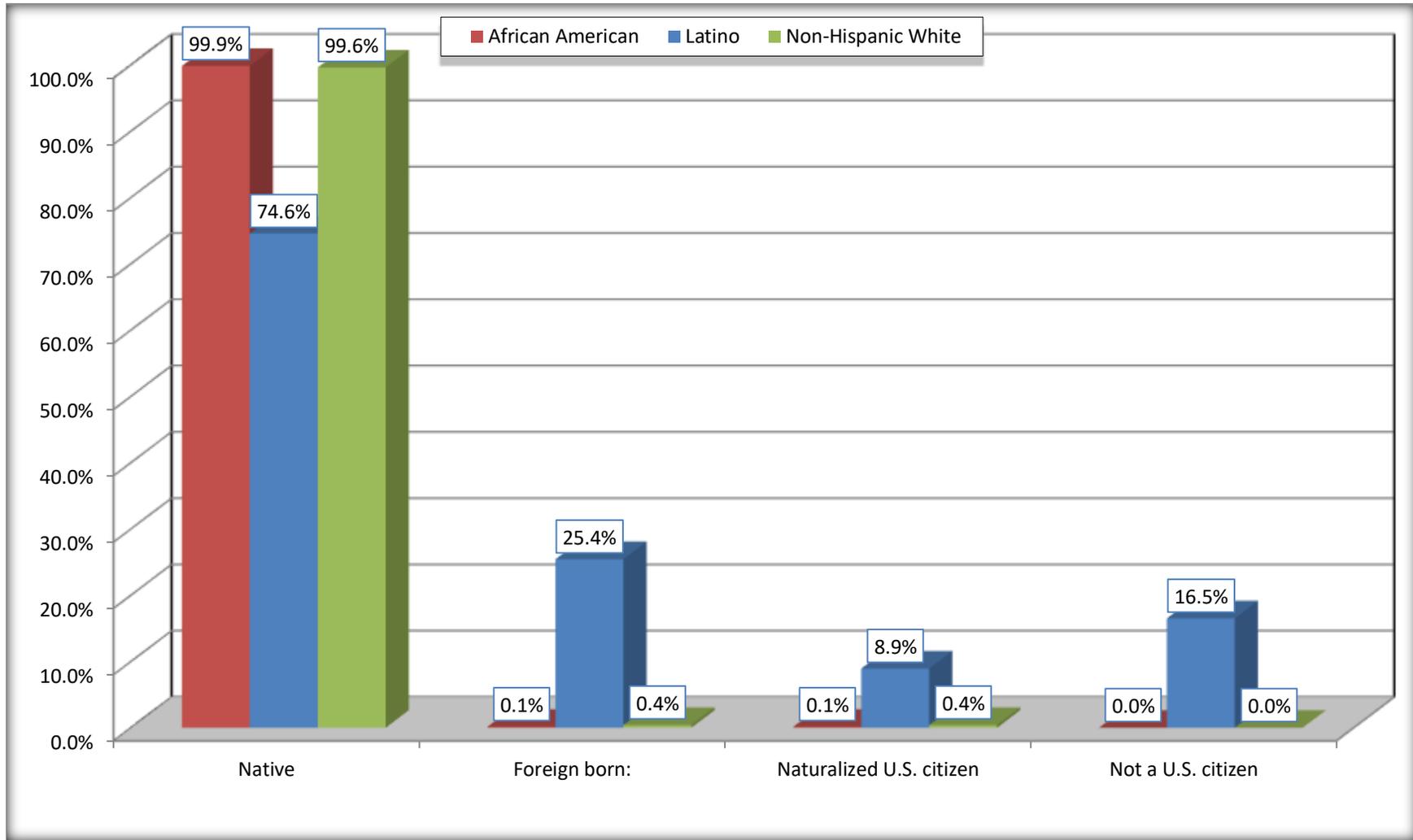
	<b>De Soto Parish, Louisiana</b>					
	African American	% of AA by Age	Latino	% of Latino by Age	White, Not Hispanic	% of NHW by Age
<b>Female:</b>	5,201	53.8%	365	46.5%	8,160	50.9%
<b>Under 18 years:</b>	<b>1,180</b>	<b>100.0%</b>	<b>128</b>	<b>100.0%</b>	<b>1,743</b>	<b>100.0%</b>
Native	1,180	100.0%	128	100.0%	1,743	100.0%
Foreign born:	0	0.0%	0	0.0%	0	0.0%
Naturalized U.S. citizen	0	0.0%	0	0.0%	0	0.0%
Not a U.S. citizen	0	0.0%	0	0.0%	0	0.0%
<b>18 years and over:</b>	<b>4,021</b>	<b>100.0%</b>	<b>237</b>	<b>100.0%</b>	<b>6,417</b>	<b>100.0%</b>
Native	4,010	99.7%	164	69.2%	6,375	99.3%
Foreign born:	11	0.3%	73	30.8%	42	0.7%
Naturalized U.S. citizen	11	0.3%	44	18.6%	42	0.7%
Not a U.S. citizen	0	0.0%	29	12.2%	0	0.0%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

### Citizenship Status of Voting Age Population (18 and Over)

#### De Soto Parish, Louisiana



Source: B05003. SEX BY AGE BY CITIZENSHIP STATUS  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B07004. GEOGRAPHICAL MOBILITY IN THE PAST YEAR BY RACE FOR CURRENT RESIDENCE IN THE UNITED STATES - Universe: POPULATION 1 YEAR AND OVER**  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

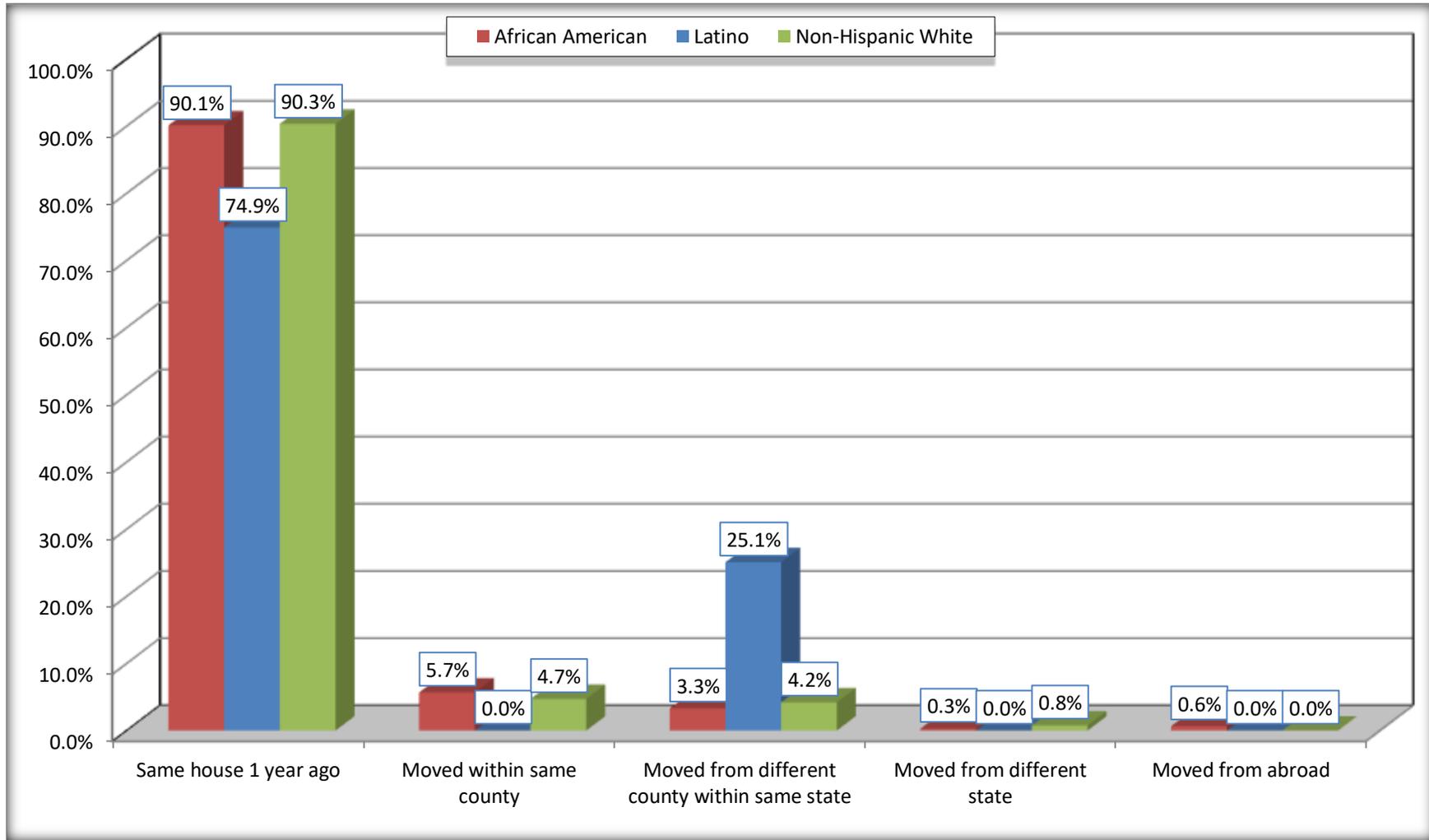
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
Total:	<b>9,473</b>	<b>100.0%</b>	<b>782</b>	<b>100.0%</b>	<b>15,949</b>	<b>100.0%</b>
Same house 1 year ago	8,537	90.1%	586	74.9%	14,409	90.3%
Moved within same county	537	5.7%	0	0.0%	750	4.7%
Moved from different county within same state	313	3.3%	196	25.1%	669	4.2%
Moved from different state	26	0.3%	0	0.0%	121	0.8%
Moved from abroad	60	0.6%	0	0.0%	0	0.0%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Geographical Mobility in the Past Year (Population 1 Year and Over)

### De Soto Parish, Louisiana



Source: B07004. GEOGRAPHICAL MOBILITY IN THE PAST YEAR BY RACE FOR CURRENT RESIDENCE IN THE UNITED STATES - Universe: POPULATION 1 YEAR AND OVER  
 Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B08105. MEANS OF TRANSPORTATION TO WORK - Universe: WORKERS 16 YEARS AND OVER**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

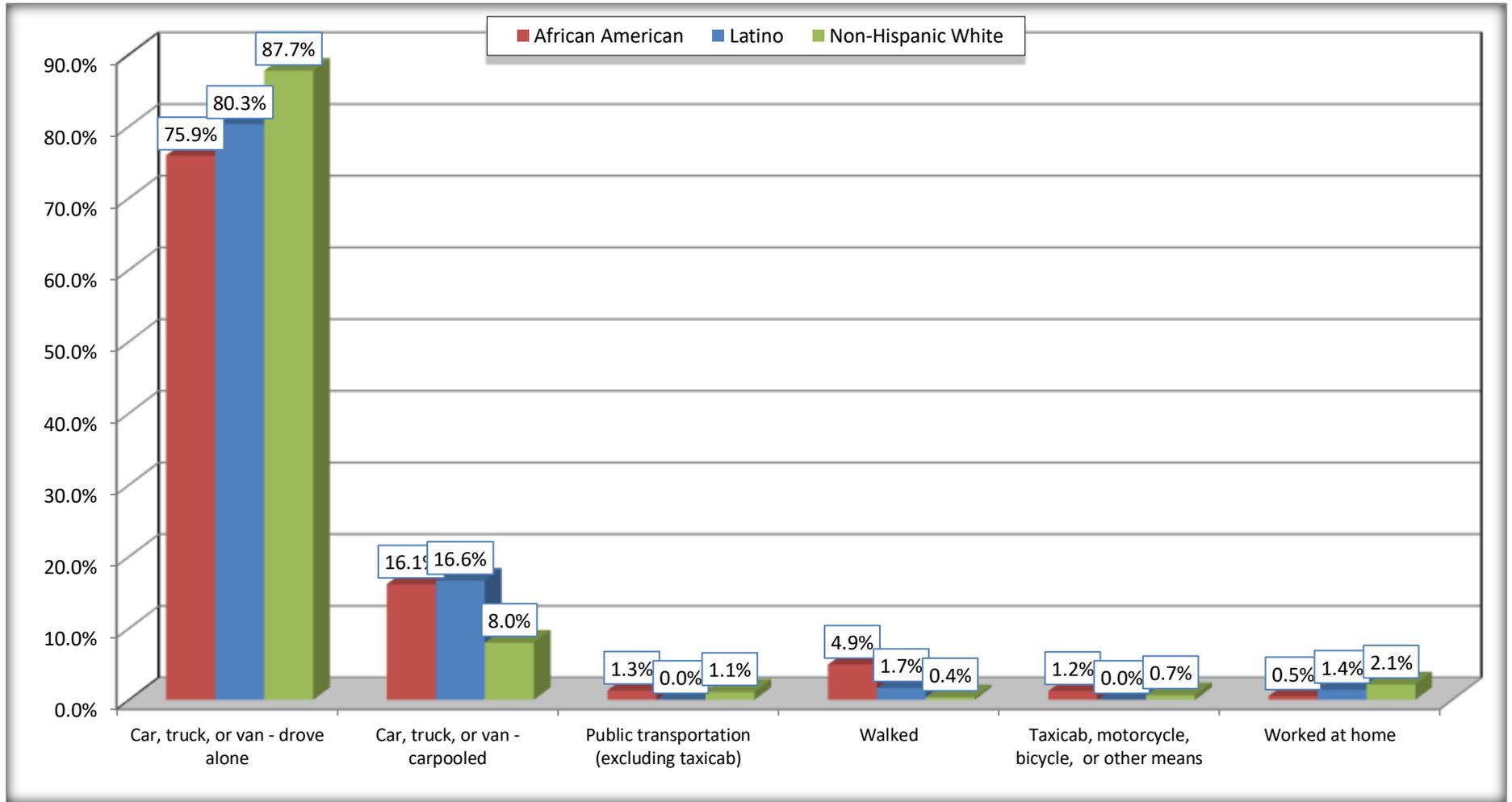
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	3,313	<b>100.0%</b>	421	<b>100.0%</b>	6,839	<b>100.0%</b>
Car, truck, or van - drove alone	2,515	75.9%	338	80.3%	6,001	87.7%
Car, truck, or van - carpooled	534	16.1%	70	16.6%	545	8.0%
Public transportation (excluding taxicab)	43	1.3%	0	0.0%	76	1.1%
Walked	163	4.9%	7	1.7%	25	0.4%
Taxicab, motorcycle, bicycle, or other means	41	1.2%	0	0.0%	45	0.7%
Worked at home	17	0.5%	6	1.4%	147	2.1%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey <http://www.census.gov/acs/www/UseData/index.htm>

## Means of Transportation to Work (Workers 16 Years and Over)

### De Soto Parish, Louisiana



Source: B08105. MEANS OF TRANSPORTATION TO WORK - Universe: WORKERS 16 YEARS AND OVER  
 Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B11002. HOUSEHOLD TYPE BY RELATIVES AND NONRELATIVES FOR POPULATION IN HOUSEHOLDS**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

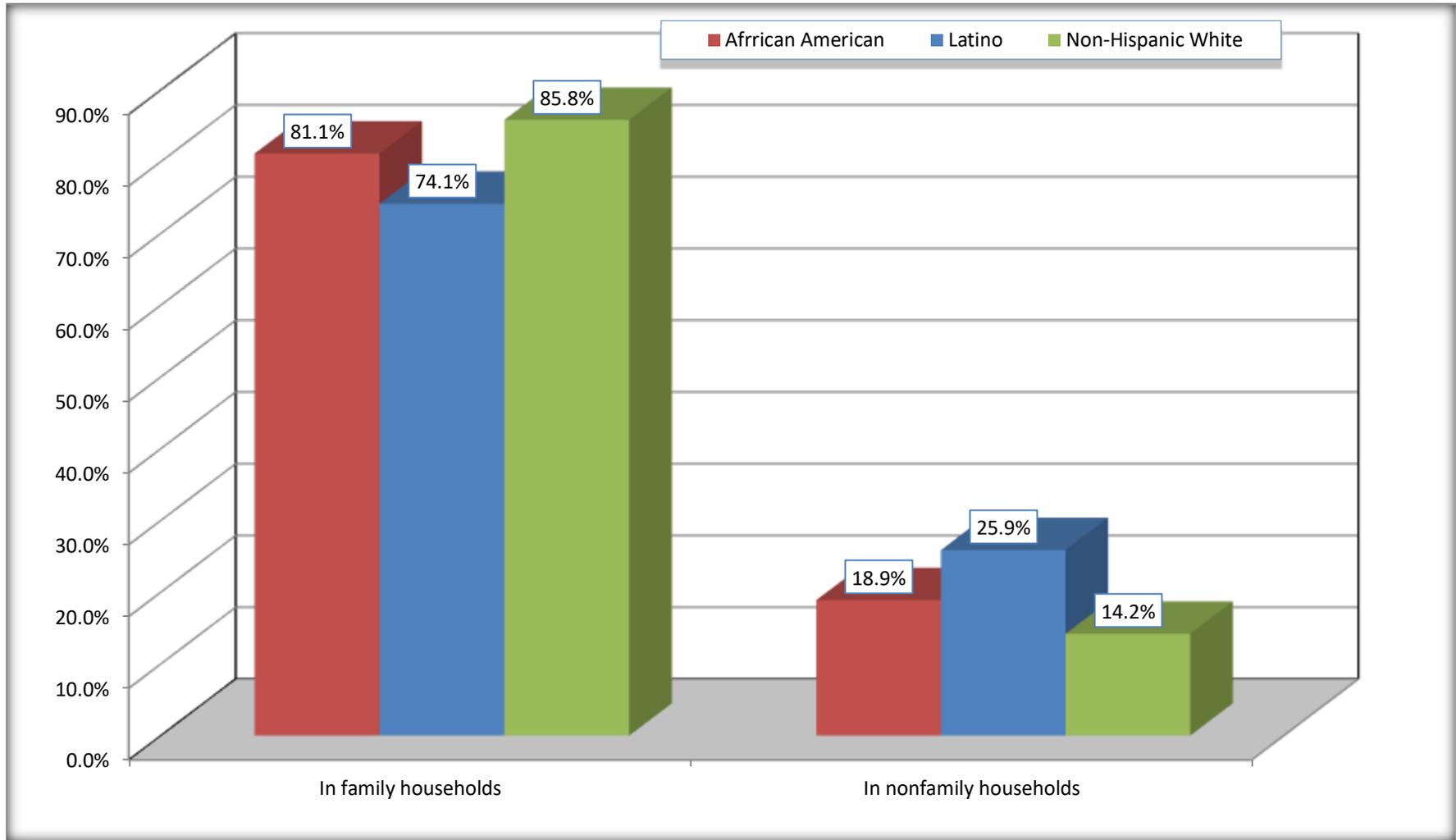
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	9,498	<b>100.0%</b>	522	<b>100.0%</b>	16,380	<b>100.0%</b>
In family households	7,704	81.1%	387	74.1%	14,055	85.8%
In nonfamily households	1,794	18.9%	135	25.9%	2,325	14.2%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Household Type for Population in Households

### De Soto Parish, Louisiana



Source: B11002. HOUSEHOLD TYPE BY RELATIVES AND NONRELATIVES FOR POPULATION IN HOUSEHOLDS  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B12002. MARITAL STATUS FOR THE POPULATION 15 YEARS AND OVER**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

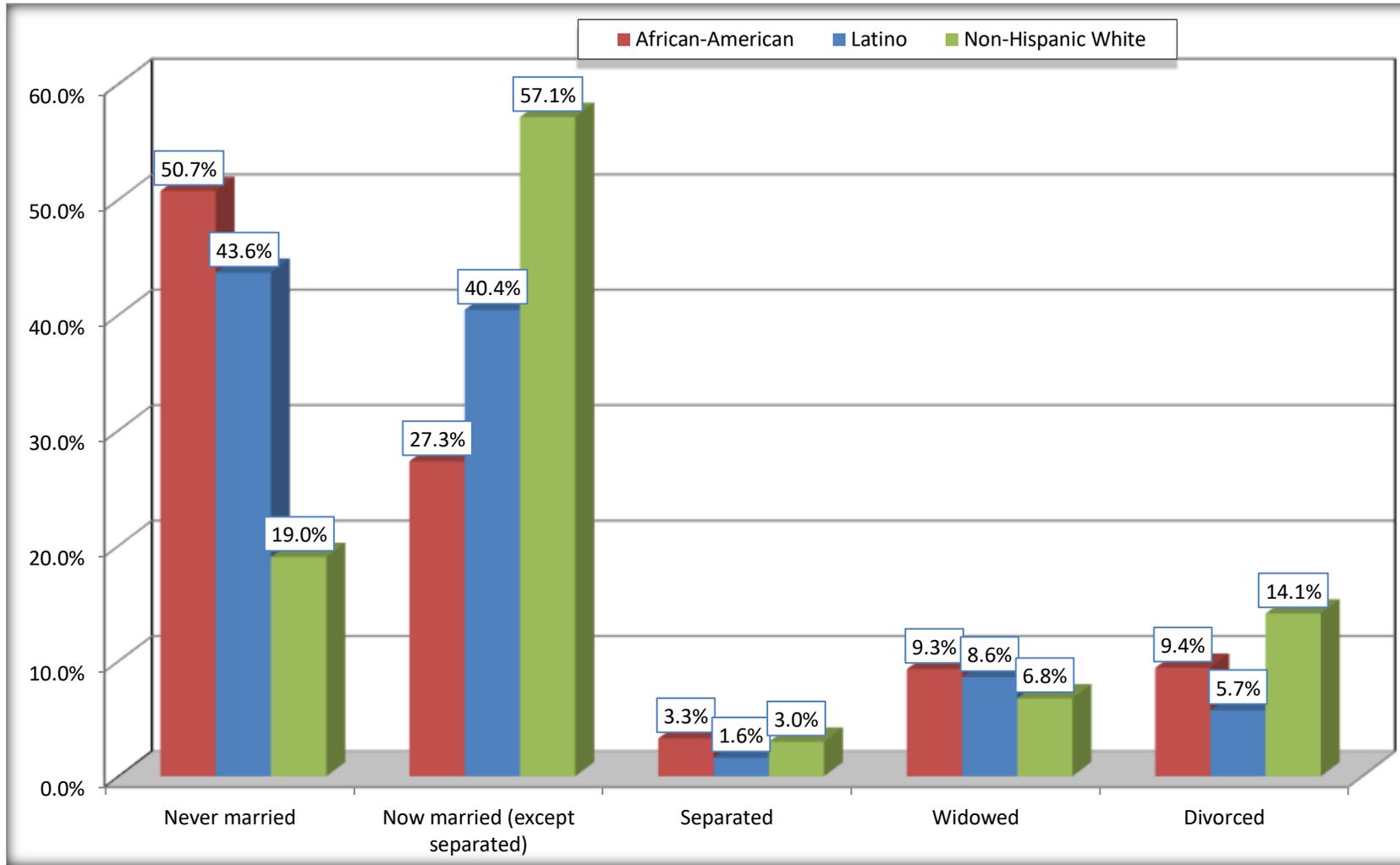
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>7,781</b>	<b>100.0%</b>	<b>559</b>	<b>100.0%</b>	<b>13,050</b>	<b>100.0%</b>
Never married	3,947	50.7%	244	43.6%	2,480	19.0%
Now married (except separated)	2,124	27.3%	226	40.4%	7,456	57.1%
Separated	255	3.3%	9	1.6%	391	3.0%
Widowed	723	9.3%	48	8.6%	882	6.8%
Divorced	732	9.4%	32	5.7%	1,841	14.1%
<b>Male:</b>	<b>3,549</b>	<b>45.6%</b>	<b>278</b>	<b>49.7%</b>	<b>6,322</b>	<b>48.4%</b>
Never married	2,002	25.7%	147	26.3%	1,348	10.3%
Now married (except separated)	1,026	13.2%	63	11.3%	3,789	29.0%
Separated	91	1.2%	0	0.0%	201	1.5%
Widowed	151	1.9%	40	7.2%	121	0.9%
Divorced	279	3.6%	28	5.0%	863	6.6%
<b>Female:</b>	<b>4,232</b>	<b>54.4%</b>	<b>281</b>	<b>50.3%</b>	<b>6,728</b>	<b>51.6%</b>
Never married	1,945	25.0%	97	17.4%	1,132	8.7%
Now married (except separated)	1,098	14.1%	163	29.2%	3,667	28.1%
Separated	164	2.1%	9	1.6%	190	1.5%
Widowed	572	7.4%	8	1.4%	761	5.8%
Divorced	453	5.8%	4	0.7%	978	7.5%

Source: U.S. Census Bureau, 2015-2019 American Community

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

### Marital Status for the Population 15 Years and Over

#### De Soto Parish, Louisiana



Source: B12002. MARITAL STATUS FOR THE POPULATION 15 YEARS AND OVER  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**C15002. SEX BY EDUCATIONAL ATTAINMENT FOR THE POPULATION 25 YEARS AND OVER**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

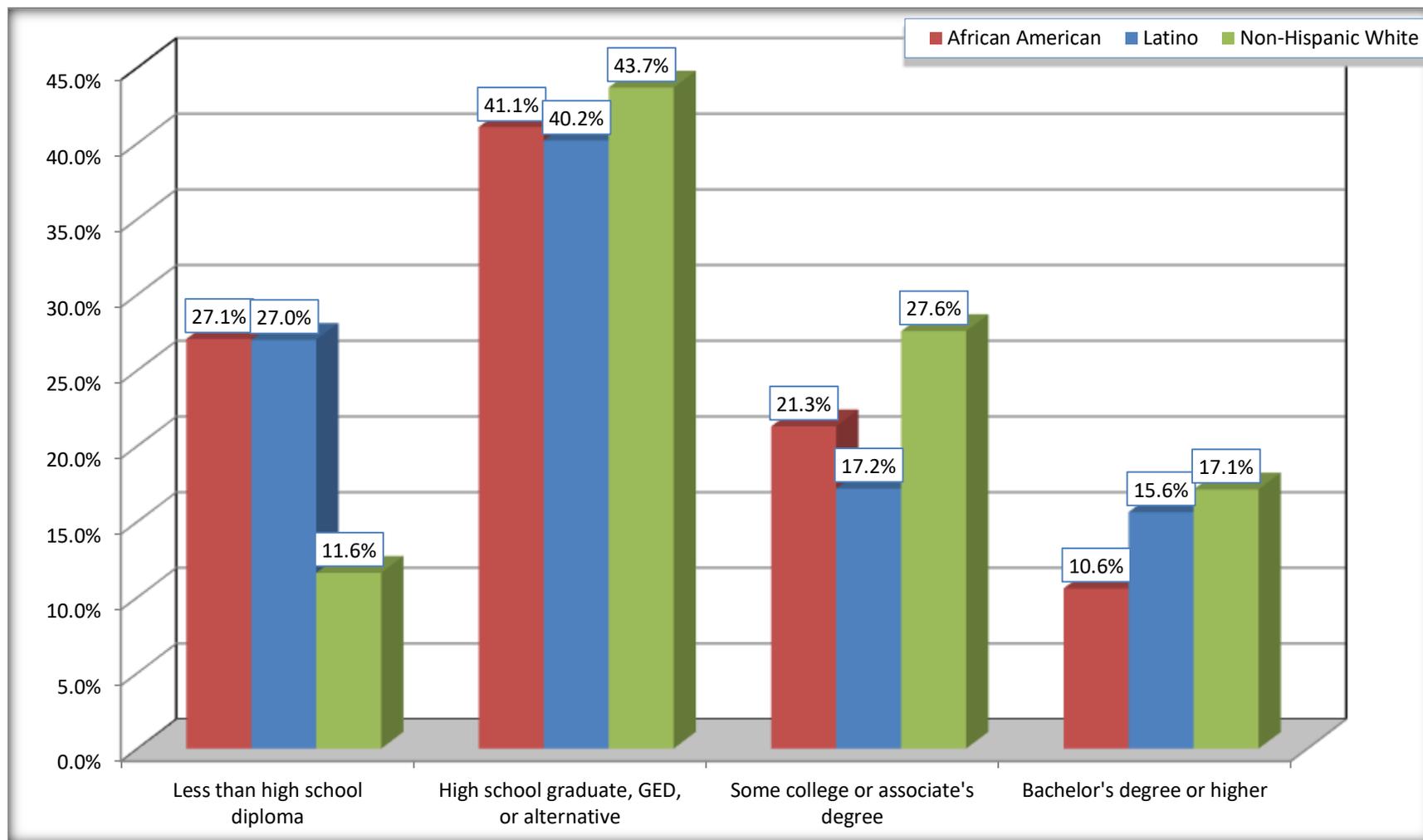
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>6,435</b>	<b>100.0%</b>	<b>448</b>	<b>100.0%</b>	<b>11,400</b>	<b>100.0%</b>
Less than high school diploma	1,742	27.1%	121	27.0%	1,324	11.6%
High school graduate, GED, or alternative	2,642	41.1%	180	40.2%	4,979	43.7%
Some college or associate's degree	1,370	21.3%	77	17.2%	3,145	27.6%
Bachelor's degree or higher	681	10.6%	70	15.6%	1,952	17.1%
Male:	2,899	45.1%	251	56.0%	5,468	48.0%
Less than high school diploma	974	15.1%	108	24.1%	491	4.3%
High school graduate, GED, or alternative	1,224	19.0%	79	17.6%	2,835	24.9%
Some college or associate's degree	489	7.6%	42	9.4%	1,460	12.8%
Bachelor's degree or higher	212	3.3%	22	4.9%	682	6.0%
Female:	3,536	54.9%	197	44.0%	5,932	52.0%
Less than high school diploma	768	11.9%	13	2.9%	833	7.3%
High school graduate, GED, or alternative	1,418	22.0%	101	22.5%	2,144	18.8%
Some college or associate's degree	881	13.7%	35	7.8%	1,685	14.8%
Bachelor's degree or higher	469	7.3%	48	10.7%	1,270	11.1%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Educational Attainment for the Population 25 Years and Older

### De Soto Parish, Louisiana



Source: C15002. SEX BY EDUCATIONAL ATTAINMENT FOR THE POPULATION 25 YEARS AND OVER  
 Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B16005. NATIVITY BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

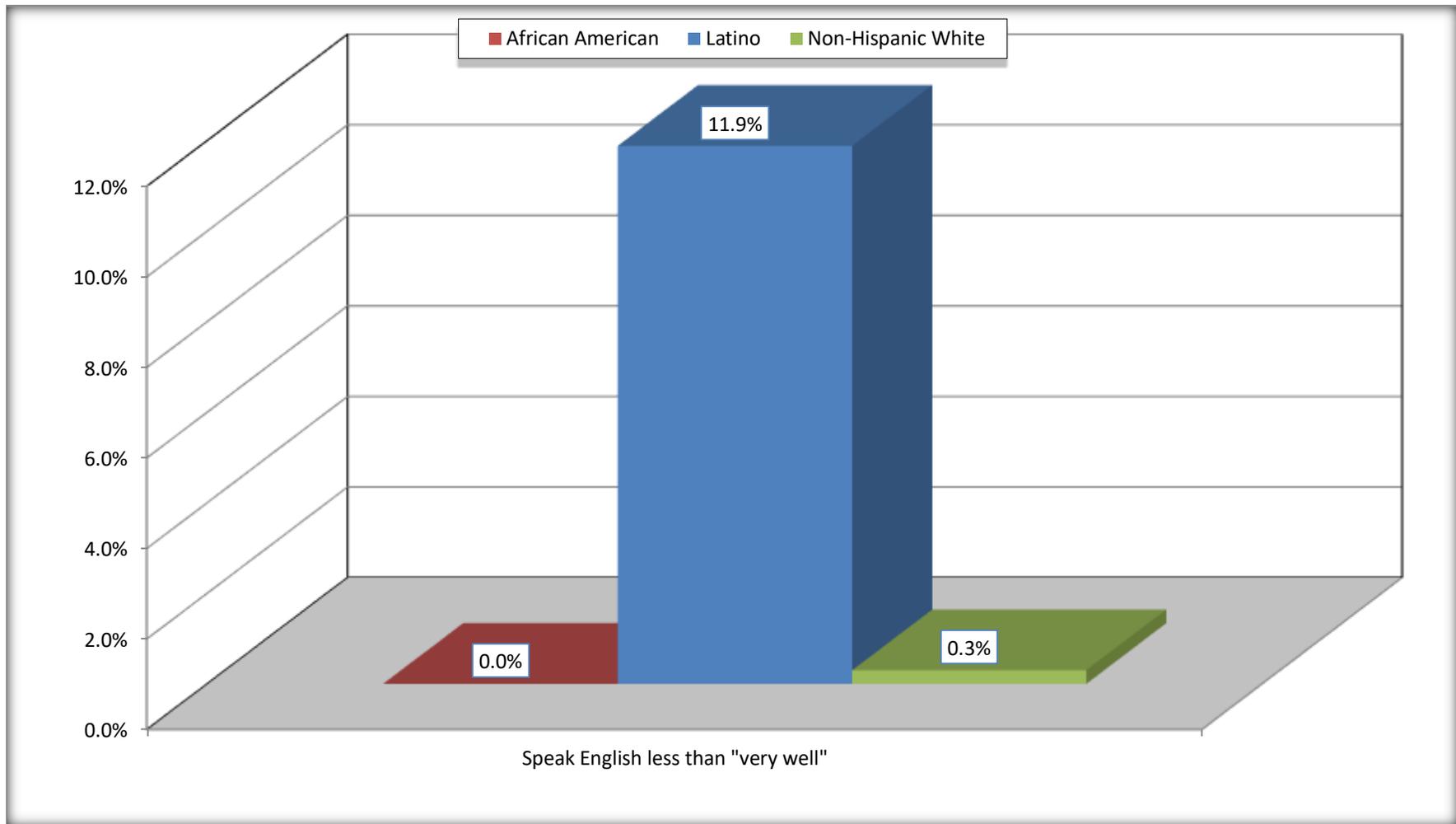
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>9,082</b>	<b>100.0%</b>	<b>648</b>	<b>100.0%</b>	<b>15,150</b>	<b>100.0%</b>
Speak only English	8,936	98.4%	480	74.1%	14,949	98.7%
Speak another language	146	1.6%	168	25.9%	201	1.3%
Speak English "very well"	146	1.6%	91	14.0%	155	1.0%
Speak English less than "very well"	0	0.0%	77	11.9%	46	0.3%
Native:	9,071	99.9%	517	79.8%	15,095	99.6%
Speak only English	8,925	98.3%	444	68.5%	14,941	98.6%
Speak another language	146	1.6%	73	11.3%	154	1.0%
Speak English "very well"	146	1.6%	51	7.9%	127	0.8%
Speak English less than "very well"	0	0.0%	22	3.4%	27	0.2%
Foreign born:	11	0.1%	131	20.2%	55	0.4%
Speak only English	11	0.1%	36	5.6%	8	0.1%
Speak another language	0	0.0%	95	14.7%	47	0.3%
Speak English "very well"	0	0.0%	40	6.2%	28	0.2%
Speak English less than "very well"	0	0.0%	55	8.5%	19	0.1%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Speak English Less than "Very Well" (Population 5 Years and Over)

### De Soto Parish, Louisiana



Source: B16005. NATIVITY BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER

Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B17010. POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES BY FAMILY TYPE BY PRESENCE OF RELATED CHILDREN UNDER 18 YEARS**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

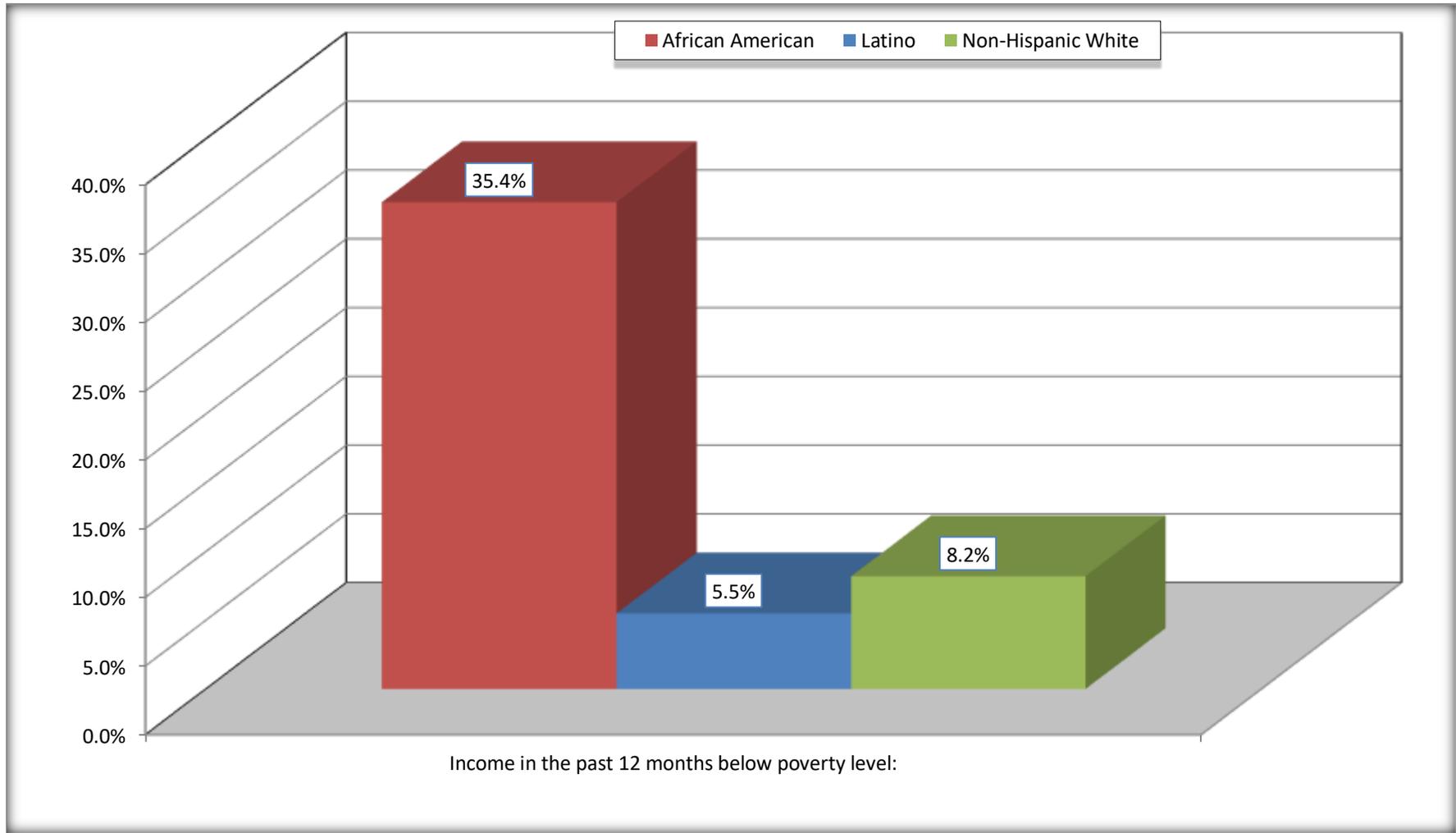
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>2,412</b>	<b>100.0%</b>	<b>146</b>	<b>100.0%</b>	<b>4,608</b>	<b>100.0%</b>
Income in the past 12 months below poverty level:	855	35.4%	8	5.5%	376	8.2%
Married-couple family:	60	2.5%	0	0.0%	128	2.8%
With related children under 18 years	13	0.5%	0	0.0%	68	1.5%
Other family:	795	33.0%	8	5.5%	248	5.4%
Male householder, no wife present	50	2.1%	0	0.0%	54	1.2%
With related children under 18 years	44	1.8%	0	0.0%	0	0.0%
Female householder, no husband present	745	30.9%	8	5.5%	194	4.2%
With related children under 18 years	553	22.9%	8	5.5%	191	4.1%
level:	1,557	64.6%	138	94.5%	4,232	91.8%
Married-couple family:	808	33.5%	126	86.3%	3,492	75.8%
With related children under 18 years	309	12.8%	81	55.5%	1,461	31.7%
Other family:	749	31.1%	12	8.2%	740	16.1%
Male householder, no wife present	161	6.7%	0	0.0%	299	6.5%
With related children under 18 years	62	2.6%	0	0.0%	228	4.9%
Female householder, no husband present	588	24.4%	12	8.2%	441	9.6%
With related children under 18 years	274	11.4%	0	0.0%	315	6.8%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Family Households Below Poverty in the Past 12 Months

### De Soto Parish, Louisiana

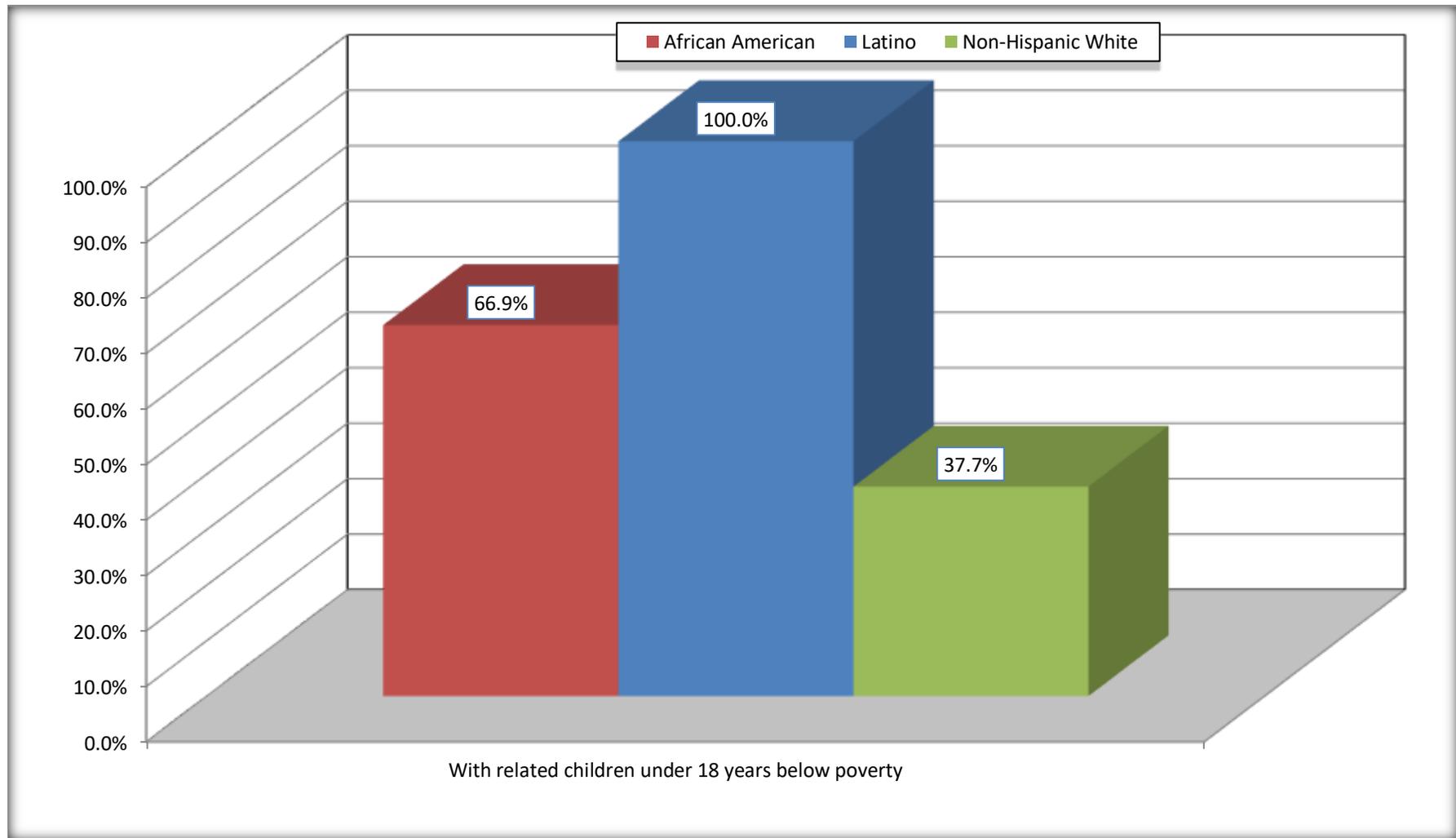


Source: B17010. POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES BY FAMILY TYPE BY PRESENCE OF RELATED CHILDREN UNDER 18 YEARS

Data Set: 2015-2019 American Community Survey 5-Year Estimates

## Female-headed Households with Related Children Below Poverty in the Past 12 Months

### De Soto Parish, Louisiana



Source: B17010. POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES BY FAMILY TYPE BY PRESENCE OF RELATED CHILDREN UNDER 18 YEARS  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B17020 POVERTY STATUS IN THE PAST 12 MONTHS BY AGE - Universe: POPULATION FOR WHOM****POVERTY STATUS IS DETERMINED**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

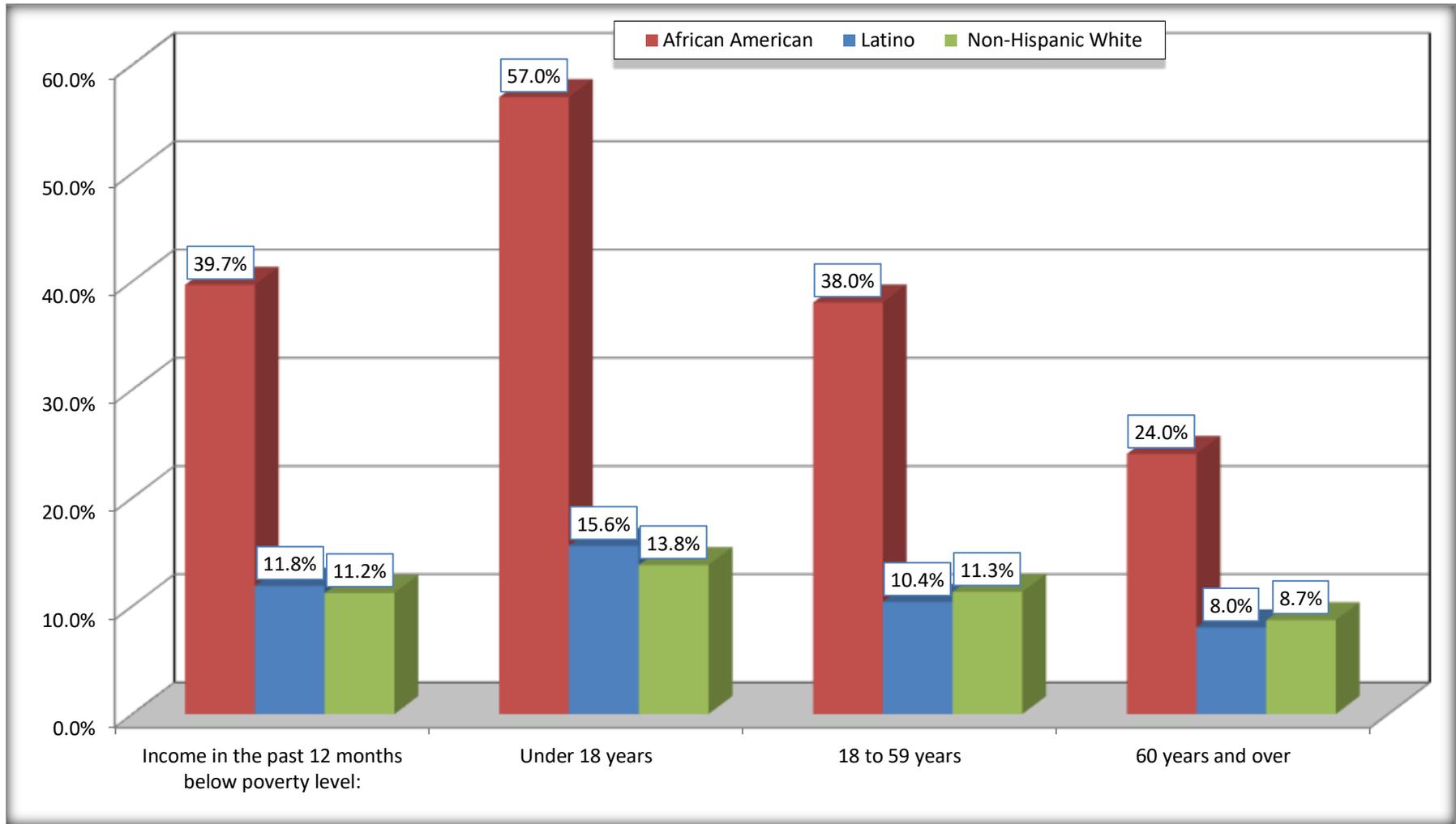
	De Soto Parish, Louisiana					
	African American	% of AA By Age	Latino	% of Latino Total	White, Not Hispanic	% of NHW By Age
<b>Total:</b>	<b>9,541</b>	<b>100.0%</b>	<b>785</b>	<b>100.0%</b>	<b>15,942</b>	<b>100.0%</b>
Income in the past 12 months below poverty level:	3,784	39.7%	93	11.8%	1,782	11.2%
<b>Under 18 years</b>	1,295	57.0%	42	15.6%	497	13.8%
<b>18 to 59 years</b>	2,016	38.0%	43	10.4%	929	11.3%
<b>60 years and over</b>	473	24.0%	8	8.0%	356	8.7%
Income in the past 12 months at or above poverty	5,757	60.3%	692	88.2%	14,160	88.8%
<b>Under 18 years</b>	977	43.0%	228	84.4%	3,112	86.2%
<b>18 to 59 years</b>	3,285	62.0%	372	89.6%	7,303	88.7%
<b>60 years and over</b>	1,495	76.0%	92	92.0%	3,745	91.3%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Population Below Poverty in the Past 12 Months

### De Soto Parish, Louisiana



Source: B17020 POVERTY STATUS IN THE PAST 12 MONTHS BY AGE - Universe: POPULATION FOR WHOM POVERTY STATUS IS DETERMINED  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B19001. HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS)**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

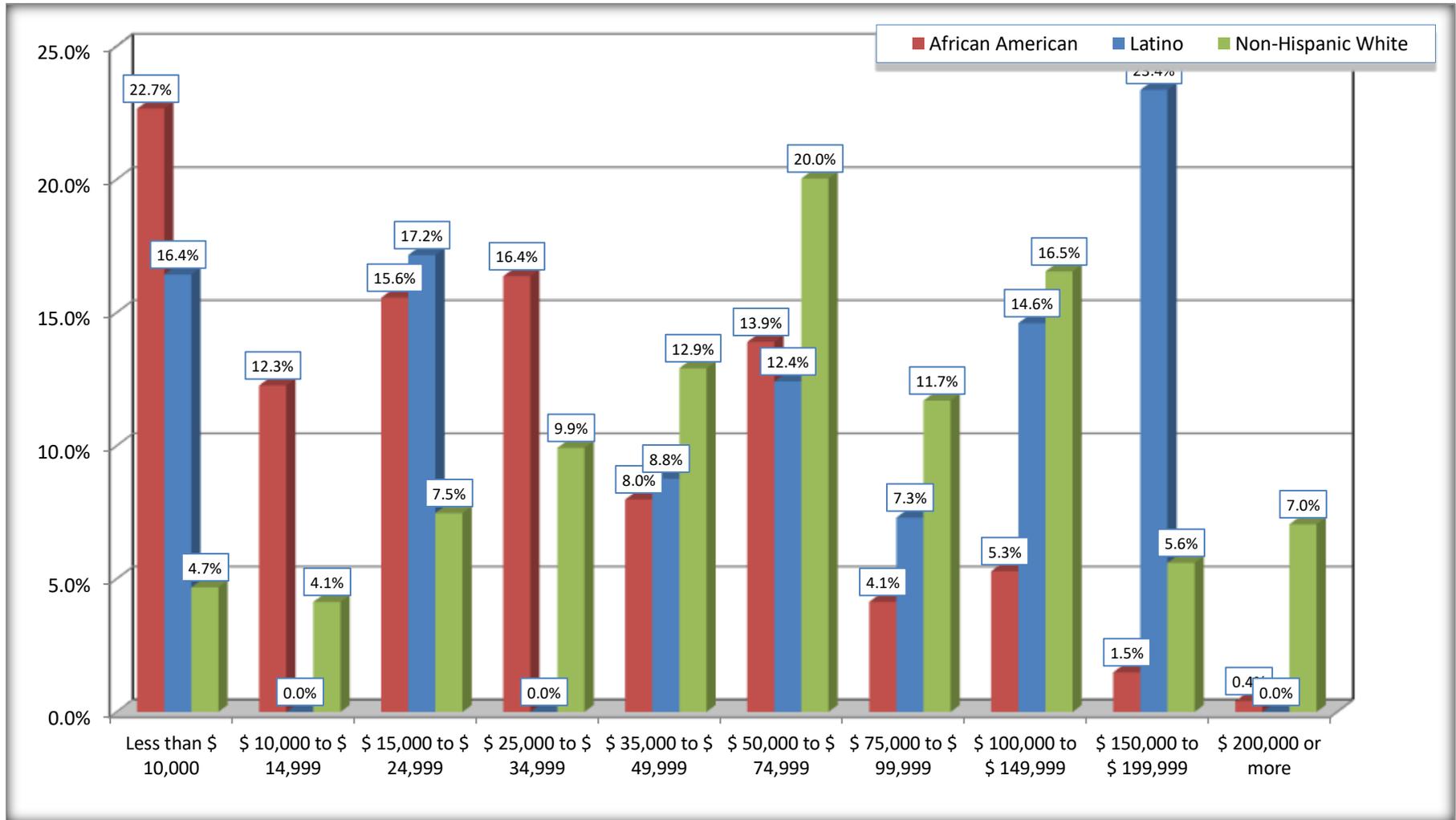
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>3,973</b>	<b>100.0%</b>	<b>274</b>	<b>100.0%</b>	<b>6,415</b>	<b>100.0%</b>
Less than \$ 10,000	900	22.7%	45	16.4%	300	4.7%
\$ 10,000 to \$ 14,999	487	12.3%	0	0.0%	265	4.1%
\$ 15,000 to \$ 24,999	618	15.6%	47	17.2%	479	7.5%
\$ 25,000 to \$ 34,999	650	16.4%	0	0.0%	636	9.9%
\$ 35,000 to \$ 49,999	317	8.0%	24	8.8%	828	12.9%
\$ 50,000 to \$ 74,999	552	13.9%	34	12.4%	1,285	20.0%
\$ 75,000 to \$ 99,999	164	4.1%	20	7.3%	750	11.7%
\$ 100,000 to \$ 149,999	210	5.3%	40	14.6%	1,061	16.5%
\$ 150,000 to \$ 199,999	59	1.5%	64	23.4%	359	5.6%
\$ 200,000 or more	16	0.4%	0	0.0%	452	7.0%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Household Income in the Past 12 Months

### De Soto Parish, Louisiana



Source: B19001. HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS)  
 Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B19013. MEDIAN HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS)**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

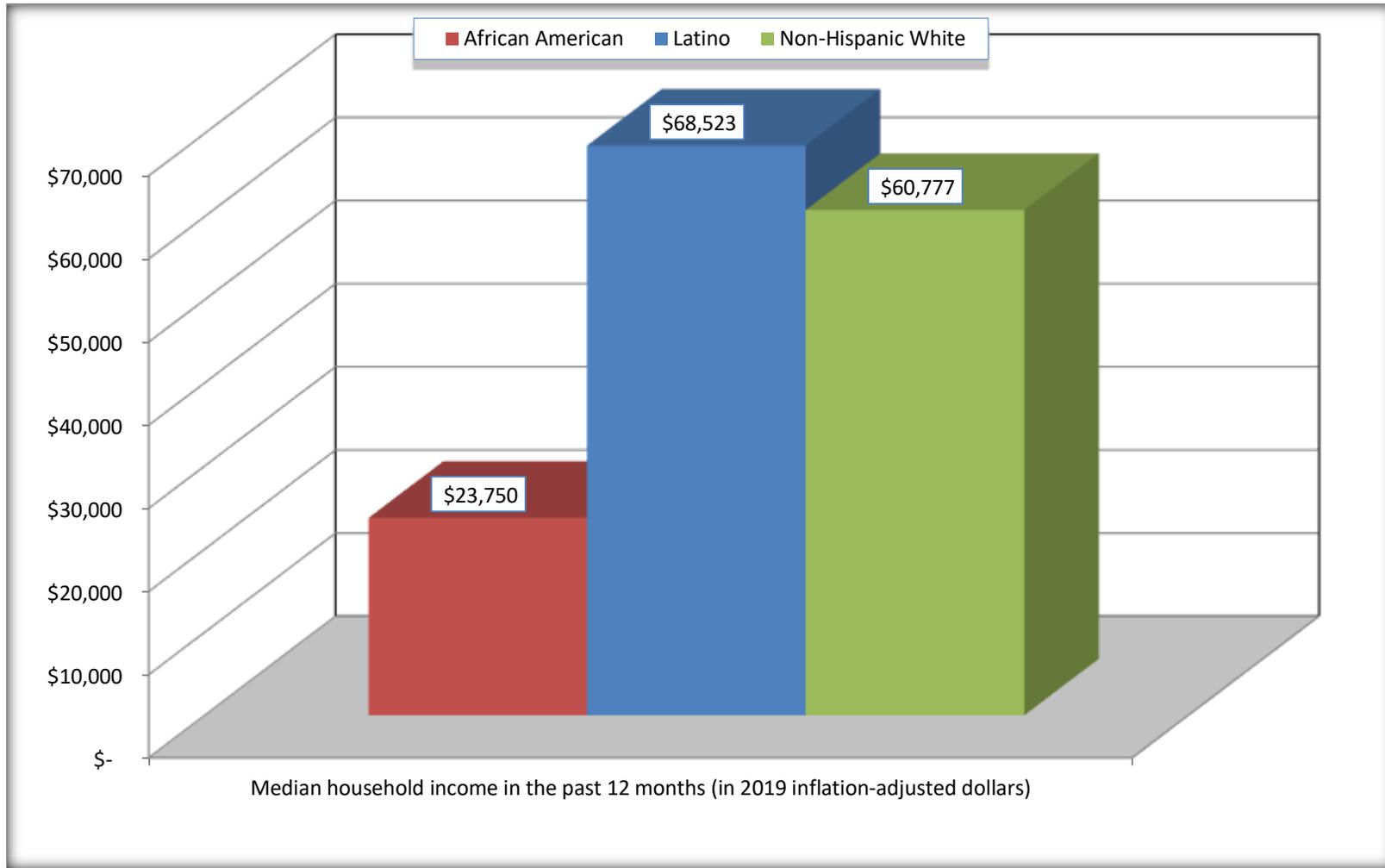
	De Soto Parish, Louisiana		
	African American	Latino	White, Not Hispanic
Median household income in the past 12 months (in 2019 inflation-adjusted dollars)	\$ 23,750	\$ 68,523	\$ 60,777

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Median Household Income in the Past 12 Months

### De Soto Parish, Louisiana



Source: B19013. MEDIAN HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS)  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B19101. FAMILY INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS)**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

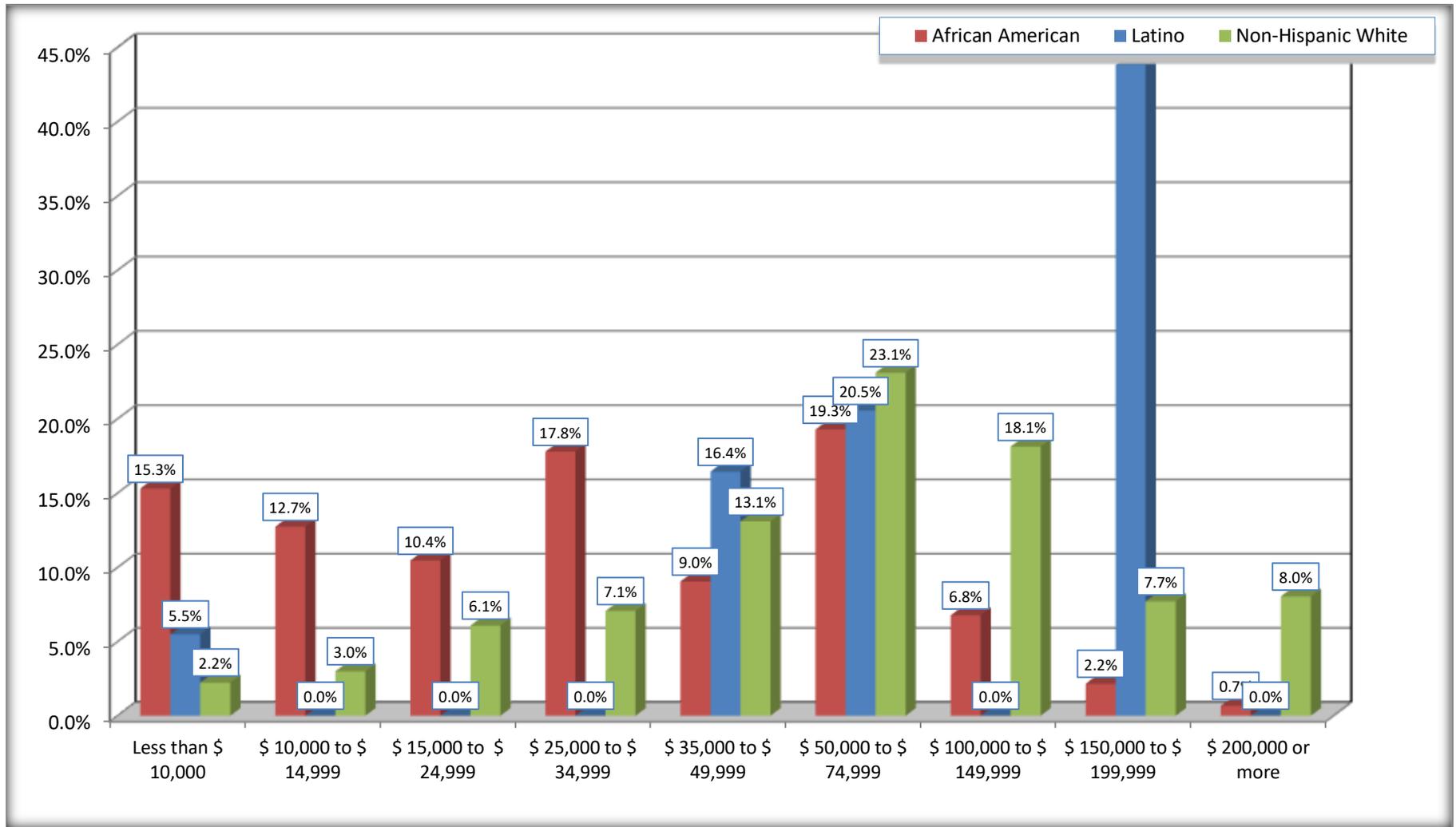
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>2,412</b>	<b>100.0%</b>	<b>146</b>	<b>100.0%</b>	<b>4,608</b>	<b>100.0%</b>
Less than \$ 10,000	369	15.3%	8	5.5%	103	2.2%
\$ 10,000 to \$ 14,999	307	12.7%	0	0.0%	138	3.0%
\$ 15,000 to \$ 24,999	<b>252</b>	<b>10.4%</b>	<b>0</b>	<b>0.0%</b>	<b>280</b>	<b>6.1%</b>
\$ 25,000 to \$ 34,999	<b>429</b>	<b>17.8%</b>	<b>0</b>	<b>0.0%</b>	<b>325</b>	<b>7.1%</b>
\$ 35,000 to \$ 49,999	<b>218</b>	<b>9.0%</b>	<b>24</b>	<b>16.4%</b>	<b>603</b>	<b>13.1%</b>
\$ 50,000 to \$ 74,999	<b>465</b>	<b>19.3%</b>	<b>30</b>	<b>20.5%</b>	<b>1,064</b>	<b>23.1%</b>
\$ 100,000 to \$ 149,999	<b>163</b>	<b>6.8%</b>	-	<b>0.0%</b>	<b>835</b>	18.1%
\$ 150,000 to \$ 199,999	52	2.2%	64	43.8%	355	7.7%
\$ 200,000 or more	16	0.7%	0	0.0%	370	8.0%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Family Income in the Past 12 Months

### De Soto Parish, Louisiana



Source: B19101. FAMILY INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS)  
 Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B19202. MEDIAN NONFAMILY HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS)**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

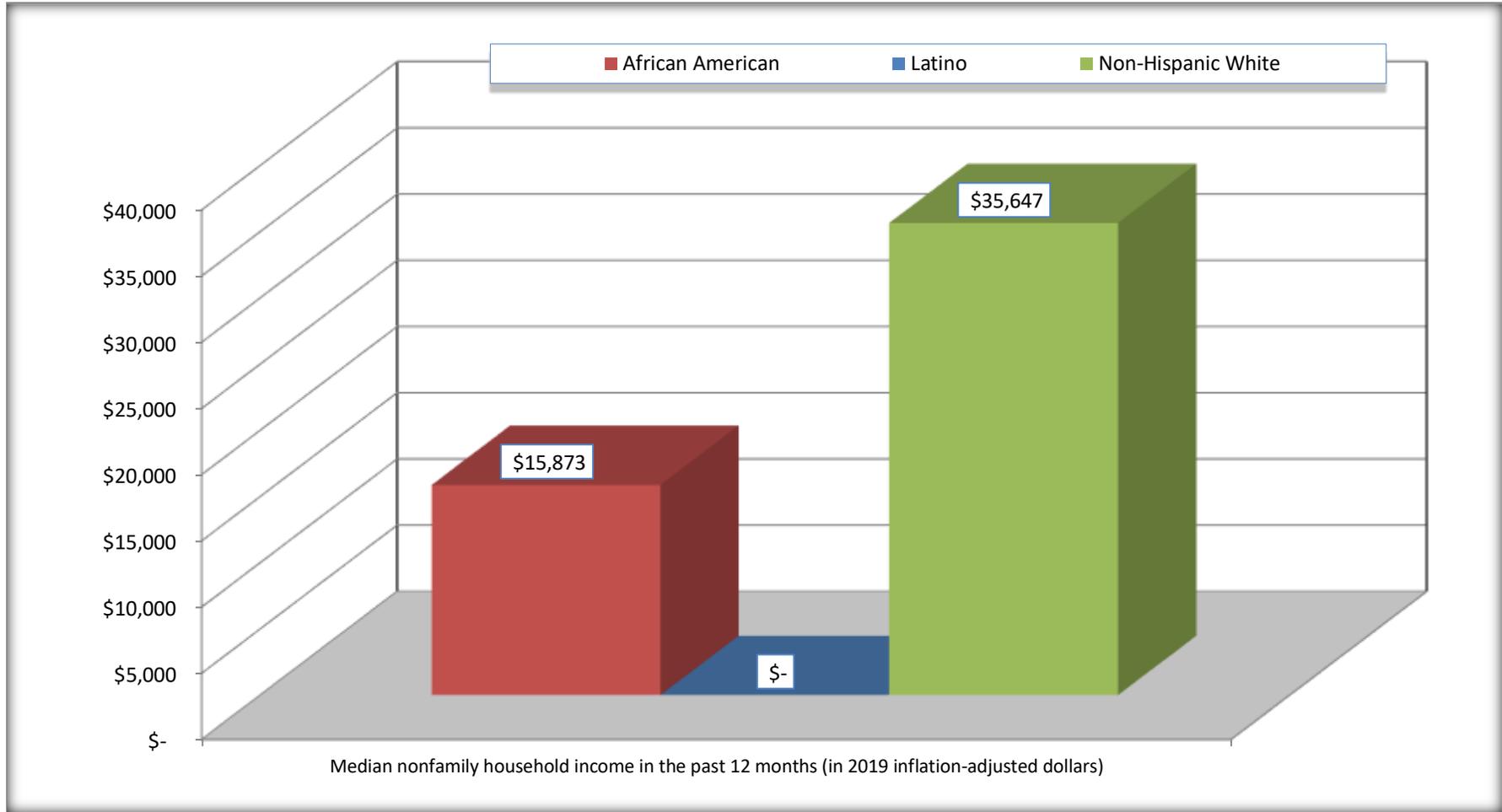
	De Soto Parish, Louisiana		
	African American	Latino	White, Not Hispanic
Median nonfamily household income in the past 12 months (in 2019 inflation-adjusted dollars)	\$ 15,873	-	\$ 35,647

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

### Median Non-Family Income in the Past 12 Months

#### De Soto Parish, Louisiana



Source: B19202. MEDIAN NONFAMILY HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS)  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B19301. PER CAPITA INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS)**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

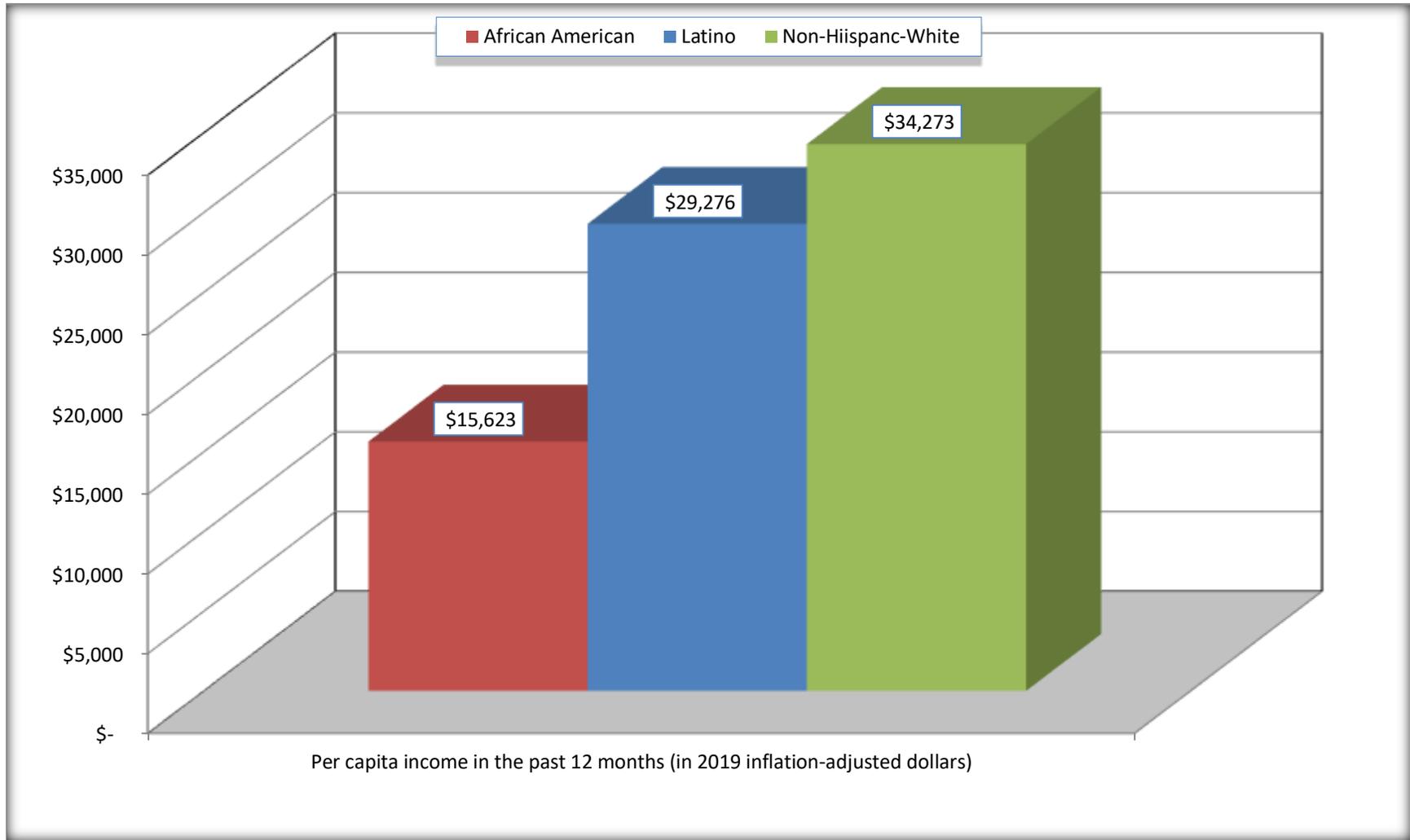
	De Soto Parish, Louisiana		
	African American	Latino	White, Not Hispanic
Per capita income in the past 12 months (in 2019 inflation-adjusted dollars)	\$ 15,623	\$ 29,276	\$ 34,273

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

### Per capita Income in the Past 12 Months

#### De Soto Parish, Louisiana



Source: B19301. PER CAPITA INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS)  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B20017. MEDIAN EARNINGS IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS) BY SEX BY WORK EXPERIENCE IN THE PAST 12 MONTHS FOR THE POPULATION 16 YEARS AND OVER WITH EARNINGS IN THE PAST 12 MONTHS**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

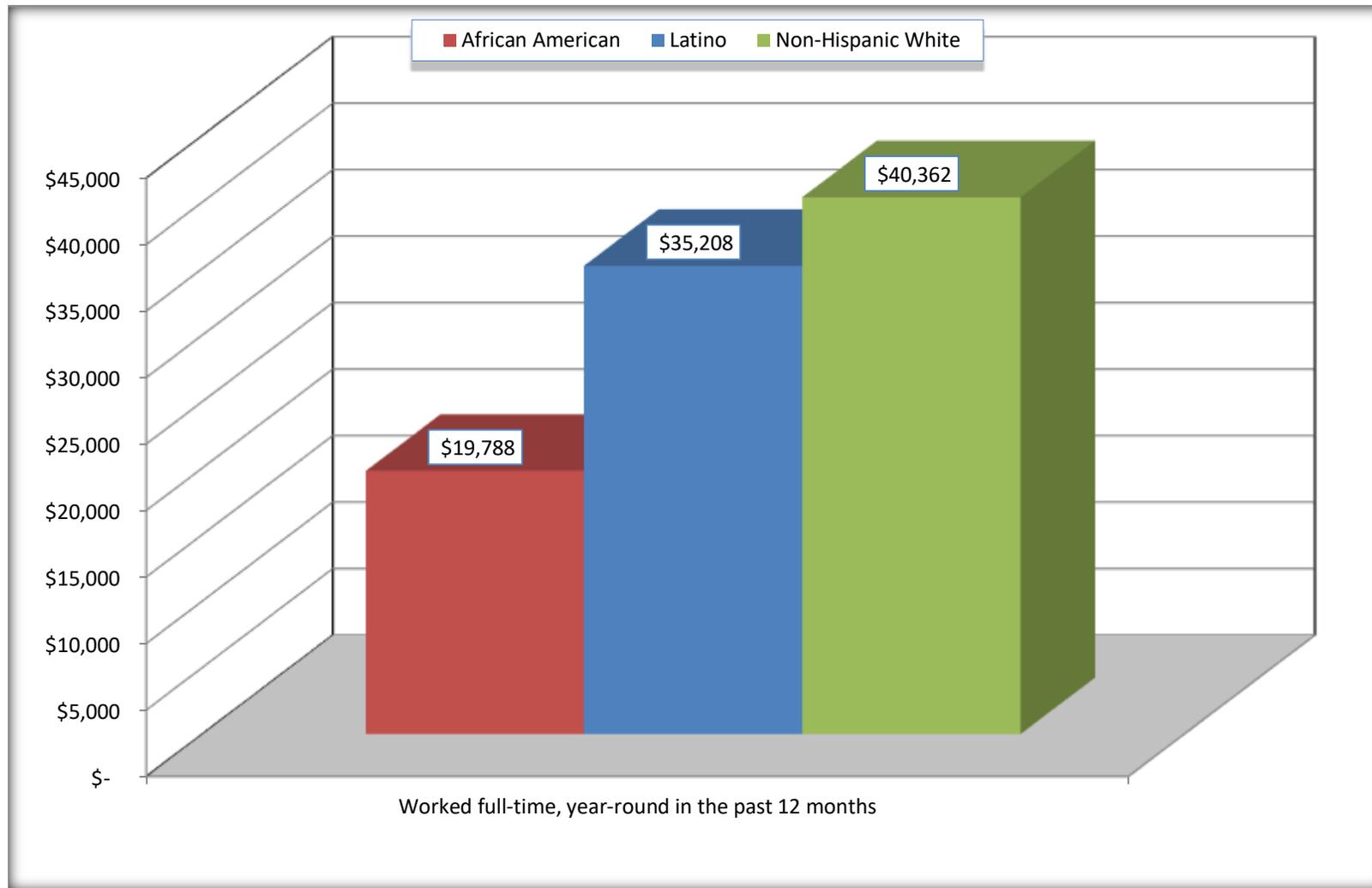
	De Soto Parish, Louisiana		
	African American	Latino	White, Not Hispanic
Median earnings in the past 12 months (in 2019 inflation-adjusted dollars) --			
Total:	\$ 19,788	\$ 35,208	\$ 40,362
Male --			
Total	\$ 24,095	\$ -	\$ 50,550
Worked full-time, year-round in the past 12 months	\$ 34,042	\$ -	\$ 57,784
Other	\$ 10,194	\$ 20,357	\$ 13,784
Female --			
Total	\$ 16,407	\$ 55,729	\$ 29,400
Worked full-time, year-round in the past 12 months	\$ 23,851	\$ 59,167	\$ 47,620
Other	\$ 7,160	\$ -	\$ 11,087

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Median earnings in the Past 12 Months (16 Years and Over with Earnings)

### De Soto Parish, Louisiana



Source: B2017. MEDIAN EARNINGS IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS) BY SEX BY WORK EXPERIENCE IN THE PAST  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B20005. SEX BY WORK EXPERIENCE IN THE PAST 12 MONTHS BY EARNINGS IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS) FOR THE POPULATION 16 YEARS AND OVER**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>7,623</b>	<b>100.0%</b>	<b>559</b>	<b>100.0%</b>	<b>12,747</b>	<b>100.0%</b>
Worked full-time, year-round in the past 12 months:	2,336	30.6%	338	60.5%	5,257	41.2%
No earnings	0	0.0%	0	0.0%	0	0.0%
With earnings:	2,336	30.6%	338	60.5%	5,257	41.2%
\$ 1 to \$ 9,999 or loss	54	0.7%	0	0.0%	14	0.1%
\$ 10,000 to \$ 19,999	513	6.7%	19	3.4%	143	1.1%
\$ 20,000 to \$ 29,999	617	8.1%	71	12.7%	911	7.1%
\$ 30,000 to \$ 49,999	652	8.6%	45	8.1%	1,240	9.7%
\$ 50,000 to \$ 74,999	269	3.5%	139	24.9%	1,618	12.7%
\$ 75,000 or more	231	3.0%	64	11.4%	1,331	10.4%
Other:	5,287	69.4%	221	39.5%	7,490	58.8%
No earnings	3,461	45.4%	132	23.6%	5,102	40.0%
With earnings: less than full time, year-round	1,826	24.0%	89	15.9%	2,388	18.7%
<b>Male:</b>	<b>3,465</b>	<b>45.5%</b>	<b>278</b>	<b>49.7%</b>	<b>6,199</b>	<b>48.6%</b>
Worked full-time, year-round in the past 12 months:	999	13.1%	186	33.3%	3,054	24.0%
No earnings	0	0.0%	0	0.0%	0	0.0%
With earnings:	999	13.1%	186	33.3%	3,054	24.0%
\$ 1 to \$ 9,999 or loss	38	0.5%	0	0.0%	11	0.1%
\$ 10,000 to \$ 19,999	97	1.3%	19	3.4%	42	0.3%
\$ 20,000 to \$ 29,999	182	2.4%	59	10.6%	367	2.9%
\$ 30,000 to \$ 49,999	389	5.1%	17	3.0%	717	5.6%
\$ 50,000 to \$ 74,999	116	1.5%	91	16.3%	891	7.0%
\$ 75,000 or more	177	2.3%	0	0.0%	1,026	8.0%

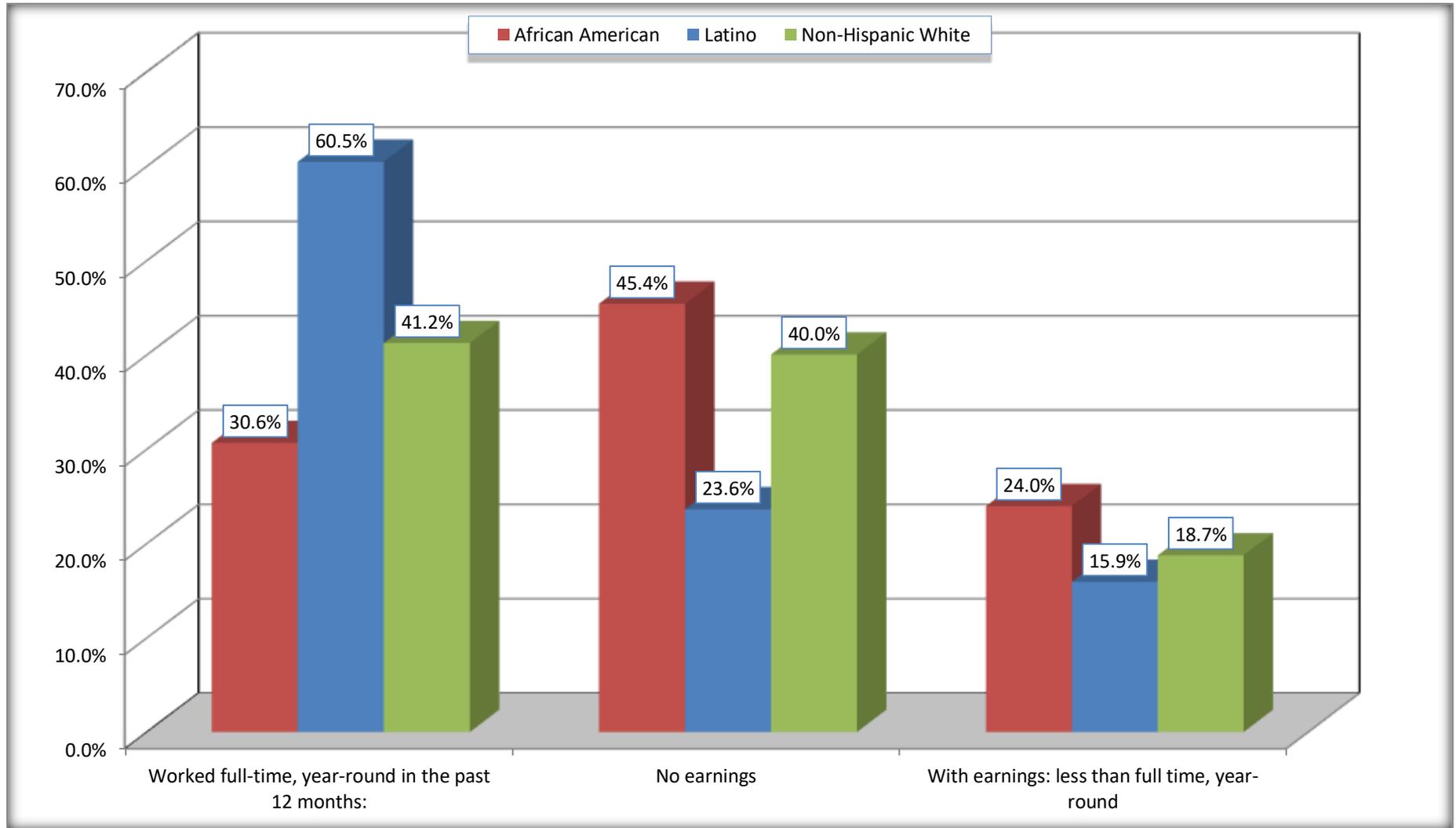
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
Other:	2,466	32.3%	92	16.5%	3,145	24.7%
No earnings	1,729	22.7%	68	12.2%	2,119	16.6%
With earnings:	737	9.7%	24	4.3%	1,026	8.0%
Female:	4,158	54.5%	281	50.3%	6,548	51.4%
Worked full-time, year-round in the past 12 months:	1,337	17.5%	152	27.2%	2,203	17.3%
No earnings	0	0.0%	0	0.0%	0	0.0%
With earnings:	1,337	17.5%	152	27.2%	2,203	17.3%
\$ 1 to \$ 9,999 or loss	16	0.2%	0	0.0%	3	0.0%
\$ 10,000 to \$ 19,999	416	5.5%	0	0.0%	101	0.8%
\$ 20,000 to \$ 29,999	435	5.7%	12	2.1%	544	4.3%
\$ 30,000 to \$ 49,999	263	3.5%	28	5.0%	523	4.1%
\$ 50,000 to \$ 74,999	153	2.0%	48	8.6%	727	5.7%
\$ 75,000 or more	54	0.7%	64	11.4%	305	2.4%
Other:	2,821	37.0%	129	23.1%	4,345	34.1%
No earnings	1,732	22.7%	64	11.4%	2,983	23.4%
With earnings:	1,089	14.3%	65	11.6%	1,362	10.7%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey <http://www.census.gov/acs/www/UseData/index.htm>

## Employment and Earnings in the Past 12 Months (16 Years and Over)

### De Soto Parish, Louisiana



Source: B20005. SEX BY WORK EXPERIENCE IN THE PAST 12 MONTHS BY EARNINGS IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS) FOR THE POPULATION 16 YEARS AND OVER  
 Data Set: 2015-2019 American Community Survey 5-Year Estimates

**C21001. SEX BY AGE BY VETERAN STATUS FOR THE CIVILIAN POPULATION 18 YEARS****AND OVER**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

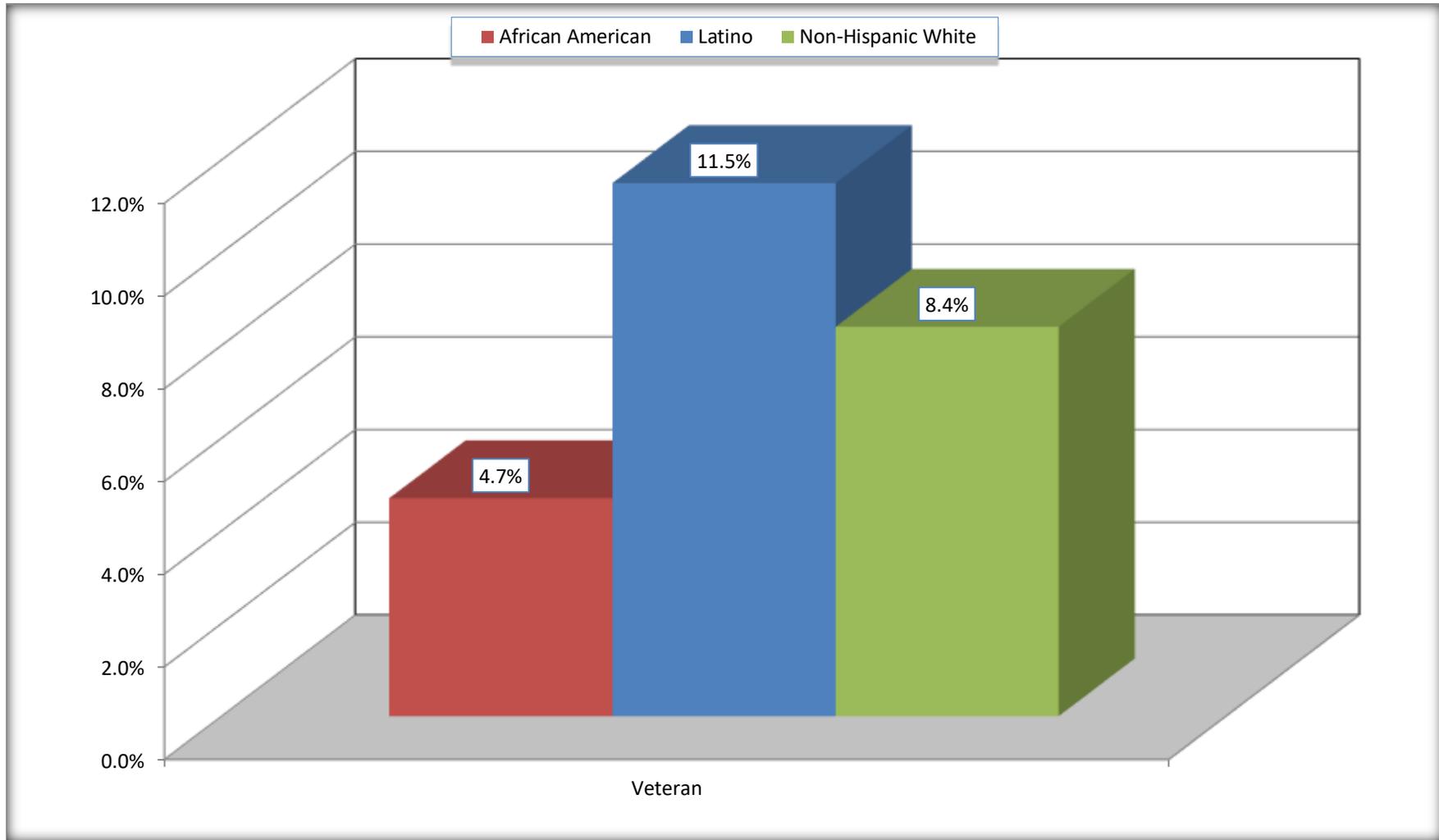
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>7,376</b>	<b>100.0%</b>	<b>515</b>	<b>100.0%</b>	<b>12,418</b>	<b>100.0%</b>
Veteran	348	4.7%	59	11.5%	1,038	8.4%
Nonveteran	7,028	95.3%	456	88.5%	11,380	91.6%
Male:	3,355	45.5%	278	54.0%	6,001	48.3%
18 to 64 years:	2,768	37.5%	230	44.7%	4,585	36.9%
Veteran	128	1.7%	15	2.9%	395	3.2%
Nonveteran	2,640	35.8%	215	41.7%	4,190	33.7%
65 years and over:	587	8.0%	48	9.3%	1,416	11.4%
Veteran	184	2.5%	0	0.0%	577	4.6%
Nonveteran	403	5.5%	48	9.3%	839	6.8%
Female:	4,021	54.5%	237	46.0%	6,417	51.7%
18 to 64 years:	3,173	43.0%	213	41.4%	4,705	37.9%
Veteran	36	0.5%	36	7.0%	41	0.3%
Nonveteran	3,137	42.5%	177	34.4%	4,664	37.6%
65 years and over:	848	11.5%	24	4.7%	1,712	13.8%
Veteran	0	0.0%	8	1.6%	25	0.2%
Nonveteran	848	11.5%	16	3.1%	1,687	13.6%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

### Veterans in the Civilian Population 18 Years and Over

#### De Soto Parish, Louisiana



Source: C21001. SEX BY AGE BY VETERAN STATUS FOR THE CIVILIAN POPULATION 18 YEARS AND OVER  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B22005. RECEIPT OF FOOD STAMPS/SNAP IN THE PAST 12 MONTHS BY RACE OF HOUSEHOLDER**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

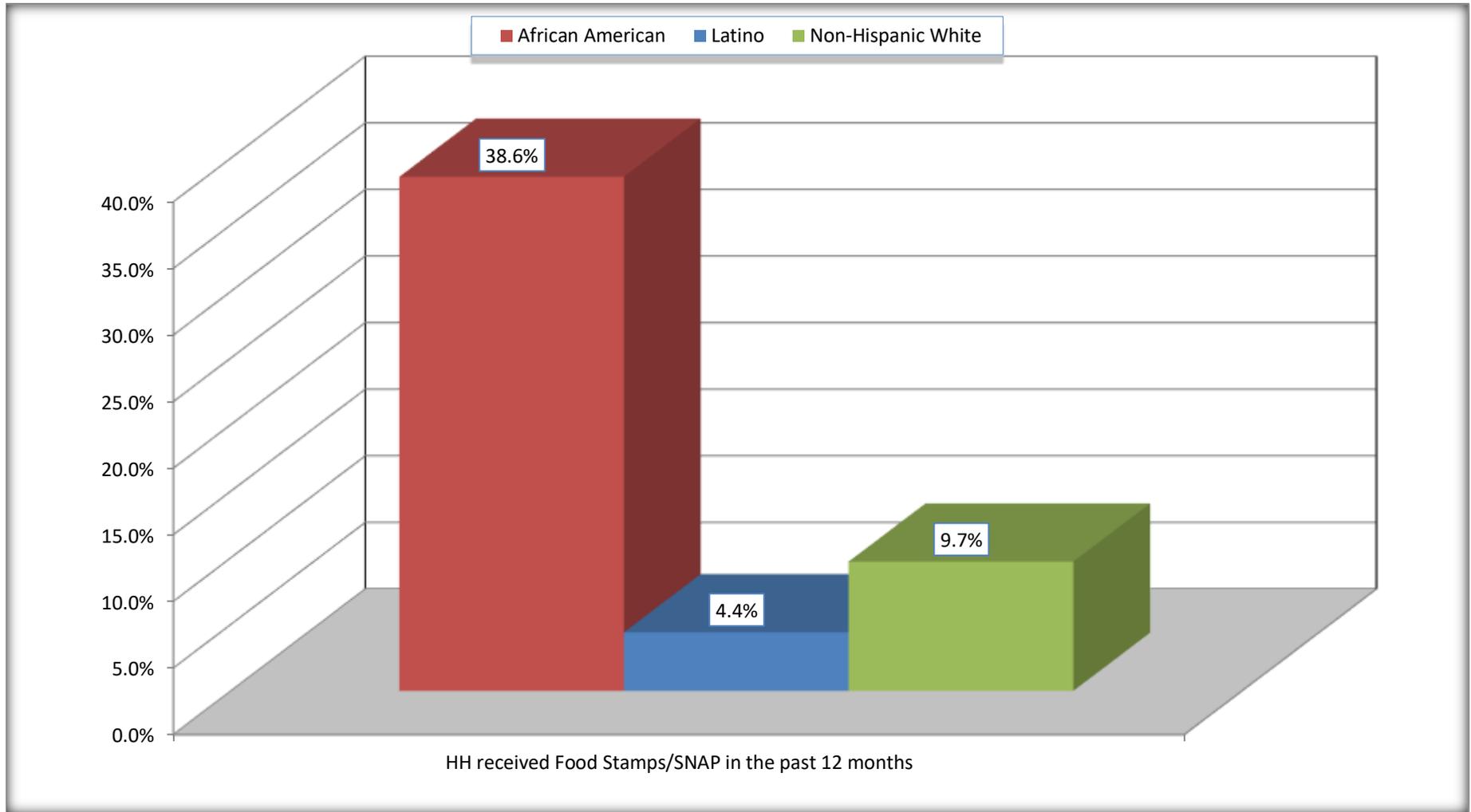
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>3,973</b>	<b>100.0%</b>	<b>274</b>	<b>100.0%</b>	<b>6,415</b>	<b>100.0%</b>
HH received Food Stamps/SNAP in the past 12 months	1,534	38.6%	12	4.4%	622	9.7%
HH did not receive Food Stamps/SNAP in the past 12 months	2,439	61.4%	262	95.6%	5,793	90.3%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey <http://www.census.gov/acs/www/UseData/index.htm>

# Receipt of Food Stamps/SNAP in the Past 12 Months by Household

## De Soto Parish, Louisiana



Source: B22005. RECEIPT OF FOOD STAMPS/SNAP IN THE PAST 12 MONTHS BY RACE OF HOUSEHOLDER  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**C23002. SEX BY AGE BY EMPLOYMENT STATUS FOR THE POPULATION 16 YEARS AND OVER**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>7,623</b>	<b>100.0%</b>	<b>559</b>	<b>100.0%</b>	<b>12,747</b>	<b>100.0%</b>
In labor force:	4,257	55.8%	421	75.3%	7,281	57.1%
In Armed Forces	0	0.0%	0	0.0%	4	0.0%
Civilian:	3,987	52.3%	421	75.3%	6,797	53.3%
Employed	3,347	43.9%	421	75.3%	6,940	54.4%
Unemployed	910	11.9%	0	0.0%	337	2.6%
Not in labor force	3,366	44.2%	138	24.7%	5,466	42.9%
Male:	3,465	45.5%	278	49.7%	6,199	48.6%
16 to 64 years:	2,878	37.8%	230	41.1%	4,783	37.5%
In labor force:	1,755	23.0%	204	36.5%	3,655	28.7%
In Armed Forces	0	0.0%	0	0.0%	4	0.0%
Civilian:	1,755	23.0%	204	36.5%	3,651	28.6%
Employed	1,379	18.1%	204	36.5%	3,432	26.9%
Unemployed	376	4.9%	0	0.0%	219	1.7%
Not in labor force	1,123	14.7%	26	4.7%	1,128	8.8%
65 years and over:	587	7.7%	48	8.6%	1,416	11.1%
In labor force:	78	1.0%	0	0.0%	209	1.6%
Employed	46	0.6%	0	0.0%	209	1.6%
Unemployed	32	0.4%	0	0.0%	0	0.0%
Not in labor force	509	6.7%	48	8.6%	1,207	9.5%

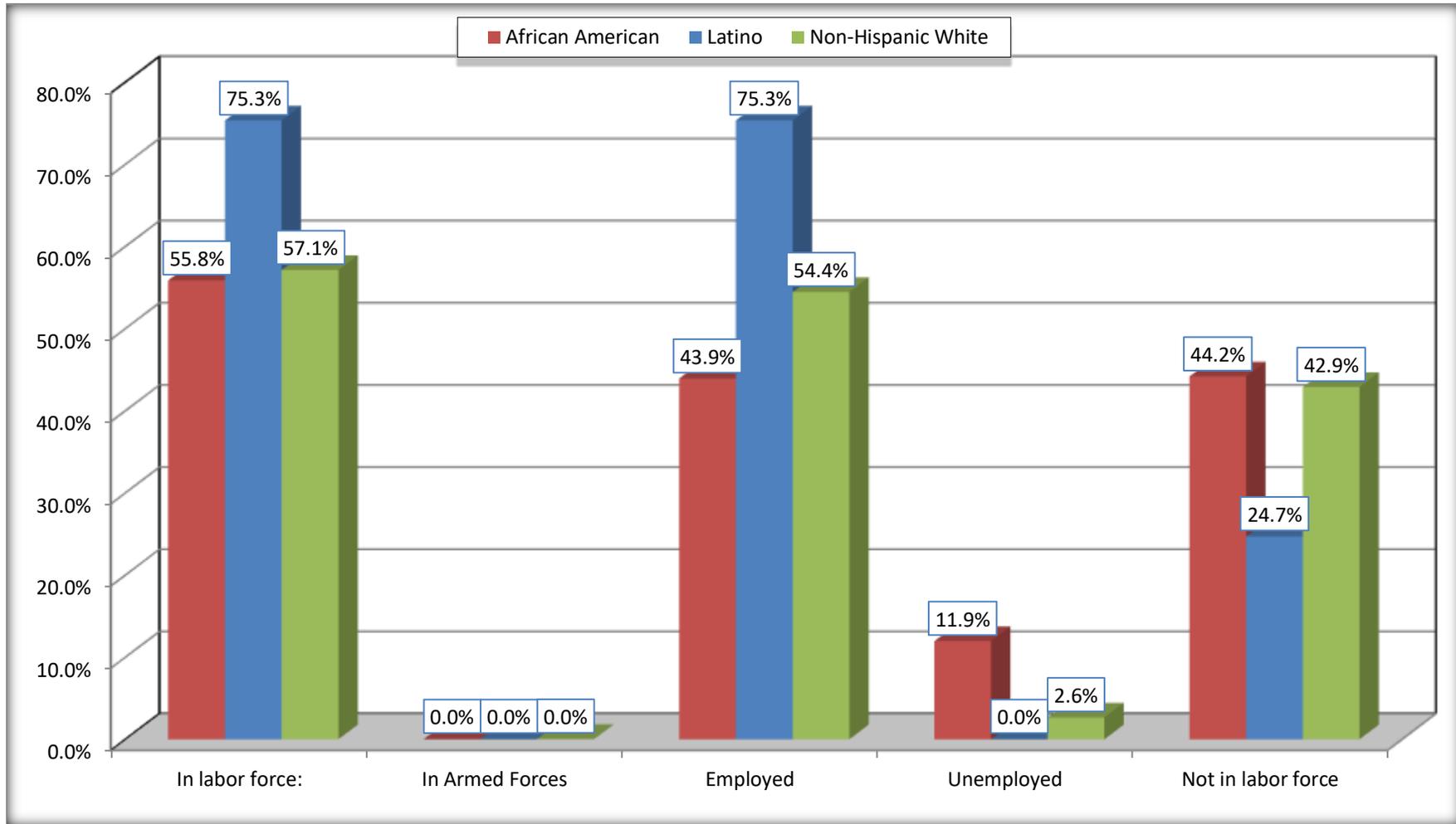
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
Female:	4,158	54.5%	281	50.3%	6,548	51.4%
16 to 64 years:	3,310	43.4%	257	46.0%	4,836	37.9%
In labor force:	2,232	29.3%	217	38.8%	3,146	24.7%
In Armed Forces	0	0.0%	0	0.0%	0	0.0%
Civilian:	2,232	29.3%	217	38.8%	3,146	24.7%
Employed	1,730	22.7%	217	38.8%	3,028	23.8%
Unemployed	502	6.6%	0	0.0%	118	0.9%
Not in labor force	1,078	14.1%	40	7.2%	1,690	13.3%
65 years and over:	848	11.1%	24	4.3%	1,712	13.4%
In labor force:	192	2.5%	0	0.0%	271	2.1%
Employed	192	2.5%	0	0.0%	271	2.1%
Unemployed	0	0.0%	0	0.0%	0	0.0%
Not in labor force	656	8.6%	24	4.3%	1,441	11.3%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Employment Status for the Population 16 years and over

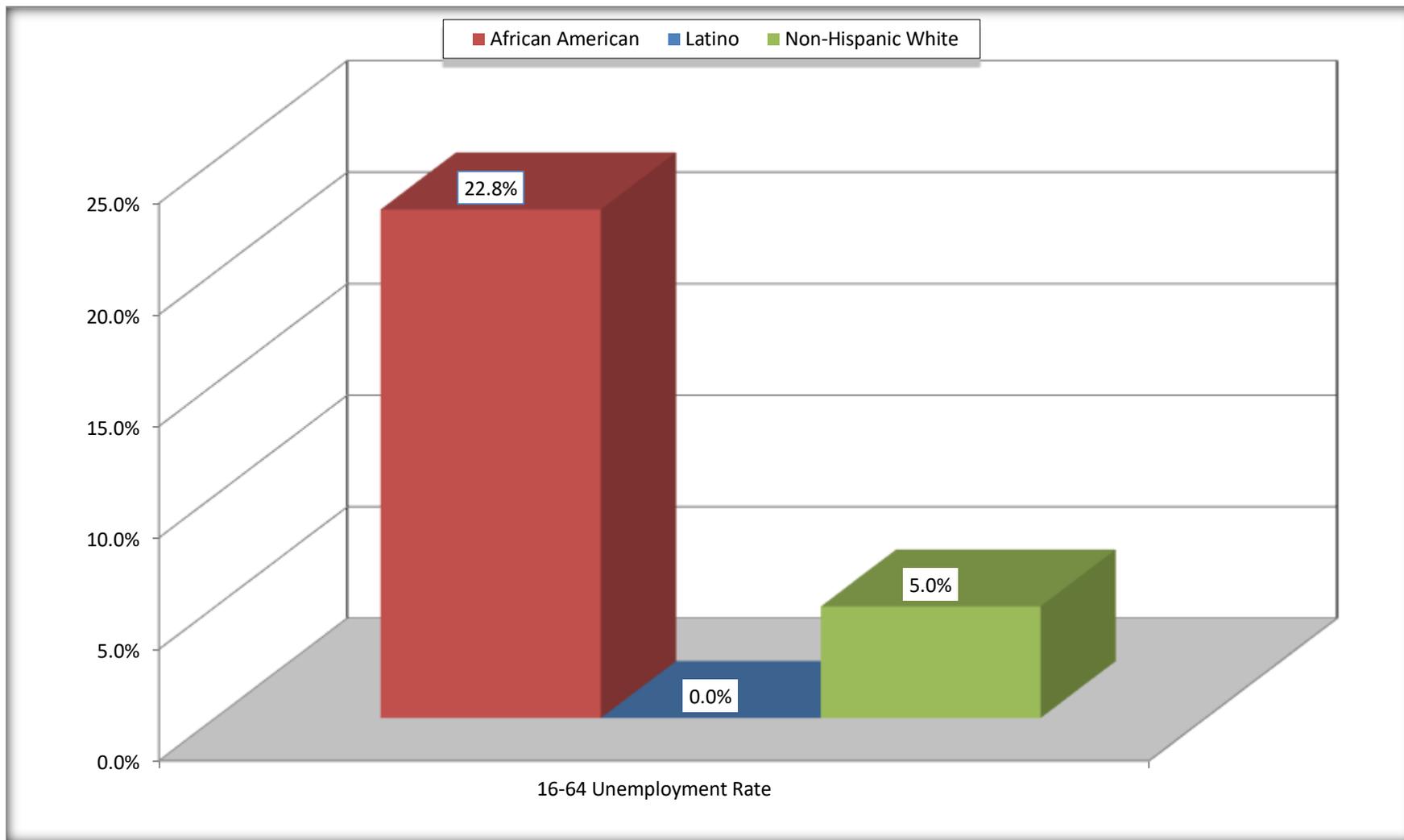
### De Soto Parish, Louisiana



Source: C23002. SEX BY AGE BY EMPLOYMENT STATUS FOR THE POPULATION 16 YEARS AND OVER  
 Data Set: 2015-2019 American Community Survey 5-Year Estimates

## Unemployment of Working Age Population (Ages 16 to 64) (As a Percent of 16-64 Civilian Labor Force)

### De Soto Parish, Louisiana



Source: C23002. SEX BY AGE BY EMPLOYMENT STATUS FOR THE POPULATION 16 YEARS AND OVER  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**C24010. SEX BY OCCUPATION FOR THE CIVILIAN EMPLOYED POPULATION 16 YEARS AND OVER**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

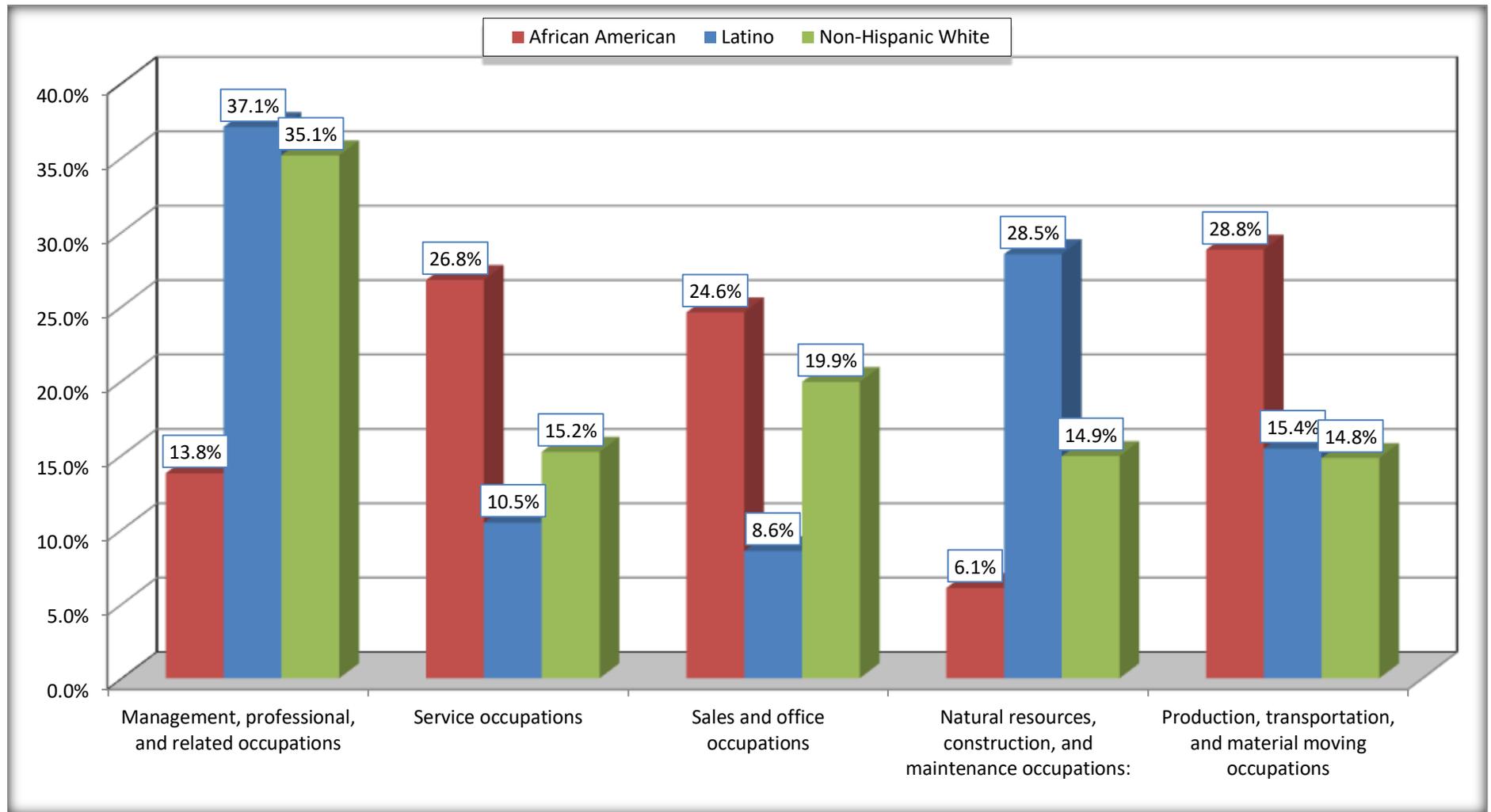
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>3,347</b>	<b>100.0%</b>	<b>421</b>	<b>100.0%</b>	<b>6,940</b>	<b>100.0%</b>
Management, professional, and related occupations	461	13.8%	156	37.1%	2,439	35.1%
Service occupations	896	26.8%	44	10.5%	1,056	15.2%
Sales and office occupations	823	24.6%	36	8.6%	1,382	19.9%
Natural resources, construction, and maintenance occupations:	203	6.1%	120	28.5%	1,036	14.9%
Production, transportation, and material moving occupations	964	28.8%	65	15.4%	1,027	14.8%
Male:	1,425	42.6%	204	48.5%	3,641	52.5%
Management, business, science, and arts occupations:	60	1.8%	22	5.2%	1,085	15.6%
Service occupations	382	11.4%	0	0.0%	431	6.2%
Sales and office occupations	115	3.4%	24	5.7%	275	4.0%
Natural resources, construction, and maintenance occupations:	203	6.1%	120	28.5%	1,012	14.6%
Production, transportation, and material moving occupations	665	19.9%	38	9.0%	838	12.1%
Female:	1,922	57.4%	217	51.5%	3,299	47.5%
Management, professional, and related occupations	401	12.0%	134	31.8%	1,354	19.5%
Service occupations	514	15.4%	44	10.5%	625	9.0%
Sales and office occupations	708	21.2%	12	2.9%	1,107	16.0%
Natural resources, construction, and maintenance occupations:	0	0.0%	0	0.0%	24	0.3%
Production, transportation, and material moving occupations	299	8.9%	27	6.4%	189	2.7%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey <http://www.census.gov/acs/www/UseData/index.htm>

## Occupation for the Civilian Employed 16 Years and Over Population

### De Soto Parish, Louisiana



Source: C24010. SEX BY OCCUPATION FOR THE CIVILIAN EMPLOYED POPULATION 16 YEARS AND OVER  
 Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B25003. TENURE - Universe: OCCUPIED HOUSING UNITS**  
 Data Set: 2015-2019 American Community Survey 5-Year Estimates

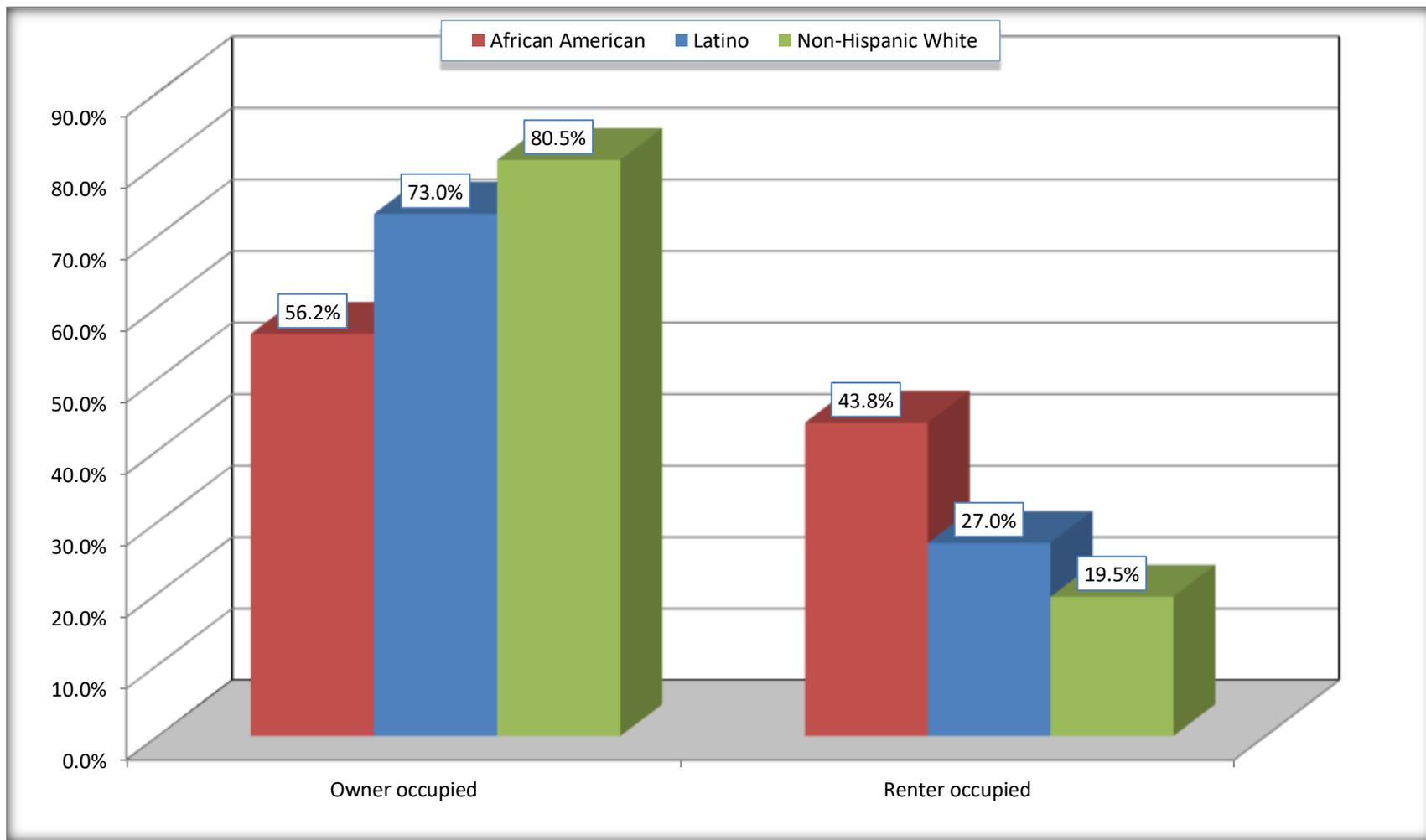
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>3,973</b>	<b>100.0%</b>	<b>274</b>	<b>100.0%</b>	<b>6,415</b>	<b>100.0%</b>
Owner occupied	2,233	56.2%	200	73.0%	5,166	80.5%
Renter occupied	1,740	43.8%	74	27.0%	1,249	19.5%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions,  
<http://www.census.gov/acs/www/UseData/index.h>

## Home Owners and Renters by Household

### De Soto Parish, Louisiana



Source: B25003. TENURE - Universe: OCCUPIED HOUSING UNITS  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B25014. OCCUPANTS PER ROOM - Universe: OCCUPIED HOUSING UNITS**

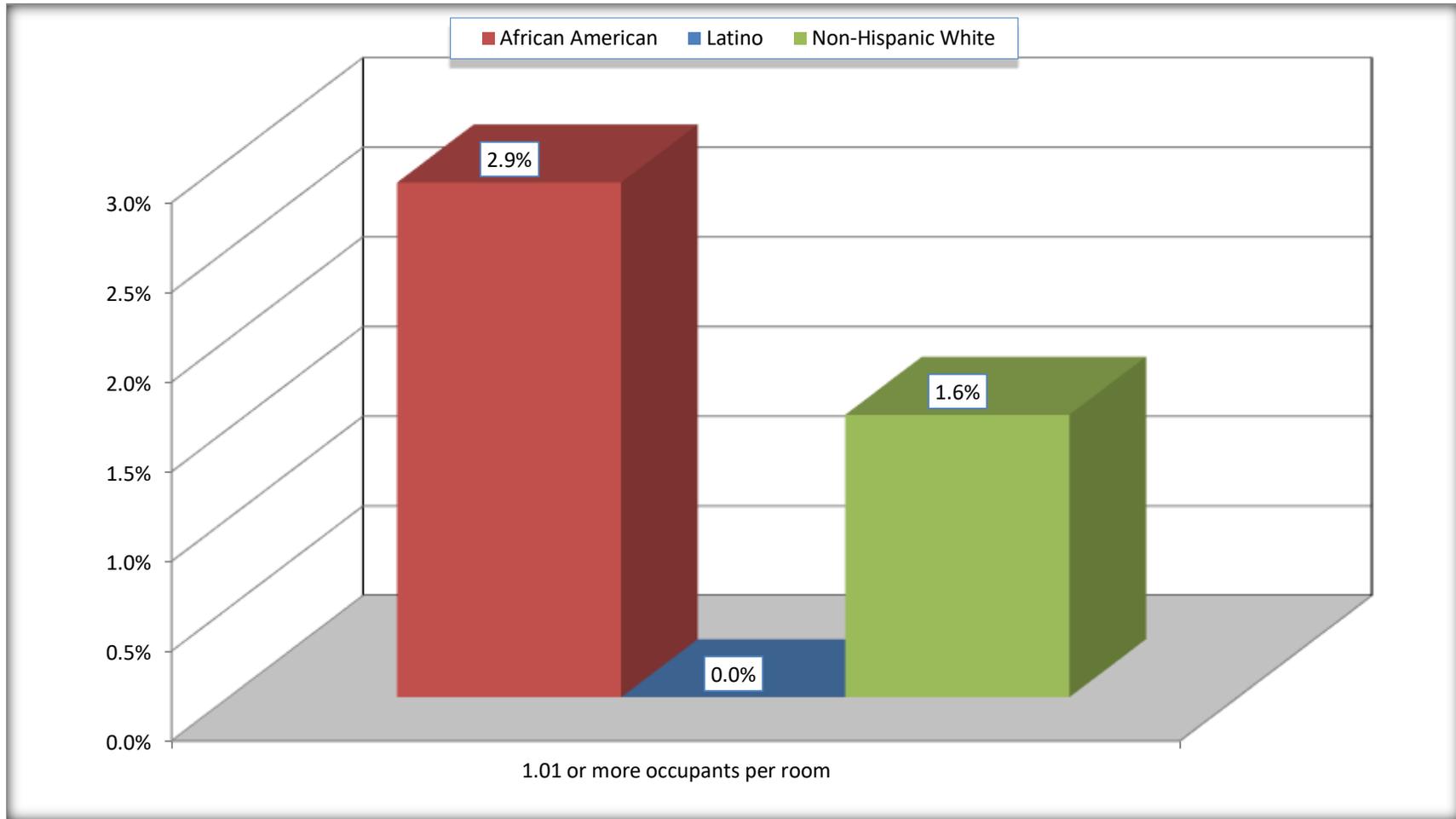
Data Set: 2015-2019 American Community Survey 5-Year Estimates

	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>3,973</b>	<b>100.0%</b>	<b>274</b>	<b>100.0%</b>	<b>6,415</b>	<b>100.0%</b>
1.00 or less occupants per room	3,859	97.1%	274	100.0%	6,314	98.4%
1.01 or more occupants per room	114	2.9%	0	0.0%	101	1.6%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, <http://www.census.gov/acs/www/UseData/index.ht>

### More than One Person per Room (Crowding) by Household De Soto Parish, Louisiana



Source: B25014. OCCUPANTS PER ROOM - Universe: OCCUPIED HOUSING UNITS  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**B18101. AGE BY DISABILITY STATUS**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

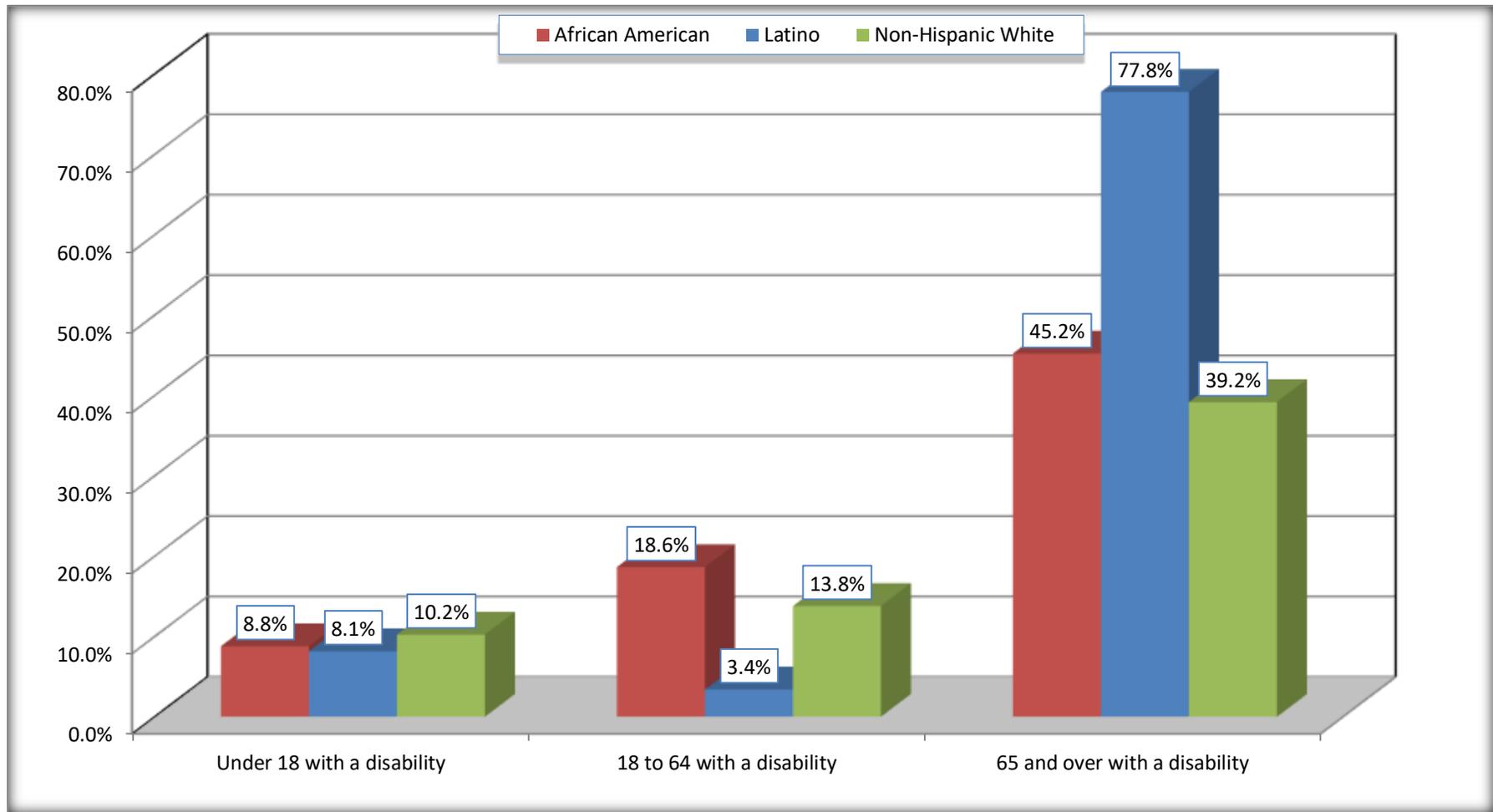
	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>9,548</b>	<b>100.0%</b>	<b>785</b>	<b>100.0%</b>	<b>15,942</b>	<b>100.0%</b>
Under 18 years:	2,279	23.9%	270	34.4%	3,613	22.7%
With a disability	200	2.1%	22	2.8%	369	2.3%
No disability	2,079	21.8%	248	31.6%	3,244	20.3%
18 to 64 years:	5,853	61.3%	443	56.4%	9,242	58.0%
With a disability	1,090	11.4%	15	1.9%	1,274	8.0%
No disability	4,763	49.9%	428	54.5%	7,968	50.0%
65 years and over:	1,416	14.8%	72	9.2%	3,087	19.4%
With a disability	640	6.7%	56	7.1%	1,209	7.6%
No disability	776	8.1%	16	2.0%	1,878	11.8%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

## Disability by Age

### De Soto Parish, Louisiana



Source: B18101. AGE BY DISABILITY STATUS  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

**C27001B. HEALTH INSURANCE COVERAGE STATUS BY AGE**

Data Set: 2014-2018 American Community Survey 5-Year Estimates

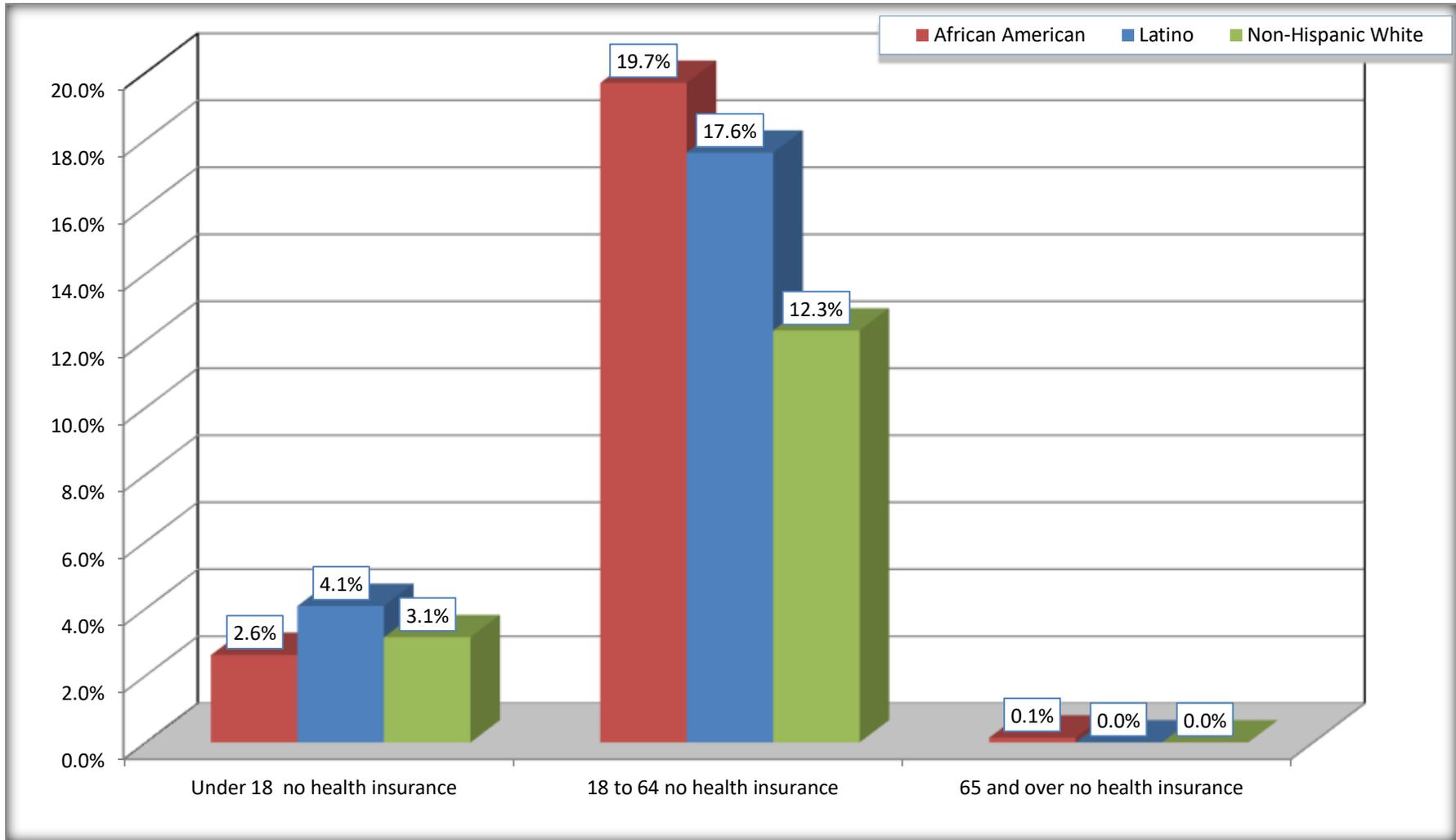
	<b>De Soto Parish, Louisiana</b>					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
<b>Total:</b>	<b>9,548</b>	<b>100.0%</b>	<b>785</b>	<b>100.0%</b>	<b>15,942</b>	<b>100.0%</b>
Under 18 years:	2,413	25.3%	270	34.4%	3,821	24.0%
With health insurance coverage	2,350	24.6%	259	33.0%	3,701	23.2%
No health insurance coverage	63	0.7%	11	1.4%	120	0.8%
18 to 64 years:	5,719	59.9%	443	56.4%	9,034	56.7%
With health insurance coverage	4,593	48.1%	365	46.5%	7,923	49.7%
No health insurance coverage	1,126	11.8%	78	9.9%	1,111	7.0%
65 years and over:	1,416	14.8%	72	9.2%	3,087	19.4%
With health insurance coverage	1,414	14.8%	72	9.2%	3,087	19.4%
No health insurance coverage	2	0.0%	0	0.0%	0	0.0%

Source: U.S. Census Bureau, 2014-2018 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see <http://www.census.gov/acs/www/UseData/index.htm>

### Lack of Health Insurance Coverage by Age

#### De Soto Parish, Louisiana



Source: C27001B. HEALTH INSURANCE COVERAGE STATUS BY AGE  
Data Set: 2014-2018 American Community Survey 5-Year Estimates

**B28009. PRESENCE OF A COMPUTER AND TYPE OF INTERNET SUBSCRIPTION IN HOUSEHOLD**

Data Set: 2015-2019 American Community Survey 5-Year Estimates

	De Soto Parish, Louisiana					
	African American	% of AA Total	Latino	% of Latino Total	White, Not Hispanic	% of NHW Total
Total:	<b>9,534</b>	<b>100.0%</b>	<b>785</b>	<b>100.0%</b>	<b>15,937</b>	<b>100.0%</b>
Has a computer:	7,841	82.2%	662	84.3%	15,080	94.6%
With dial-up Internet subscription alone	61	0.6%	11	1.4%	80	0.5%
With a broadband Internet subscription	5,725	60.0%	474	60.4%	13,327	83.6%
Without an Internet subscription	2,055	21.6%	177	22.5%	1,673	10.5%
No Computer	1,693	17.8%	123	15.7%	857	5.4%

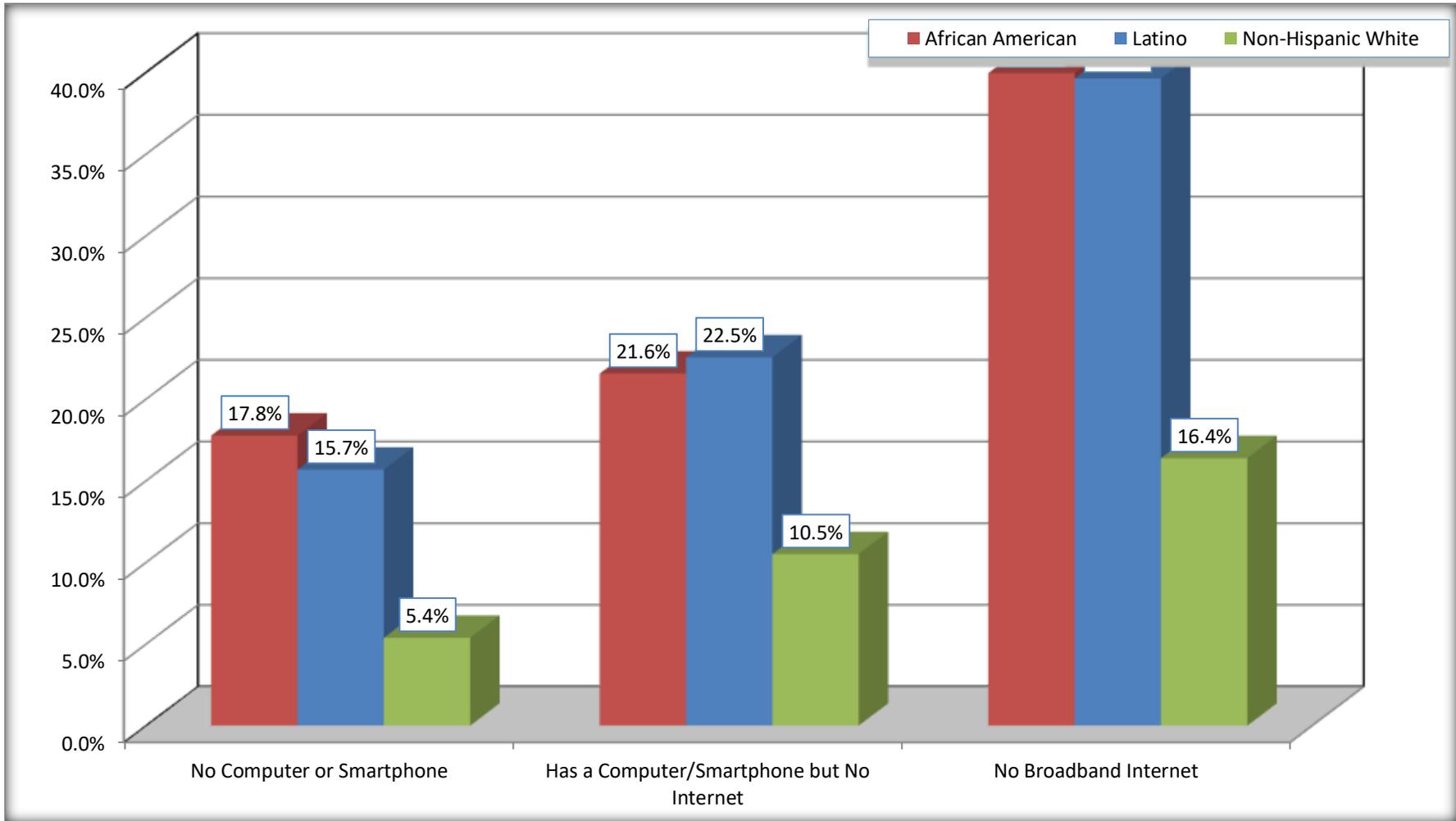
Source: U.S. Census Bureau, 2015-2019 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

### Computer/Smartphone and Internet Access

#### De Soto Parish, Louisiana



Source: B28009. PRESENCE OF A COMPUTER AND TYPE OF INTERNET SUBSCRIPTION IN HOUSEHOLD  
Data Set: 2015-2019 American Community Survey 5-Year Estimates

# EXHIBIT 2

**UNITED STATES DISTRICT COURT WESTERN  
DISTRICT OF LOUISIANA SHREVEPORT DIVISION**

DAVID B. MEANS, ET AL.

CIVIL ACTION NO. 5:23-cv-00669

VERSUS

JUDGE DAVID C. JOSEPH

DESOTO PARISH, ET AL.

MAGISTRATE JUDGE HORNSBY

**DECLARATION OF DR. LISA HANDLEY**

**I. Summary**

At the request of the amici curiae in this case, I conducted an analysis of voting patterns by race in recent elections in DeSoto Parish. On the basis of this analysis, I have concluded that voting in DeSoto Parish is consistently and starkly racially polarized. In every one of the 16 elections analyzed, Black voters provided cohesive support for their preferred candidates and White voters strongly favored opponents of these candidates. This racial polarization impedes the ability of Black voters to elect candidates of their choice unless districts are drawn that provide Black voters with an opportunity to elect their preferred candidates to the DeSoto Parish Police Jury.

Incorporating turnout data and the estimates of votes by race produced by the racial bloc voting analysis, I calculated the Black voting age population (BVAP) that would be needed for the Black-preferred candidate to win each of the elections I analyzed. Based on this analysis, I have concluded that a district would need to have a BVAP of between 50 and 55 percent to provide Black voters with an opportunity to elect their candidates of choice to the DeSoto Parish Police Jury.

**II. Professional Background and Experience**

I have over thirty-five years of experience as a voting rights and redistricting expert. I have advised scores of jurisdictions and other clients on minority voting rights and redistricting-related issues. I have served as an expert in dozens of voting rights cases. My clients have included state and local jurisdictions, independent redistricting commissions (Arizona, Colorado, Michigan), the U.S. Department of Justice, national civil rights organizations, and such international organizations as the United Nations.

I have been actively involved in researching, writing, and teaching on subjects relating to voting rights, including minority representation, electoral system design, and redistricting. I co-authored a book, *Minority Representation and the Quest for Voting Equality* (Cambridge

University Press, 1992), and co-edited a volume, *Redistricting in Comparative Perspective* (Oxford University Press, 2008), on these subjects. In addition, my research on these topics has appeared in peer-reviewed journals such as *Journal of Politics*, *Legislative Studies Quarterly*, *American Politics Quarterly*, *Journal of Law and Politics*, and *Law and Policy*, as well as law reviews (e.g., *North Carolina Law Review*) and a number of edited books. I hold a Ph.D. in political science from The George Washington University.

I have been a principal of Frontier International Electoral Consulting since co-founding the company in 1998. Frontier IEC specializes in providing electoral assistance in transitional democracies and post-conflict countries. In addition, I am a Visiting Research Academic at Oxford Brookes University in Oxford, United Kingdom.

### **III. Analyzing Voting Patterns by Race**

An analysis of voting patterns by race serves as the foundation of two of the three elements of the “results test” as outlined in *Thornburg v. Gingles*: a racial bloc voting analysis is needed to determine whether the minority group is politically cohesive; and the analysis is required to determine if Whites are voting sufficiently as a bloc to usually defeat the candidates preferred by minority voters. The voting patterns of White and minority voters must be estimated using statistical techniques because direct information about the race of the voters is not, of course, available on the ballots cast.

To carry out an analysis of voting patterns by race, an aggregate level database must be constructed because individual level data is not available. The aggregate data relied on is usually election precinct data. Information relating to the demographic composition and election results in the precincts is collected, merged, and statistically analyzed to determine if there is a relationship between the racial composition of the precincts and support for specific candidates across the precincts.

***Standard Statistical Techniques*** Three standard statistical techniques have been developed over time to estimate vote choices by race: homogeneous precinct analysis, ecological regression, and ecological inference.<sup>1</sup> Two of these analytic procedures—homogeneous precinct

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<sup>1</sup> For a detailed explanation of homogeneous precinct analysis and ecological regression, see Bernard Grofman, Lisa Handley, and Richard Niemi, *Minority Representation and the Quest for Voting Equality* (Cambridge University Press, 1992). See Gary King, *A Solution to the Ecological Inference Problem* (Princeton University Press, 1997) for a more detailed explanation of ecological inference.

analysis and ecological regression—were employed by the plaintiffs’ expert in *Thornburg v. Gingles*, have the benefit of the Supreme Court’s approval in that case, and have been used in most subsequent voting rights cases. The third technique, ecological inference, was developed after the *Gingles* decision and was designed, in part, to address some of the disadvantages associated with ecological regression analysis. Ecological inference analysis has been introduced and accepted in numerous district court proceedings.

*Homogeneous precinct* (HP) analysis is the simplest technique. It involves comparing the percentage of votes received by each of the candidates in precincts that are racially or ethnically homogeneous. The general practice is to label a precinct as homogeneous if at least 90 percent of the voters or voting age population is composed of a single race. (In Louisiana, where turnout data by race is available, a homogenous precinct is defined as a precinct in which 90 percent or more of the voters were Black or White.) In fact, the homogeneous results reported are not estimates—they are the actual precinct results. However, most voters in DeSoto Parish do not reside in homogeneous precincts, and voters who reside in homogeneous precincts may not be representative of voters who live in more racially diverse precincts. For this reason, I refer to these percentages as estimates.

The second statistical technique employed, *ecological regression* (ER), uses information from all precincts, not simply the homogeneous ones, to derive estimates of the voting behavior of minorities and Whites. If there is a strong linear relationship across precincts between the percentage of minorities and the percentage of votes cast for a given candidate, this relationship can be used to estimate the percent of minority and White voters supporting the candidate.

The third technique, *ecological inference* (EI 2x2), was developed by Harvard Professor Gary King. This approach also uses information from all precincts but, unlike ecological regression, it does not rely on an assumption of linearity. Instead, it incorporates maximum likelihood statistics to produce estimates of voting patterns by race. In addition, it utilizes the method of bounds, which uses more of the available information from the precinct returns than ecological regression.<sup>2</sup> Unlike ecological regression, which can produce percentage estimates of

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<sup>2</sup> The following is an example of how the method of bounds works: if a given precinct has 100 voters, of whom 75 are Black and 25 are White, and the Black candidate received 80 votes, then at least 55 of the Black voters voted for the Black candidate and at most all 75 did. (The method of bounds is less useful for calculating estimates for White voters because as few as five of the White voters and as many as all of the White voters could have voted for the candidate.)

less than 0 or more than 100 percent, ecological inference was designed to produce only estimates that fall within the possible limits. However, EI does not guarantee that the estimates for all of the candidates add to 100 percent for each of the racial groups examined.

In conducting my analysis of voting patterns by race in recent elections in DeSoto Parish, I also used a more recently developed version of ecological inference, which I have labeled “EI RxC” in the summary table. One advantage of EI RxC is that it produces generally accepted confidence intervals for the estimates of minority and White voters supporting each of the candidates. I have included these confidence intervals in the summary table.

**Database** To analyze voting patterns by race using aggregate level information, a database that combines election results with demographic information is required. This database is almost always constructed using election precincts as the unit of analysis. The demographic composition of the precincts is based on voter registration or turnout by race if this information is available. Because Louisiana collects voter registration data by race (registering voters self-identify their race), and tallies and provides precinct-level turnout by race data, I was able to use turnout by race to denote the demographic composition of the precincts.

The 2015–2022 election results and turnout by race data, for all precincts and election cycles, are publicly available on the Louisiana Secretary of State’s website. In addition, in order to produce participation rates (turnout as a percentage of voting age population), census population data was obtained from the Census FTP portal.

Early votes are reported only at the parish level in Louisiana—they are not allocated back to the precinct where the voter resides. The percentage of DeSoto Parish votes that were cast early ranged from approximately 25% (2015) to as high as slightly over 58% in the 2020 presidential contest. Rather than simply ignore these votes, they have been allocated to the parish precincts proportionally based on the votes received by each of the candidates on Election Day.<sup>3</sup>

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<sup>3</sup> An example of the allocation process is as follows: Candidate X received 80% of her Election Day parish-wide vote in two-precinct Parish Z from Precinct A and 20% from Precinct B. Therefore, 80% of her early votes are allocated to Precinct A and 20% to Precinct B. Allocating early votes in this manner depresses the amount of racial polarization since the methodology does not take into account the race of the voter.

*Elections analyzed* All recent statewide election contests that included Black candidates were analyzed.<sup>4</sup> These elections are listed in Table 1, below.<sup>5</sup>

**Table 1: Elections Analyzed**

<b>Election Cycle</b>	<b>Office</b>	<b>Black Candidate(s)</b>
November 2022	U.S. Senator	Gary Chambers, Jr.
November 2020	U.S. President/Vice President	Kamala Harris
	U.S. Senator	Adrian Perkins Derrick Edwards
November 2019	Secretary of State	Gwen Collins-Greenup
October 2019	Lieutenant Governor	Willie Jones
	Attorney General	Ike Jackson
	Treasurer	Derrick Edwards
	Secretary of State	Gwen Collins-Greenup
December 2018	Secretary of State	Gwen Collins-Greenup
November 2018	Secretary of State	Gwen Collins-Greenup
November 2017	Treasurer	Derrick Edwards
October 2017	Treasurer	Derrick Edwards
November 2015	Lieutenant Governor	Kip Holden
October 2015	Lieutenant Governor	Kip Holden
	Attorney General	Ike Jackson Geri Broussard Baloney
	Secretary of State	Chris Tyson

Although endogenous elections (elections for the office at issue) are probative in determining if voting is racially polarized, I was not able to analyze recent DeSoto Parish police

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<sup>4</sup> Courts consider election contests that include minority candidates more probative than contests that include only White candidates for determining if voting is racially polarized. This is because it is not sufficient for minority voters to be able to elect their candidates of choice only if these candidates are White. On the other hand, it is important to recognize that not all minority candidates are the preferred candidates of minority voters.

<sup>5</sup> In one of the elections analyzed—the November 2020 election for U.S. President—it was the running mate, Kamala Harris, who is Black.

jury elections. There are two reasons for this. First, there are only a very small number of precincts in each policy jury district (three to eight precincts) and many of these “precincts” are actually split portions of precincts with no associated turnout by race data. Second, the exercise of apportioning the early votes cast in the police jury elections across the very limited number of precincts and split precincts is too prone to erroneous precinct level vote estimates.

#### **IV. Voting Is Racially Polarized in DeSoto Parish**

Voting is consistently and starkly racially polarized in DeSoto Parish. The Appendix, attached to the end of this report, provides the estimates of the percentage of Black and White voters supporting each of the candidates in the 16 statewide elections examined, using the four statistical methods discussed above.

As the Appendix clearly shows, Black and White voters supported different candidates in every election contest analyzed. Black voters were cohesive in support of their preferred candidates and the White voters consistently bloc voted against these candidates. Moreover, the candidates preferred by Black voters consistently failed to win elections in the parish – although some candidates supported by Black voters succeeded in advancing to a runoff, none of these candidates actually won the election contest parish-wide.

Black voters support for their preferred candidates (“Black-preferred candidates”) average 82.2% across all 16 contests.<sup>6</sup> When contests with only two candidates are considered, the level of cohesion was even higher, with Black voters’ support averaging 93.0% for the Black-preferred candidates across these eight elections. The average percentage of White voter support for the Black-preferred candidate, on the other hand, was 9.7% across all 16 contests and rose to only 12.4% when contests with only two candidates are considered.

#### **V. Calculating the Black VAP Needed to Elect Black-Preferred Candidates**

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<sup>6</sup> In all 16 of the contests analyzed, the Black candidate or, if there was more than one Black candidate, one of the Black candidates, was the candidate of choice of Black voters. This means that in the two-candidate contests the candidate of choice of Black voters received more than 50% of the vote. However, in the eight (out of the 16 elections) in which more than two candidates competed, the candidate of choice of Black voters may have received only a plurality of the Black vote. I averaged the percentage of the vote received by the candidate of choice of Black voters in all 16 contests and in the eight contests with only two candidates. Although the Black-preferred candidate was always a Black candidate in the statewide elections, not all Black candidates who ran statewide were the candidates of choice of Black voters and hence have not been included in the averages.

The Black voting age population (BVAP) percentage needed in a district to elect Black-preferred candidates can be calculated by taking into account the relative participation rates of the Black and White age-eligible population, as well as the estimated level of Black voter support for the Black-preferred candidates (their “cohesiveness”), and the estimated level of White voters “crossover” voting for the Black-preferred candidates.

**Equalizing Black and White turnout** Because Black age-eligible voters often turn out to vote at lower rates than White age-eligible voters, the BVAP needed to ensure that Black voters comprise at least half of the voters in an election is often higher than 50 percent. This pattern of higher White participation than Black participation is true for recent statewide elections in DeSoto Parish. Using the respective turnout rates of the Black and White age-eligible population, I have calculated the percentage needed to equalize the number of Black and White voters in a given election.<sup>7</sup> Table 2 lists participation rates for Black and White voters in recent DeSoto Parish elections and the BVAP percentage that would be needed to produce an equal number of Black and White voters in the election.

**Table 2: Participation Rates by Race in Recent DeSoto Parish Elections**

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<sup>7</sup> The equalizing percentage is calculated mathematically by solving the following equation:

Let

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

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

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

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

Therefore,

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

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

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

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

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

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

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

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

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

Election Date	Total turnout/ Total VAP	Black turnout/ Black VAP	White turnout/ White VAP	BVAP Needed to Produce Equal Number of Black and White Voters
2022 November	46.5%	38.8%	54.7%	58.5%
2020 November	73.0%	69.4%	80.3%	53.7%
2019 November	52.1%	56.0%	53.9%	49.1%
2019 October	46.3%	46.8%	49.7%	51.5%
2018 December	13.8%	11.5%	16.3%	58.5%
2018 November	53.9%	50.3%	60.2%	54.5%
2017 November	10.7%	9.0%	12.6%	58.4%
2017 October	11.7%	8.8%	14.4%	62.2%
2015 November	39.3%	41.8%	40.8%	49.4%
2015 October	43.2%	41.7%	47.2%	53.1%

Equalizing turnout is only the first step in the process – it does not take into account the voting patterns of Black and White voters. If voting is racially polarized but a significant number of White voters typically “crossover” to vote for Black voters’ preferred candidate, it may be the case that this crossover voting can compensate for depressed Black turnout; it may even produce a situation in which Black voters need not comprise 50 percent of the voters in an election for the Black-preferred candidate to win.

***Incorporating Minority Cohesion and White Crossover Voting in the Equation*** A district-specific, functional analysis should take into account not only differences in the turnout rates of the age-eligible Black and White population, but also voting patterns by race.<sup>8</sup> To illustrate this mathematically, consider a district that has 1000 persons of voting age, 50% of whom are Black and 50% of whom are White. Let us begin by assuming that Black turnout is lower than White turnout in a two-candidate election. In our hypothetical election example, 42% of the Black voting age population (VAP) turn out to vote and 60% of the White VAP vote. This means that, for our illustrative election, there are 210 Black voters and 300 White voters. Further suppose that 96% of the Black voters supported their candidate of choice and 25% of the White voters cast their votes for this candidate (with the other 75% supporting her opponent in the

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<sup>8</sup> For an in-depth discussion of this approach to creating effective minority districts, see Bernard Grofman, Lisa Handley and David Lublin, “Drawing Effective Minority Districts: A Conceptual Framework and Some Empirical Evidence,” *North Carolina Law Review*, volume 79 (5), June 2001.

election contest). Thus, in our example, Black voters cast 200 of their 210 votes for the Black-preferred candidate and their other 8 votes for her opponent; White voters cast 75 of their 300 votes for the Black-preferred candidate and 225 votes for their preferred candidate:

	VAP	Turnout	Voters	Support for Black-preferred candidate	Votes for Black-preferred candidate	Support for White-preferred candidate	Votes for White-preferred candidate
Black	500	0.42	210	0.96	202	0.04	8
White	500	0.60	300	0.25	75	0.75	225
			510		277		233

The candidate of choice of Black voters would receive a total of 277 votes (202 from Black voters and 75 from White voters), while the candidate preferred by White voters would receive only 233 votes (8 from Black voters and 225 from White voters). The Black-preferred candidate would win the election with 55.4% (277/500) of the vote in this hypothetical 50% Black VAP district. And the Black-preferred candidate would be successful despite the fact that the election was racially polarized and that potential Black voters turned out to vote at a lower rate than potential White voters. In fact, in this hypothetical, the candidate of choice of Black voters would still win the election by a very small margin (50.9%) in a district that is 45% Black with these same voting patterns:

	VAP	Turnout	Voters	Support for Black-preferred candidate	Votes for Black-preferred candidate	Support for White-preferred candidate	Votes for White-preferred candidate
Black	450	0.42	189	0.96	181	0.04	8
White	550	0.60	330	0.25	83	0.75	248
			519		264		255

**VI. Majority BVAP Districts Needed to Elect Black-Preferred Candidates in DeSoto Parish**

Table 3, below, incorporates the turnout rates (found in Table 2) and the estimates of Black and White voters’ support for the candidates preferred by Black voters (found in the

Appendix) to calculate the percentage of the vote the Black-preferred candidates would receive given BVAP percents of 45%, 50%, and 55%. Although I have calculated these percentages for all 16 contests, it is only in the two-candidate contests that the percentage received by the Black-preferred candidate indicates whether this candidate would succeed in winning the election contest. (The failure of the Black-preferred candidate to receive more than 50% of the vote in a contest with more than two candidates does not tell us if the candidate would proceed to a runoff, let alone if the candidate would ultimately win the election.)

**Table 3: Percent of Vote Received by Black-Preferred Candidates**

	race of B-P candidate	Turnout rate for office and percent vote for Black-preferred candidates						percent of vote B-P cand would have received if district was 55% black VAP	percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP
		Black votes			White votes					
		votes cast for office	B-P	all others	votes cast for office	B-P	all others			
<b>2-candidate contests</b>										
Nov 2020 US President	W/B	69.4	85.1	14.9	80.3	14.2	85.8	50.6	47.1	43.6
Nov 2019 Sec of State	B	56.0	95.5	4.5	53.9	13.7	86.3	59.5	55.4	51.3
Oct 2019 Lieut Governor	B	46.8	96.6	3.4	49.7	8.8	91.2	55.8	51.4	47.0
Oct 2019 Attn General	B	46.8	91.9	8.1	49.7	7.4	92.6	52.6	48.4	44.2
Dec 2018 Sec of State	B	11.5	95.2	4.8	16.3	11.0	89.0	50.0	45.8	41.8
Nov 2017 Treasurer	B	9.0	95.2	4.8	12.6	12.2	87.8	50.9	46.8	42.8
Nov 2015 Lieut Governor	B	41.8	96.3	3.7	40.8	19.5	80.5	62.2	58.4	54.5
Oct 2015 Sec of State	B	41.7	88.4	11.6	47.2	12.4	87.6	51.9	48.0	44.3
<b>contests with more than 2 candidates</b>										
Nov 2022 US Senate	B	38.8	40.6	59.4	54.7	2.5	97.5	20.2	18.3	16.5
Nov 2020 US Senate	B	69.4	70.2	29.8	80.3	5.0	95.0	38.5	35.2	32.0
Oct 2019 Sec of State	B	46.8	90.3	9.7	49.7	9.8	90.2	52.9	48.8	44.8
Oct 2019 Treasurer	B	46.8	93.8	6.2	49.7	10.8	89.2	55.2	51.1	46.9
Nov 2018 Sec of State	B	50.3	61.3	38.7	60.2	4.5	95.5	33.2	30.4	27.6
Oct 2017 Treasurer	B	8.8	87.1	12.9	14.4	8.9	91.1	42.3	38.6	35.0
Oct 2015 Lieut Gov	B	41.7	90.0	10.0	47.2	8.7	91.3	50.9	46.8	42.8
Oct 2015 Attn General	B	41.7	37.6	62.4	47.2	5.5	94.5	22.2	20.6	19.0

Looking down the final three columns of Table 3, it is apparent that the Black-preferred candidates wins very few (only two out of the eight contests) of the two-candidate contests in a district with a BVAP of 45%, and would still not win a majority of the contests with a BVAP of 50% (three out of the eight contests). However, a BVAP of 55% produces a win for the Black-preferred candidate in seven of the eight two-candidate contests and a tie in the eighth contest (December 2018 election for Secretary of State). On the basis of this analysis, I conclude that a

district with a BVAP between 50 and 55% is necessary to provide Black voters with an opportunity to elect their candidates of choice in DeSoto Parish.

**VII. Conclusion**

My analysis of voting patterns by race found that the Black community in DeSoto Parish is cohesive in supporting their preferred candidates and that White voters consistently bloc vote to defeat these candidates. This racial polarization substantially impedes the ability of Black voters to elect candidates of their choice to the DeSoto Parish Police Jury unless districts are drawn to provide Black voters with this opportunity. Given the participation rates and voting patterns of Black and White voters, only a majority BVAP district is likely to provide Black voters with opportunity to elect their candidates of choice to the Parish Police Jury.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

A handwritten signature in blue ink that reads "Lisa Handley". The signature is written in a cursive, flowing style.

July 4, 2023

# HANDLEY APPENDIX

Voting patterns in DeSoto Parish in recent statewide elections	Estimates for Black Voters									Estimates for White Voters					
	Party	Race	Actual Votes	95% confidence interval			EI 2x2	ER	HP	95% confidence interval			EI 2x2	ER	HP
				EI	RxC	interval				EI	RxC	interval			
<b>2022 November</b>															
<b>U.S. Senator</b>															
John Kennedy	R	W	68.0	4.9	2.3, 8.2	6.4	-0.3	7.9	92.4	90.8, 93.9	92.5	95.3	89.7		
Gary Chambers, Jr	D	B	13.4	40.6	37.3, 43.8	45.5	44.7	32.1	2.5	1.4, 3.8	0.5	0.2	3.3		
Luke Mixon	D	W	8.2	20.0	16.8, 23.2	20.6	17.5	17.3	3.0	1.8, 4.5	0.6	4.7	3.1		
Others			10.4	34.4	31.3, 37.4	33.4	38.6	42.7	2.0	1.0, 3.2	1.4	-0.2	3.9		
<b>2020 November</b>															
<b>U.S. President</b>															
Biden/Harris	D	W/B	37.0	85.1	68.5, 90.3	97.1	105.0	-	14.2	9.7, 16.2	7.0	6.1	-		
Trump/Pence	R	W/W	61.8	13.5	6.5, 16.9	2.3	-5.3	-	85.2	75.9, 87.9	91.8	93.2	-		
Others			1.1	1.4	.7, 1.7	0.9	1.0	-	0.7	.2, .8	1.1	0.9	-		
<b>U.S. Senator</b>															
Adrian Perkins	D	B	26.1	70.2	66.3, 73.9	73.0	75.0	-	5.0	2.9, 7.0	4.3	5.0	-		
Derrick Edwards	D	B	4.5	9.3	7.1, 11.3	10.1	11.1	-	1.5	.6, 2.6	0.9	1.2	-		
Bill Cassidy	R	W	61.0	4.1	2.0, 7.0	3.8	-4.9	-	90.6	88.7, 92.2	90.8	91.2	-		
Others			8.4	16.4	13.3, 19.3	16.8	18.7	-	3.0	1.5, 4.7	3.0	2.9	-		
<b>2019 October</b>															
<b>Lieutenant Governor</b>															
Willie Jones	D	B	36.3	96.6	93.1, 98.8	98.2	105.1	-	8.8	6.6, 11.4	7.1	8.7	10.4		
Billy Nungesser	R	W	63.8	3.4	1.2, 6.9	1.9	-5.1	-	91.2	88.6, 93.4	92.9	91.4	89.6		
<b>Attorney General</b>															
Ike Jackson	D	B	33.9	91.9	87.1, 95.4	91.4	96.3	-	7.4	5.1, 10.5	6.9	9.7	10.5		
Jeff Landry	R	W	66.1	8.1	4.6, 12.9	8.8	4.1	-	92.6	89.5, 94.9	92.9	90.1	89.5		
<b>Secretary of State</b>															
Gwen Collins-Greenup	D	B	34.2	90.3	86.0, 93.7	93.5	97.5	-	9.8	7.6, 12.5	7.0	9.9	10.8		
Kyle Ardoin	R	W	36.7	3.1	1.1, 6.2	1.2	-1.9	-	51.5	49.3, 53.5	54.0	49.2	52.4		
Thomas Kennedy III	R	W	22.1	4.2	2.1, 7.2	4.3	2.9	-	30.5	28.2, 32.3	30.7	31.6	26.5		
Amanda Smith	R	W	7.0	2.5	1.1, 4.5	2.7	1.4	-	8.2	6.7, 9.5	8.3	9.1	10.3		
<b>Treasurer</b>															
Derrick Edwards	D	B	35.8	93.8	90.3, 96.4	-	101.6	-	10.8	8.7, 13.0	7.4	10.0	10.5		
John Schroder	R	W	60.3	2.7	.8, 5.8	-	-5.4	-	87.0	84.8, 88.9	88.7	86.3	85.1		
Teresa Kenny		W	3.9	3.6	1.9, 5.5	-	4.0	-	2.2	.9, 3.6	4.0	3.7	4.4		

Voting patterns in DeSoto Parish in recent statewide elections	Estimates for Black Voters						Estimates for White Voters								
	Party	Race	Actual Votes	95% confidence interval			EI 2x2	ER	HP	95% confidence interval			EI 2x2	ER	HP
				EI	RxC	interval				EI	RxC	interval			
<b>2019 November Secretary of State</b>															
Gwen Collins-Greenup	D	B	40.6	95.5	91.7, 98.0	97.0	106.4	-	13.7	11.3, 16.5	11.2	9.9	14.4		
Kyle Ardoin	R	W	59.4	4.5	2.0, 8.3	3.0	-6.2	-	86.3	83.5, 88.7	88.8	90.3	85.6		
<b>2018 November Secretary of State</b>															
Gwen Collins-Greenup	D	B	20.8	61.3	57.2, 65.1	64.7	66.0	-	4.5	2.6, 6.7	1.5	3.5	4.7		
Renee Fontenot Free	D	W	12.0	26.8	23.0, 30.4	28.8	30.3	-	6.0	4.1, 8.0	4.7	6.5	5.9		
Julie Stokes	R	W	4.6	1.8	.7, 3.2	0.8	0.9	-	5.6	4.7, 6.5	6.7	5.4	5.6		
Kyle Ardoin	R	W	19.8	3.3	1.4, 5.8	2.6	2.5	-	26.8	25.2, 28.3	27.0	26.3	25.6		
Rick Edmonds	R	W	19.4	1.4	.5, 2.9	0.8	-4.4	-	26.2	24.9, 27.4	27.7	26.0	29.2		
Thomas Kennedy III	R	W	13.5	2.6	1.2, 4.7	2.3	2.0	-	18.2	16.8, 19.5	18.3	19.1	16.5		
Others			9.9	2.8	1.2, 4.9	2.6	3.0	-	12.6	11.2, 13.8	12.9	13.3	12.5		
<b>2018 December Secretary of State</b>															
Gwen Collins-Greenup	D	B	34.8	95.2	90.1, 98.3	98.2	103.8	-	11.0	8.1, 14.2	10.4	12.2	12.4		
Kyle Ardoin	R	W	65.2	4.8	1.7, 9.9	1.8	-3.6	-	89.0	85.8, 91.9	89.7	88.0	87.6		
<b>2017 October Treasurer</b>															
Derrick Edwards	D	B	29.3	87.1	81.2, 91.8	92.5	105.0	-	8.9	6.3, 11.7	8.8	2.3	7.8		
Angele Davis	R	W	20.6	2.8	1.0, 6.0	2.2	-4.6	-	27.2	24.8, 29.6	27.4	30.4	24.4		
Neil Riser	R	W	17.5	4.7	1.9, 8.6	0.0	-2.8	-	22.3	19.9, 24.7	23.7	27.6	22.5		
John Schroder	R	W	28.3	3.4	1.1, 7.0	3.1	3.6	-	36.8	34.1, 39.4	36.0	33.9	38.9		
Others			4.3	2.0	.7, 3.9	1.6	-1.5	-	4.9	3.5, 6.2	5.7	6.0	6.5		
<b>2017 November Treasurer</b>															
Derrick Edwards	D	B	35.9	95.2	89.4, 98.7	94.3	110.7	-	12.2	9.0, 15.7	13.1	8.8	11.6		
John Schroder	R	W	64.1	4.8	1.3, 10.6	5.9	-10.6	-	87.8	84.3, 91.0	86.7	91.2	88.4		
<b>2015 October Lieutenant Governor</b>															
Kip Holden	D	B	33.3	90.0	85.9, 93.4	95.1	95.3	-	8.7	6.5, 11.1	5.2	8.2	12.9		
Billy Nungesser	R	W	24.7	3.0	1.2, 5.6	0.0	-0.3	-	34.1	32.0, 36.0	34.8	35.1	34.7		

Voting patterns in DeSoto Parish in recent statewide elections	Estimates for Black Voters						Estimates for White Voters						
	Party	Race	Actual Votes	95% confidence			95% confidence						
				EI RxC	interval	EI 2x2	ER	HP	EI RxC	interval	EI 2x2	ER	HP
John Young	R	W	31.4	4.4	2.1, 7.5	3.4	4.0	-	43.6	41.3, 45.6	44.4	42.6	39.5
Elbert Guillory	R	B	10.6	2.6	1.0, 5.0	1.3	1.0	-	13.7	12.0, 15.2	14.9	14.0	12.8
<b>Attorney General</b>													
Ike Jackson	D	B	13.1	37.5	28.7, 41.5	40.0	38.8	-	2.8	1.0, 7.6	0.5	3.3	2.8
Geri Broussard Baloney	D	B	15.4	37.6	32.7, 41.6	40.6	43.2	-	5.5	3.6, 7.9	4.3	4.4	6.2
Buddy Caldwell	R	W	42.1	17.5	12.0, 25.8	15.4	15.6	-	53.5	49.1, 56.9	54.5	52.7	53.6
Jeff Landry	R	W	27.3	5.8	3.2, 10.1	3.2	1.6	-	36.5	34.4, 38.4	38.2	37.5	35.2
Marty Maley	R	W	2.1	1.5	.6, 2.6	0.6	1.1	-	1.6	.9, 2.4	2.7	2.4	2.2
<b>Secretary of State</b>													
Chris Tyson	D	B	35.6	88.4	82.0, 93.3	91.2	90.6	-	12.4	9.5, 16.0	10.5	15.8	17.5
Tom Schedler	R	W	64.4	11.6	6.7, 18.0	8.4	9.7	-	87.6	84.0, 90.6	89.4	84.4	82.5
<b>2015 November</b>													
<b>Lieutenant Governor</b>													
Kip Holden	D	B	46.3	96.3	92.8, 98.6	98.7	105.6	-	19.5	17.0, 22.4	16.6	16.7	21.3
Billy Nungesser	R	W	53.7	3.7	1.4, 7.2	0.5	-5.6	-	80.5	77.6, 83.0	83.4	83.3	78.7

# EXHIBIT 3

December 5, 2022

*Sent via email*

DeSoto Parish Police Jury  
101 Franklin Street  
Mansfield, LA 71052

Re: DeSoto Parish Policy Jury Redistricting

Dear Members of the DeSoto Parish Police Jury,

The NAACP Legal Defense and Educational Fund, Inc. (“LDF”) writes to correct certain misleading information contained in a letter to the DeSoto Parish Police Jury, dated November 18, 2022, from attorneys at the John D. and Eric G. Johnson Law Firm, LLC and Holzman Vogel Baran Torchinsky & Josefiak, PLLC (the “November 18 Letter”). The November 18 Letter accuses the Police Jury of intentionally discriminating against DeSoto Parish’s white population and threatens litigation based on inaccurate and misleading assertions concerning the Police Jury redistricting plan adopted in April 2022 (“Plan C”). While we do not object to efforts to reduce the population deviations that appear in Plan C, we believe that this can be accomplished with minimal additional changes to district lines. Moreover, we believe the arbitrary elimination of existing majority-Black Police Jury districts, as the November 18 Letter advocates, would itself constitute intentional racial discrimination and may also amount to vote dilution in violation of Section 2 of the Voting Rights Act of 1965.

### **I. Complying with “One Person, One Vote.”**

The Equal Protection Clause of the Fourteenth Amendment requires “equal representation for equal numbers of people” in the apportionment of state and local legislative districts, such as the districts from which members of the DeSoto Parish Police Jury are elected.<sup>1</sup> This “One Person, One Vote” principle provides that maps that weaken the voting power and representation of residents of one legislative district compared to other residents of another district in the same body are

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<sup>1</sup> See *Reynolds v. Sims*, 377 U.S. 533, 559-60 (1964) (citing *Wesberry v. Sanders*, 376 U.S. 1, 18 (1964)).

unconstitutional.<sup>2</sup> The Supreme Court has held that population deviations within plus or minus 5% of the mathematical mean—that is, a total deviation of no more than 10%—are presumptively constitutional.<sup>3</sup> Redistricting plans that exceed this standard are not automatically invalid if the jurisdiction can show that an adopted plan legitimately advances a rational governmental policy formulated “free from any taint of arbitrariness or discrimination.”<sup>4</sup>

Adherence to traditional redistricting principles, the set of general criteria that guide redistricting, may be sufficient to justify greater deviations.<sup>5</sup> These principles serve important democratic purposes. For example, ensuring contiguity and compactness in district maps helps to unify communities and support effective representation. It also importantly limits the ability of map drawers to improperly manipulate lines, helping to prevent the practice of gerrymandering.

Contrary to the November 18 Letter and the attached complaint, it appears that Plan C was drawn according to traditional redistricting principles and goals, and not predominantly on the basis of race or with the intent to discriminate against white voters. Rather, it appears that it was drawn primarily to preserve, to the extent practicable, the existing district boundaries while substantially correcting for changes in the population. Maintaining districts as previously drawn, where deviation from those historical boundaries is not required by the Voting Rights Act or other principles, can serve voters by maintaining continuity of representation. This principle aims to ensure that redistricting does not introduce radical changes to maps and to voters’ elected representatives unnecessarily.

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<sup>2</sup> See *Reynolds*, 377 U.S. at 567–68.

<sup>3</sup> See *Reynolds*, 377 U.S. at 568 (“The Equal Protection Clause demands no less than substantially equal state legislative representation for all citizens, of all places as well as of all races.”); see also *Gaffney v. Cummings*, 412 U.S. 735, 744–45 (1973) (explaining that “minor deviations from mathematical equality among state legislative districts” are not constitutionally suspect, but “larger variations from substantial equality are too great to be justified by any state interest”); *Brown v. Thomson*, 462 U.S. 835, 842 (1983) (holding that apportionment plans with a maximum population deviation among districts of less than 10% are generally permissible, whereas disparities in excess of 10% most likely violate the “one person, one vote” principle).

<sup>4</sup> *Roman v. Sincock*, 377 U.S. 695, 710 (1964); see *Brown*, 462 U.S. at 847–48 (stating that “substantial deference” should be given to a state’s political decisions, provided that “there is no ‘taint of arbitrariness or discrimination’”); see also *Brown*, 462 U.S. at 852 (Brennan, J., dissenting) (“Acceptable reasons . . . must be ‘free from any taint of arbitrariness or discrimination . . . .’”).

<sup>5</sup> E.g., *Brown*, 462 U.S. at 847-48 (principle of preserving county boundaries could justify deviation as high as 13%); see generally *Shaw v. Reno*, 509 U.S. 630, 647, 651 (1993).

Other traditional redistricting principles may also justify the larger than normal deviations found in Plan C. For example, the U.S. Supreme Court has recognized the importance of keeping communities of interest whole in the map-drawing process.<sup>6</sup> Communities of interest can be defined as a neighborhood or group of people with common policy concerns that would benefit from being maintained in a single district. While race cannot be the sole factor, race is one factor that can help define a community of interest in tandem with other considerations such as population deviations, contiguity, and maintaining the cores of prior districts. Indeed, it is critical that no one factor outweighs all others.

Even if the Police Jury is inclined to redraw the redistricting plan to reduce the population deviation to within the presumptively valid 10% threshold, there is no reason for the radical departure from historic district lines advocated by the November 18 Letter or for disregarding other traditional redistricting principles without any justification other than changing the racial composition of the districts. By way of example, attached to this letter is an alternative plan that reduces the overall deviation to approximately 4.7% while making minimal additional changes to Plan C.

## **II. The November 18 Letter Is Misleading.**

The authors of the November 18 Letter make a number of misleading assertions to support the flawed argument that Plan C constitutes a racial gerrymander and is the product of racial discrimination.

Racial gerrymandering occurs where race is the predominant reason for drawing district lines in a particular manner.<sup>7</sup> Where reasons other than race predominantly drove the line drawing, there has been no racial gerrymandering, even if race was a secondary consideration. The complainants assert that Plan C is a racial gerrymander because the districts have purportedly bizarre shapes and boundaries. They ignore that Plan C's districts largely follow the same lines as in the prior plans, with some departure from the old lines to reduce the deviation. Thus, any awkwardness in the district lines can better be explained by adherence to the traditional principle of preserving the prior district lines than by the race of individual voters.

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<sup>6</sup> *Karcher v. Daggett*, 462 U.S. 725 (1983).

<sup>7</sup> See *Miller v. Johnson*, 515 U.S. 900, 909 (1995).

Likewise, the November 18 letter asserts that the fact that the predominantly white Police Jury districts have greater than average population while the predominantly Black districts have lower than average population is evidence that this honorable body intentionally discriminated against DeSoto Parish's white voters. That contention is flawed for the same reason that the complainants' racial gerrymandering argument fails: The deviations are better explained by the map drawer's attempt to preserve the existing district lines while taking into account where the population growth had occurred. Moreover, as the alternative plan attached hereto shows, these deviations can be rendered de minimis with minor adjustments to Plan C.

The November 18 Letter suggests that the Police Jury should have endeavored to eliminate one or more existing majority-Black districts ostensibly in the name of avoiding racial gerrymandering and discrimination—regardless of the impact on existing district lines, the relationships between voters and their elected representatives, or the demands of traditional redistricting principles. Doing as the complainants ask, however, could place the Policy Jury in significant legal jeopardy. Indeed, it is difficult to imagine a starker example of intentional discrimination than purposely eliminating an existing majority-minority district for no other reason than to achieve a desired racial composition for the overall plan. Yet that is exactly what the complainants would have this body do.

### **III. The DeSoto Parish Police Jury Must Comply with Section 2 of the Voting Rights Act.**

The November 18 Letter also suggest that the Police Jury lacked sufficient evidence that the Voting Rights Act required race-based line drawing. Putting aside that, as explained above, Plan C was not drawn predominantly on the basis of race, there is substantial evidence that a DeSoto Parish Police Jury map that dilutes the voting strength of Black community members and/or eliminates majority-Black districts that have historically existed could run afoul of federal law. Removal of these districts would likely violate Section 2.

To ensure that racial minority voters have an equal opportunity to elect their preferred candidates, Section 2 prohibits states and localities from drawing electoral lines with the intent or effect of diluting the voting strength of voters of color. That is, the Voting Rights Act requires that voters of color be provided equal opportunities to elect representatives of their choice not only for state-level representative bodies,

but also for local elected bodies including parish governing boards, school boards, and city councils.

Section 2 prohibits minority vote dilution and requires you to ensure that racial minority voters have an equal opportunity “to participate in the political process and elect candidates of their choice,” in light of the Parish’s demographics, voting patterns, history, and other factors under the “totality of circumstances.”<sup>8</sup>

Redistricting maps may dilute the voting strength of people of color if: (1) a district can be drawn in which the minority community is sufficiently large and geographically compact to constitute a majority; (2) the minority group is politically cohesive; and (3) in the absence of a majority-minority district, candidates preferred by the minority group would usually be defeated due to the political cohesion of non-minority voters for their preferred candidates.<sup>9</sup> After establishing these three preconditions, a “totality of circumstances” analysis determines whether minority voters “have less opportunity than other members of the electorate to participate in the political process and to elect representatives of their choice.”<sup>10</sup>

Recent election results demonstrate stark patterns of voting along racial lines in the State of Louisiana,<sup>11</sup> and DeSoto Parish specifically. In a study of 11 recent elections encompassing DeSoto Parish, LDF found strong patterns of racial polarized voting wherein Black voters in the parish supported a common preferred candidates

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<sup>8</sup> See *Thornburg v. Gingles*, 478 U.S. 30, 34 (1986).

<sup>9</sup> *Id.*

<sup>10</sup> 52 U.S.C. § 10301(b); *Colleton Cty. Council v. McConnell*, 201 F. Supp. 2d 618, 632 (D.S.C. 2002) (quoting *Gingles*, 478 U.S. at 47) (“[Section] 2 prohibits the implementation of an electoral law that ‘interacts with social and historical conditions to cause an inequality in the opportunities enjoyed by black and white voters to elect their preferred representatives.’”); see also *LULAC v. Perry*, 548 U.S. 399, 425 (2006) (describing the operation of the “totality of the circumstances” standard in the vote-dilution claims).

<sup>11</sup> A district court recently found that there was sufficient preliminary evidence of racially polarized voting statewide to support plaintiffs’ challenge to Louisiana’s Supreme Court district map. *Louisiana State Conference of NAACP v. Louisiana*, 490 F. Supp. 3d 982, 1019 (M.D. La. 2020). In *St. Bernard Citizens For Better Government*, the district court found racially polarized voting patterns in statewide gubernatorial elections, as well as local parish elections. *St. Bernard Citizens For Better Gov’t*, 2002 WL 2022589, at \*7 (E.D. La. Aug. 26, 2002). See, e.g., *Terrebonne Par. Branch NAACP v. Jindal*, 274 F. Supp. 3d 395, 436-37 (M.D. La. 2017), rev’d sub nom. *Fusilier v. Landry*, 963 F.3d 447 (5th Cir. 2020) (The district court found that there were racially polarized voting patterns in the parish’s judicial elections, and although the Fifth Circuit reversed the district court’s decision, it held that the district court did not err in its finding of racially polarized voting); *Citizens for a Better Gretna v. City of Gretna*, 636 F. Supp. 1113, 1124 (E.D. La. 1986); *Major v. Treen*, 574 F. Supp. 325, 337 (E.D. La. 1983) (The court held that there was racial polarization in Orleans Parish).

by substantial margins, ranging from approximately 60 to over 90 percent, while white voters preferred different candidates by similar margins. At a parish-wide level, the candidates preferred by Black voters were generally outvoted compared to preferred by white voters. Such patterns form the heart of a potential minority vote dilution claim.<sup>12</sup> The Parish Police Jury must therefore be well attuned to your obligations under Section 2 of the Voting Rights Act and must not arbitrarily eliminate districts that have historically provided Black voters in the parish an opportunity to elect candidates of their choice. Should you consider a new map, Section 2 compels you to preserve effective majority-minority opportunity districts that remain necessary and effective for Black voters to elect candidates of their choice.

\* \* \*

In conclusion, we hope to be a resource in your efforts to ensure the map ultimately enacted for the DeSoto Parish Police Jury complies with the U.S. Constitution and both federal and state statutes. We provide this guidance to help you mitigate the risk of costly and unnecessary litigation. States and localities that fail to adhere to federal law in the redistricting process risk exposure to extremely burdensome legal fees—including both defense costs and the costs of prevailing plaintiffs—and for this reason it is critical that you take steps to ensure that your plan complies with federal law.<sup>13</sup> We would encourage caution against adopting the

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<sup>12</sup> *Gingles*, 478 U.S. at 48 n.15; see also *Johnson v. De Grandy*, 512 U.S. 997, 1007 (1994) (explaining that racially polarized voting increases the potential for discrimination in redistricting, because “manipulation of district lines can dilute the voting strength of politically cohesive minority group members”); *N. Carolina State Conf. of NAACP v. McCrory*, 831 F.3d 204, 221 (4th Cir. 2016) (noting that racially polarized voting is “[o]ne of the critical background facts of which a court must take notice” in Section 2 cases); *Collins v. City of Norfolk, Va.*, 816 F.2d 932, 936-38 (4th Cir. 1987) (emphasizing that racially polarized voting is a “cardinal factor[]” that “weigh[s] very heavily” in determining whether redistricting plans violate Section 2 by denying Black voters equal access to the political process).

<sup>13</sup> Last year, a small school district in New York State paid more than \$11 million dollars in attorneys’ fees after losing a Section 2 lawsuit brought by a local NAACP branch. See Jennifer Korn, *ERCSD Threatens to Fire Teachers if Legal Fees Not Cut to \$1: NAACP Leaders Respond*, ROCKLAND COUNTY TIMES, Jan. 21, 2020, <https://bit.ly/39dKvij>; Report and Recommendation, NAACP, *Spring Valley Branch v. East Ramapo Central School Dist.*, No. 7:17-08943-CS-JCM, 2020 WL 7706783 at \*12 (S.D.N.Y. Dec. 29, 2020) (finding that the school district should pay over \$4 million in plaintiffs’ attorneys’ fees and costs).

Lawmakers in Charleston County, South Carolina, following the 2000 redistricting cycle, spent \$2 million unsuccessfully defending against a Section 2 claim and an additional \$712,027 in plaintiffs’ attorneys’ fees and costs. Order Granting Attorneys’ Fees, *Moultrie v. Charleston Cty.*, No. 2:01-cv-00562-PMD (D.S.C. Aug. 8, 2005); Congressional Authority to Protect Voting Rights After Shelby

flawed reading of federal statutory and constitutional requirements contained in the November 18 Letter, and urge you to disregard the complainants' calls to engage in discriminatory map-making.

Our organization has authored a guidebook, *Power on the Line(s): Making Redistricting Work for Us*, which further expands upon the principles defined above that can be accessed online at [bit.ly/LDFRedistrictingGuide](https://bit.ly/LDFRedistrictingGuide). Please also feel free to contact Stuart Naifeh, [snaifeh@naacpldf.org](mailto:snaifeh@naacpldf.org), with any questions or to discuss these issues in more detail.

We appreciate your consideration and time and wish you best of luck in enacting a fair and equitable map.

Sincerely,

/s/ Stuart Naifeh

Stuart Naifeh, Manager of the Redistricting Project  
Victoria Wenger, Attorney  
NAACP Legal Defense & Educational Fund, Inc.  
40 Rector Street, 5th Fl.  
New York, NY 10006

/s/ Sara Rohani

Sara Rohani, Redistricting Fellow  
NAACP Legal Defense & Educational Fund, Inc.  
700 14th St. N.W. Ste. 600  
Washington, D.C. 20005

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County v. Holder: Hearing Before the Subcomm. on the Constitution, Civil Rights and Civil Liberties of the H. Comm. on Judiciary, 116th Cong. 14 (Sept. 24, 2019) (Written Testimony of Professor Justin Levitt) (citing Amended Judgment, *Moultrie v. Charleston Cty.*, No. 2:01-0562 (D.S.C. Aug. 9, 2005)).

A challenge to Virginia's state legislative redistricting cost taxpayers more than \$4 million dollars. Dave Ress, *Big bills for Virginia's redistricting battle*, Daily Press, (July 13, 2018), <http://www.dailypress.com/news/politics/dp-nws-shad-plank-0714-story.html>.

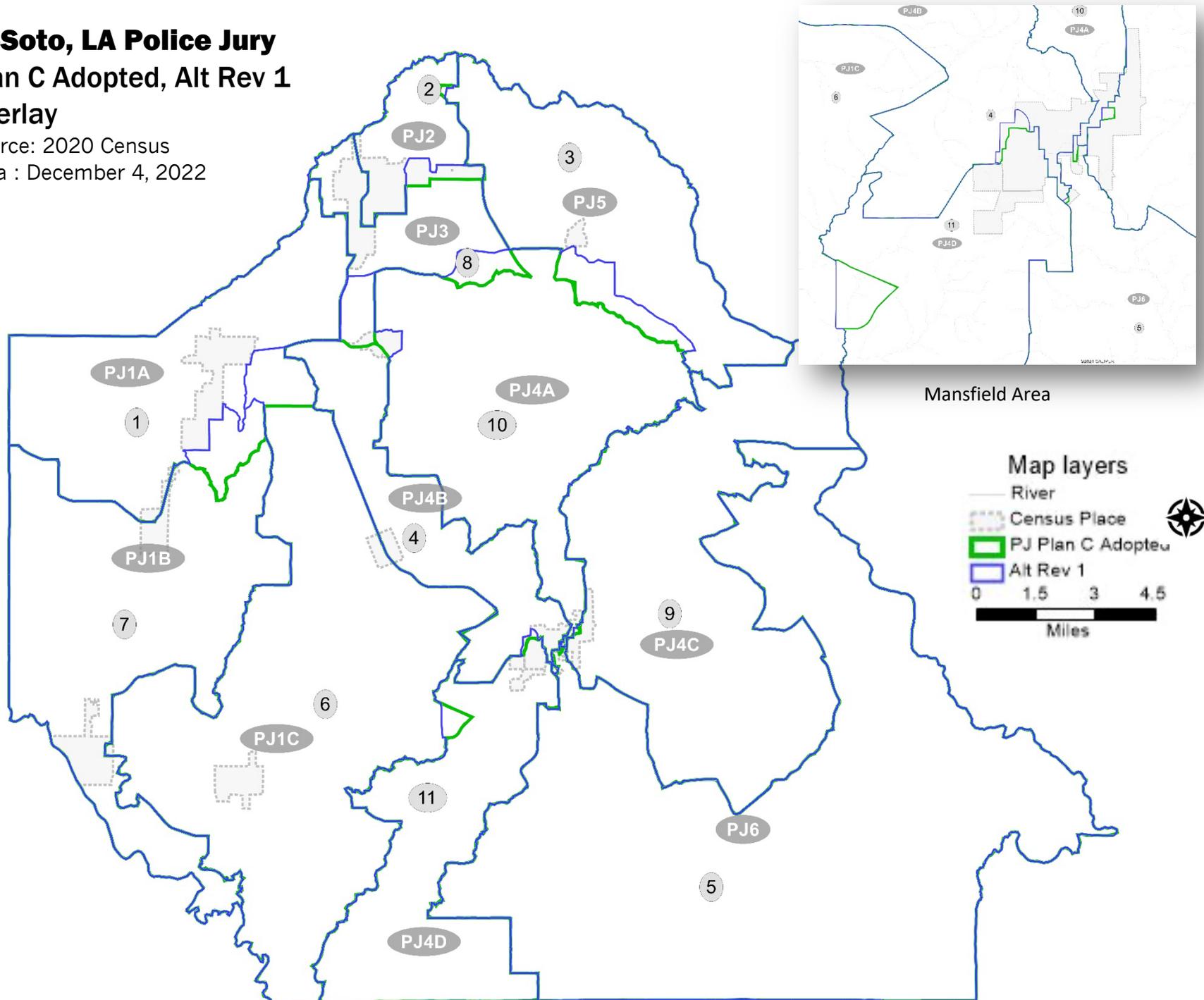
NAACP Legal Defense and Educational Fund, Inc. (“LDF”)

Since its founding in 1940, LDF has used litigation, policy advocacy, public education, and community organizing strategies to achieve racial justice and equity in political participation, education, economic justice, and criminal justice. Throughout its history, LDF has worked to enforce and promote laws and policies that increase access to the electoral process and prohibit voter discrimination, intimidation, and suppression. LDF has been fully separate from the National Association for the Advancement of Colored People (“NAACP”) since 1957, though LDF was originally founded by the NAACP and

**Appendix I**

**DeSoto, LA Police Jury  
Plan C Adopted, Alt Rev 1  
Overlay**

Source: 2020 Census  
Data : December 4, 2022



Mansfield Area

