

Exhibit 5

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA**

PRESS ROBINSON, et al.,

Plaintiffs,

v.

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

Defendant.

EDWARD GALMON, SR., et al.,

Plaintiffs,

v.

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

Defendant.

Civil Action No. 3:22-cv-00211-SDD-RLB

Civil Action No. 3:22-cv-00214-SDD-RLB

**DECLARATION OF PRESS ROBINSON IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to 28 U.S.C. § 1746, I, Dr. Press Robinson, declare as follows:

1. My name is Press Robinson. I am over 18 years of age and am competent to make this declaration. I have personal knowledge of the statements made in this affidavit and each is true and correct.
2. I am Black and a U.S. citizen.
3. I am a resident of the State of Louisiana, and I currently reside in Baton Rouge, Louisiana.
4. I am lawfully registered to vote in Congressional District (“CD”) 2.
5. I am a regular voter who votes in federal, state, and local elections. I last voted in the November 2021 election. I intend to vote in future elections, including the upcoming 2022 congressional elections.

6. I have always been actively involved in my community and I regularly keep up with the political process. In the 1980s, I was the first Black person to be elected to the East Baton Rouge School Board. I served on the board for over twenty years. I was also the first Black person to be elected president of the School Board. I am a former member of the NAACP. I am currently a participant of Together Baton Rouge and Together Louisiana. These organizations monitor what is happening in my community and around the state of Louisiana.
7. I have followed the current redistricting cycle. I learned about the process through news reports and through conversations with others at Together Baton Rouge and Together Louisiana. I believe that a second majority-Black district is necessary, and that the enacted map, with only one majority-Black district results in the dilution of Black voting strength in Louisiana.
8. I strongly believe that the maps introduced during the legislative session that included two majority-Black districts would better protect my community. The enacted plan packs voters like me in Baton Rouge into the same district as New Orleans. Baton Rouge and New Orleans are distinct communities with distinct needs. New Orleans is a destination city for tourists, whereas tourism is less important to Baton Rouge's economy. New Orleans is also below sea level, and so major disasters are a major concern there. But in Baton Rouge, improving our infrastructure is a major concern. For example, we have been having discussions for almost half a century about the need for a new bridge over the Mississippi River.

9. I am frustrated that the Legislature has enacted a map that packs Black voters in Baton Rouge like me into CD 2 along with those in New Orleans. As a resident of CD 2, the strength of my vote is diluted. The enacted map deprives me of the opportunity to elect a candidate who represents my needs and the needs of my community. It prevents my community and I from being able to advocate effectively for the causes we care about.
10. I declare under penalty of perjury under the laws of Louisiana that the foregoing is true and correct. This Declaration was executed on April 13, 2022.

Press Robinson
Dr. Press Robinson

Exhibit 6

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA**

PRESS ROBINSON, et al.,

Plaintiffs,

v.

KYLE ARDOIN, in his official capacity
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Defendant.

Civil Action No. 3:22-cv-00211-SDD-RLB

Civil Action No. 3:22-cv-00214-SDD-RLB

**DECLARATION OF EDGAR CAGE IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to 28 U.S.C. § 1746, I, Edgar Cage, declare as follows:

1. My name is Edgar Cage. I am over 18 years of age and am competent to make this declaration. I have personal knowledge of the statements made in this affidavit and each is true and correct.
2. I am Black and a U.S. citizen.
3. I am a resident of the State of Louisiana, and I currently reside in Baker, Louisiana.
4. I am lawfully registered to vote in Congressional District (“CD”) 2.
5. I am a regular voter who votes in federal, state, and local elections. I last voted in the November 13, 2021 election. I intend to vote in future elections, including the upcoming 2022 congressional elections.

6. I am politically active. I regularly attend legislative sessions. I am also involved with Together Louisiana and Together Baton Rouge. These are non-partisan organizations that focus on issues that affect people in my state and community.
7. As the Legislative Liaison for Together Louisiana, I remain up to date on political developments. I've learned about and discussed the current redistricting process at Together Louisiana, including through discussions we had with Fair Districts Louisiana and Louisiana Progress.
8. I have also learned about the redistricting process through listening to roadshow testimony. I even testified on a few occasions. I testified that Louisiana should have a congressional map with two majority-Black districts in order to ensure that Black voters have the same opportunity to elect candidates of their choice as white voters.
9. I supported the maps introduced during the legislative session that included two majority-Black districts because I felt that they better protected my community. The enacted map packs Black voters like me in Baton Rouge into the same district as New Orleans.
10. Black voters in Baton Rouge like myself should not be packed into the same congressional district as New Orleans because these two major cities represent distinct communities. New Orleans and Baton Rouge have very different economies. For example, while New Orleans is heavily reliant on tourism, Baton Rouge's economy relies on the petrochemical industry. The education systems are also different. Unlike Baton Rouge, New Orleans's public school system is comprised of only charter schools. Additionally, there are unique infrastructure

concerns in Baton Rouge. As an example, the traffic caused by Interstate 10 is a big problem in Baton Rouge. Voters in Baton Rouge like myself should not have to compete for the attention of the same congressional representative as those in New Orleans.

11. As a resident of CD 2, the strength of my voice is diluted. The enacted map prevents me from being able to advocate effectively for the causes I care about.
12. I declare under penalty of perjury that the foregoing is true and correct. This Declaration was executed on April 13, 2022.

Edgar Cage
Edgar Cage

Exhibit 7

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA**

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Plaintiffs,

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Defendant.

Civil Action No. 3:22-cv-00211-SDD-RLB

Civil Action No. 3:22-cv-00214-SDD-RLB

**DECLARATION OF DOROTHY NAIRNE IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to 28 U.S.C. § 1746, I, Dorothy Nairne, declare as follows:

1. My name is Dorothy Nairne. I am over 18 years of age and am competent to make this declaration. I have personal knowledge of the statements made in this affidavit and each is true and correct.
2. I am Black and a U.S. citizen.
3. I am a resident of the State of Louisiana, and I currently reside in Assumption Parish.
4. I am lawfully registered to vote in Congressional District (“CD”) 6.
5. I am a regular voter who votes in federal, state, and local elections. Most recently, I voted in the 2020 General Election. I intend to vote in future elections, including the upcoming 2022 congressional elections.

6. I am very active in my community. I have attended rallies and town halls, particularly around economic development and environmental justice, because advocating for the health and well-being of my community is highly important to me. In advance of the 2020 decennial census, I served as a Captain of Together Louisiana, a non-partisan organization that advocates for my community. In that capacity, I knocked on doors throughout Napoleonville to encourage my neighbors to fill out their census forms and vote in the 2020 General Election.
7. I studied U.S. History and Black History at my university, so I have long been aware of the ways in which redistricting is used to undermine the power of Black voters. I have followed this redistricting cycle since the 2020 decennial census results were released. I attended redistricting webinars hosted by the Urban League of Louisiana and the NAACP, and I watched the news and read about the legislative session.
8. Because I have been following these updates, I am aware that the total population in my district, CD 6, has increased based on the 2020 census data. I am aware that the enacted plan cracks communities of Black voters like me in a way that prevents the creation of a second majority-Black district and, thus, dilutes my vote. I will suffer irreparable harm because I will be denied the opportunity to elect candidates of my choice, who represents my needs and my interests.
9. My community has very specific needs. Many of my neighbors' families have lived here since enslavement, and the legacy of under-investment in this area continues to this day. My community is rural, has a sizeable Black population, and lacks resources. Our students are under-served, our infrastructure needs

modernization, we lack ready access to fresh groceries, and our economy requires diversification to ensure that our young people have gainful employment opportunities. In the Louisiana Legislature's new congressional map, we are forced to compete for resources and investments with communities that look very different from ours, and that, because they make up the majority of voters in the district, are able to gain the attention of our congressional representative.

10. Enacting a second majority-Black district would lead to many positive changes. It would boost the confidence and sense of self-efficacy of my community. We would be able to get things done, and young people would have more of a reason to stay. Conversations with my neighbors have made it clear to me that my community has lost faith in our political institutions. Being represented by someone who fights for our rights and interests would be a statement to my community that our voices matter. I would feel like the work of my ancestors to ensure that I stand on equal footing with others would finally come to fruition.
11. I have donated to Congressional candidates and I have contacted my Congressman on issues I care deeply about. As a small business owner, I have met with members of my Congressman's Economic Development team for business planning purposes. But I do not believe that my Congressman advocates for my community's needs. As is, I have yet to see my Congressman campaign in my community. Short of when natural disasters strike, we are all but ignored. Because I live in CD 6, my vote is diluted and I am deprived of my right to be heard by a congressperson who represents my interests.

12. I feel angry, paralyzed, and at times helpless knowing that my vote is diluted. If the enacted map remains in place, it will diminish my ability to advocate for the things I care deeply about, such as environmental, socioeconomic, and racial justice. Through my advocacy, I am aware that I do not get equal access to my Congressional representative when compared to other voters in my district. I am also keenly aware that I have to work harder to get the attention of my Congressperson compared to voters in other districts. This is not fair, and at times it feels debilitating.
13. I am a person of action. I want to make sure my choices are meaningful and propel my community forward. As a Black woman whose family fought for the right to vote, the efficacy of my vote deeply matters to me. My parents faced every hurdle imaginable to make sure their voices were heard and to carve out a better life for their children. I am committed to doing the same for the next generation. I want to see my community rise and the only way it can is if our voices are heard.
14. I declare under penalty of perjury that the foregoing is true and correct. This Declaration was executed on April 13, 2022.



Dr. Dorothy Nairne

Exhibit 8

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA**

PRESS ROBINSON, et al.,

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Civil Action No. 3:22-cv-00211-SDD-RLB

Civil Action No. 3:22-cv-00214-SDD-RLB

**DECLARATION OF EDWIN RENÉ SOULÉ IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to 28 U.S.C. § 1746, I, Edwin René Soulé, declare as follows:

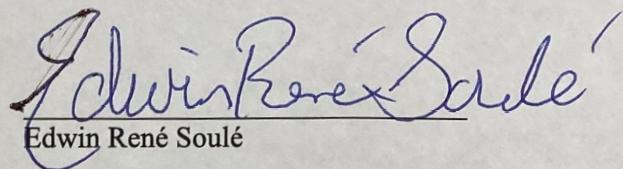
1. My name is Edwin René Soulé. I am over 18 years of age and have personal knowledge of the statements made in this affidavit and each is true and correct.
2. I am Black and a U.S. citizen.
3. I am a resident of the State of Louisiana, and I currently reside in Hammond, Louisiana.
4. I am lawfully registered to vote in Congressional District (“CD”) 1.
5. I am a regular voter who votes in federal, state, and local elections. I most recently voted in the elections for Hammond City Judge on March 17, 2022. I intend to vote in future elections, including the upcoming 2022 congressional election.

6. I have been politically active for over the past 40 years. I regularly attend rallies and town halls in Hammond and neighboring parishes, as well as legislative committee hearings at the State Capitol in Baton Rouge. I worked as campaign manager for a candidate for CD 5, Sandra “Candy” Christophe, during the special election for CD 5, in March 2021.
7. I am a community leader and social advocate, as well as a member of the Tangipahoa Parish NAACP. Throughout the redistricting process, I have been reaching out to legislators to urge them to pass a congressional map with two majority-Black districts.
8. I am frustrated that the Legislature overrode the Governor’s veto to enact a map with only one majority-Black district. I believe that another majority-Black district would not only bring equal access to representation for those Black voters who would live in a second majority-Black district but for all Black voters across the state. A second majority-Black district would give Black voters a true voice in a significant segment of the state.
9. Because my vote is diluted living in CD 1, I will have to work harder to get the attention of my Congressperson. I feel that the Legislature’s failure to pass a map that gives Black Louisianans an equal opportunity to elect candidates of their choice deprives me of my voice and my right to be heard by my congressional representative.
10. I have previously met with my Congressperson, Representative Steve Scalise, at a town hall meeting, approximately four years ago. I brought up my concerns about the economic issues and hardships facing everyday working people. I remember

he interrupted me and dismissed what I had to say before I could finish my remarks. He was not responsive to my concerns and did not treat me like a constituent that he represents. I believe that under the enacted map, it will continue to be difficult for me to advocate for myself and appeal to my representative.

11. I do not believe that my vote counts and is given equal weight as the vote of white Louisianans. I believe my community is underserved by my current representative. For instance, I was personally impacted by Hurricane Ida in August 2021. It was one of the strongest hurricanes that has hit Louisiana in recent years. I did relief work following the Hurricane and saw firsthand the devastation and damage it caused throughout CD 1. But Representative Scalise voted against critical hurricane recovery funds.
12. As the 2022 congressional election is approaching, I believe that I will need to increase efforts in my community to encourage people to vote and to advocate for my needs.
13. I believe that because of the way the congressional map is drawn, my congressperson does not have to pay attention or be responsive to my needs. He can ostracize Black voters because our voting strength is diluted. This means that we do not have a chance to raise issues and ensure that Black voices are heard. This makes me feel frustrated because the way the congressional map is drawn prevents Black voters from having any real influence over our representative to respond to our needs.

14. I know that my representative does not have to be responsive because my vote does not carry equal weight.
15. I declare under penalty of perjury that the foregoing is true and correct. This Declaration was executed on April 14, 2022.



Edwin René Soulé
Edwin René Soulé

Exhibit 9

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA**

PRESS ROBINSON, et al.,

Plaintiffs,

v.

KYLE ARDOIN, in his official capacity
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Defendant.

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Defendant.

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Civil Action No. 3:22-cv-00214-SDD-RLB

**DECLARATION OF ALICE WASHINGTON IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to 28 U.S.C. § 1746, I, Dr. Alice Washington, declare as follows:

1. My name is Alice Washington. I am over 18 years of age and am competent to make this declaration. I have personal knowledge of the statements made in this affidavit and each is true and correct.
2. I am Black and a U.S. citizen.
3. I am a resident of the State of Louisiana, and I currently reside in Baton Rouge, Louisiana.
4. I am lawfully registered to vote in Congressional District (“CD”) 6.
5. I am a regular voter who votes in federal, state, and local elections. I last voted in the 2020 general election. I intend to vote in future elections, including the upcoming 2022 congressional election.

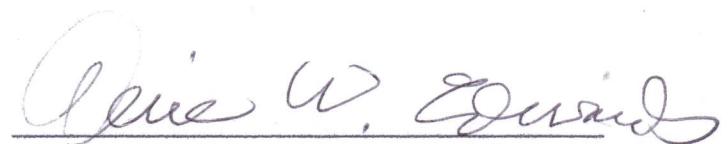
6. I have phone banked for candidates in previous elections. I have also written to and met with my representatives to discuss issues that are important to me, and to seek constituent services.
7. I learned about the redistricting process through the leaders of Together Louisiana, a community non-profit, which made me pay more attention to the process. I volunteered with Together Louisiana and the ACLU to work for a fair redistricting process. I have also learned about redistricting through following the news.
8. I support a second Black-majority district because I support fairness in our society. I care about this cause as a matter of fairness. Right now, the Baton Rouge area's population is approximately one-third Black, and I hoped that redistricting would distribute the population so that elections are fairer. When I go to vote, sometimes I feel that my vote will not matter because the candidates I believe in can never win. I believe that a second Black-majority is necessary to assure that people of color are represented and heard on the issues they care about. I also believe it is important for all of society to have a chance to come together and live more harmoniously, which will be accomplished by fairer representation.
9. I supported the maps introduced during the legislative session that included two majority-Black districts because I felt that they protected my community. As a social worker, I identify with communities of underserved people. I have a lifelong commitment to underserved communities. Any of these maps would

have kept the Black community in Baton Rouge intact, while also providing Black voters in CD 6 with an equal opportunity to elect candidates of their choice.

10. I am frustrated that the Legislature has enacted a map that packs Black voters into CD 2 and disperses Black voters across the other five congressional districts. I believe that the enacted map does not give equal weight to all votes because it dilutes Black voting strength in five out of six congressional districts in Louisiana.
11. Because of the way the congressional redistricting map has been drawn, I do not have equal access to my congressional representative when compared to other voters. Under the enacted map, my voice and the voices of other Black citizens in my district is submerged in a much larger white population. Because of that, elected officials don't need the support of the Black community to win elections, which means that I will have to work harder than white voters to get the attention of my Congressperson. I feel that the enacted map dilutes my vote and deprives me of the opportunity to elect a candidate of my choice. I also believe that the enacted map deprives me of my voice as a Black voter and deprives me of my right to be heard by my congressional representative.
12. I feel that my representative, Congressman Garret Graves, does not represent my views or my community. Sometimes my representatives vote in a way that does not support my community's interests. For example, following the January 6, 2021 attack on the United States Capitol, Congressman Graves voted to overturn the election results, which I found outrageous. Many people in my community feel the same frustration, and want to have their voices heard. Our communities

suffer when the government's policies favor large corporations over us, as a result of our representatives ignoring our views. I believe that if the enacted map remains in place, it would be even more difficult for me to advocate for myself and appeal to my representatives to listen to my views.

13. I declare under penalty of perjury that the foregoing is true and correct. This Declaration was executed on April 14, 2022.



A handwritten signature in black ink, appearing to read "Alice W. Edwards". The signature is written in a cursive style with a horizontal line underneath it.

Dr. Alice Washington

Exhibit 10

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA**

PRESS ROBINSON, et al.,

Plaintiffs,

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KYLE ARDOIN, in his official capacity
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Civil Action No. 3:22-cv-00214-SDD-RLB

**DECLARATION OF CLEE LOWE IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to 28 U.S.C. § 1746, I, Rev. Clee Lowe, declare as follows:

1. My name is Clee Lowe. I am over 18 years of age and am competent to make this declaration. I have personal knowledge of the statements made in this affidavit and each is true and correct.
2. I am Black and a U.S. citizen.
3. I am a resident of the State of Louisiana, and I currently reside in Baton Rouge, Louisiana.
4. I am lawfully registered to vote in Congressional District (“CD”) 6.
5. I am a regular voter who votes in federal, state, and local elections. I last voted in 2022 in the special election for district judge, via absentee ballot. I intend to vote in future elections, including the upcoming 2022 congressional elections.

6. I have attended rallies for candidates, and write to my representatives to express my views. As a pastor, I have contacted my representatives to provide services for veterans who attend my church.
7. I learned about redistricting through news reports, conversations with others in my community who are concerned about redistricting, and by following the legislative session. I work with a grassroots organizing group called Together Baton Rouge, as well as a statewide group called Together Louisiana. I work with these groups to train community leaders to effect change that improves the quality of life in the communities in my parish, including redistricting advocacy to ensure fair representation. I participated in a redistricting summit to discuss issues related to fair representation for my community.
8. I supported the maps introduced during the legislative session that included two majority-Black districts because I felt that they protected my community. It is only fair, given the shifts in population and the increase in the Black population, that we have representation for our desires and issues. The population shifts make clear that there must be an additional Black-minority district so we have the opportunity to elect representatives of our choice. Any of these maps would have kept the Black community in Baton Rouge intact while also providing them with an equal opportunity to elect candidates of their choice.
9. I am frustrated that the Legislature has enacted a map that packs Black voters into CD 2 and disperses Black voters across the other five congressional districts. I believe that the enacted map does not give equal weight to all votes because it

dilutes Black voting strength in five out of six congressional districts in Louisiana.

10. One result of the vote dilution caused in my district, CD 6, by the enacted map, that harms me is that I will not have equal access to my congressional representative when compared to other voters. Under the enacted map, the strength of my vote is diluted, which means that I will have to work harder than white voters in the other five congressional districts, to get the attention of my Congressperson. Because I live in CD 6, I feel that the enacted map dilutes my vote and deprives me of the opportunity to see candidates I believe in win elections to represent me. I also believe that the enacted map deprives me of my voice as a Black voter and deprives me of my right to be heard by my congressional representative.
11. My congressional representative, Congressman Garret Graves, has not been responsive to the concerns in the Black community in our district. He has not visited Black institutions, such as churches and businesses. I feel that he does not respond to our community's concerns. I believe that if the enacted map remains in place, it would be even more difficult for me to advocate for myself and appeal to my representative. That will make it more difficult to express my views and connect my congregation members with critical government services.
12. I declare under penalty of perjury that the foregoing is true and correct. This Declaration was executed on April 14, 2022.



Rev. Clee Lowe

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA**

PRESS ROBINSON, et al.,

Plaintiffs,

v.

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Defendant.

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Defendant.

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Civil Action No. 3:22-cv-00214-SDD-RLB

**DECLARATION OF DAVANTE LEWIS IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to 28 U.S.C. § 1746, I, Davante Lewis, declare as follows:

1. My name is Davante Lewis. I am over 18 years of age and am competent to make this declaration. I have personal knowledge of the statements made in this affidavit and each is true and correct.
2. I am Black and a U.S. citizen.
3. I am a resident of the State of Louisiana, and I currently reside in Baton Rouge, Louisiana.
4. I am lawfully registered to vote in Congressional District (“CD”) 2.
5. I am a regular voter who votes in federal, state, and local elections. I most recently voted in judicial elections for East Baton Rouge Parish Family Court and Baton Rouge City Court in November 2021. I have endeavored to vote in every

U.S. congressional election since I qualified to vote in 2010. I intend to vote in future elections, including the upcoming 2022 congressional elections.

6. I am politically active in my community. I am the Director of Public Affairs and Outreach at Louisiana Budget Project. My job primarily is to engage with elected officials and candidates, community members, partner organizations around civic participation and policy. That has kept me very close and deeply involved with upcoming elections, engagement with candidates who are running for office, as well as currently elected individuals. I have done phone-banking, assisted with text drives, and done direct canvassing to voters over elections.
7. I have closely followed the current redistricting cycle since the beginning of the census work, including assisting with census outreach, waiting for census data, paying close attention to reapportionment and redistricting at the state and local level in Louisiana. I attended and provided testimony at the Baton Rouge roadshow. I watched a livestream of every other roadshow stop available on the Legislature's website.
8. As I have been actively involved in work as a policy advocate and throughout the redistricting process, I have come to believe that a second majority-Black district is necessary to ensure that Black voting strength is not diluted.
9. As a collective whole, Black voices are diluted in Louisiana's congressional delegation. Black voters from Baton Rouge are packed into the same congressional district as Black voters from New Orleans, even though we have vastly different needs and make up different communities.

10. I live in the Garden District of Baton Rouge, which borders South Baton Rouge, a predominantly Black area. Because of the way that the congressional districts are drawn, packing Black voters into CD 2, I am not in the same congressional district as my neighbors who live in CD 6. Therefore, while I am in walking distance of Congressman Garret Graves' home, who represents CD6, I am packed into the same congressional district with voters from the lower wards in New Orleans, which is over an hour from my house.
11. Baton Rouge and New Orleans do not need to be in the same congressional districts because they are made up of different communities. For instance, Baton Rouge and New Orleans do not have the same economy. Most people in New Orleans work in hospitality industries, whereas in Baton Rouge, most people work in petrochemical industries.
12. One of the challenges of being packed into the same congressional district as voters from New Orleans is that because New Orleans has more people, their needs are met first. For instance, we need a new bridge in Baton Rouge and would benefit from infrastructure relief, but because New Orleans has more influence due to its size, my congressperson, Representative Troy Carter, focuses more on the infrastructure needs of New Orleans, specifically on using those infrastructure funds to maintain the levee system. I should not have to compete for resources and attention from my elected representative with voters from New Orleans when we do not have the same communities or needs.
13. It is disheartening that the Legislature enacted a map that continues Louisiana's long history of discrimination making it harder for Black people to participate

equally in the political process. I am disheartened that some of the same barriers to voting rights that my great-grandmother and grandmother advocated against continue today. While this country may have come far in certain ways, we still have a long way to go.

14. A second majority-Black district would give Black voters an equal opportunity to elect candidates of their choice. A map with two majority-Black districts is about fair and equal access to representation. Fair representation means that someone is willing to listen to and appreciate my voice and the voice of Black voters in Louisiana. It is not lost on me that we are fighting for an equal opportunity to elect candidates of our choice just as my ancestors before me.
15. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. This Declaration was executed on April 14, 2022.



Davante Lewis

A handwritten signature in blue ink, appearing to read "Davante Lewis". Below the signature, the name "Davante Lewis" is printed in a smaller, sans-serif font.

Exhibit 12

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA**

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Defendant.

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**DECLARATION OF MARTHA DAVIS IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to 28 U.S.C. § 1746, I, Martha Davis, declare as follows:

1. My name is Martha Davis. I am over 18 years of age and am competent to make this declaration. I have personal knowledge of the statements made in this affidavit and each is true and correct.
2. I am Black and a U.S. citizen.
3. I am a resident of the State of Louisiana, and I currently reside in Baton Rouge, Louisiana.
4. I am lawfully registered to vote in Congressional District (“CD”) 2.
5. I am a regular voter who votes in federal, state, and local elections. I have voted in every U.S. congressional election that I can remember. I intend to vote in future elections, including the upcoming 2022 congressional elections.

6. I am politically active in my community. I regularly volunteer with Together Baton Rouge, particularly on issues I care deeply about. For example, I have written to my Congressperson, phone-banked, or talked to my friends and neighbors about fighting for sensible gun control measures and combatting violence in East Baton Rouge, ensuring access to clean water for my community, ending homelessness, and expanding fresh food initiatives. Last year, I knocked on doors to help pass a tax to support the bus transit system in Baton Rouge. I also recently made calls to ask people to vote against Amendment 5's industrial tax exemptions.
7. As a member of AARP, I write letters to legislators, including my Congressperson, about issues such as keeping Social Security solvent, supporting affordable healthcare, and bolstering consumer protection.
8. I have followed the current redistricting cycle with great interest. I watched the Baton Rouge Road show. I have spoken with my family about redistricting. I have come to believe that a second majority-Black district is necessary to ensure that Black voting strength is not diluted.
9. The enacted map packs Black voters like me in Baton Rouge into the same district as New Orleans. Baton Rouge voters like me should not be forced to compete with New Orleans voters for airtime and resources. Our needs are vastly different. For example, investments in New Orleans understandably must focus on natural disaster relief. But in Baton Rouge, we need very different things, such as investments in improving Interstate 10, building another bridge over the Mississippi River, and adding more lanes to our roads to alleviate the heavy

traffic caused by our recent population boom. Our cities should not have to compete for the attention of the same congressional representative.

10. As a resident of CD 2, the strength of my vote is diluted. This prevents me from being able to advocate effectively for the causes I care about.
11. If a second majority-Black district were enacted, I would feel hopeful. A lot of people I know feel there is no point in voting because they believe it does not make a difference. To get things done, you have to believe change is possible. When Barack Obama became President, we saw more Black people at the polls than ever before, because he made us feel that we mattered. If we had fair representation, my community would have the hope that is a necessary to make change happen.
12. I declare under penalty of perjury that the foregoing is true and correct. This Declaration was executed on April 13, 2022.



Martha Davis

Exhibit 13

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA**

PRESS ROBINSON, et al.,

Plaintiffs,

v.

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

Defendant.

EDWARD GALMON, SR., et al.,

Plaintiffs,

v.

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

Defendant.

Civil Action No. 3:22-cv-00211-SDD-RLB

Civil Action No. 3:22-cv-00214-SDD-RLB

**DECLARATION OF AMBROSE SIMS IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to 28 U.S.C. § 1746, I, Ambrose Sims, declare as follows:

1. My name is Ambrose Sims. I am over 18 years of age and am competent to make this declaration. I have personal knowledge of the statements made in this affidavit and each is true and correct.
2. I am Black and a U.S. citizen.
3. I am a resident of the State of Louisiana, and I currently reside in West Feliciana, Louisiana.
4. I am lawfully registered to vote in Congressional District (“CD”) 5.
5. I am a regular voter who votes in federal, state, and local elections. I try to vote in every election. I intend to vote in future elections, including the upcoming 2022 congressional elections.

6. I consider myself to be a politically active person. I have worked or volunteered on political campaigns at the local and congressional level. Most recently, I worked for a congressional campaign in 2016. I have also hosted fundraisers and canvassed candidates I believe in.
7. As President of the West Feliciana NAACP, I have helped run and coordinate voter registration drives, get-out-the-vote campaigns, and phone-banking events. While I was not personally able to attend the legislative road shows on redistricting, I encouraged West Feliciana NAACP members to attend. I also encouraged them to attend webinars on redistricting and to write to their representatives about their displeasure over the recent Congressional map veto override.
8. I have known that redistricting is important for as long as I remember, but I first became involved in redistricting advocacy in 2010. In both the last and current redistricting cycles, I have encouraged friends, families, and neighbors to educate themselves on redistricting.
9. There is no doubt in my mind that there should be a second majority- Black congressional district in Louisiana. It is commonsense and it is only fair that a state with a one-third Black population should be able to elect officials who will be responsive to their needs in one third of the congressional districts.
10. Knowing that my interests are not fairly represented in Congress makes me feel helpless. I work hard each day to organize my community and to advocate for a wide array of issues, such as equal access to cell towers and high-speed internet, but it feels as though my voice is falling on deaf ears.
11. The enacted plan disempowers my community by splitting our numbers and diluting the power of our vote. West Feliciana is more rural, has a larger Black population,

and has fewer resources than many of the more metropolitan, whiter, and wealthier areas that our community is distanced with. We are a distinct community, with distinct needs. If the enacted plan is not enjoined, I will be denied the opportunity to elect a candidate who votes for my and my community's needs and interests.

12. Because the strength of my vote is diluted under the enacted map, I will lose the ability to advocate effectively for causes I am passionate about, like economic justice, economic development, fair wages, fair employment practices, and modernizing West Feliciana by investing in our infrastructure. I am very active in my community, and I know I am not the only one who feels frustrated. My community is under-served and always has been, and folks understandably feel apathetic.
13. If a second majority-Black district were enacted, I would feel a renewed sense that change is possible. I dream of a future when I can call my Congressperson about the issues I care about and actually see real results for people who look like me. I might even consider running for office myself.
14. I was born in the Deep South in the early 1950s and have experienced inequality and discrimination my entire life. I was one of only a few Black students to graduate from Louisiana State University in 1973. It is my lifelong passion to build a Louisiana that is inclusive and fair, and I firmly believe that one way to do that is by making sure my voice is heard at the congressional level.
15. I declare under penalty of perjury that the foregoing is true and correct. This Declaration was executed on April 13, 2022.



Ambrose Sims

Exhibit 14

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA**

PRESS ROBINSON, et al.,

Plaintiffs,

v.

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

Defendant.

EDWARD GALMON, SR., et al.,

Plaintiffs,

v.

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

Defendant.

Civil Action No. 3:22-cv-00211-SDD-RLB

Civil Action No. 3:22-cv-00214-SDD-RLB

**DECLARATION OF MICHAEL W. MCCLANAHAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to 28 U.S.C. § 1746, I, Michael W. McClanahan, declare as follows:

1. My name is Michael W. McClanahan. I am over the age of 18 and competent to make this declaration.
2. I am the President of the National Association for the Advancement of Colored People Louisiana State Conference ("Louisiana NAACP"). The Louisiana NAACP is a Plaintiff in this case.
3. The Louisiana NAACP was chartered in 1943. I have served as President of the Louisiana NAACP since 2017 and am currently in my third term. We are a nonprofit and nonpartisan organization and a State Conference of the National Association for the Advancement

of Colored People. The Louisiana NAACP's work is devoted to pursuing the social, political, economic, and educational equity of Black people in this state and nation. Our mission includes eliminating racial discrimination and uplifting the protection of voting rights and fair political participation. As a nonprofit, the Louisiana NAACP depends entirely on the work of volunteers, supported by membership fees and private donors.

4. The Louisiana NAACP's work in support of voting rights includes multiple statewide initiatives. Our voter engagement work during recent elections has included "get out the vote" ("GOTV") campaigns; widespread voter registration efforts; voter engagement and education via social media; Relational Voting and the Hustle Initiative, which are voter engagement, registration, and information programs which have engaged over 100,000 Louisiana voters; and a "Souls to the Polls" program that engaged tens of thousands of Louisiana voters during the last presidential election.

5. The Louisiana NAACP has approximately 5,000 members throughout Louisiana, including Black Louisianans who are registered voters. The Louisiana NAACP has over 40 local branches comprising adult members and 16 youth and college chapters across the state. Members live and are registered voters in nearly every parish in Louisiana, including in every Congressional Districts ("CD") as drawn in the enacted congressional map. The Louisiana NAACP has active chapters in all six congressional districts, including: St. Bernard (CD 1); New Orleans (CD 2); Lafayette (CD 3); Shreveport (CD 4); Monroe (CD 5); and Baton Rouge (CD 6).

6. Under the enacted map, Black voters in Louisiana are packed into CD 2 because they constitute a disproportionate majority. Black voters are dispersed, or cracked, across the other five congressional districts, which deprives Black people of meaningful representation and

opportunities to elect our preferred candidates, despite making up nearly one-third of Louisiana's population. If elections proceed under the enacted maps, Black voting strength in Louisiana will be diluted and NAACP members living in the State will be directly impacted.

7. The Louisiana NAACP's involvement in the redistricting process has been a multi-year effort, encompassing various forms of advocacy.

8. The Louisiana NAACP has been deeply involved in the formal legislative redistricting process. On behalf of the NAACP, I was personally in attendance at multiple committee hearings throughout the redistricting roadshow and special session. Other members of the NAACP made their voices heard by testifying at the roadshow hearings, testifying during the redistricting session, placing calls and sending texts to the Governor, urging him to veto the maps passed by the legislature, and contacting state legislators to ask them to sustain the Governor's veto.

9. The Louisiana NAACP signed multiple letters throughout the redistricting process on October 18, 2021, December 14, 2021, February 4, 2022, and February 18, 2022, and submitted maps along with the first letter on October 18.

10. After the Legislature passed maps that did not increase representation for Black voters in Louisiana, including NAACP members, our organization launched several coordinated campaigns to demand that the Governor veto the map. We hosted a press conference and rally at the Governor's mansion on February 23, 2022. Prior to the veto override session, members of the Louisiana NAACP and local chapters made over 100 calls to legislators to urge them to sustain the Governor's veto.

11. The Legislature nevertheless overrode the Governor's veto and passed a map with only one majority-Black district, choosing to pack Black voters in CD 2, rather than give Black

voters in each of the six congressional districts an equal opportunity to elect candidates of their choice. As a result, the Louisiana NAACP has shifted our efforts to fight against the effects of voter dilution in the other five congressional districts, by increasing education and outreach to voters in affected districts.

12. The discriminatory map will impede the Louisiana NAACP's mission to achieve equitable political representation for Black voters across the entire state. The Louisiana NAACP will be forced to divert resources from its broader statewide voter registration and community empowerment initiatives to ensure that its constituents and members in the affected districts are able to engage with the political process on equal footing with those in other districts.

13. For instance, the Louisiana NAACP typically engages in GOTV across the entire state, including organizing voter education events and preparing voter materials. However, the Louisiana NAACP has not been able to begin our general GOTV and voter education work for the upcoming fall elections because we have needed to focus on redistricting advocacy and will continue to shift our focus to target districts where Black voting strength is diluted.

14. In addition, the Louisiana NAACP will need to devote more of its own resources to engage with the congressional candidates that represent Black voters in CD 1, 3, 4, 5, and 6, to ensure that Black voters have a voice and opportunity to be heard by their elected officials.

15. The Louisiana NAACP has devoted significant time and resources to redistricting education. We had to educate people on what redistricting means and how to engage in the process, and we had to recontinue our advocacy efforts after the Governor's veto was overridden. When the Legislature acts to weaken the voices of Black voters, such as by enacting a map that dilutes Black voting strength, NAACP members and other voters become disillusioned with the process and become apathetic. Political participation is a cornerstone of the Louisiana NAACP's

mission. Now, under the discriminatory map, the NAACP will have to redouble its efforts to engage Black voters and convince them that their vote matters, which will require more resources and will make it more difficult to accomplish other organizational goals.

16. Despite the significant efforts and resources that we have devoted to advocating for a representative congressional map, the Louisiana legislature has insisted on enacting a map that violates federal law and deprives Black voters an equal opportunity to participate in the political process and elect their candidate of choice in five out of six congressional districts.

17. During the roadshow, the legislative session, and the campaign to sustain the veto, the Louisiana NAACP has advocated for a congressional map with two majority-Black districts. In our advocacy letter, we presented the Legislature with several alternative configurations that would have included two majority-Black districts. We supported each of the maps introduced during the special session that included a second majority-Black district. I believe that any of these maps would have reversed longstanding dilution of Black voting strength in Louisiana's congressional maps.

18. The maps also adhered to traditional redistricting principles and protected communities of interest. For instance, Native communities in Houma, Thibodaux, and Lafourche typically live off the Bayous and form a distinct community of interest. Under the current congressional map, this distinct community of interest is split. At least one map introduced during the legislative session with two majority-Black districts kept this community in the same congressional district.

19. In addition, these maps would have had Baton Rouge and New Orleans in two separate congressional districts. This configuration, in my opinion, better reflects the different

communities of interest in Baton Rouge and New Orleans. There is no compelling reason for Baton Rouge and New Orleans to be packed into a single congressional district.

20. I know from my work with Louisiana NAACP members and from attending the roadshow that people from Baton Rouge do not want to be in the same congressional district as people from New Orleans because Baton Rouge and New Orleans are two cities with distinct needs.

21. In my personal experience, as a resident of Baton Rouge, I firmly believe that Baton Rouge and New Orleans should not be in the same congressional district because they are two very different cities. Baton Rouge and its metropolitan area constitute a distinct community of interest than New Orleans. Baton Rouge has different food, different culture, and a different energy than New Orleans. Despite being the capital city, Baton Rouge is a blue-collar town. Unlike New Orleans, Baton Rouge has experienced slower economic development and has a slower pace than New Orleans.

22. Moreover, CD2 in the enacted map cracks the population of Baton Rouge in two. These two regions have historically been part of the greater Baton Rouge area. Splitting this defined, established community disenfranchises and diminishes the power of Black voters in the greater Baton Rouge area by preventing them from being represented by a single Congressmember.

23. I believe that a second majority-Black district is needed in Louisiana to combat the impact of racial discrimination and give Black people in Louisiana a voice and an opportunity for equal access to representation to combat the longstanding effects of racial discrimination in Louisiana.

24. Racism is alive and well in the state of Louisiana. Black people in Louisiana

experience discrimination in all aspects of everyday life, including housing, economic development, healthcare, and criminal justice.

25. In my experience as President of the Louisiana NAACP, I have personally witnessed the effects of institutional racism in Louisiana. For instance, some of my work takes me to rural Louisiana, where poverty rates are disproportionately high in Black communities. In addition, I recently served on the Governor's Covid-19 task force where it became glaringly obvious to me that Black Louisianans, particularly during the Covid-19 pandemic, do not have equal access to quality health care as white Louisianans.

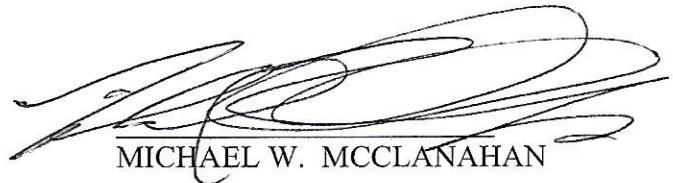
26. Another example of Louisiana's long history of racism includes environmental racism. Louisiana is home to Cancer Alley, where petrochemical plants running along the Mississippi River between Baton Rouge and New Orleans, have caused high rates of cancer and respiratory diseases. The rates of illness are disproportionately higher for Black people living in Cancer Alley than for white people.

27. I believe that this institutional and environmental racism can be attributed in part to the way our congressional maps are drawn, which perpetuates longstanding discrimination against Black people. The configuration of the congressional map with only one majority-Black district means that Black Louisianans, who make up nearly one-third of the state's population, do not have an equal opportunity to elect candidates of their choice. Black Louisianans do not have equal access to representation or to their congressional representatives.

28. A map with two majority-Black districts would help move the state of Louisiana in the right direction and address this history of discrimination by finally giving Louisiana's Black residents an equal voice and opportunity to participate in the political

process.

29. I declare under penalty of perjury that the foregoing is true and correct. This Declaration was executed on April 14, 2022.



MICHAEL W. MCCLANAHAN

A handwritten signature in black ink, appearing to read "MICHAEL W. MCCLANAHAN". The signature is fluid and cursive, with the name written in a larger, more formal style at the end.

Exhibit 15

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA**

PRESS ROBINSON, et al.,

Plaintiffs,

v.

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

Defendant.

EDWARD GALMON, SR., et al.,

Plaintiffs,

v.

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

Defendant.

Civil Action No. 3:22-cv-00211-SDD-RLB

Civil Action No. 3:22-cv-00214-SDD-RLB

**DECLARATION OF ASHLEY SHELTON IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to 28 U.S.C. § 1746, I, Ashley Shelton, declare as follows:

1. I am 45 years old and competent to make this declaration.
2. I am Black and a U.S. citizen.
3. I am a lawfully registered voter. I reside and am registered to vote in Congressional District (“CD”) 6.
4. I have voted in Louisiana since I turned 18 years old.
5. I am a resident of Baton Rouge, Louisiana, where I have lived my whole life. I serve as the President and CEO of the Power Coalition for Equity and Justice (“PCEJ”).
6. PCEJ is a nonpartisan, nonprofit statewide civic engagement table in Louisiana that works to build grassroots power, advocate for community-centered policies, and increase voter participation.
7. PCEJ’s mission is to support community-driven activism and grassroots

leadership development to empower citizens to address classism, racism, and other marginalization in their own lives and communities. PCEJ advances its mission with the support of a small full- and part-time staff, community volunteers, and a membership of nonprofit and advocacy organizations united around an integrated civic engagement strategy to educate and empower voters across Louisiana.

8. In 2019, PCEJ staff, volunteers, and member organizations engaged with 465,406 infrequent and semi-frequent voters of color through hundreds of thousands of doors knocked, phone calls, and text messages, totaling over 1.2 million contact attempts in an effort to support civic participation. In 2020, PCEJ's efforts, including over 2.7 million contact attempts to infrequent and semi-frequent voters of color, helped contribute to the highest early voter turnout in Louisiana history. PCEJ continued this work in 2021, activating participation in local elections through outreach and registration drives. In recent election cycles, PCEJ also provided rides to the polls and rapid response voter support during early voting and on election days.

9. PCEJ, along with its stakeholders, constituents, and member organizations, has been deeply engaged in every step of the redistricting process. PCEJ has organized numerous trainings to educate the community about redistricting, has mobilized voters and volunteers to participate in the redistricting roadshows, has advocated for the passage of a congressional plan with two majority-Black districts that gives Black voters in Louisiana an equal opportunity to elect candidates of their choice.

10. PCEJ hosted at least five trainings on the redistricting process before the Redistricting Roadshow began. The Redistricting Roadshow where public meeting about redistricting hosted by the Louisiana Legislature across the state October 2021 through January 2022. PCEJ also hosted nine trainings over the course of the roadshow, one at each stop. In

addition, PCEJ organized approximately 250 Louisiana voters to travel to Baton Rouge and make public comments during the redistricting special session. The resounding theme of the testimony was the need for fair and equitable maps and a second majority-Black district.

11. On behalf of Power Coalition, I attended the roadshow in Baton Rouge and the majority of the special session hearings. Members of PCEJ staff were present at every roadshow hearing and throughout the special session and veto override session.

12. PCEJ submitted three letters to the Legislature and one to the Governor during the redistricting process. One of these letters, submitted in October 2021, included seven different maps that included two majority-Black districts and protected communities of interest. Similar maps were introduced as legislation and amendments during the redistricting special session. None, however, made it out of committee.

13. When the Legislature first passed H.B. 1 and S.B. 5, which include only one majority-Black district, PCEJ launched voter outreach and public education campaigns to demand that the Governor veto the Legislature's map.

14. Despite PCEJ's immense efforts, I was frustrated when the Legislature overrode the Governor's veto to enact a congressional map with only majority-Black district and failed to provide equitable representation for Black voters and PCEJ's broad and diverse constituencies. The enacted map perpetuates longstanding vote dilution in Louisiana by packing Black voters in CD 2, and dispersing Black voters across the other five congressional districts, which prevents Black voters from having an equal opportunity to elect candidates of choice.

15. PCEJ's stakeholders, constituents, and member organizations are directly impacted by vote dilution under the enacted map. Several of our partners, such as Voice of the Experienced ("VOTE") and Step Up Louisiana actively participated in redistricting advocacy on

behalf of their affected constituents. These organizations provided testimony, participated in workshops and days of action, and helped with trainings throughout the redistricting process.

16. I am also personally impacted by the discriminatory effect of the enacted congressional map. As a resident of Baton Rouge, I live in CD 6 and am represented by Representative Garret Graves. Despite living in a city that is over 50 percent Black, I do not feel that I have ever had the opportunity to elect a candidate of choice in my congressional district.

17. I do not believe that my congressional representative has ever been responsive to my needs or the needs of my community because of the way my congressional district is drawn to dilute Black voting strength. For example, only one congressperson voted in favor of Build Back Better, an infrastructure bill that is desperately needed in Louisiana, the second poorest state in the country. I do not understand why my congressperson, Representative Garret Graves, voted against a bill that would help my community.

18. Although not in my district, another example of this unresponsiveness occurred in CD 1, another majority-white district where Black voting strength is diluted. Representative Steve Scalise voted against much needed hurricane recovery aid relief despite his district being decimated by Hurricane Ida in 2021.

19. Throughout the entire redistricting process, and as a result of the enactment of the discriminatory congressional map, PCEJ has diverted staff time and resources from our routine voter mobilization efforts and policy work to advocate for fair and equal districts.

20. First, PCEJ has spent significant resources on digital ads to target and reach out to communities that will be impacted by the enacted map. The financial resources we used to campaign for the Governor's veto and for the Legislature to sustain the veto are resources that we would have used for other programs.

21. PCEJ relies on volunteers for our voter advocacy and Election Day efforts, which include “Get Out the Vote” (“GOTV”), rides to the polls, and election monitoring efforts. In addition, we regularly organize and host events to educate voters with candidate surveys and forums. We have recently been forced to divert volunteer recruitment from our own to instead steer potential volunteers to advocacy efforts related to the redistricting roadshows, special session, and veto campaign.

22. For instance, when PCEJ launched campaigns to demand the Governor’s veto, these efforts coincided with the timing of the recent municipal elections in the majority of parishes statewide. As a result, PCEJ was required to divert time and resources from our routine voter mobilization efforts to advocate for fair and equal districts.

23. As the 2022 congressional election approaches, PCEJ will be forced to divert resources from its broader, statewide voter registration and community engagement initiatives to fight against the discriminatory maps and its dilutive effects. Because the Legislature has enacted a map that packs Black voters into CD 2 and cracks them among the remaining districts, PCEJ will need to increase education and outreach to member organizations and voters in CD 1, 3, 4, 5, and 6, where Black voting strength is diluted.

24. One example is that we regularly travel across the state to conduct voter education and engagement trainings, including GOTV trainings, to reach voters statewide. With the congressional elections approaching, we typically would conduct these trainings across the state, reaching voters statewide. But because the enacted map will dilute Black voting strength in specific districts, these statewide trainings may now be delayed, if not canceled, because staff members and member organizations that would typically be involved with these initiatives will need to shift focus to helping, educating, and advocating for affected voters. The diluted map has

a direct effect on PCEJ's ability to achieve our mission: to educate and empower as many voters as possible. We will have to add more staff and build an organizing team dedicated to combatting the effects of vote dilution. We have to expend more resources to keep voters who feel disenfranchised involved by creating new materials, hosting community events, and simply conducting more intensive outreach. These organizers will need to work even harder to activate voters of color, who are aware their voices are minimized because of district lines. A three-minute conversation at the door now turns into a five-minute conversation.

25. If the current enacted map stays in place , PCEJ will be forced to redouble efforts to reach voters who are impacted by the discriminatory congressional map. Voters who live in cracked districts are more difficult to engage because they feel, based on the results of elections, that their votes don't matter. It takes more time and resources to empower them and educate them on the importance of their votes. Alternatively, voters in competitive districts where they may have the opportunity to elect candidates of choice are easier to motivate and take less time to educate. If the state had passed a map with two majority-Black districts, we would be able to reach and educate more voters. By making our voter mobilization work more expensive and less effective, we have to devote less resources to our other goals.

26. Our work in future elections has also been hindered by our ongoing efforts to address the discriminatory impact of the enacted map. Louisiana will have statewide elections in 2023. Typically, PCEJ would begin building the infrastructure for statewide mobilization efforts in 2022, but because we will have to divert resources and refocus efforts on educating and targeting voters residing in cracked congressional districts, we cannot begin our work on future elections. This will inevitably result in PCEJ engaging fewer voters during the 2023 statewide elections.

27. A map that includes a second majority-Black district is the “North Star” of PCEJ’s work. A second majority-Black district would give Black voters in Louisiana an equal opportunity to elect candidates of their choice and to combat longstanding racial discrimination in Louisiana.

28. Louisiana is my home state and a place that I love deeply, but our state has a long history of racial discrimination and inequity that cannot be denied. Black people in Louisiana experience inequity and discrimination in every facet of life.

29. Louisiana is a state that year after year, witnesses the very real impact of climate change. The last several elections have been preceded by major climate events in Louisiana and the effects of the climate devastation have disproportionately impacted Black communities. PCEJ works to support communities after these natural disasters, through various means such as cash assistance and, importantly, surveying damage to polling sites to understand the impact on vulnerable communities in order to guide these voters on how to participate.

30. We have the highest maternal mortality rate of Black women in the country. PCEJ works with several maternal health organizations, recently successfully advocating to ensure midwives and doulas are covered by health insurance. Voting is the social determinant of health that is rarely discussed. The only way to fix many of these issues and the effects of racial discrimination is for Black voters to have equal opportunity to elect candidates that they prefer to fix the issues that directly impact our community.

31. During the roadshows, numerous member organizations and constituents of PCEJ voiced their support for a congressional map with two majority-Black districts. PCEJ supported the maps introduced during the legislative session that included two majority-Black districts. Any one of those maps would have given Black voters an equal opportunity to elect

candidates of their choice and protected communities of interest throughout the state. Many Baton Rouge and New Orleans residents testified at the roadshows that they are distinct communities of interest and should not be in the same congressional district. A map with two majority-Black districts would protect these communities of interest.

32. The maps with two majority-Black districts also protects distinct communities of interest in the Delta Parishes, the petrochemical industry and pipelines in the southern part of the state, as well as the Cajun and Creole communities in the Acadian region.

33. Under a map with only one majority-Black district, New Orleans and the Black communities in Baton Rouge are packed into a single congressional district, CD 2. This occurs despite New Orleans and Baton Rouge constituting two distinct communities of interest. There is no reason that Baton Rouge and New Orleans need to be in the same congressional district. A map with two majority-Black districts would separate Baton Rouge and New Orleans into two congressional districts and would protect the distinct communities of interest therein.

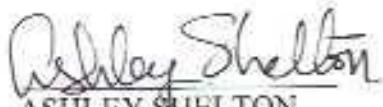
34. As a resident of Baton Rouge, I know that Baton Rouge makes up its own community of interest. Although Baton Rouge is one of the largest cities in Louisiana, it is smaller than New Orleans. Because it is not as population dense, it has more of an intimate community feel compared to the urban environment in New Orleans.

35. The life and culture in Baton Rouge is not as fast-paced as New Orleans. While New Orleans has a booming economy, an academic community made up of private universities, colleges and some historically Black colleges and universities, Baton Rouge has slower economic development and a tighter knit academic community, made up of two historically Black colleges and universities.

36. Because the Legislature has enacted a map that dilutes Black voting strength and

deprives Black voters of an equal opportunity to elect candidates of their choice, our members and constituencies must advocate for their votes to be given equal weight. PCEJ must work with member organizations and constituencies to combat unlawful vote dilution resulting from the enacted map and ensure that affected voters have equal access to representation.

37. I declare under penalty of perjury that the foregoing is true and correct. This Declaration was executed on April 14, 2022.



ASHLEY SHELTON

Exhibit 16

2022 ELECTIONS

Date of Election	January 15	March 26	April 30	November 8	December 10
Type of Election	Special General-Catahoula Police Juror, Dist. 3	Municipal Primary	Municipal General	Open Primary/Congressional	Open General/Congressional
Deadline: Specials	n/a	12/29/2021	n/a	6/22/2022	n/a
Deadline: Propositions	n/a	12/29/2021	3/7/2022	6/22/2022	10/17/2022
Qualifying Dates	n/a	1/26/2022 – 1/28/2022	n/a	7/20/2022 – 7/22/2022	n/a
In Person/By Mail Registration Deadline	12/15/2021	2/23/2022	3/30/2022	10/11/2022*	11/9/2022
Geaux Vote Online Registration Deadline	12/25/2021	3/5/2022	4/9/2022	10/18/2022	11/19/2022
Deadline to Request a Mail Ballot from Registrar (other than Military and Overseas)	1/11/2022	3/22/2022	4/26/2022	11/4/2022	12/6/2022
Deadline for Registrar to Receive Voted Mail Ballot (other than Military and Overseas)	1/14/2022	3/25/2022	4/29/2022	11/7/2022	12/9/2022
Early Voting Begins	➤ 1/3/2022	3/12/2022	4/16/2022	10/25/2022	11/26/2022
Early Voting Ends	1/8/2022	3/19/2022	4/23/2022	11/1/2022	12/3/2022

IMPORTANT NOTES

* Deadline advanced one day due to Columbus Day (Mail) Holiday.

➤ Early Voting adjusted due to New Year's Eve/New Year's Day Holiday.

DATES ARE SUBJECT TO CHANGE BY THE LEGISLATURE

Exhibit 17

JRULE 21

Joint Rule No. 21. Redistricting criteria

A. To promote the development of constitutionally and legally acceptable redistricting plans, the Legislature of Louisiana adopts the criteria contained in this Joint Rule, declaring the same to constitute minimally acceptable criteria for consideration of redistricting plans in the manner specified in this Joint Rule.

B. Each redistricting plan submitted for consideration shall comply with the Equal Protection Clause of the Fourteenth Amendment and the Fifteenth Amendment to the U.S. Constitution; Section 2 of the Voting Rights Act of 1965, as amended; and all other applicable federal and state laws.

C. Each redistricting plan submitted for consideration shall provide that each district within the plan is composed of contiguous geography.

D. In addition to the criteria specified in Paragraphs B, C, G, H, I, and J of this Joint Rule, the minimally acceptable criteria for consideration of a redistricting plan for the House of Representatives, Senate, Public Service Commission, and Board of Elementary and Secondary Education shall be as follows:

(1) The plan shall provide for single-member districts.

(2) The plan shall provide for districts that are substantially equal in population. Therefore, under no circumstances shall any plan be considered if the plan has an absolute deviation of population which exceeds plus or minus five percent of the ideal district population.

(3) The plan shall be a whole plan which assigns all of the geography of the state.

(4) Due consideration shall be given to traditional district alignments to the extent practicable.

E. In addition to the criteria specified in Paragraphs B, C, G, H, I, and J of this Joint Rule, the minimally acceptable criteria for consideration of a redistricting plan for Congress shall be as follows:

(1) The plan shall provide for single-member districts.

(2) The plan shall provide that each congressional district shall have a population as nearly equal to the ideal district population as practicable.

(3) The plan shall be a whole plan which assigns all of the geography of the state.

F. In addition to the criteria specified in Paragraphs B, C, G, H, I, and J of this Joint Rule, the minimally acceptable criteria for consideration of a redistricting plan for the Supreme Court shall be that the plan shall be a whole plan which assigns all of the geography of the state.

G.(1) To the extent practicable, each district within a redistricting plan submitted for consideration shall contain whole election precincts as those are represented as Voting Districts (VTDs) in the most recent Census Redistricting TIGER/Line Shapefiles for the State of Louisiana which corresponds to the P.L. 94-171 data released by the United States Bureau of the Census for the decade in which the redistricting is to occur. However, if the redistricting plan is submitted after the year in which the legislature is required by Article III, Section 6, of the Constitution of Louisiana to reapportion, then to the extent practicable, the redistricting plan submitted for consideration shall contain whole election precincts as those are represented as VTDs as validated through the data verification program of the House and Senate in the most recent Shapefiles made available on the website of the legislature.

(2) If a VTD must be divided, it shall be divided into as few districts as practicable using a visible census tabulation boundary or boundaries.

H. All redistricting plans shall respect the established boundaries of parishes, municipalities, and other political subdivisions and natural geography of this state to the extent practicable. However, this criterion is subordinate to and shall not be used to undermine the maintenance of communities of interest within the same district to the extent practicable.

I. The most recent P.L. 94-171 data released by the United States Bureau of the Census, as validated through the data verification program of the House and Senate, shall be the population data used to establish and for evaluation of proposed redistricting plans.

J. Each redistricting plan submitted to the legislature by the public for consideration shall be submitted electronically in a comma-delimited block equivalency file.

HCR 90, 2021 R.S., eff. June 11, 2021.

Exhibit 18

https://www.nola.com/news/article_c4191476-a8f8-58b6-93af-5d8663ed3731.html

With clear path to re-election, Cedric Richmond can look to a bigger platform in Democrats' future

BY JESSICA WILLIAMS | jwilliams@theadvocate.com

OCT 23, 2018 - 6:00 PM

U.S. Rep. Cedric Richmond, Louisiana's lone congressional Democrat, appears well-positioned to retain his 2nd Congressional District seat and could see his influence rise on Capitol Hill should his party regain control of the House after this fall's midterms.

The race for the district, which stretches from New Orleans and into parts of Baton Rouge, appears well in hand for Richmond. He has raised \$1.4 million and has over \$800,000 available to spend against three underfunded, long-shot candidates, none of whom are affiliated with a political party. His role as a vocal critic of President Donald Trump is also an asset in a district with a majority-minority voting populace.

The only intrigue concerns whether Richmond, who was elected chairman of the influential Congressional Black Caucus in 2016, will see his political star rise if Democrats get the seats they need to control the House.

As the lone Democrat in a deeply Republican state, Richmond has tried to thread a delicate needle by maintaining close ties to his more powerful colleagues in the majority, such as Republican House Majority Whip Steve Scalise, while serving as a strong voice in opposition of the Trump administration.

He has worked with his Republican colleagues on issues on which both parties agree. That has allowed him to move forward legislation that forgave more than \$335 million in federal disaster rebuilding loans awarded to Southern University at New Orleans, Dillard University and Xavier University after

Hurricane Katrina. He also helped secure funding for plans to build a new levee system to protect parts of St. Charles and St. John the Baptist parishes.

Still, he hasn't been afraid to speak forcefully against Trump from his position as head of the 49-member Black Caucus, a group that plays a considerable role in shaping priorities for the national Democratic Party and whose leaders can go on to wield greater influence on Capitol Hill.

For the past two years, he has urged the president to advance policies that benefit black Americans, and he derided Trump as "racially challenged" — a term Richmond later conceded was interchangeable with "racist."

Can't see video below? Click here.

Richmond this week derided Trump as "the worst president in my lifetime, who has taken the country to a dangerous place, especially for African-Americans."

Richmond said he would consider running for a leadership post should the House flip to Democratic control. But any position he might seek will depend on the moves of his colleagues, particularly his longtime friend Assistant Democratic Leader James Clyburn, of South Carolina.

Clyburn has said he would likely run for speaker of the House if former Speaker U.S. Rep Nancy Pelosi declines to do so. For his part, Richmond said he would support Clyburn if he were to make a bid for the gavel.

Richmond said he would defer to Clyburn before running for several available spots. Any position in the Democratic leadership, however, would help Louisiana's relatively junior delegation punch above their weight. Richmond would also be in line to lead a subgroup of the House Judiciary or House Homeland Security committees on which he now serves, he said.

A New Orleans native, Richmond served more than a decade in the state Legislature before eight years in Washington. He's recently begun to broaden his power base at home, backing candidates in local races in the same way some of his predecessors have.

He said a Democrat-led House will bring swift change.

"If Democrats get in the majority — which I think we will — you will see us very quickly vote to raise the minimum wage, for paid family leave ... and for criminal justice reform," Richmond said.

Still, Richmond's three opponents in the race — Belden Batiste, Shawndra Rodriguez and Jesse Schmidt — claim his efforts to push for change have been inadequate, that he doesn't appeal to his conservative constituents and that it's time for a fresh face in Congress.

Belden "Noonie Man" Batiste, a 44-year-old community activist from New Orleans, calls himself "the people's candidate." If elected, Batiste will fight for a federal minimum wage of \$15 an hour and for restrictions on the use of certain semi-automatic assault rifles. He would also work to unify the 2nd District, which he said is too fragmented.

"Whatever is working in New Orleans, let's apply in Gretna. Whatever is working in Gretna, let's see it in New Orleans. We've got to build stronger communities," he said.

Batiste pulled no punches when discussing Richmond in a recent interview.

He accused the congressman of failing to help more than 50 residents of the Gordon Plaza subdivision atop the former Agriculture Street

landfill in New Orleans' Upper 9th Ward move from that toxic site, and of ignoring residents in the River Parishes who have been exposed to pollution.

Batiste also scoffed at Richmond's relationship with Scalise and said Richmond hasn't gone after Trump often enough.

Batiste, who isn't registered with a political party, defines himself as an "independent progressive democrat." He said he isn't taking donations because he doesn't want to owe anyone any favors.

Shawndra Rodriguez, 46, is a conservative who abandoned the Democratic Party when she became a Christian three years ago, at the end of Barack Obama's second presidential term.

She said she realized she had been "fed the same lies" by Democrats for years.

She supports the reversal of Roe v. Wade, the controversial 1973 U.S. Supreme Court decision that legalized abortion. She also wants to bring prayer back to public schools, and doesn't

believe in the “fear-based agenda” that she believes influences how scientists and others discuss climate change.

Rodriguez supports deportation and said media images of children separated from their parents who illegally crossed U.S. borders seek to play on public sympathy and help people dodge the legal process.

Rodriguez also criticized Richmond for not backing the policies of Republicans and Trump, the latter of whom “has done a great job,” she said, particularly in creating more jobs for Americans by enticing companies to make more domestic products.

Rodriguez has nearly 20 years of experience in the financial services industry, a career she recently gave up to pursue politics. She said she

With clear path to re-election, Cedric Richmond can look to a bigger platform in Dead Heat/Future | News | nola.com
has raised less than \$10,000 for her campaign; federal finance reports show no direct contributions.

Jesse Schmidt, the 40-year-old owner of fire alarm and security company Gulf Coast Special Systems, said he is getting into national politics because he is tired of seeing partisanship hinder Capitol Hill.

Whenever Schmidt, registered with neither party, has gone to vote, he has been presented with “two polar opposites with very little common ground,” he said. “Once they got into office, they just talked and talked about how bad the other side was, and it seemed like nothing was actually really getting done.”

He supports creating a law that would stop an immigrant who travels to the U.S. illegally from filing lawsuits in civil courts and would allow that immigrant to be deported even if lawsuits were filed on their behalf.

Schmidt said the national political arena is no place for debates about abortion and other social issues that have already been litigated. He also supports the federal legalization of marijuana.

He has raised about \$16,700. About \$13,000 of that was left over as of the last reporting period.

The 2nd District covers most of New Orleans and large parts of Baton Rouge, and snakes through several communities between those two cities. The winner in the race will serve for a two-year term.

Early voting began Tuesday, and runs through Oct. 30, except for Sunday, Oct. 28. The primary is Nov. 6; a runoff, if needed, will be Dec. 8.

FOLLOW JESSICA WILLIAMS ON TWITTER, @JWILLIAMSNOLA.

Exhibit 19



U.S. Department of Justice

Civil Rights Division

Office of the Assistant Attorney General

Washington, D.C. 20035

Honorable Jimmy N. Dimos
Speaker, House of Representatives
P. O. Box 94062
Baton Rouge, Louisiana 70804-9062

JUL 15 1991

Dear Mr. Dimos:

This refers to Act No. 1 (2d E.S. 1991), which provides the 1991 redistricting plan and an implementation schedule therefor for the House of Representatives of the State of Louisiana, submitted to the Attorney General pursuant to Section 5 of the Voting Rights Act of 1965, as amended, 42 U.S.C. 1973c. We received your initial submission on May 14, 1991; supplemental information was received June 6 and 13, 1991.

We have carefully considered the information you have provided, as well as Census data and information and comments from other interested persons. At the outset, we would note that as it applies to the redistricting process, the Voting Rights Act requires the Attorney General to determine whether the submitting authority has sustained its burden of showing that each of the legislative choices made under a proposed plan is free of racially discriminatory purpose or retrogressive effect and that the submitted plan will not result in a clear violation of Section 2 of the Act. In the case of a statewide redistricting such as the instant one, this examination requires us not only to review the overall impact of the plan on minority voters, but also to understand the reasons for and the impact of each of the legislative choices that were made in arriving at this particular plan.

In making these judgments, we apply the legal rules and precedents established by the federal courts and our published administrative guidelines. See, e.g., 28 C.F.R. 51.52 (a), 51.55, 51.56. For example, we cannot preclear those portions of a plan where the legislature has deferred to the interests of incumbents while refusing to accommodate the community of interest shared by insular minorities. See, e.g., Garza v. Los Angeles County, 918 F.2d 763, 771 (9th Cir. 1990), cert. denied, 111 S. Ct. 681 (1991); Ketchum v. Byrne, 740 F.2d 1398, 1408-09 (7th Cir. 1984), cert. denied, 471 U.S. 1135 (1985). Such concerns are frequently related to the unnecessary fragmentation of minority communities or the needless packing of minority constituents into a minimal number of districts in which they can expect to elect candidates of their choice. See 28 C.F.R. 51.59. We endeavor to evaluate these issues in the context of the demographic changes which compelled the particular jurisdiction's

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need to redistrict (*id.*). Finally, our entire review is guided by the principle that the Act insures fair election opportunities and does not require that any jurisdiction attempt to guarantee racial or ethnic proportional results.

Turning now to the instant submission, we note first that demographic changes in the state during the past decade have resulted in a small gain in total population and approximately a one percent increase in the black proportion of the total population which, under 1990 data, is 30.8 percent. Yet, it appears in some areas, the demographic shifts are such that the black proportion of the total population is greater than it was ten years ago, a factor that we have evaluated in our review of the proposed redistricting plan. In addition, we have examined the 1991 House redistricting choices in light of a pattern of racially polarized voting that appears to characterize elections at all levels in the state.

With this background in mind, our analysis shows that, in large part, the Louisiana House redistricting plan meets Section 5 preclearance requirements. In seven areas, however, the proposed configuration of district boundary lines appears to minimize black voting strength, given the particular demography of those areas: the Northwest area, involving Caddo and Bossier Parishes; the Northcentral area, including Bienville, Claiborne, Jackson, Lincoln, Union, and Winn Parishes; the Delta Parishes of East Carroll, Madison, Tensas, and Concordia; the area consisting of Pointe Coupee, the Felicianas, and St. Helena parishes; East Baton Rouge Parish; Orleans Parish; and Jefferson Parish.

As you know, we have discussed these concerns in some detail at meetings with House staff and counsel. In general, it appears that in each of these areas the state does not propose to give effect to overall black voting strength, even though it seems that boundary lines logically could be drawn to recognize black population concentrations in each area in a manner that would more effectively provide to black voters an equal opportunity to participate in the political process and to elect candidates of their choice. For example, in the Northwest area and in East Baton Rouge Parish, it appears that black population is overconcentrated in some districts at the expense of establishing at least one additional district in which black voters would have the potential for electing their preferred candidate. In Orleans Parish, at least one of the proposed black majority districts has a black population level that suggests it may not provide a realistic opportunity for black voters under current circumstances, while a portion of a continuous black neighborhood seems unnecessarily to have been separated from the black community in that district and submerged in a predominantly white district.

- 3 -

In the three rural areas at issue and in Jefferson Parish, it appears that concentrations of black voters have been submerged into several different white majority districts, although reasonable configurations of boundary lines would permit recognition of these concentrations in a manner that would provide to black voters the opportunity to elect their candidate of choice in at least one district in each area. In addition, such an alternative configuration for the Delta Parishes likely would produce a more compact district as well.

Under the Section 5 guidelines, one relevant factor as to a redistricting effort is "[t]he extent to which available alternative plans satisfying the jurisdiction's legitimate interests were considered." 28 C.F.R. 51.59(e). For most of the areas in question, reasonable alternatives providing for black majority districts were presented and advanced by minority legislators. Also, our own analysis suggests that a number of different configurations may be possible in which boundary lines are drawn as logically as in the proposed plan, but in which the black population concentrations are recognized in a manner which provides an additional opportunity for minority voters. Moreover, House staff also have indicated that in Jefferson Parish the alternative advanced by the Legislative Black Caucus (H.B. No. 2) is not the only scheme that permits a combination of black communities into a black majority district. While the state avers that the H.B. No. 2 alternative was rejected primarily because it crosses the Mississippi River, no non-racial explanation has been advanced for failing to consider alternatives that would result in a black majority district that does not span the river.

In addition, our analysis indicates that the state has not consistently applied its own criteria, but it does appear that the decision to apply or deviate from the criteria in each instance tended to result in the plan's not providing black voters with a district in which they can elect a candidate of their choice. For example, applying the compactness and "whole parish" criteria in the Northcentral region means that cohesive black population concentrations are divided into three white majority districts, while deviating from those same criteria in configuring the Delta Parishes also separates cohesive black population into white majority districts. With regard to the Delta districts, the state avers that it adhered to the criteria of combining similar communities of black population concentrations that are located in similar demographic and geographic areas, in this case, the "bottomland" areas of the Delta Parishes that border the State of Mississippi to the east. Yet, along the parishes that border Mississippi to the north, the state deviated from these criteria, even though there likewise are similar demographic and geographic characteristics (e.g., black concentrations, rural) among these areas of the Mississippi border parishes. The result in each case is the submergence of

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black population concentrations into white majority districts. Such departures from neutral guidelines are sufficient to support a reasonable inference that "the departures are explainable," at least in part, "by a purpose to minimize the voting strength of a minority group." Connor v. Finch, 431 U.S. 407, 425 (1977).

In light of the considerations discussed above, I cannot conclude, as I must under the Voting Rights Act, that the state's burden has been sustained in this instance. Therefore, on behalf of the Attorney General, I must object to the 1991 redistricting plan for the State House of Representatives to the extent that it incorporates the proposed configurations for the seven areas discussed above.

We note that under Section 5 you have the right to seek a declaratory judgment from the United States District Court for the District of Columbia that the proposed 1991 House redistricting plan has neither the purpose nor will have the effect of denying or abridging the right to vote on account of race or color. In addition, you may request that the Attorney General reconsider the objection. However, until the objection is withdrawn or a judgment from the District of Columbia Court is obtained, the 1991 redistricting plan for the House of Representatives continues to be legally unenforceable. Clark v. Roemer, 59 U.S.L.W. 4583 (U.S. June 3, 1991); 28 C.F.R. 51.10 and 51.45.

The remaining change proposed under Act No. 1 (2d E.S. 1991) with respect to the implementation schedule is directly related to the proposed 1991 House redistricting plan. Therefore, the Attorney General is unable to make any determination at this time with regard to the proposed implementation schedule. See 28 C.F.R. 51.22(b) and 51.35.

To enable us to meet our responsibility to enforce the Voting Rights Act, please inform us of the action the State of Louisiana plans to take concerning these matters. If you have any questions, you should call Lora L. Tredway (202-307-2290), an attorney in the Voting Section.

Sincerely,


John R. Dunne
Assistant Attorney General
Civil Rights Division

Exhibit 20

https://www.nola.com/news/politics/article_b608193c-c9f4-531a-8e24-01534407c15a.html

Steve Scalise's attendance at 2002 white nationalists event ignites political firestorm

Julia O'Donoghue, NOLA.com | The Times-Picayune

PUBLISHED DEC 30, 2014 AT 9:15 AM | UPDATED JUL 22, 2019 AT 3:53 PM

Steve Scalise

Rep. Steve Scalise, R-Jefferson, said he didn't know who he was speaking to when he appeared at a white nationalist conference as a speaker 12 years ago. (AP Photo/J. Scott Applewhite)

U.S. Rep. **Steve Scalise**, R-Jefferson, acknowledged Monday that he **spoke at a white nationalist conference** in Metairie in 2002, but said he did not realize the type of organization he was speaking to and has never affiliated with the group.

News of the speech immediately ignited a political firestorm around Scalise the Majority

the U.S. House, just days before the next Congress takes office next week.

The conference was organized by the European-American Unity and Rights Organization, or EURO, an entity founded by former Ku Klux Klan leader David Duke, who spoke via video during the two-day event. Duke was a state House member just years before Scalise also served in the Legislature.

"I didn't know who all of these groups were and I detest any kind of hate group. For anyone to suggest that I was involved with a group like that is insulting and ludicrous," Scalise said Monday in a telephone interview with NOLA.com | The Times-Picayune. (**Read the full interview here.**)

"David Duke was never at any group that I spoke to," said Scalise, who added that he didn't recall the EURO conference.

Liberal groups and some Democrats pounced on news about Scalise's attendance at the event with calls challenging his fitness to keep his Congressional leadership post. Republicans, including Gov. Bobby Jindal, issued statements supporting Scalise.

Scalise, who was a state representative in 2002, said he was speaking to groups and giving interviews that year because he was one of very few members of the Legislature opposed to the so-called Stelly state tax plan. With limited staff, Scalise said he wasn't able to vet all groups he spoke to, as he does now. Had he known about EURO's affiliation, the congressman said he wouldn't have accepted the invitation.

"I had one person that was working for me. When someone called and asked me to speak, I would go. I was, in no way, affiliated with that group or other groups I was talking to," he said.

But Duke, in an interview with The Washington Post on Monday, said Scalise was invited to the 2002 conference by two of Duke's longtime associates, Howie Farrell and Kenny Knight. In addition, The Gambit reported about EURO and its connection to Duke two weeks before the event in 2002, indicating it was "scaled down" to be attended only by EURO members and "local organizers."

Scalise "says he didn't realize what the conference was. I don't know if he did or did not," Duke told The Post, adding that Scalise was simply taking an opportunity to meet constituents. Duke told the newspaper he didn't hear Scalise during the times he participated via audio and video conferencing.

Duke served as a state representative from Metairie before he drew national attention in

Edwards in a runoff election for Louisiana governor. Scalise also represented parts of Jefferson Parish in Baton Rouge.

"[Duke] was a state representative before me. Everyone knew who he was. I would not go to any group that he was a part of," Scalise said.

Reports of Scalise's appearance at the conference were first posted on the liberal Louisiana politics website **CenLamar Sunday (Dec. 28). The site cited comments posted on a white supremacist website by people who attended the event and recalled Scalise's appearance.**

In a statement Monday, the Louisiana Republican Party supported Scalise.

"For the 25 years that I've known Congressman Scalise, he has been an aggressive advocate for conservative reform. He has been willing to bring this message to anyone who would listen and has spoken to thousands of groups during his career in public service," said Roger Villere, chairman of the state GOP, in a written statement.

Jindal also stood by Scalise in a statement he released Monday evening.

"I know Congressman Scalise to be a good man who is fair-minded and kindhearted. I'm confident he absolutely rejects racism in all its forms," wrote Jindal.

Scalise also drew support from U.S. Rep. Cedric Richmond, D-New Orleans, the only Democrat in Louisiana's U.S. House delegation.

"I don't think Steve Scalise has a racist bone in his body," Richmond said. "Steve and I have worked on issues that benefit poor people, black people, white people, Jewish people. I know his character."

Richmond suggested the criticisms about Scalise were more about politics than substance.

"I am not going to let them use Steve as a scapegoat to score political points when I know him and know his family," Richmond said.

The Louisiana Democratic Party did not agree with Richmond and called Scalise's appearance at the 2002 event troubling.

"It's even more disturbing to hear that his allies are trying to sweep this incident under the rug by blaming Scalise's staff and claiming the then-state representative didn't know the group's ideology. That's ridiculous," said Stephen Handwerk, executive director of the state Democratic Party, in a written statement.

According to announcements of the 2002

Metairie was a "workshop on civil rights and heritage related activism" for white nationalist groups. It listed Duke as EURO's "national president," indicating he would be speaking via video from another EURO event being held simultaneously in Italy.

One of the participants at the event, posting in the same white nationalist website under the name "Alsace Hebert," wrote about Scalise's appearance.

"The meeting was productive locally as State Representative, Steve Scalise, discussed ways to oversee gross mismanagement of tax revenue or 'slush funds' that have little or no accountability. Representative Scalise brought into sharp focus the dire circumstances

within the Housing and Urban Development Fund, an apparent give-away to a selective group based on race," read the comment, first reported by the CenLamar blog.

The Anti-Defamation League included the 2002 EURO conference in its "**extremists events**" **watchlist** that year, describing the group as a "white supremacist" organization and noting that Duke was to address attendees.

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CORRECTION: An earlier version of this story incorrectly said Steve Scalise represented the same state House district as David Duke. Scalise represented District 82, Duke represented District 81.

Julia O'Donoghue is a state politics reporter based in **Baton Rouge**. She can be reached at jodonoghue@nola.com or on Twitter at [@jsodonoghue](https://twitter.com/jsodonoghue). Please consider following us on Facebook at **NOLA.com** and **NOLA.com-Baton Rouge**.

Exhibit 21

**Office of the Governor
State of Louisiana**

JOHN BEL EDWARDS
GOVERNOR



P.O. Box 94004
BATON ROUGE, LOUISIANA 70804-9004
(225) 342-7015
GOV.LA.GOV

March 9, 2022

VIA HAND DELIVERY

Honorable Clay J. Schexnayder
Speaker of the House
Louisiana House of Representatives
Post Office Box 94062
Baton Rouge, Louisiana 70804-9062

RE: Veto of House Bill 1 of the 2022 First Extraordinary Session

Dear Speaker Schexnayder:

Please be advised that I have vetoed House Bill 1 of the First Extraordinary Session of 2022.

This bill is the Legislature's effort to conduct the mandatory reapportionment of the congressional map for the United States House of Representatives. While much work was put into the development of this map by members of the Legislature, it is clear that the primary rationale behind the creation and passage of the map was to protect incumbents and to preserve the party split in the current congressional delegation. In so doing, the Legislature disregarded the shifting demographics of the state, which unquestionably call for the addition of a second majority minority district. Specifically, the Black voting age population in the state increased by 4.4% from the 2010 census to the 2020 census, resulting in the Black voting age population making up 31.2%, almost one-third of the State's population. Instead of accounting for this increase in population, the Legislature preserved the status quo and enacted a map where Black voters in five of the six congressional districts are deprived of the opportunity to elect a candidate of their choice.

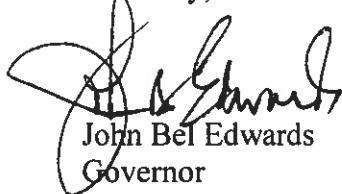
It is my firm belief that this map violates Section 2 of the Voting Rights Act of 1965 and further is not in line with the principle of fundamental fairness that should have driven this process. In choosing this map, the Legislature rejected numerous alternative maps with two majority minority districts, which happen to be one-third of the six congressional districts, that would have given more Black voters an opportunity to elect a candidate of their choice. While no electoral map is perfect, and no map is a guarantee of success for a certain candidate, these alternatives would have allowed for a fairer allocation of voting strength to a population that has been historically disadvantaged. As eloquently discussed by Senator Cleo Fields on the floor of the

Honorable Clay J. Schexnayder
March 9, 2022
Page 2

Senate, only five Black members from Louisiana have been elected and seated in the United States House of Representatives since statehood. This injustice cannot continue.

This veto need not be the conclusion of the Legislature's efforts to create a map that is in compliance with Section 2 of the Voting Rights Act. There are multiple pre-filed bills for the 2022 Regular Session where the Legislature can – and should – enact a map that creates a second majority minority seat. By vetoing this bill, I am asking the Legislature to get back to work in a real effort at compromise and fairness. I remain confident that the Legislature can get this right.

Sincerely,



John Bel Edwards
Governor

enclosure

cc: Honorable Patrick Page Cortez
Louisiana Senate President

Exhibit 22



Sent via email

December 14, 2021

Senate and Governmental Affairs Committee
 Louisiana State Senate
 P.O. Box 94183
 Baton Rouge, LA 70804
 s&g@legis.la.gov

House and Governmental Affairs Committee
 Louisiana House of Representatives
 P.O. Box 94062
 Baton Rouge, LA 70804
 h&ga@legis.la.gov

**Re: Response to Chair Stefanski's November 22 Press Conference
 Remarks Concerning Congressional Redistricting**

Dear Chair Stefanski, Chair Hewitt, and Other Members of the House and Senate Governmental Affairs Committees:

The NAACP Legal Defense and Educational Fund, Inc., the ACLU Voting Rights Practice, American Civil Liberties Union of Louisiana, Louisiana Justice Institute, Louisiana State Conference of the NAACP, and Power Coalition for Equity and Justice write in response to comments made by Chair Stefanski concerning congressional redistricting during his November 22, 2021, press conference. Chair Stefanski expressed a number of concerns about the illustrative congressional maps submitted by a coalition of organizations, including our organizations, on October 18, 2021 (the "Coalition maps"),¹ which we have reattached as **Appendix 1** of this letter. In particular, Chair Stefanski articulated potential objections to drawing a second district

¹ See LDF Sends Letter to Louisiana House and Senate Governmental Affairs Committees on their Obligation to Comply with Section 2 of the Voting Rights Act During Redistricting (Oct. 18, 2021), <https://www.naacpldf.org/press-release/ldf-sends-letter-to-louisiana-house-and-senate-governmental-affairs-committees-on-their-obligation-to-comply-with-section-2-of-the-voting-rights-act-during-redistricting/>.

comprised of a majority of Black voters (“majority-Black opportunity district”), which this body has the occasion to do in the 2022 legislative session.² These comments misinterpret federal and state law and misconstrue the Coalition maps, and we send this letter to correct those inaccuracies and provide further guidance on the Committees’ obligation to comply with Section 2 of the Voting Rights Act and the Fourteenth Amendment to the U.S. Constitution.

First, Chair Stefanski contended that the districts “in the maps [he has] seen submitted to [him]” may not be “effective” based on the minority population and voting-age population in these districts.³ Chair Stefanski suggested that the majority-Black opportunity districts proposed in the Coalition maps would not allow a candidate preferred by Black voters to prevail due to an insufficient number of Black voters in those districts.

Chair Stefanski’s concerns are unfounded and reflect an incomplete analysis of the Coalition maps. We conducted an analysis of recompiled election results and determined that the two proposed majority-Black opportunity districts in the Coalition maps (CD2 and CD5) would reliably perform to provide an opportunity for a candidate preferred by Black voters to prevail.⁴

Based on this analysis, the candidate preferred by Black voters clearly would have the opportunity to prevail in CD2 as drawn in all seven of the Coalition maps (each of which include some portion of the current Congressional District 2), with vote shares for the Black-preferred candidate generally ranging between 62.2% and 68.8%. This analysis also showed that the Black candidate of choice would prevail in CD5 in each of the Coalition maps, the majority of the time—in some cases by significant margins—although the elections would be more competitive.⁵ These results demonstrate that it is possible to draw two majority-Black opportunity districts that

² The only maps submitted to the Committees with two majority-Black opportunity districts were the Coalition maps submitted on October 18, 2021. See Appendix 1.

³ Chairman Stefanski made these remarks as a guest speaker at the Press Club of Baton Rouge. A recording of the press conference can be found here: <https://www.youtube.com/watch?v=SuquGa6rJI8>.

⁴ Our analysis was performed by taking vote totals (or shares) from a selection of recent racially contested elections (i.e., elections featuring at least one Black and one white candidate) in Louisiana and calculating the vote totals for the candidate preferred by Black voters had the election been run under each of the Coalition maps.

⁵ For example, Gwen Collins-Greenup, a Black woman running against a white male, was the candidate of choice of Black voters for the statewide run-off election for Secretary of State in December of 2018. In 2018, the Secretary of State run-off was the only statewide race on the ballot and there were no federal office run-offs that year. The recompiled election results from the Secretary of State run-off show that the vote share for Collins-Greenup in CD2 of the Coalition maps ranged between 63.8% and 70.6%; and the vote share for Collins-Greenup in CD5 of the Coalition maps ranged from 53.6% to 61%.

would be effective and would comply with Section 2 by providing Black voters with an equal opportunity to elect candidates of their choice.

Second, Chair Stefanski stated that the “some of the [proposed] districts look very similar to districts that have been struck down in the past as racial gerrymanders.” He specifically referred to two districts—“one that’s commonly referred to as the ‘Zorro’ district and one that’s commonly referred to as the ‘slash’ district”—that were struck down by the courts.⁶

Chairman Stefanski’s statements are inaccurate and lead to erroneous conclusions about the legality of two majority-Black opportunity districts in Louisiana. Chairman Stefanski is seemingly referring to the *Hays v. Louisiana*, 936 F. Supp. 360 (W.D. La. 1996), cases. The maps singled out in *Hays* were drawn nearly 30 years ago (following the 1990 census) and were struck down because they “cavalierly disregard[ed]” the traditional redistricting principles that are usually considered during the redistricting process, including compactness and respect for political subdivisions.⁷

In contrast to the maps in *Hays*, the seven Coalition maps illustrate different ways to achieve two majority-Black opportunity districts while also considering traditional redistricting principles. Each of the seven Coalition maps is more compact than the current congressional map on at least two of the three widely recognized statistical measures of compactness.⁸ In addition, while the “Zorro” map in the *Hays* cases was rejected in part for splitting parishes 28 times, the Coalition maps demonstrate that it is possible to draw a map using 2020 Census data that splits relatively few parishes.⁹ Plan A1, for instance, splits parishes only 14 times, which is even better than the current map, which splits parishes 15 times.

In sum, the *Hays* cases do not foreclose the creation of a second majority-Black opportunity district in Louisiana. Indeed, as recently as 2019, a federal court held that a Section 2 challenge to Louisiana’s current congressional districts—alleging, among other things, that an additional majority-minority district could be developed—was

⁶ Although Chair Stefanski said that these maps were struck down in the “early 2000s,” he appears to be referring to two maps struck down in *Hays v. Louisiana* following the 1990 Census. The Z-shaped, “Zorro” district was declared unlawful in *Hays v. Louisiana*, 839 F. Supp. 1188 (W.D. La. 1993) (hereinafter *Hays I*). The “slash” district, or “inkblot” district, proposed after the Zorro district was rejected by the court, was also struck down in *Hays v. Louisiana*, 862 F. Supp. 119 (W.D. La. 1994) (hereinafter *Hays II*), and again in *Hays v. Louisiana*, 936 F. Supp. 360 (W.D. La. 1996) (hereinafter *Hays III*).

⁷ *Hays I*, 839 F. Supp. at 1200–01. Instead of adhering to these principles, the court found that the map creators “concentrated virtually exclusively on racial demographics and considered essentially no other factor” in drawing up an additional majority-minority congressional district. *Hays III*, 936 F. Supp. at 368. Moreover, it should be noted that the *Hays* line of cases were racial gerrymandering cases, not Section 2 challenges.

⁸ See Compactness Reports for Illustrative Maps (on file with LDF).

⁹ *Hays I*, 839 F. Supp. at 1200-01.

credible enough to survive a motion to dismiss.¹⁰ Instead, the *Hays* cases reinforce the importance of drawing districting plans that carefully evaluate whether districts can be drawn in which the minority population is sufficiently large and geographically compact to constitute a majority and respecting traditional redistricting principles to the extent possible to comply with Section 2 of the Voting Rights Act.

Third, Chair Stefanski asserted that there has been “a lot of talk” among Committee members about preserving the “current congressional configuration” by “tweaking around the edges,” in part because the current congressional map was “precleared” by the Department of Justice (“DOJ”) under Section 5 of the Voting Rights Act. Chair Stefanski claimed that because the DOJ precleared the current maps, “we know this configuration is legal.”

Chair Stefanski is incorrect as a matter of law. DOJ preclearance determinations are based on compliance with Section 5 of the Voting Rights Act, *not* compliance with Section 2. The two provisions use different legal standards, and the fact that a map was precleared under Section 5 does not necessarily mean it would comply with Section 2. Section 5 prohibits “retrogressive” maps that weaken the ability of Black voters to participate in the democratic process when compared to a previous map.¹¹ In contrast, Section 2 prohibits maps that dilute minority voting strength based on the U.S. Supreme Court’s framework in *Gingles*, *regardless* of whether the map is retrogressive when compared to a previous map.¹²

The Supreme Court has expressly “refuse[d] to equate a Section 2 vote dilution inquiry with the Section 5 retrogression standard.”¹³ Therefore, maps that meet preclearance standards may nevertheless violate Section 2. Indeed, the Supreme Court and numerous federal courts have struck down district maps as violating Section 2 even when those maps were precleared by the DOJ under Section 5.¹⁴ For that matter, the fact that a federal court denied in 2019 a motion to dismiss a Section 2 claim again

¹⁰ *Johnson v. Ardoin*, No. 18-cv-00625, 2019 WL 2329319 (M.D. La. May 31, 2019).

¹¹ *Thornburg v. Gingles*, 478 U.S. 30 (1986); *see also* United States Department of Justice, *Guidance under Section 2 of the Voting Rights Act*, <https://www.justice.gov/opa/pressrelease/file/1429486/download>.

¹² The October 18 letter included a more detailed overview of the *Gingles* framework used by courts to prove a Section 2 violation.

¹³ *See Georgia v. Ashcroft*, 539 U.S. 461 (2003).

¹⁴ *See, e.g., League of United Latin Am. Citizens v. Perry*, 548 U.S. 399, 480 (2006) (holding that Texas’s congressional redistricting plan violated Section 2 of the VRA, notwithstanding the fact that the plan had been precleared by DOJ under Section 5 following the 2000 Census); *Benavidez v. Irving Indep. Sch. Dist.*, No. 3:13-CV-0087-D, 2014 WL 4055366, at *19 (N.D. Tex. Aug. 15, 2014) (same, noting that “the Supreme Court has repeatedly recognized that § 2 and § 5 have different aims with different requirements, and that a change that is permissible under § 5 may in fact violate § 2”); *St. Bernard Citizens For Better Gov’t v. St. Bernard Par. Sch. Bd.*, No. CIV.A. 02-2209, 2002 WL 2022589, at *2 n.2 (E.D. La. Aug. 26, 2002) (declaring a redistricting plan invalid under Section 2, notwithstanding the fact that the plan had been precleared by DOJ).

Louisiana's *current* map should make it clear to the Committees that preclearance of the previous map does not insulate the Committees from the requirements of Section 2.¹⁵

Moreover, the interest in "tweaking around the edges" of the current congressional configuration disregards its obligations to comply with Section 2 of the Voting Rights Act. As previously explained in the October 18 letter, a new congressional map that includes only one majority-Black opportunity district likely violates Section 2 because it would deprive Black voters in Louisiana—who represent approximately one-third of the state's voting age-population—of an opportunity to elect the candidate of their choice in five of Louisiana's six congressional districts.

Fourth, Chair Stefanski questioned whether District 2 could remain comprised of a majority of Black voters without including Baton Rouge. Specifically, in response to a reporter who correctly noted that District 2 could "still be a majority-minority district without Baton Rouge," Chair Stefanski asked, "could it?" and added, "I would have to see those numbers and I'd love if you submitted a map."

Chair Stefanski's concerns are unfounded. As demonstrated in each of the seven Coalition Maps, it is possible to remove Baton Rouge from District 2 and keep District 2 a majority-Black district, while also drawing a second majority-Black opportunity district that includes the majority of Baton Rouge's predominantly Black communities. In each of the seven Coalition maps, CD2 and CD5 *both* have a Black voting-age population (BVAP) over 50%.

Fifth, Chair Stefanski expressed the Committee's commitment to preserving whole precincts. However, state law does not require preservation of whole precincts. House Concurrent Resolution 90, which sets forth redistricting principles for the Committee's consideration, merely advises preservation of whole precincts "to the extent practicable."¹⁶ In any event, compliance with the federal Voting Rights Act and the U.S. Constitution must take precedence over state-level redistricting goals, such as preserving whole precincts.¹⁷ Moreover, the constitutional requirement that congressional districts must be drawn with "precise mathematical equality"¹⁸ makes it

¹⁵ See *Johnson*, 2019 WL 2329319 at *4.

¹⁶ HCR 90, Joint Rule No. 21(G).

¹⁷ See *Terrebonne Par. Branch NAACP v. Jindal*, 274 F. Supp. 3d 395, 426 (M.D. La. 2017), *rev'd on other grounds sub nom. Fusilier v. Landry*, 963 F.3d 447 (5th Cir. 2020) ("While respect for existing political boundaries is also a valued traditional districting method, election precincts are not such important political boundaries that they should negate a districting proposal, particularly where other key districting principles are obeyed.") (quoting *United States v. Vill. of Port Chester*, 704 F. Supp. 2d 411, 439–40 (S.D.N.Y. 2010)); *Georgia State Conf. of NAACP v. Fayette Cty. Bd. of Comm'rs*, 950 F. Supp. 2d 1294, 1312 (N.D. Ga. 2013) *rev'd on other grounds*, 775 F.3d 1336 (11th Cir. 2015) (same).

¹⁸ *Karcher v. Daggett*, 462 U.S. 725, 730–31 (1983) (holding that congressional districts must be mathematically equal in population, unless a deviation from that standard is necessary to achieve a legitimate state objective).

virtually impossible to draw a congressional map without splitting at least some precincts. Splitting precincts may be necessary to comply with federal and state law, and we urge you to prioritize compliance with the Voting Rights Act and the U.S. Constitution as you redraw the congressional map.

* * *

As explained in the October 18, 2021, letter, the state legislature has an affirmative obligation to ensure its compliance with the Voting Rights Act, including considering whether it is necessary to develop an additional majority-Black opportunity district to provide Black voters with an equal opportunity to elect candidates of their choice and to participate in the political process in congressional elections in Louisiana.

We are happy to discuss our concerns further and to provide assistance to help ensure the Committees develop a redistricting plan that satisfies its obligations under the Voting Rights Act, U.S. Constitution, and other requirements and considerations. Please feel free to contact LDF Redistricting Counsel Michael Pernick at (917) 790-3597 or by email at mpernick@naacpldf.org with any questions or to discuss these issues in more detail.

Sincerely,

/s/ Michael Pernick

Michael Pernick

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Stuart Naifeh, Manager of the Redistricting Project

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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 the areas of education, economic justice, political participation, and criminal justice. Throughout its history, LDF has worked to enforce and promote laws and policies that prohibit voter discrimination, intimidation, and suppression and increase access to the electoral process.

American Civil Liberties Union Foundation

For 100 years, the ACLU has been our nation’s guardian of liberty, working in courts, legislatures, and communities to defend and preserve the individual rights and liberties guaranteed by the Constitution and laws of the United States. Whether it’s ending mass incarceration, achieving full equality for the LGBT community, advancing racial justice, establishing new privacy protections for our digital age, or preserving the right to vote or the right to have an abortion, the ACLU takes up the toughest civil liberties and civil rights cases and issues to defend all people from government abuse and overreach. With more than one million members, activists, and supporters, the ACLU is a nationwide organization that fights tirelessly in all 50 states, Puerto Rico, and Washington, D.C., for the principle that every individual’s rights must be protected equally under the law, regardless of race, religion, gender, sexual orientation, gender identity or expression, age, disability, national origin, and record of arrest or conviction.

American Civil Liberties Union of Louisiana

The ACLU of Louisiana has worked to advance and preserve the individual rights and liberties guaranteed by the Constitution and laws of the United States and the State of Louisiana since 1956. The organization is part of a nationwide network of ACLU affiliates that fight tirelessly in all 50 states, Puerto Rico, and Washington, D.C.

Louisiana Justice Institute

Louisiana Justice Institute is a non-profit civil rights legal advocacy organization and law firm that fosters and supports social justice campaigns across Louisiana to protect the rights of Black communities. Since its founding in 2007, LJI has been involved in numerous campaigns, impact litigation, and social justice advocacy involving – but not limited to – immigrant rights, housing rights, education rights (including special education advocacy and litigation), voting rights, and environmental litigation.

Louisiana NAACP State Conference

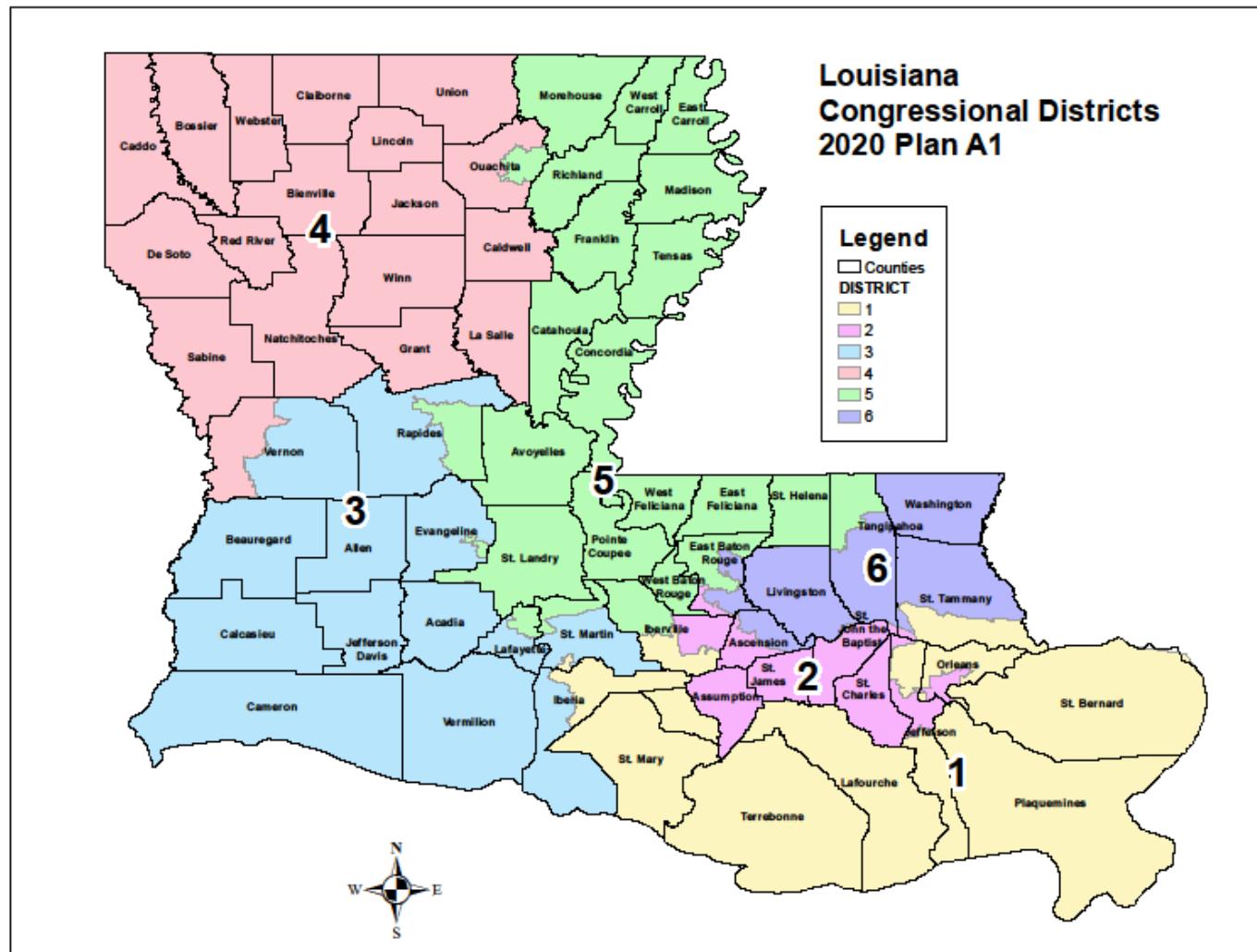
Louisiana State Conference of the National Association for the Advancement of Colored People (the “Louisiana NAACP State Conference”) is a state subsidiary of the National Association for the Advancement of Colored People, Inc. For decades, the Louisiana NAACP State Conference has worked towards its mission to ensure the political, educational, social, and economic equality of all persons and to eliminate race-based discrimination.

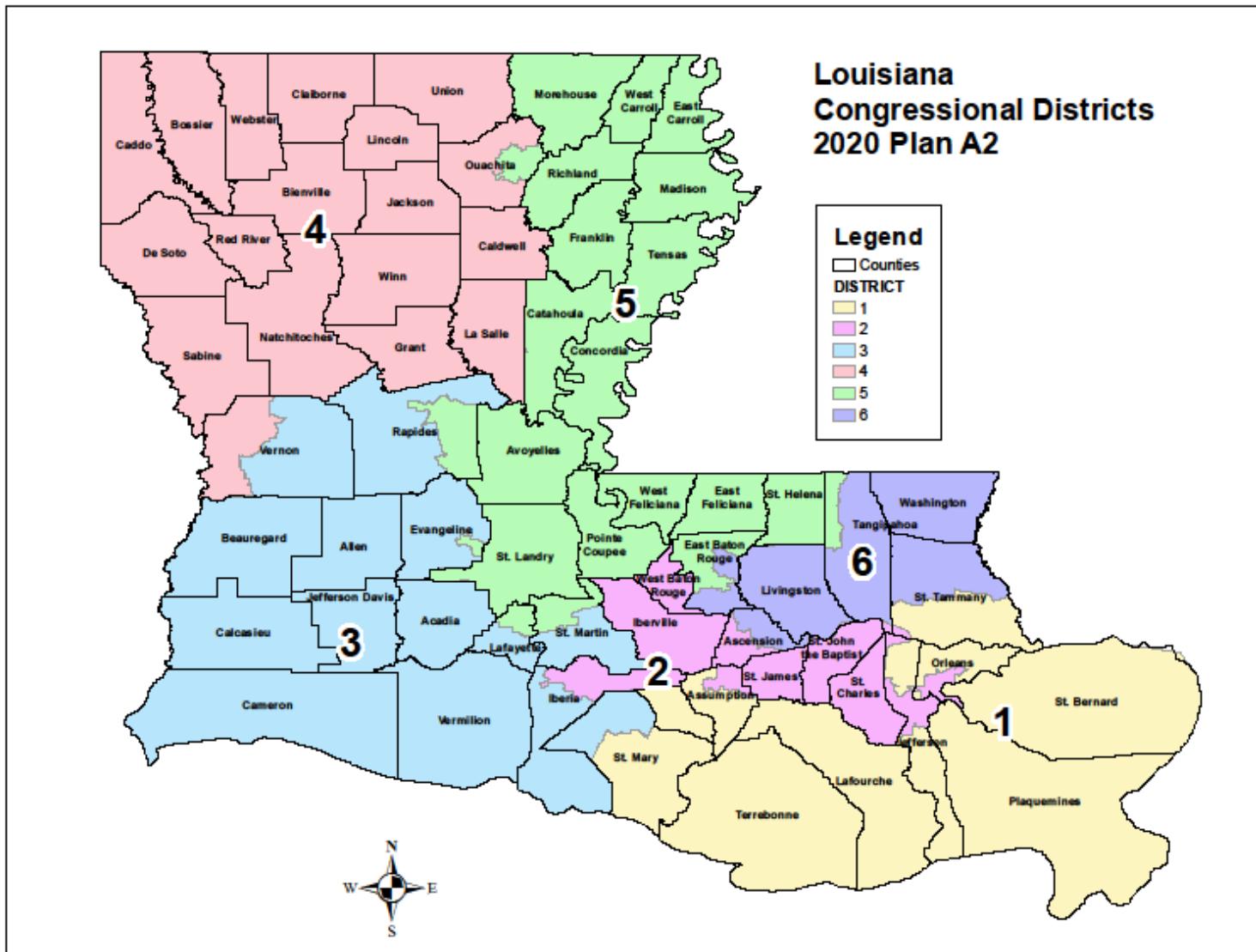
Power Coalition for Equity and Justice

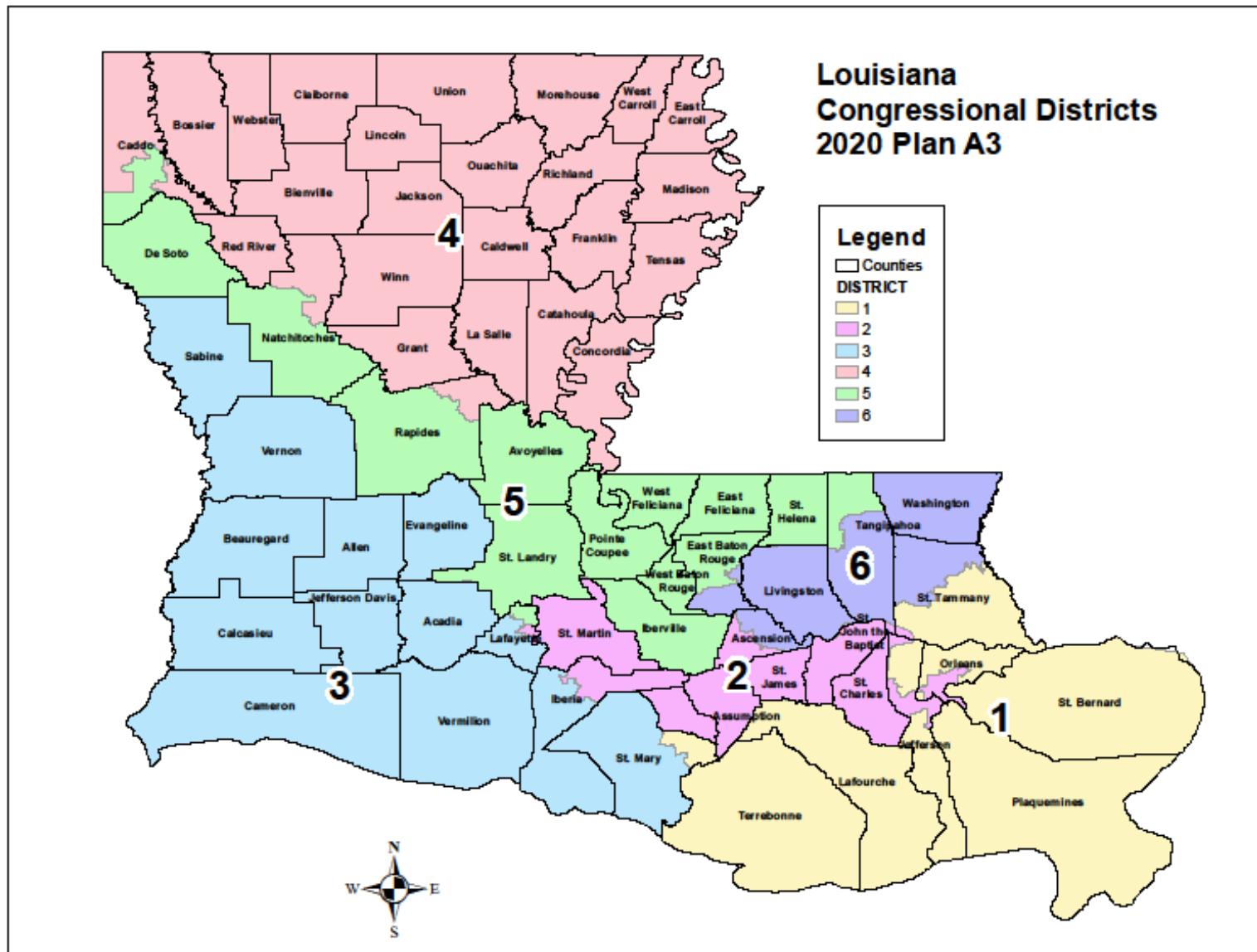
The Power Coalition for Equity and Justice works to build voice and power in traditionally ignored communities. We are a coalition of groups from across Louisiana whose mission is to organize in impacted communities, educate and turn out voters, and fight for policies that create a more equitable and just system in Louisiana.

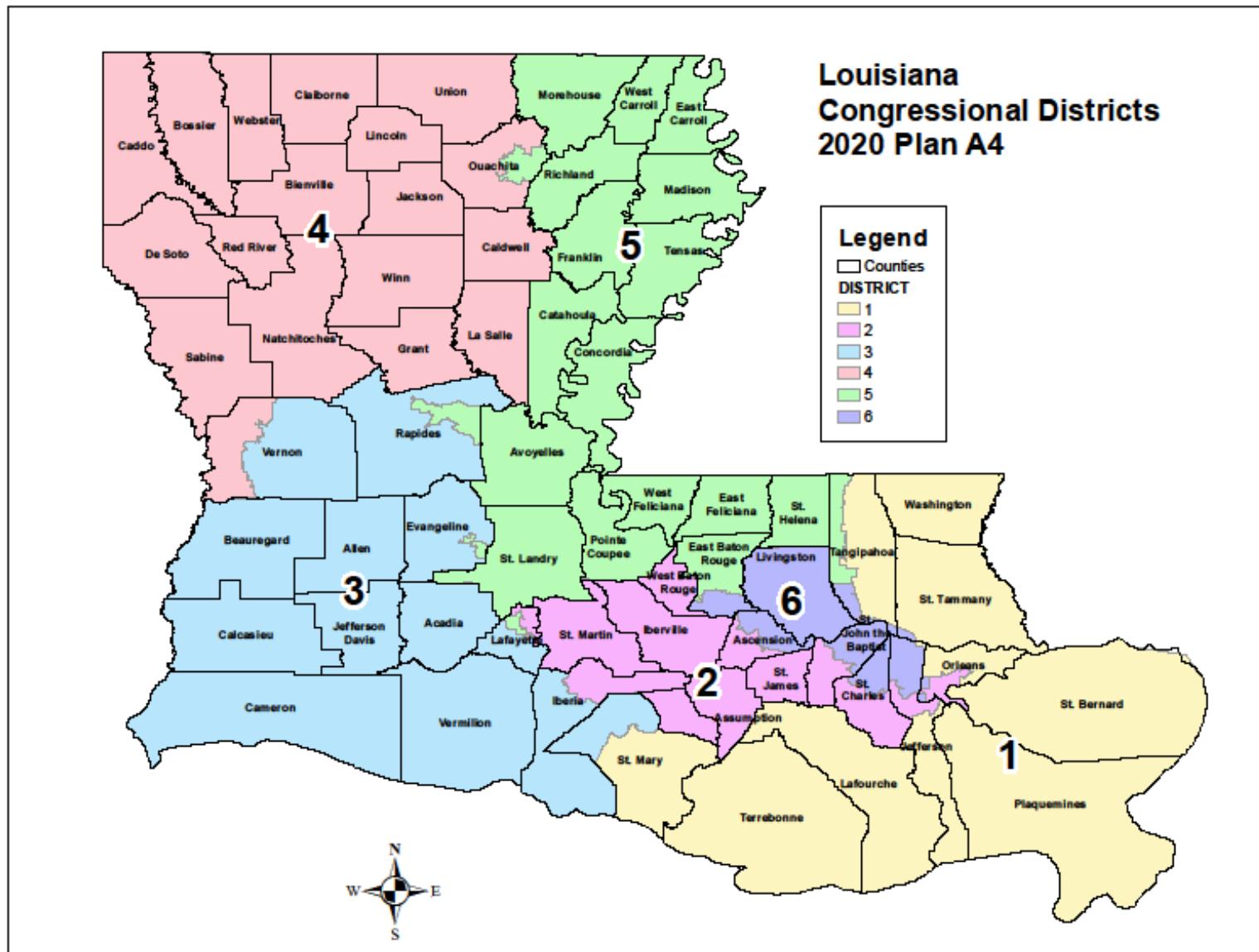
APPENDIX 1

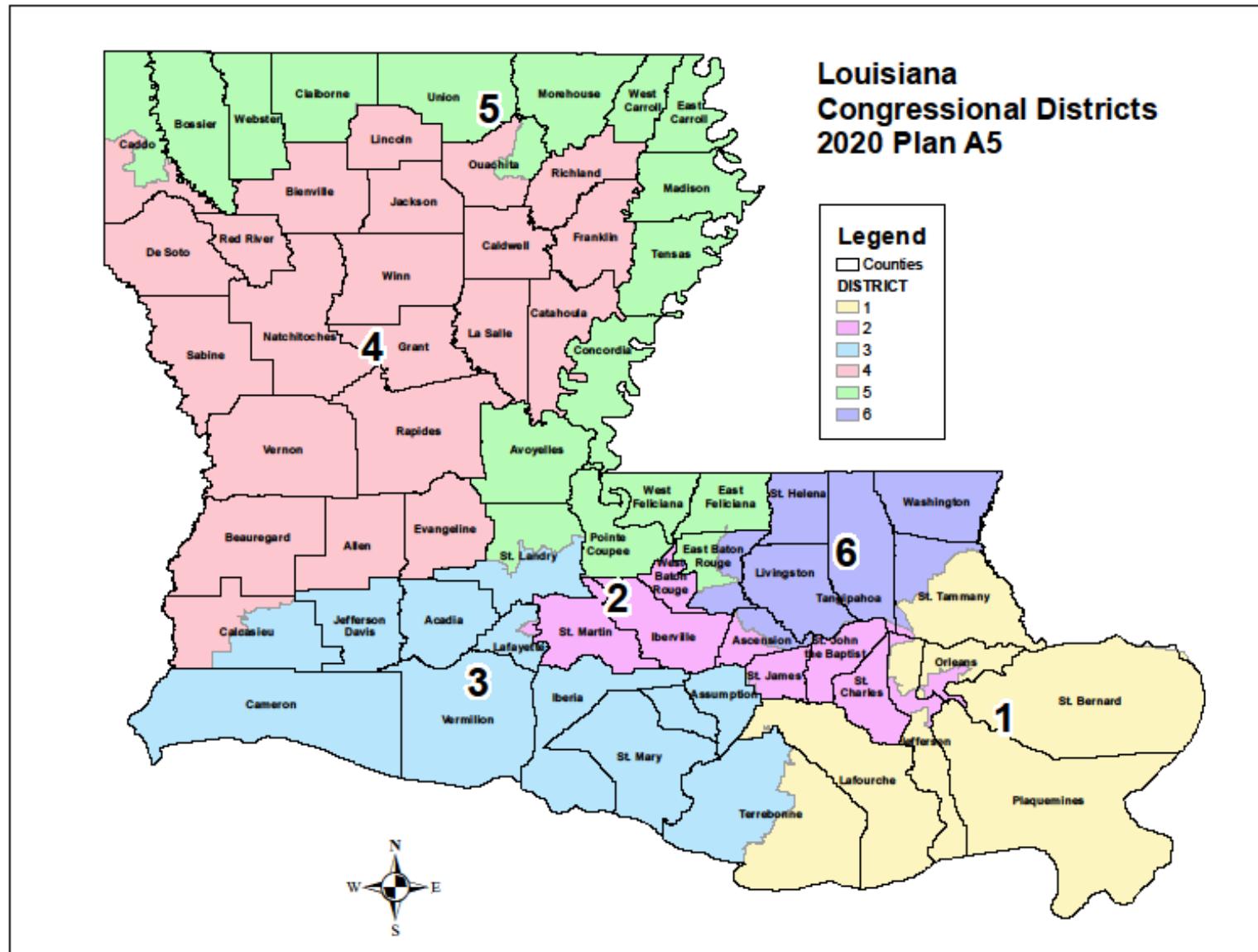
Seven Illustrative Maps (A1 – A7) with Two Majority-Minority Opportunity Districts

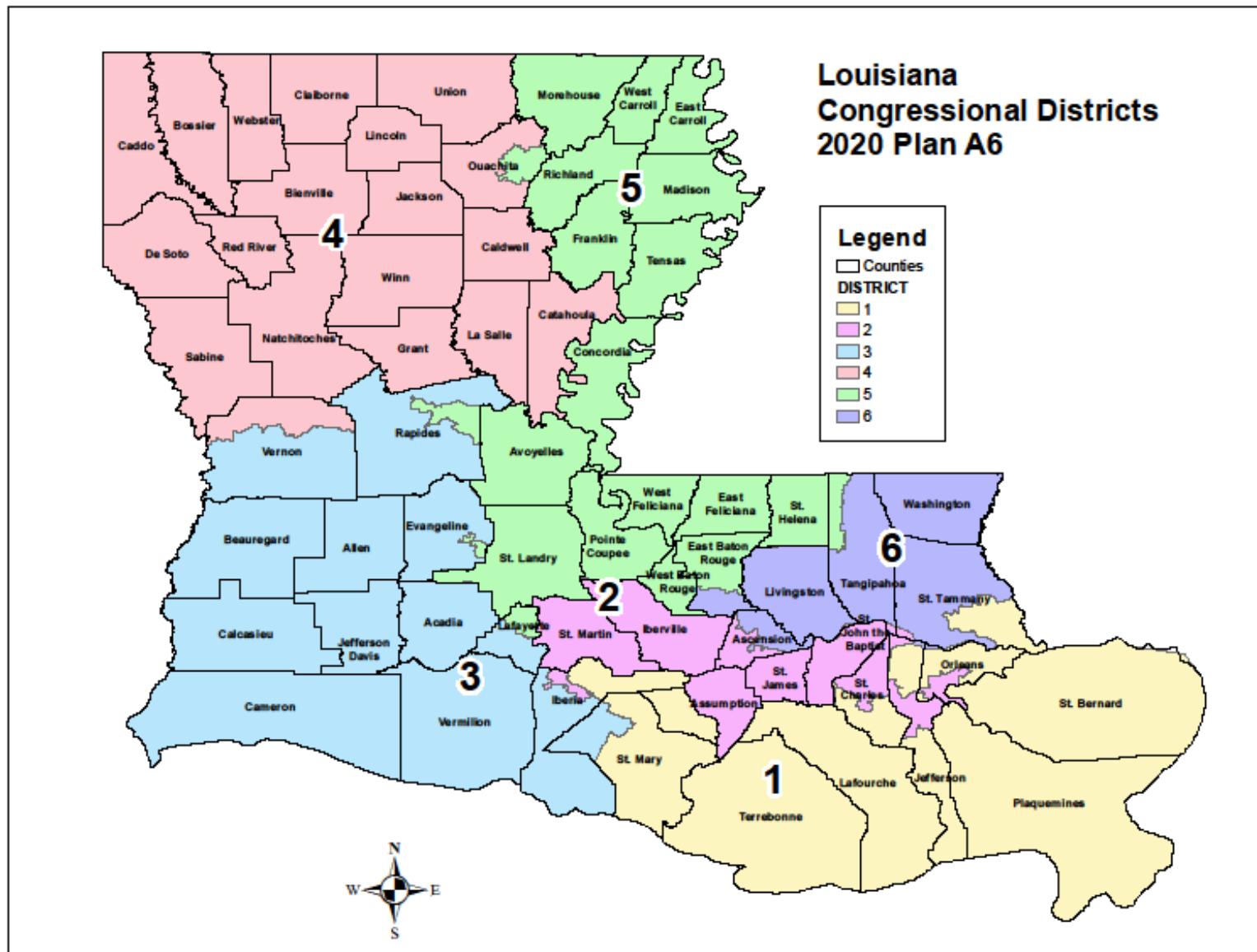


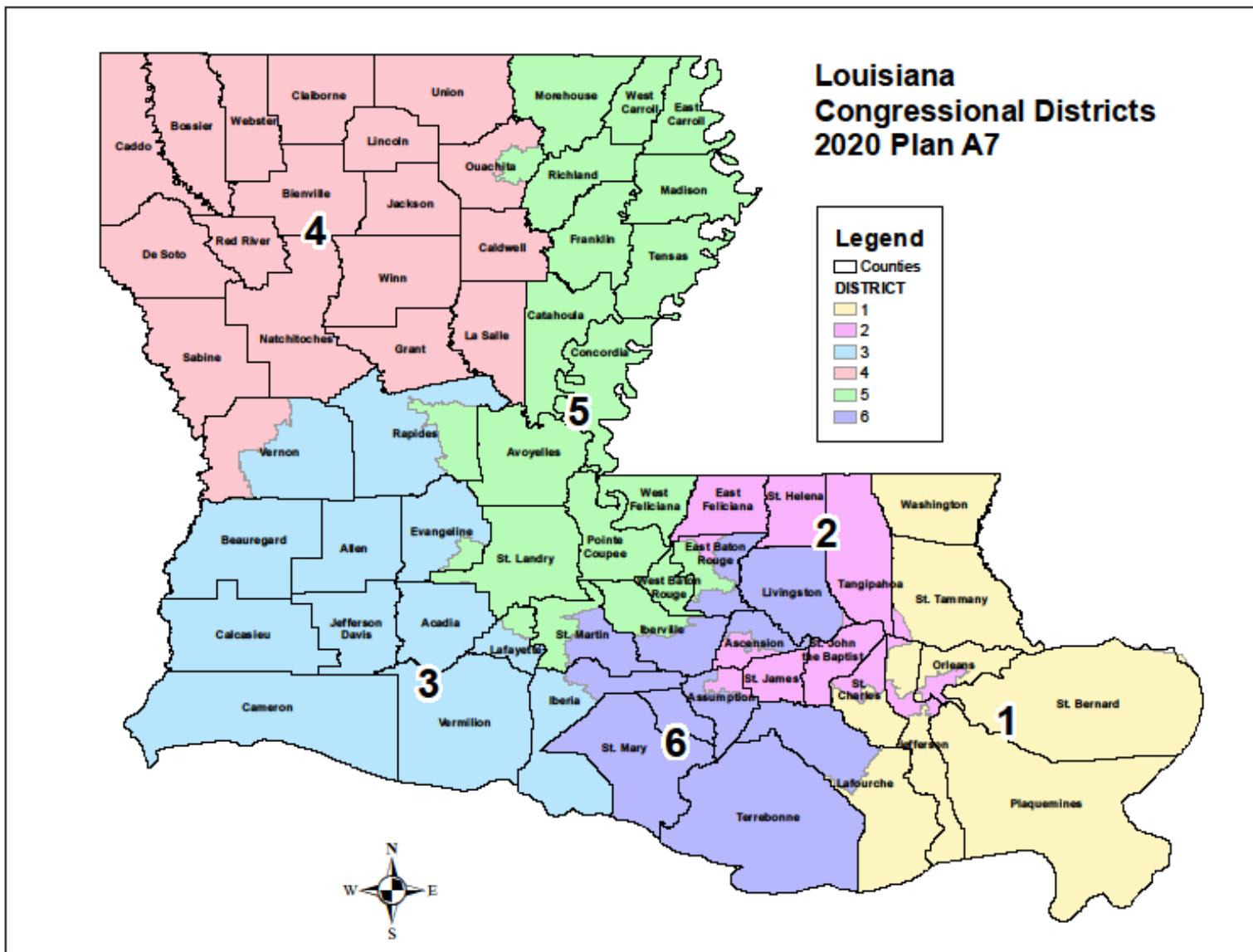












UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

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

Plaintiffs,

v.

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

Defendant.

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

Plaintiffs,

v.

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

Defendant.

Civil Action No. 3:22-cv-00211-SDD-RLB

Civil Action No. 3:22-cv-00214-SDD-RLB

**PROPOSED ORDER GRANTING PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

This Court has considered Plaintiffs' motion for preliminary injunction and supporting authorities, the submissions of the other parties, and the evidence and pleadings of record, and finds that Plaintiffs have clearly established their burden of persuasion as to each of the four elements required for a preliminary injunction.

Plaintiffs' motion for preliminary injunction is therefore **GRANTED**.

IT IS SO ORDERED:

Defendants, as well as their agents and successors in office, are **PRELIMINARILY ENJOINED** from enforcing or giving any effect to the boundaries of the congressional districts as enacted in La. Rev. Stat. § 18:1276, including conducting any further congressional elections under the enacted map.

The Court further **ORDERS** that Defendant Louisiana Secretary of State Kyle Ardoin shall conduct the November 8, 2022 Congressional Election Open Primary and December 10, 2022 General Elections using the Congressional districts defined in the Illustrative Plan submitted by the Robinson Plaintiffs. The Court, however, stays execution of this paragraph of its order until the adjournment of the current legislative session, June 6, 2022, in order to provide the Louisiana Legislature an opportunity to enact a map compliant with Section 2 of the Voting Rights Act.

Should the Legislature pass a new Congressional plan on or before June 6, 2022, the parties shall have 5 days from the date of passage by the Legislature to notify the Court of their positions with respect to whether the Legislature's plan is sufficient to remedy the violation of Section 2 of the Voting Rights Act alleged in the Complaint. However, absent further action by this Court, this Order shall remain in effect, and the 2022 Congressional Elections shall be conducted pursuant to the Robinson Plaintiffs' Illustrative Plan.

SO ORDERED this _____ day of _____, 2022.

United States District Judge