

**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.*

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

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-00214-SDD-RLB

**PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

Plaintiffs Press Robinson, Edgar Cage, Dorothy Nairne, Edwin René Soulé, Alice Washington, Clee Earnest Lowe, Davante Lewis, Martha Davis, Ambrose Sims, NAACP Louisiana State Conference, and Power Coalition for Equity and Justice, by and through their counsel, respectfully move this Court to: (i) enjoin Defendant from administering the upcoming election in November 2022 under the recently enacted congressional district map; (ii) order that the election be administered under the Robinson Plaintiffs' illustrative map, as described in the expert report of Anthony Fairfax; (iii) stay the execution of its order implementing the illustrative map until the adjournment of the current legislative session, June 6, 2022, in order to provide the Louisiana Legislature an opportunity to enact a compliant map. A preliminary injunction is justified for the reasons set out in the memorandum of law filed concurrently with this motion, and the declarations, expert reports, and other materials attached thereto.

Plaintiffs readily satisfy the traditional elements for a preliminary injunction—a likelihood of success on the merits, irreparable injury if the injunction is not granted, and the balance of equities and the public interest all favor an injunction.

Plaintiffs are likely to succeed on the merits of their claim that the 2022 congressional map violates Section 2 of the Voting Rights Act because it fails to include two districts in which Black voters have an equal opportunity to elect their candidate of choice. Louisiana's population is nearly one-third Black, and the Black population is sufficiently geographically compact to create an additional majority-Black district. The threshold factors identified by the Supreme Court in *Thornburg v. Gingles*, 478 U.S. 30 (1986) for establishing a violation of Section 2 in the redistricting context are satisfied, as is the further requirement that, considering the totality of circumstances, "the political processes leading to nomination or election in the State or political subdivision are not equally open to participation" by Black Louisianans. 52 U.S.C. § 10301(b).



Rather than select one of the numerous maps that complied with the Voting Rights Act and were presented to the Legislature during the redistricting process, the Legislature chose a map that dilutes Black voting power.

Plaintiffs will also suffer irreparable injury if forced to vote pursuant to maps that unlawfully dilute their vote. *See Patino v. City of Pasadena*, 229 F. Supp. 3d 582, 590 (S.D. Tex. 2017); *see also League of Women Voters of N.C. v. North Carolina*, 769 F.3d 224, 247 (4th Cir. 2014). As the Fourth Circuit noted in that case, “Courts routinely deem restrictions on fundamental voting rights irreparable injury.” *Id.*

Finally, the balance of equities and the public interest support an injunction. The harm to Plaintiffs’ right to vote is egregious, and the Defendant has no legitimate countervailing interest in conducting an election in violation of the Voting Rights Act. Nor would the State’s ability to administer the 2022 congressional election be impeded by an injunction, when that election is nearly seven months away.

Plaintiffs also request that the Court waive the posting of security as otherwise required by Federal Rule of Civil Procedure 65(c), a matter left to the discretion of the trial court, which “may elect to require no security at all.” *Kaepa, Inc. v. Achilles Corp.*, 76 F.3d 624, 628 (5th Cir. 1996). In exercising this discretion, courts in the Fifth Circuit have waived the security requirement where a motion for preliminary injunction seeks to enjoin the enforcement of a state law that, in part, is claimed to violate Section 2 of the Voting Rights Act. *See, e.g., City of El Cenizo v. Texas*, 264 F. Supp. 3d 744, 813 (W.D. Tex. 2017) (no security for preliminary injunction in challenge to immigration enforcement law challenged, in part, under the Voting Rights Act).

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have electronically filed a copy of the foregoing with the Clerk of Court using the CM/ECF system which provides electronic notice of filing to all counsel of record, on this 15th Day of April, 2022.

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

**PLAINTIFFS' MEMORANDUM OF LAW IN SUPPORT OF A PRELIMINARY  
INJUNCTION**

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### **PRELIMINARY STATEMENT**

Louisiana’s 2022 congressional map, enacted by the Louisiana State Legislature (the “Legislature”) over a gubernatorial veto and without the support of a single Black member of either house of the Legislature, is only the latest action by the State that improperly dilutes the power of Louisiana’s Black voters and impedes their ability to participate fully and equally in the political process. Throughout the history of the State, Black Louisianans have experienced persecution and discrimination, including at the ballot box. The pernicious effects of slavery, segregation, and more than a century of voting restrictions are evident today in explicit and implicit racial appeals in the electoral process, chronic underrepresentation of Black representatives in elected positions, wide disparities in areas such as education, employment, and health, and a stark pattern of racially polarized voting in election after election.

These facts and more establish that the 2022 congressional map violates Section 2 of the Voting Rights Act of 1965 (“VRA”), 52 U.S.C. § 10301, by depriving Black Louisiana voters of an equal opportunity to elect their candidates of choice to Congress. The VRA was enacted by Congress in 1965 and reenacted in 1982 to protect Black voters from voting practices that discriminate against or prevent Black citizens from exercising their voices equally in the political process. Although Black voters represent nearly one-third of Louisiana’s voting age population, the 2022 congressional map dilutes Black voting strength by “packing” large numbers of Black voters into a single majority-Black congressional district (Congressional District 2, or CD 2), and “cracking” the State’s remaining Black voters among the five remaining districts, all of which are majority white. By failing to adopt a congressional map with two majority-Black districts, the State falls far short of what the VRA requires.

Plaintiffs readily satisfy the requirements for demonstrating that a preliminary injunction is warranted here. To begin with, Plaintiffs are likely to succeed on the merits of the Section 2

claim. The threshold factors identified by the Supreme Court in *Thornburg v. Gingles*, 478 U.S. 30 (1986) for establishing a VRA violation in the context of redistricting have been met. As shown in the accompanying expert report of Anthony Fairfax, Black voters represent a sufficiently large and geographically compact group such that creation of a congressional map with two majority-Black congressional districts and conforming to traditional districting criteria is entirely feasible. The illustrative plan prepared by Mr. Fairfax (the “Illustrative Plan”) not only includes two majority-Black districts, but scores better than or as well as the Legislature’s map by every traditional redistricting metric. *See* Ex. 1<sup>1</sup> And, as shown in the accompanying expert report of Dr. Lisa Handley, the remaining *Gingles* factors are also readily satisfied: Black voters in Louisiana are politically cohesive, and Louisiana’s white majority votes sufficiently as a bloc to enable it usually to defeat the candidate preferred by Black voters. *See* Ex. 2. Finally, Plaintiffs easily satisfy their burden on the totality of the circumstances, including the stark underrepresentation of Black elected officials at all levels of State government; large gaps in educational attainment, unemployment, and other socioeconomic indicators between Black and white Louisianians; political campaigns marked by explicit and coded racial appeals; and the tenuous nature of the Legislature’s proffered justifications for refusing to adopt a map with two majority-Black districts. The 2022 congressional map impairs the ability of Black voters to elect their candidates of choice, as shown in the accompanying expert reports of R. Blakeslee Gilpin and Dr. Traci Burch. *See* Exs. 3 & 4.

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<sup>1</sup> Citations to “Ex.” Refer to Exhibits to the Declaration of John Adcock.

Ex. 1 refers to the expert report of Anthony Fairfax; Ex. 2 refers to the expert report of Dr. Lisa Handley; Ex. 3 refers to the expert report of Dr. R. Blakeslee Gilpin; and Ex. 4 refers to the expert report of Dr. Traci Burch.

The remaining preliminary injunction factors also weigh strongly in favor of granting Plaintiffs' motion. As a matter of law, Plaintiffs will suffer irreparable injury if forced to vote pursuant to maps that improperly dilute their vote in violation of the VRA. Likewise, the balance of equities and the public interest strongly favor granting an injunction. Plaintiffs' rights are protected and the public interest is advanced by the implementation of a congressional map that complies with federal law. Any burden of an injunction upon Defendant is minimal, particularly in view of the fact that Election Day is still more than six months away. Moreover, any burden on the State from an injunction results not from any action by Plaintiffs or the Court, but from the decision by the Legislature to enact a map with only a single majority-Black district despite compelling evidence in the legislative record that a congressional map with two majority-Black districts is both feasible and required by the VRA.

Timely intervention by this Court is needed to implement a congressional district map that satisfies the requirements of Section 2 of the VRA if the legislature fails to act, and to do so sufficiently in advance of the coming election. The period for candidates to declare their candidacies, between July 20 and 22, 2022, is only a few short months away.<sup>2</sup> Voters—and the organizations that work to educate and engage them—will likewise need time to learn the candidates' positions in order to participate effectively in the political process.

Plaintiffs seek by this motion to protect the fundamental right of Plaintiffs and Louisiana's Black voters to vote on an equal basis and to cast undiluted ballots this year for the congressional candidates of their choice. This Court possesses ample authority to grant the relief that Plaintiffs seek and that Louisianans deserve. Plaintiffs respectfully move for a preliminary

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<sup>2</sup> The dates of the candidate qualifying period and other election deadlines can be found on the Secretary's website. Ex. 16.

injunction to prevent Defendant from conducting the 2022 congressional elections under the enacted district maps, to set a deadline of June 6, 2022 for the Legislature to enact a compliant map and, if the Legislature fails to do so, order that the November 2022 election be conducted under the Illustrative Plan. *See* Ex. 1.

This proposed remedial schedule allows the legislature ample time to have the first opportunity to implement a remedial map. The legislature is currently in session, and the date for final adjournment of that session is June 6, 2022, at 6:00 pm. Bills concerning congressional redistricting have already been introduced in both chambers of the Legislature, including at least three bills that would address the violation of the Voting Rights Act outlined below, any of which could serve as a vehicle for the adoption of a remedial map. If the legislature fails to act in this time frame, Plaintiffs' Illustrative Plan, which includes two majority-Black districts and conforms to all of the Legislature's stated redistricting criteria, provides an appropriate interim remedy that can be ordered immediately, providing ample time for the Defendant implement an interim plan and to administer the 2022 Congressional Election without disruption.

### **FACTUAL BACKGROUND**

The 2020 U.S. Decennial Census of Population and Housing confirmed that Louisiana is home to the second highest percentage of Black citizens in the country. Black Louisianans represent approximately 31.2% of the State's voting age population, and non-whites collectively represent nearly 40%. Ex. 1 at 16. Yet only one of the six congressional districts, representing little over 16% of the Louisiana's congressional delegations, has a majority-minority population. Ex. 2 at 9–10. In the 2020 census, the total number of Black Louisianans of voting age increased by 7.2%. Ex. 1 at 16, Table 2. Louisiana's population growth over the last decade was driven entirely by growth in minority populations, while the State's white population decreased by 5.1%. Ex. 1 at 15, Table 1. Louisiana's white population is dramatically overrepresented in the

2022 congressional map: only 58% of Louisiana’s voting age population is non-Hispanic white, but non-Hispanic whites are a substantial majority in five of the State’s six congressional districts—over 83%. Ex. 1 at 16, Table 2.

The Legislature must redraw congressional district boundaries after each decennial census. U.S. Const. art. I § 2. Pursuant to Joint Rule 21 of the Legislature, each redistricting plan submitted for consideration by the Legislature in the current redistricting cycle must comply with state and federal law, including Section 2 of the VRA. Ex. 17.

On February 18, 2022, the Legislature passed both H.B. 1 and S.B. 5—bills that contained identical district configurations, including only a single majority-Black district. Comp. ¶ 82. In public meetings and throughout the Special Legislative Session leading to the adoption of the 2022 congressional map, members of the public—including Plaintiffs—told the Legislature that such a congressional map with only a single majority-Black district would violate the VRA. *See, e.g.*, Ex. 22. The Legislature was provided multiple potential alternative maps that featured two majority-Black districts while respecting traditional districting principles (such as contiguity, compactness, and respect for political subdivisions) at least as well as—if not better than—H.B. 1 and S.B. 5.<sup>3</sup>

On March 9, Governor Edwards vetoed both H.B. 1 and S.B. 5, stating in his veto letters a “firm belief” that the map “violates Section 2 of the Voting Rights Act.” *See, e.g.*, Ex. 21.

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<sup>3</sup> *See, e.g.*, H.B. 4, 1st Spec. Sess. (La. 2022); H.B. 5, 1st Spec. Sess. (La. 2022); H.B. 7, 1st Spec. Sess. (La. 2022); H.B. 8, 1st Spec. Sess. (La. 2022); H.B. 9, 1st Spec. Sess. (La. 2022); H.B. 12, 1st Spec. Sess. (La. 2022); S.B. 2, 1st Spec. Sess. (La. 2022); S.B. 4, 1st Spec. Sess. (La. 2022); S.B. 6, 1st Spec. Sess. (La. 2022); S.B. 9, 1st Spec. Sess. (La. 2022); S.B. 10, 1st Spec. Sess. (La. 2022); S.B. 11, 1st Spec. Sess. (La. 2022); S.B. 16, 1st Spec. Sess. (La. 2022); S.B. 18, 1st Spec. Sess. (La. 2022); Amendment #88 to H.B. 1, 1st Spec. Sess. (La. 2022); Amendment #99 to H.B. 1, 1st Spec. Sess. (La. 2022); Amendment #153 to H.B. 1, 1st Spec. Sess. (La. 2022); Amendment #62 to S.B. 2, 1st Spec. Sess. (La. 2022); Amendment #116 to S.B. 5, 1st Spec. Sess. (La. 2022); Amendment #91 to S.B. 5, 1st Spec. Sess. (La. 2022).

Governor Edwards’s veto letter explained that in failing to enact a congressional map that complies with the Voting Rights Act, the Legislature “disregarded the shifting demographics of the state,” particularly the increase in the Black voting age population since the 2010 census. *Id.* The 2022 Regular Legislative Session convened on March 14, 2022. On March 29, the Legislature entered into a veto session and each house voted to override the Governor’s veto—the first successful veto override in over a quarter century. Every Black legislator voted against the override.

The 2022 congressional map artificially limits Black voters’ influence by “packing” them into CD 2 and “cracking” them among the State’s five remaining districts. These district lines, coupled with high levels of racially polarized voting (as federal courts have repeatedly recognized), greatly dilute the ability of the State’s Black voters to elect their candidates of choice. State voters have elected only four Black members of Congress since Reconstruction. Ex. 4 at 25. Louisiana has not had a Black Governor or Lieutenant Governor since Reconstruction. It has not had a Black U.S. Senator, Secretary of State, or Attorney General since joining the Union in 1812. Blacks are persistently underrepresented at every level and in every branch of the State’s government.

Plaintiffs are Black citizens and voters in Louisiana, who are denied an equal opportunity to elect candidates of their choice because the Legislature’s congressional map dilutes their votes, as well as the NAACP and Power Coalition, organizations working to empower and engage civic and political participation that now must divert resources to combat the discriminatory impacts of the congressional district plan. *See, e.g.*, Ex. 14 ¶¶ 13–14; Ex. 15 ¶¶ 20–23. Time is of the essence. Absent swift relief, the 2022 elections will be held using maps that violate Section 2 of the Voting Rights Act.



## ARGUMENT

In order to prevail on a motion for a preliminary injunction, the movant must prove (1) a substantial likelihood of success on the merits, (2) a substantial threat of irreparable injury if the injunction is not issued, (3) that the threatened injury if the injunction is denied outweighs any harm that will result if the injunction is granted, and (4) that the grant of an injunction will not disserve the public interest. *Harding v. Edwards*, 487 F. Supp. 3d 498 (M.D. La. 2020), *appeal dismissed sub nom. Harding v. Ardoin*, No. 20-30632, 2021 WL 4843709 (5th Cir. May 17, 2021); *see also Janvey v. Alguire*, 647 F.3d 585, 595 (5th Cir. 2011). The balance of the equities and the public interest “merge when the Government is the opposing party.” *Nken v. Holder*, 556 U.S. 418, 435 (2009). Because all four criteria are met here, the Court should issue an injunction.

### **I. Plaintiffs are substantially likely to prove that the Legislature’s congressional district map violates Section 2 of the Voting Rights Act**

Section 2 of the Voting Rights Act prohibits any “standard, practice, or procedure” that “results in a denial or abridgement of the right of any citizen of the United States to vote on account of race or color.” 52 U.S.C. § 10301(a). To prove a violation of Section 2 of the VRA in the redistricting context, Plaintiffs must satisfy the three preconditions the Supreme Court set out in *Thornburg v. Gingles*, 478 U.S. 30 (1986): (1) Black voters are “sufficiently large and geographically compact to constitute a majority in a single-member district”; (2) Black voters are “politically cohesive”; and (3) the white majority “votes sufficiently as a bloc to enable it . . . usually to defeat the minority’s preferred candidate.” *Id.* at 50–51; *see also LULAC v. Perry*, 548 U.S. 399, 425 (2006); *Citizens for a Better Gretna v. City of Gretna, La.*, 834 F.2d 496, 497 (5th Cir. 1987). Once all *Gingles* preconditions are met, the Court must examine “the totality of circumstances”—including the nine factors identified in the Senate report that accompanied the

1982 amendments to the Voting Rights Act—to determine whether “the political processes leading to nomination or election in the State or political subdivision are not equally open to participation” by members of the minority group. 52 U.S.C. § 10301(b); *see also Gingles*, 478 U.S. at 43–44.

**A. *Gingles* One: An additional, compact, majority-Black district can be drawn in Louisiana.**

The Illustrative Plan presented by Plaintiffs’ expert, Anthony Fairfax, demonstrates that Louisiana’s Black population is sufficiently numerous and geographically compact to comprise a majority of the voting age population in two districts in the State’s six-district congressional plan. Mr. Fairfax’s Illustrative Plan performs as well as or better than the enacted congressional plan on every measure of customary redistricting principles, as well as the state’s own redistricting guidelines as set out by the Louisiana legislature in Joint Rule 21. Ex. 17.

To establish the first *Gingles* precondition (“*Gingles* I”) here, Plaintiffs must demonstrate that the Black voting age population is sufficiently numerous and geographically compact to form a second majority-Black congressional district in a six-district plan. Satisfying the first part of *Gingles* I, compactness, normally requires submitting as evidence hypothetical redistricting schemes in the form of illustrative plans. *See, e.g., Fairley v. Hattiesburg, Miss.*, 584 F.3d 660, 669 (5th Cir. 2009). In assessing these plans, the issue is not whether plaintiffs’ plan is “oddly shaped, but whether the proposal demonstrate[s] that a geographically compact district could be drawn.” *Houston v. Lafayette Cnty., Miss.*, 56 F.3d 606, 611 (5th Cir. 1995) (emphasis omitted).

Compactness also requires accounting for “traditional districting principles such as maintaining communities of interest and traditional boundaries.” *LULAC*, 548 U.S. at 433 (a compactness “inquiry should take into account traditional districting principles such as maintaining communities of interest and traditional boundaries” because “[t]he recognition of

nonracial communities of interest reflects the principle that a State may not assume from a group of voters' race that they think alike, share the same political interests, and will prefer the same candidates at the polls") (quoting *Abrams v. Johnson*, 521 U.S. 74, 92 (1997)).

Mr. Fairfax's Illustrative Plan readily satisfies *Gingles* I. It is more compact than H.B. 1 and S.B. 5 by objective measures, adheres as well as or better than H.B. 1 and S.B. 5 on all traditional redistricting principles, and includes two congressional districts with a Black citizen voting age population of greater than 50%. Ex. 1 at 3–4, 12, 13. Plaintiffs' Illustrative Plan ensures equal population, contiguity, and compactness; minimizes or eliminates political subdivision splits, both of precincts and parishes; preserves communities of interest, including cities, landmarks, and census-designated places, and mitigates cracking of the Black population equal to or better than the enacted 2022 congressional map. Ex. 1 at 18–23. For example, legislators like Senator Hewitt emphasized that the 2022 congressional map kept census-designated places like the Fort Polk military base intact and "in connection with their surrounding communities." Senator Hewitt, Feb. 3 Senate and Governmental Affairs Testimony. The Illustrative Plan also preserves census-designated places, including the Fort Polk military base. Ex. 1 at 21–22. Mr. Fairfax's analysis underscores that the state could have achieved all of its stated redistricting objectives without diluting Black voting power.

**B. *Gingles* Two and Three: Black Louisianans are politically cohesive and white Louisianans vote as a bloc to defeat candidates preferred by Black Louisianans**

*Gingles* precondition II requires that Black voters in Louisiana are "politically cohesive," and precondition III requires that the white majority "votes sufficiently as a bloc to enable it usually to defeat the minority's preferred candidate." *LULAC*, 548 U.S. at 425 (citation omitted). Plaintiffs, therefore, must prove (II) voting in Louisiana is highly polarized along racial lines and (III) under the enacted congressional map racially polarized voting ("RPV") will

result in the defeat of Black Louisianans' preferred candidates in majority-white districts.

*Gingles*, 478 U.S. 56–63.

As shown in the accompanying expert report of Dr. Handley, these preconditions are met here. Ex. 2 at 1. Dr. Handley's analysis is in accord with the consistent finding by federal courts that voting in Louisiana is racially polarized. *See, e.g., Terrebonne Par. Branch NAACP v. Jindal*, 274 F. Supp. 3d 395, 433–37 (M.D. La. 2017), *rev'd on other grounds, Fusilier v. Landry*, 963 F.3d 447 (5th Cir. 2020) (finding RPV in judicial elections in Terrebonne Parish); *St. Bernard Citizens For Better Gov't*, 2002 WL 2022589, at \*6–7 (E.D. La. Aug. 26, 2002) (finding RPV in statewide gubernatorial and local parish elections); *La. State Conference of NAACP v. Louisiana*, 490 F. Supp. 3d 982, 1019 (M.D. La. 2020) (holding that plaintiff had standing to challenge Louisiana's Supreme Court district map on the basis, in part, of allegations of polarized voting).

It is beyond dispute that Black voters in Louisiana have voted as a cohesive bloc. Dr. Handley used the standard statistical tool of ecological inference to review 15 biracial exogenous statewide elections from 2015 to 2020. Ex. 2 at 7. These 15 contests consist of recent statewide elections that include Black candidates, *id.*, which are considered the most probative evidence of RPV. *See League of United Latin Am. Citizens, Council No. 4434 v. Clements*, 999 F.2d 831, 864 (5th Cir. 1993) (holding that evidence from “elections between white candidates [is] generally less probative in examining the success of minority-preferred candidates . . . [than] elections involving black or Hispanic candidates”). In these 15 elections, voting was highly racially polarized. *Id.* at 7. The average percentage of Black voter support for the Black-preferred candidate was 83.8%, even when some contests had multiple candidates. *Id.*; *see Gingles*, 478 U.S. at 68 (“[I]t will frequently be the case that a black candidate is the choice of blacks, while a white

candidate is the choice of whites.”). Moreover, in contests with just two candidates, the cohesion is stronger, with the support for the preferred Black candidate averaging 93.5%. Ex. 2 at 7.

Dr. Handley’s analysis of nine recent *endogenous* congressional elections involving Black candidates shows the same pattern of Black voters voting as a cohesive bloc. *Id.* at 7. Analysis of voting patterns in endogenous elections—ones that involve districts at the same level of government at issue in the litigation—is important. See *Clark v. Calhoun Cnty.*, 88 F.3d 1393, 1397 (5th Cir. 1996).<sup>4</sup> This analysis included three elections in CD 2 and six elections in other congressional districts. Ex. 2 at 7–8 and App. B. All six of the elections outside CD 2 were racially polarized. *Id.*<sup>5</sup> CD 2 is the only district in Louisiana with a majority-Black population, and its current congressman is Representative Troy Carter, who is Black. Within all

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<sup>4</sup> However, while “exogenous elections are less probative than elections for the particular office at issue . . . ‘the exogenous character of . . . elections does not render them nonprobative.’” *NAACP v. Fordice*, 252 F.3d 361, 370 (5th Cir. 2001)(quoting *Rangel v. Morales*, 8 F.3d 242, 247 (5th Cir. 1993)). Moreover, “plaintiffs may not be denied relief simply because the absence of black candidates has created a sparsity of data on racially polarized voting in purely indigenous elections. Rather, plaintiffs’ claims should stand or fall based upon the probative value of the evidence of racial bloc voting that they *have* adduced, along with the presence or absence of other factors demonstrating a lack of access to the political process.” *Westwego Citizens for Better Government v. Westwego*, 872 F.2d 1201, 1209-10 (5th Cir. 1989) (emphasis added).

<sup>5</sup> However, Dr. Handley noted that the results for the 2020 election in Congressional District 2 were inconclusive. Ex. 2 at 7 and n.11. Three out of the four evaluations Dr. Handley performed show polarized voting with a plurality of white votes supporting then-Representative Cedric Richmond’s white opponent. Ex. 2 at 7 and App. B. Moreover, there are likely special circumstances to explain Mr. Richmond’s success with white voters of a little over 50% in the 2018 election. The only white candidate on the ballot in the 2018 election was Jesse Schmidt. He was not a viable candidate, described in local news coverage as an “underfunded, long shot candidate.” Ex. 18. White voters’ support of Mr. Richmond dropped considerably in the 2020 election when a viable alternative white candidate was on the ballot. Special circumstances that explain a minority candidate’s success should not be used defeat claims of vote dilution in otherwise racially polarized electorate. See, e.g., *Rodriguez v. Bexar Cnty.*, 385 F.3d 853, 864 (5th Cir. 2004) (citing *Gingles*, 478 U.S. at 57); *Fusilier*, 963 F.3d at 447.

these endogenous elections, Black voters voted has a cohesive bloc. In CD 2, Black voters have supported their candidate of choice with a range of support from 80% to 96%. Ex. 2 at App. B. In the other six elections involving Black candidates, all of which involved multiple candidates, the voting patterns demonstrate that Black voter support was cohesive. Ex. 2 at 8. Of the six contests, four were decided at the primary stage, with the white candidate that was preferred by white voters prevailing. Two elections required a runoff, but due to white bloc voting, no Black candidate made it to the runoff in either case. Ex. 2 at App. B.

It is also beyond dispute that racial bloc voting by white voters nearly always results in the defeat of Black Louisianans' preferred candidates in majority-white districts. *Gingles*, 478 U.S. 56–63. While Section 2 does not guarantee Black electoral success, “[o]ne may suspect vote dilution from political famine.” *Johnson v. De Grandy*, 512 U.S. 997, 1017 (1994). Dr. Handley found that in every one of the 15 statewide election contests in which a Black candidate was running, white voters voted in bloc against the candidate supported by Black-voters, preventing the Black voters' candidate of choice from being elected. Ex. 2 at 7. The average percentage of white voters for the Black-preferred candidate in these elections was only 11.7%. *Id.* Likewise, in the recent endogenous congressional elections, the Black-preferred candidate did not win in any district other than in CD 2. *Id.* at 8. White support for the Black congressional candidates in the six elections in districts outside of CD 2 ranged from 1.1% to 7.4%. *Id.* at App. B. For example, in CD 5 in 2020, Sandra Christopher, who is Black, was the plurality choice of Black voters, but less than 5% of white voters supported her and she did not even make it to the runoff election. *Id.* at 9. In Louisiana congressional elections, Black preferred candidates outside CD 2 fail to win or even advance to the runoffs. *Id.*

Dr. Handley also found that the recently enacted 2022 congressional map, like the 2011 map, offers only one district where Black voters will have the opportunity to elect their candidate of choice. *Id.* at 10–11, Table 4. Performing a functional analysis, Dr. Handley found Black-preferred candidates in recent statewide elections would have performed similarly under the enacted plan as they did under the 2011 map, and the new plan is therefore unlikely to result in the election of Black-preferred candidates in future congressional elections outside of CD 2. *Id.*

Dr. Handley also conducted an analysis of the extent to which Black voters would have greater electoral opportunities under Mr. Fairfax’s Illustrative Plan, looking at likely voting patterns of Congressional Districts 2, 3, 4, 5 and 6 in the enacted plan. *Id.* at 12–13. Under Mr. Fairfax’s plan, the additional majority-Black district, CD5, draws in parts of each of these districts. Dr. Handley found that in all of these districts, Black voters vote as a cohesive bloc. *Id.* at 13. The percentage of support of Black voters for Black-preferred candidates across all five districts that would contribute voters to illustrative CD 5 was 82.8% to 84.5%. *Id.*

*Gingles* preconditions II and III have been met. In Louisiana, the Black community is cohesive in support of its preferred candidates and white voters consistently vote in bloc to defeat these candidates.

## **II. The totality of the circumstances indicates that the Legislature’s map denied Black voters a meaningful opportunity to elect their preferred candidates**

As shown in detail in the accompanying expert reports of Dr. R. Blakeslee Gilpin and Dr. Traci Burch, each of the factors relevant to an assessment of the totality of the circumstances shows that the Legislature’s congressional map deprives Black voters of a meaningful opportunity to elect their candidates of choice. *See Gingles*, 478 U.S. at 36–37 (setting forth relevant Senate factors). We summarize their findings briefly here.

**1. Senate Factor 1: Louisiana has an ongoing history of official, voting-related discrimination**

Louisiana has been persistent and creative in seeking to prevent its Black citizens from voting. Louisiana maintained a Grandfather Clause until the Supreme Court struck down this device in 1915. *See* Ex. 3 at 30. Thereafter, the state enacted an Understanding Clause to replace it, which required Louisiana voters to “give a reasonable interpretation of any section of the federal or state constitution in order to vote.” *Bossier Parish School Board v. Reno*, 907 F. Supp. 434, 455 (D.D.C. 1995) (Kessler, J., dissenting) (internal quotation marks omitted). Poll taxes and voter roll purges were also used to hinder Black registration. *Major v. Treen*, 574 F. Supp. 325, 340 (E.D. La. 1983). The state at one time “prohibited elected officials from helping illiterates” and established an all-white democratic primary, which completely excluded Black Louisianans from the political process between 1923 and the Supreme Court’s condemnation of the practice in 1944. *See* Ex. 3 at 30; *Smith v. Allwright*, 321 U.S. 649 (1944). In 1950, citizenship tests and a prohibition against single-shot voting were instituted. *Major*, 574 F. Supp. at 340. Between 1940 and 1964, the States Rights Party “spearheaded a strong movement against black enfranchisement and judicially-directed desegregation.” *Id.*

From 1965 to 1989, the U.S. Attorney General issued 66 objection letters (11 to the State and 55 to local governments) nullifying over 200 voting changes. Ex. 3 at 35. Louisiana’s preclearance requirement was renewed in 1970, 1975, and 1982. *Id.* at 35. From 1990 until the preclearance regime was struck down in *Shelby County v. Holder*, 570 U.S. 529 (2013), the U.S. Attorney General issued 79 additional objection letters in response to voting related changes in the State. *See* Department of Justice, *Section 5 Objection Letters*, <https://www.justice.gov/crt/section-5-objection-letters> (last visited Apr. 14, 2022).



Redistricting in Louisiana has repeatedly been characterized by racially discriminatory maps. After the 1981 redistricting cycle, a federal court found the State’s redistricting plan, which included no majority-Black district, violated Section 2 of the VRA by diluting Black voting strength. *See Major*, 574 F. Supp. at 331.

The post-1990 round of redistricting was also tainted by Voting Rights Act violations. Ex. 3 at 44. The Department of Justice objected to the State’s legislative redistricting plan and stated that it had “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.” Ex. 19. The Justice Department found that “[i]n seven areas . . . the proposed configuration of district boundary lines appears to minimize black voting strength, given the particular demography of those areas. . . .” *Id.* Just two years later, in the *Chisom v. Roemer* cases, five Black voters in Orleans Parish filed a class action suit on behalf of all Black voters registered in the parish alleging that electing two at-large supreme court justices from Orleans, St. Bernard, Plaquemines, and Jefferson Parishes violated the VRA. Ex. 3 at 39. The state eventually settled the litigation in 1992, creating a majority-Black district in the state’s supreme court plan, which to-date is the only district from which a Black justice has been elected. *Id.*

Local jurisdictions in the state have repeatedly been the subject of Section 5 objections and findings of liability under Section 2 of the VRA. Ex. 3 at 40–41.

## **2. Senate Factor 2: Louisiana voters are highly racially polarized**

Federal courts have consistently found that voting in Louisiana is racially polarized to a very great extent. As described in detail, *supra* pp. 9–13, and in the expert report of Dr. Lisa Handley, the state’s elections demonstrate stark patterns of racial polarization. In 2020, Louisiana’s most recent congressional elections, voters in four of the five white majority districts had a choice between Black and white candidates. In each instance, the white candidate

prevailed with little Black support, while white support for Black candidates was virtually non-existent. *See* Ex. 2 at 8. Moreover, the gap between Black and white support for Black-preferred candidates is significant and consistent across elections at every level of government.

**3. Senate Factor 5: Discrimination in Louisiana has produced severe socioeconomic disparities impairing the ability of Black Louisianans to participate in the political process**

The ongoing effects of discrimination on Black Louisianans, which can be seen across multiple metrics, including economic, health, employment, living, and environmental conditions, hinder Black Louisianans' ability to participate in the political process in the state.

*Economic:* The U.S. Census Bureau's American Community Survey ("ACS") demonstrates that Black and Latino poverty rates are nearly three times as high as the white poverty rate in Louisiana. The median income for Black Louisianan households is about \$29,000 less than that of white households. Ex. 4 at 10. Over three times as many Black households lack access to a vehicle as white households. *Id.* Moreover, Black Louisianans are underrepresented among small business owners. *Id.* Black Louisianans, while often located in areas of the State most affected by natural disasters, face more difficulty than white Louisianans in securing relief to rebuild homes and businesses after natural disasters occur. *Id.*

*Health:* Dramatic health disparities between Black and white Louisianans persist in Louisiana. According to the Centers for Disease Control and Prevention ("CDC"), in Louisiana, white men are expected to live over seven years longer than Black men and white women are expected to live over five years longer than Black women. Ex. 4 at 16–17.

Between 2016 and 2018, infant and child mortality rates among Black children were about twice as high as those for white children, Ex. 4 at 17. While rates of invasive cancer are similar for Black and white Louisianans, there is a statistically significant disparity in the mortality rate from invasive cancers (211.2 deaths per 100,000 adults for Black Louisianans vs.

173.6 deaths per 100,000 for white Louisianans). Ex. 4 at 16. According to the CDC, 42.9% of Black Louisianans are obese, compared to 32.4% of white Louisianans. *Id.* According to the 2019 ACS, white Louisianans are more likely to have health insurance than Black Louisianans. Ex. 4 at 17–18.

*Employment:* Severe racial discrimination in employment persists in Louisiana. Between 2011 and 2021, nearly 8,700 charges of race- or color-based employment discrimination were filed in Louisiana. Ex. 4 at 10.

*Education:* Black Louisianans have faced educational discrimination throughout Louisiana's history, and de facto racial segregation remains a persistent feature of the State's educational system. As recently as 2017, ProPublica's *Miseducation* project demonstrated high levels of racial segregation within 50% of all Louisiana school districts, with nine out of 68 school districts over 87% non-white. Ex. 4 at 7.

School segregation detrimentally affects the academic performance of minority students. Despite comprising 43.5% of public school students in the 2017-2018 school year, Black students were only 22.9% of students in gifted and talented programs and 35.5% of students taking Advanced Placement courses. Ex. 4 at 8. Two-thirds of the students with a school suspension that school year were Black. Ex. 4 at 8. Among current students, there is a racial gap in assessment test scores. Black eighth graders score 30 points lower in Math on average and 26 points lower in Reading on average than white eighth graders. Ex. 4 at 8.

*Environmental living conditions:* As a result of racial residential segregation, chemical plants and other hazards are located near heavily Black residential areas. In Cancer Alley, an area of Louisiana between New Orleans and Baton Rouge, studies have linked elevated levels of air pollution to increased risk of cancer, COVID-19, and asthma. Ex. 4 at 18. Flooding in

Louisiana disproportionately affects Black neighborhoods. Ex. 4 at 16. When Hurricane Katrina hit southeast Louisiana in 2005, the damage was most extensive in the region's Black neighborhoods. *Id.* Mortality rates for adults 30 years and older were significantly higher for Black residents of Orleans Parish than white residents. *Id.* at 18. In the aftermath of Hurricane Katrina, Black New Orleans residents were more likely to be displaced, and for longer periods, than white New Orleans residents, and Black residents had a more difficult time returning to their neighborhoods due to delays in disaster relief and rebuilding efforts. *Id.*

*Criminal Justice & Incarceration:* As of 2021, Louisiana has the highest incarceration rate in the country. *Id.* at 20. Black Louisianans are dramatically overrepresented in the incarcerated population: despite comprising just 33% of state residents, Black Louisianans are imprisoned at a rate double their presence in the population. Nearly 66% of prisoners, 49% of probationers, and 70 % of parolees in Louisiana are Black. Ex. 4 at 20.

**4. Senate Factor 6: Louisiana political campaigns are marked by overt and subtle racial appeals**

Louisiana's political campaigns have persistently been characterized by both explicit and implicit racial appeals. Most notable is the political career of former state legislator and Ku Klux Klan leader and long-time neo-Nazi David Duke. In 1989, Duke, who founded the National Association for the Advancement of white People, openly appealed to white racial fears in his numerous bids for public office in Louisiana. Ex. 4 at 23. Duke has also endorsed other Louisiana politicians in recent elections, including former Louisiana Governor Mike Foster, who went on to win 84% of the white vote. *Id.*

Several other candidates have likewise been associated with white-supremacist groups. In 2002, Steve Scalise, the current U.S. representative for CD 1 (which is 72.7% white) spoke at

a conference organized by a white supremacist group associated with neo-Nazi activists while serving as a Louisiana state representative. Ex. 20.

Even where there is no explicit endorsement of white supremacy, candidates regularly attempt to make racial resentment and fear salient in the minds of voters. Ex. 4 at 22. In 2012, a candidate for Louisiana Supreme Court District 5, Justice Jeff Hughes, darkened the image of his Black opponent, John Guidry, in campaign materials, and referred to Guidry as an “affirmative action Democrat.” *La. State Conf. of the NAACP*, 490 F. Supp. 3d at 993. In the 2019 gubernatorial race, Eddie Rispone, the Republican candidate, produced a campaign ad that began with a prominent display of mugshots of Black men and other men of color, and in which Rispone blamed Governor Edwards for crimes committed by people after early release from prison. Ex. 4 at 23. The images are juxtaposed with all-white images of Rispone with his constituents. *Id.*

**5. Senate Factor 7: Black candidates in Louisiana are underrepresented in office and rarely win elections outside majority-minority districts**

Despite constituting approximately one-third of the Louisiana population, Black Louisianans remain underrepresented in public office at all levels. Louisiana has never had a Black U.S. Senator. Louisiana has only elected four Black congresspeople since Reconstruction. Ex. 4 at 25. Representative Troy Carter (the only Black member of Louisiana’s current House delegation) is from the CD 2, a majority-Black district created in the 1980s as a result of a Section 2 challenge to Louisiana’s congressional scheme.

This significant lack of representation extends beyond representation in the federal government. Louisiana has not had a Black Governor or Lieutenant Governor since Reconstruction. Ex. 4 at 25. Louisiana has never had a Black Secretary of State or Attorney General, seats that directly impact voting and criminal justice. Currently, Black legislators hold

25% of state legislative seats (36 of 144). Ex. 4 at 25. There are ten Black State Senators (10/39) and 26 Black members of the State House (26/105). All were elected from majority-Black districts. *Id.*

Less than a quarter of Louisiana mayors are Black (71/304). *Id.* Only two of the eight elected Board of Elementary and Secondary Education members are Black. Ex. 4 at 25–26.

Black judges have also been “underrepresented in the trial and appellate courts. While the black population comprises about 30.5% of the voting age population in Louisiana, black people only account for about 17.5% of the judges in Louisiana.” *Terrebonne Par. Branch NAACP*, 274 F. Supp. 3d at 445. Today, 26.1% of Louisiana’s state court judges are Black. Ex. 4 at 25. Of the 42 district courts in the state, Black women serve or have served as judges on only six district courts and Black men serve or have served as judges on 13 district courts. Only one Black justice sits on the Louisiana Supreme Court, Ex. 4 at 26, and she was elected in a majority-Black district created as a result of a Section 2 challenge to Louisiana’s at-large judicial electoral scheme. *In re Off. of Chief Just., Louisiana Supreme Ct.*, 2012-1342, 101 So. 3d 9, 21 (La. Oct. 16, 2012).

#### **6. Senate Factor 8: Louisiana is not responsive to Black residents**

As discussed above, Black Louisianans disproportionately suffer from the effects of racial discrimination across many areas, including health, employment, and education. In each of these areas, severe racial disparities are indicative of a failure on the part of elected officials to address the needs of Black residents.

During the redistricting roadshow, Black Louisianans often and explicitly connected the lack of responsiveness of officials to race. For instance, at a meeting in Lake Charles, Lydia Larse, a Black resident, said: “I feel as though my voice is not being heard because y’all don’t need us. We’re not needed. You don’t care.” Ex. 4 at 27.

**7. Senate Factor 9: The justification for the new congressional map is tenuous**

The sponsors and advocates of H.B. 1 and S.B. 5 provided several justifications for supporting these bills over maps that provided for two majority-Black districts in Louisiana. However, many of the given justifications lacked evidentiary support or were based on misunderstandings. The final plan adopted by the Louisiana legislature did not achieve the very redistricting principles the bill sponsors stressed were important.

Sponsors of H.B. 1 and S.B. 5 claimed that traditional redistricting principles, such as compactness, maintaining communities of interest, or respecting political boundaries, were important. When presented with alternative bills that added a second majority-Black district while outperforming H.B. 1 and S.B. 5 on those metrics, they backed away from these principles. In fact, by the end of the process, supporters of H.B. 1 in particular shifted their legislative priorities. Instead of compactness or other measures, Representative Magee said that the primary criterion for drawing the congressional districts was “to honor the traditional boundaries as best as possible.” Ex. 4 at 39. Representative Magee said the drafters of H.B. 1 prioritized the traditional boundaries after looking at all the other criteria they could have used. Yet Representative Magee publicly stated that he did not even look at any performance data on this or any other metric to compare H.B. 1 with plans that would create two majority-Black districts.

**III. Plaintiffs will suffer irreparable injury absent an injunction**

If preliminary relief is denied, Plaintiffs and similarly situated Louisiana voters will suffer irreparable injury. Vote dilution in violation of Section 2 of the VRA “irreparably injures the plaintiffs’ right to vote and to have an equal opportunity to participate in the political process.” *Patino v. City of Pasadena*, 229 F. Supp. 3d 582, 590 (S.D. Tex. 2017); *Casarez v.*

*Val Verde Cty.*, 957 F. Supp. 847, 865 (W.D. Tex. 1997) (holding that violation of local election laws and the Voting Rights Act was “a harm monetary damages cannot address”).

Plaintiffs have a strong interest in exercising their right to vote free from a racially discriminatory districting scheme that violates Section 2 of the VRA. But if Defendant moves forward with the current legally non-compliant map, Plaintiffs will have no choice and ultimately be forced to vote in districts that dilute their vote. *See, e.g.*, Ex. 5 ¶¶ 8-9; Ex. 13 ¶ 12; Ex. 11 ¶ 12. Plaintiffs residing in “packed” and “cracked” districts will not have equal access to their congressional representatives as compared to voters in other districts. *See, e.g.*, Ex. 10 ¶ 10; Ex. 7 ¶ 12.

Plaintiffs, and all similarly situated Black voters, will be deprived of the opportunity to elect candidates of their choice. *Id.* And “once the election occurs, there can be no do-over and no redress,” so the injury to “voters is real and completely irreparable if nothing is done to enjoin” the challenged conduct. *League of Women Voters of N.C. v. North Carolina*, 769 F.3d 224, 247 (4th Cir. 2014). The “restriction on [this] fundamental right to vote therefore constitutes irreparable injury.” *Michigan State A. Philip Randolph Inst. v. Johnson*, 833 F.3d 656 (6th Cir. 2016).

#### **IV. The balance of equities and the public interest weigh in favor of an injunction**

When the defendant is a government actor, courts consider the harm to the opposing party and the weight of the public interest together. *See Nken*, 556 U.S. at 435. In this case, on balance, preserving the rights of Louisianans is strongly in the public interest and the threat of disenfranchising Black Louisianans vastly outweighs the minimal potential administrative burden that an injunction might impose on Defendant.



The injury faced by Plaintiffs is grave—a denial of their fundamental right to vote. *See Dunn v. Blumstein*, 405 U.S. 330, 336 (1972) (right to vote is of particular public importance because it is “preservative of all rights” (internal quotation marks omitted)). The public interest “favors permitting as many qualified voters to vote as possible.” *Obama for Am. v. Husted*, 697 F.3d 423, 437 (6th Cir. 2012). It will serve the public interest for Defendant to be prohibited from enforcing, implementing, or conducting elections using a map that violates Section 2.

In contrast, the harm, if any, that this injunction would cause to the State is minimal. A state is in no way harmed by issuance of a preliminary injunction which prevents the state from enforcing restrictions likely to be found to violate Section 2 of the VRA. On the contrary, courts have found that such injunctions benefit the state. *Giovani Carandola Ltd. v. Bason*, 303 F.3d 507, 521 (4th Cir. 2002); *see also Charles H. Wesley Educ. Found., Inc. v. Cox*, 408 F.3d 1349, 1355 (11th Cir. 2005). Further, “[t]he public interest always is served when public officials act within the bounds of the law and respect the rights of the citizens they serve.” *Casarez*, 957 F. Supp. at 865 (quoting *Nobby Lobby, Inc. v. City of Dallas*, 767 F. Supp. 801, 821 (N.D. Tex. 1991), *aff’d*, 970 F.2d 82 (5th Cir. 1992)). On balance, any harm the State can identify pales in comparison to the harms suffered by Plaintiffs in this case.

Though the state may argue that it is too late in the election cycle to implement a new congressional plan without risking voter confusion, the facts of this case are not at odds with the so-called “*Purcell* principle.” The Supreme Court and the Fifth Circuit have recognized that the *Purcell* principle warns “lower federal courts should ordinarily not alter . . . election rules *on the eve of an election*.” *Republican Nat’l Comm. v. Dem. Nat’l Comm.*, 140 S. Ct. 1205, 1207 (2020) (emphasis added); *Tex. Democratic Party v. Abbott*, 978 F.3d 168, 181–82 (5th Cir. 2020). Under *Purcell*, courts should avoid issuing orders that may cause voters to become

confused and stay away from the polls. *Purcell v. Gonzalez*, 549 U.S. 1, 4–5 (2006); *Mi Familia Vota v. Abbott*, 497 F. Supp. 3d 195, 221–22 (W.D. Tex. 2020). Historically, court-ordered changes to the impending election process that do not pass muster under *Purcell* are those that would confuse the electorate and that are ordered immediately before an impending election. *See, e.g., Veasey v. Perry*, 769 F.3d 890, 893–95 (5th Cir. 2014) (seeking an injunction that would require new election procedure nine days before election period, and which would require the state to train 25,000 new poll workers). The Supreme Court’s recent redistricting rulings are consistent with granting a preliminary injunction here. *Compare, e.g., Merrill v. Milligan*, 142 S. Ct. 879, 879 (2022) (applying *Purcell* to stay injunction against Alabama’s congressional map entered seven weeks before the beginning of primary election), *with Wisconsin Legislature v. Wisconsin Elections Comm’n*, 142 S. Ct. 1245 (2022) (striking down Wisconsin’s state legislative plans five months before the beginning of primary election). Here, the election is over six months away, meaning the risk of confusing the electorate is significantly reduced. Moreover, courts have noted that if there is a countervailing threat to the deprivation of the fundamental right to vote, this threat outweighs the potential harm laid out in the *Purcell* doctrine. *See Self Advocacy Sols. N.D. v. Jaeger*, 464 F. Supp. 3d 1039, 1055 (D.N.D. 2020); *Mi Familia Vota*, 497 F. Supp. 3d at 222. The chaos and harm that would be suffered by the Louisiana voters if maps violating Section 2 of the VRA are used in the 2022 elections would result in precisely the type of confusion the *Purcell* doctrine seeks to avoid. The sooner this Court imposes an injunction on Defendant, the more strongly the public interest will be served.

### CONCLUSION

For the foregoing reasons, the preliminary injunction should be granted.

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**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.*

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

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-00214-SDD-RLB

**DECLARATION OF JOHN ADCOCK IN SUPPORT OF PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

I, John Adcock, hereby declare as follows:

1. I am over 18 years of age and am competent to make this declaration.
2. I am an attorney in good standing with the Louisiana Bar and able to practice before the Middle District of Louisiana.
3. I have personal knowledge of the statements made in this affidavit and each is true and correct.
4. I am an attorney with John Adcock Law LLC.
5. I am counsel for Plaintiffs Press Robinson, Edgar Cage, Dorothy Nairne, Edwin René Soulé, Alice Washington and Clee Earnest Lowe, Davante Lewis, Martha Davis, Ambrose Sims, Louisiana State Conference of the NAACP (“Louisiana NAACP”), Power Coalition for Equity and Justice (“Power Coalition”), in the above-captioned action and submit this declaration to provide the Court true and correct copies of certain documents submitted in support of Plaintiffs’ Motion for Preliminary Injunction:

**Exhibit 1** is a true and correct copy of the expert report of Tony Fairfax, dated April 14, 2022.

**Exhibit 2** is a true and correct copy of the expert report of Dr. Lisa Handley, dated April 14, 2022.

**Exhibit 3** is a true and correct copy of the expert report of Dr. Blakeslee Gilpin, dated April 14, 2022.

**Exhibit 4** is a true and correct copy of the expert report of Dr. Traci Burch, dated April 14, 2022.

**Exhibit 5** is a true and correct copy of the declaration of Dr. Press Robinson, dated April 14, 2022.

**Exhibit 6** is a true and correct copy of the declaration of Edgar Cage, dated April 14, 2022.

**Exhibit 7** is a true and correct copy of the declaration of Dr. Dorothy Nairne, dated April 14, 2022.

**Exhibit 8** is a true and correct copy of the declaration of Edwin René Soulé, dated April 14, 2022.

**Exhibit 9** is a true and correct copy of the declaration of Dr. Alice Washington, dated April 14, 2022.

**Exhibit 10** is a true and correct copy of the declaration of Clee Earnest Lowe, dated April 14, 2022.

**Exhibit 11** is a true and correct copy of the declaration of Davante Lewis, dated April 14, 2022.

**Exhibit 12** is a true and correct copy of the declaration of Martha Davis, dated April 14, 2022.

**Exhibit 13** is a true and correct copy of the declaration of Ambrose Sims, dated April 14, 2022.

**Exhibit 14** is a true and correct copy of the declaration of Michael W. McClanahan, dated April 14, 2022.

**Exhibit 15** is a true and correct copy of the declaration of Ashley Shelton, dated April 14, 2022.

**Exhibit 16** is a true and correct copy of the following web page: 2022 Elections, La. Sec'y of State, publicly available at <https://www.sos.la.gov/ElectionsAndVoting/PublishedDocuments/ElectionsCalendar2022.pdf>.

**Exhibit 17** is a true and accurate copy of Louisiana State Legislature, *JRule 21*, publicly available at <https://www.legis.la.gov/Legis/Law.aspx?d=1238755>.

**Exhibit 18** is a true and correct copy of the article entitled “With Clear Path to Re-Election, Cedric Richmond Can Look to a Bigger Platform in Democrats’ Future.” The article, authored by Jessica Williams, was published on NOLA.com on October 23, 2018 and is publicly available at [https://www.nola.com/news/article\\_c4191476-a8f8-58b6-93af-5d8663ed3731.html](https://www.nola.com/news/article_c4191476-a8f8-58b6-93af-5d8663ed3731.html).

**Exhibit 19** is a true and correct copy of a Letter to Jimmy Dimos, then-Speaker of the Louisiana House of Representatives, from John R. Dunne, then-Assistant Attorney General for Civil Rights. The letter is dated July 15, 1991 and is publicly available at <https://www.justice.gov/sites/default/files/crt/legacy/2014/05/30/LA-1730.pdf>.

**Exhibit 20** is a true and correct copy of the article entitled “Steve Scalise’s Attendance at 2002 White Nationalists Event Ignites Political Firestorm.” The article, authored by Julia O’Donoghue, was published on NOLA.com on December 30, 2014 and is publicly available at [https://www.nola.com/news/politics/article\\_b608193c-c9f4-531a-8e24-01534407c15a.html](https://www.nola.com/news/politics/article_b608193c-c9f4-531a-8e24-01534407c15a.html).

**Exhibit 21** is a true and correct copy of a letter to Clay J. Schexnayder, Speaker of the Louisiana House of Representatives, from Governor John Bel Edwards. The letter is dated March 9, 2022 and is available publicly at <https://gov.louisiana.gov/assets/docs/Letters/SchexnayderLtr20220309VetoHB1.pdf>.

**Exhibit 22** is a true and correct copy of a letter to the Louisiana State and Governmental Affairs Committee from Michael Pernick, et al. The letter is dated December 14, 2021 and is available publicly at <https://www.naacpldf.org/wp-content/uploads/2021.12.14-Louisiana-Congressional-Redistricting-Advocacy-Follow-Up-Letter.pdf>.



Dated: April 15, 2022

Respectfully submitted,

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RETRIEVED FROM DEMOCRACYDOCKET.COM

# Exhibit 1

RETRIEVED FROM DEMOCRACYDOCKET.COM

**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.*

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

EDWARD GALMON, SR., et al.,  
*Plaintiffs,*

v.

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

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

**EXPERT REPORT OF ANTHONY E. FAIRFAX ON THE  
DEVELOPMENT OF AN ILLUSTRATIVE CONGRESSIONAL DISTRICT PLAN FOR  
THE STATE OF LOUISIANA**

**APRIL 15, 2022**

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## I. Introduction

1. I have been retained by counsel representing the Plaintiffs in this lawsuit to analyze and determine whether it is possible to draw an Illustrative Plan that adheres to state and federal redistricting criteria and satisfies the first precondition of *Thornburg v. Gingles*<sup>1</sup> for the state of Louisiana.
2. As a result of this analysis, I have developed an Illustrative congressional district plan for the state of Louisiana that is described in this report. The Illustrative Plan adheres to traditional and state redistricting criteria and performs better in adhering to these criteria than the plan enacted by the state legislature (“HB1”).<sup>2</sup> The redistricting criteria analyzed include: 1) population deviation (equal population or “one person, one vote”); 2) contiguity; 3) compactness; 4) minimizing political subdivision splits for parishes; 5) minimizing political subdivision splits for Voting Tabulation Districts (“VTDs”)<sup>3</sup>; 6) preserving communities of interest for census places<sup>4</sup>; 7) preserving communities of interest for landmark areas; and 8) fracking.
3. The Illustrative Plan (see Figure 1) performs as well or better than the enacted HB1 Plan (see Figure 2) in eight out of eight redistricting criteria. HB1 does not perform better than the Illustrative Plan on any criteria.

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<sup>1</sup> See *Thornburg v. Gingles*, 478 U.S. 30 (1986). The *Gingles* case requires plaintiffs to show that the minority group "is sufficiently numerous and geographically compact to form a majority in a single-member district."

<sup>2</sup> See <https://redist.legis.la.gov/EnrolledBills>

<sup>3</sup> Voting Tabulation Districts (VTDs) are used by the Louisiana state legislature for redistricting plan development. VTDs tend to follow the boundaries of local precincts. However, VTDs are generated by the Census Bureau and constructed from census blocks.

<sup>4</sup> Census places, as defined by the U.S. Census Bureau, include governmental entities such as cities and towns as well as Census Designated Places (“CDPs”). CDPs are generated by the Census Bureau for statistical purposes, they usually reflect “named” areas that the local community designates but have no governmental body. See <https://www.federalregister.gov/documents/2018/11/13/2018-24571/census-designated-places-cdps-for-the-2020-census-final-criteria>

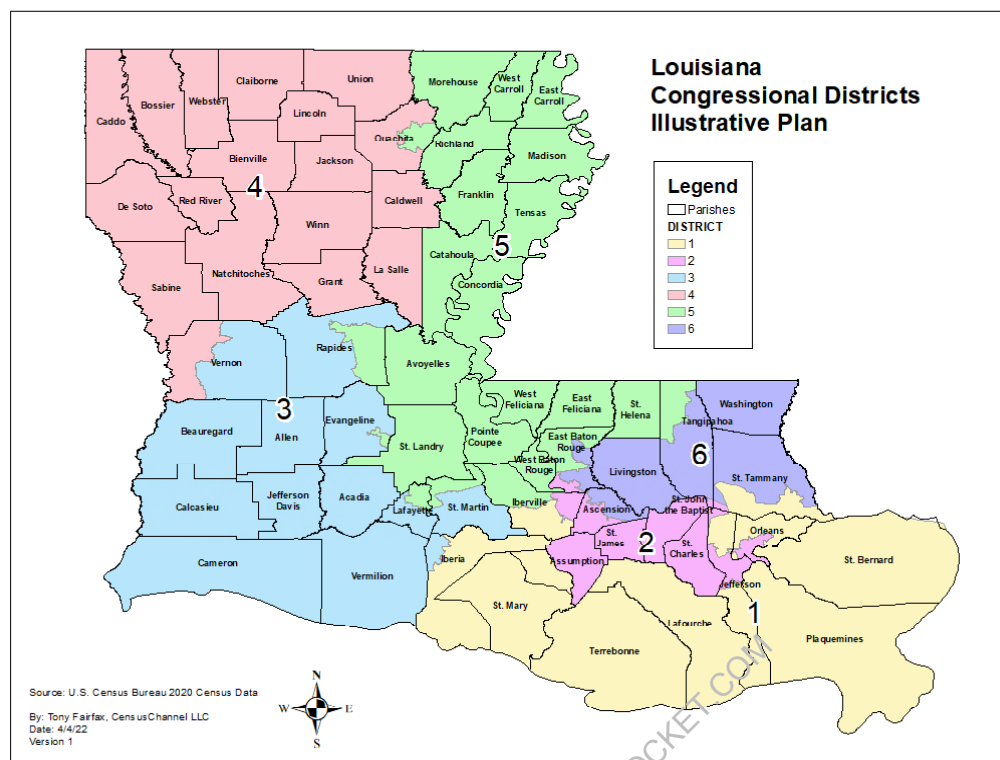


Figure 1 – Illustrative Plan for Louisiana Congressional Districts

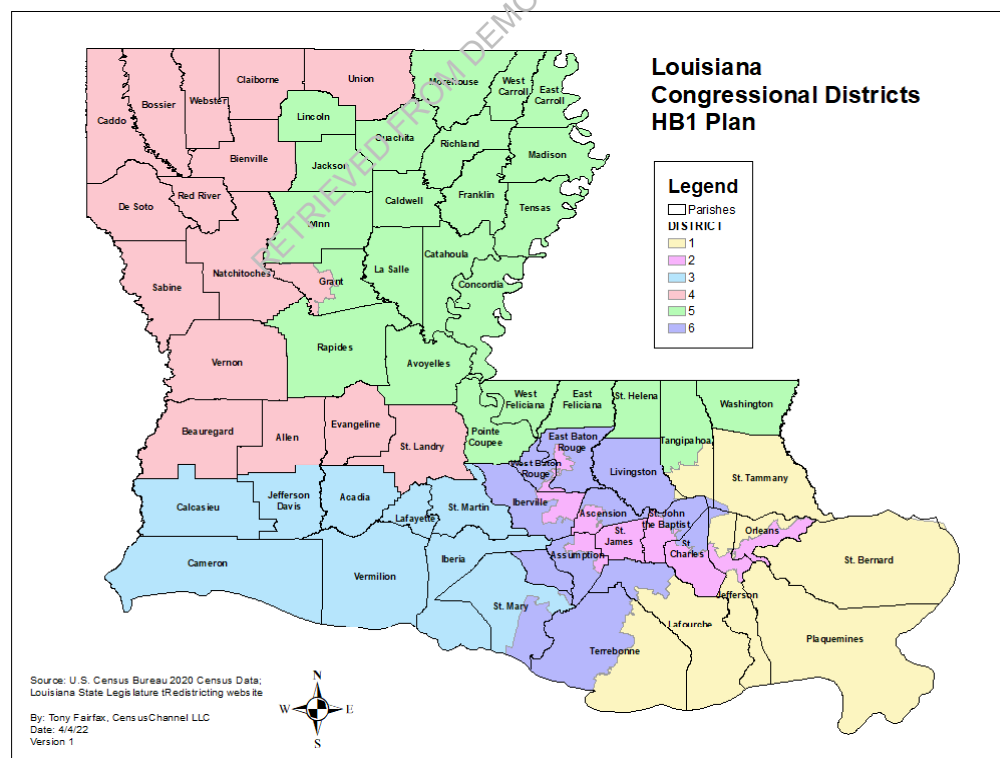


Figure 2 – HB1 Enacted Plan for Louisiana Congressional Districts

4. The Illustrative Plan performs better than HB1 in five of the criteria, including: 1) population deviation (equal population, one person, one vote); 2) compactness; 3) political subdivision splits (parishes); 4) preserving communities of interest (census places); and 5) fracking.
5. In addition to adhering to and performing better than the enacted plan, the Illustrative Plan satisfies the first precondition of *Thornburg v. Gingles*.
6. Finally, this report demonstrates that it is possible to draw an Illustrative Plan that adheres to traditional and state redistricting criteria and contains two majority-Black congressional districts that are drawn without race predominating during the development of the Illustrative Plan.
7. This report outlines the methodology, the applications utilized, the data used, the redistricting criteria that were analyzed, the results obtained, and the conclusions that were ultimately drawn.

## **II. Background**

8. The state legislature passed a six-district congressional plan (HB1) on February 18, 2022. Only one congressional district in HB1 has a district that contains a Black voting age population<sup>5</sup> (“BVAP”) that is more than 50 percent (“majority-Black district”). Subsequent to the passage of HB1, on March 9, 2020, Governor John Bel Edwards vetoed the legislation for the congressional plan. However, the state legislature overrode the governor’s veto on March 20, 2022, enacting and establishing the new congressional boundaries of HB1.

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<sup>5</sup> Voting age population (“VAP”) includes those persons above the age of 18 years.



### III. Qualifications

9. I received a Bachelor of Science degree in Electrical Engineering (BSEE) from Virginia Tech in 1982 and a Master of Geospatial Information Science and Technology (MGIST) degree from N.C. State University in 2016.
10. Currently, I am a demographic and mapping consultant and the CEO/Principal Consultant of CensusChannel LLC. As a consultant working on redistricting issues over the last thirty years, I have developed nearly one thousand redistricting plans during the last four redistricting cycles. I have drawn plans for jurisdictions of all sizes, from statewide plans to redistricting plans for small municipalities. In the course of my career, I have also had the opportunity to draw and analyze many plans for jurisdictions within multiple states throughout the country. In addition, during that timeframe, I have provided consulting services for numerous non-profit and public-sector groups centering on redistricting plan development, analysis, and training.
11. Throughout the redistricting cycles, I have provided services and/or training for several notable organizations including: the American Civil Liberties Union (ACLU), Campaign Legal Center, Congressional Black Caucus Institute (CBC Institute), Louisiana Legislative Black Caucus (LLBC), NAACP, NAACP Legal Defense and Educational Fund, Power Coalition for Equity and Justice, Southern Coalition for Social Justice (SCSJ), and Southern Echo.
12. Recently, I was hired to develop an illustrative redistricting plan for the *Arkansas State Conference NAACP v. Arkansas Board of Apportionment* court case. The Illustrative plan included five additional majority-Black districts as opposed to the Board of Apportionment plan. The plan, report, and testimony provided evidence of the first prong in *Thornburg v. Gingles* in proving dilution of Black voting strength in violation of Section 2 of the Voting

Rights Act (VRA). The effort included plan development, expert report, rebuttal report, and testimony.

13. Prior to this round of redistricting, I was hired to develop illustrative redistricting plans, associated expert reports, depositions, and provide testimony in the *Holloway v. City of Virginia Beach* court case. The Illustrative plans included two majority-Black combined coalition districts to provide evidence of the first prong in *Gingles* for the city of Virginia Beach, VA.
14. Also, prior to the 2020 redistricting cycle, I was hired to be the Districting Master for the City of Everett, Washington. The task was to assist the city's Redistricting Commission with developing their districting plan. The city moved from a fully seven-member at-large voting system to five single-member districts and two members elected at-large. As Districting Master, I shepherded the commission through the entire plan development process as they successfully developed the city's first districting system.
15. In addition to Arkansas and Virginia, I have testified and provided depositions as a redistricting expert in North Carolina and Texas. I provided testimony with a focus on demographic and mapping analysis in federal and state court cases. This included: *Covington v. North Carolina* (North Carolina), *NC NAACP v. State of North Carolina* (North Carolina), *Wright v. North Carolina* (North Carolina) *Perez v. Perry* (Texas), and *Perez v. Abbott* (Texas).
16. My redistricting/GIS experience and work as an expert are contained within my attached resume (see Appendix A).

#### IV. Software, Data, and Technical Process Utilized

17. The software utilized to develop the Illustrative Plans was Maptitude for Redistricting (“Maptitude”) by Caliper Corporation. Maptitude for Redistricting is one of the leading redistricting software applications utilized by consultants, major nonprofit groups, and governmental entities.<sup>6</sup> The software includes Census 2020 data (“PL94-171”) for the state of Louisiana that was utilized during the map-drawing process.

18. ESRI’s ArcGIS’s ArcMap application was used to generate statewide and district maps for the final Illustrative Plan and HB1. ESRI, the creator of the “shapefile,” is one of the leading GIS corporations in the world.

19. Several datasets were acquired and utilized:

- a. The 2010 and 2020 census data for the total population were obtained from Caliper Corporation’s datasets for the state of Louisiana.<sup>7</sup> 2019 5-Yr ACS Census socioeconomic data at the county and census tract level were also obtained from the Caliper dataset.
- b. Data for Louisiana were downloaded from the Census Bureau’s website, specifically the 2019 1-Year ACS data and the Community Resilience Estimates Equity Supplement.<sup>8</sup>
- c. The geographic boundaries for the 2011 congressional districts<sup>9</sup> were also obtained from Caliper Corporation’s datasets for the state of Louisiana. An updated shapefile version of the Louisiana VTDs was also downloaded from the Legislature’s Redistricting website.<sup>10</sup>

<sup>6</sup> See <https://www.caliper.com/mtrnews/clients.htm> for Maptitude for Redistricting’s client list.

<sup>7</sup> Caliper Corporation provides 2020 Census Data (PL94-171 data) in a format readable for their software, Maptitude for Redistricting. The population data are identical to the data provided by the Census Bureau.

<sup>8</sup> See <https://data.census.gov/cedsci/> and <https://www.census.gov/programs-surveys/community-resilience-estimates/data/supplement.html>

<sup>9</sup> I reviewed the 2011 congressional districts using 2010 Census data in Maptitude. The results in Maptitude generated the same population size and deviation as the Louisiana legislature’s reports. The state’s congressional districts reports are located at the Louisiana Redistricting website: <https://redist.legis.la.gov/CurrentDistricts> (see Appendix B).

<sup>10</sup> [https://redist.legis.la.gov/default\\_ShapeFiles2020](https://redist.legis.la.gov/default_ShapeFiles2020). I analyzed the 2020 VTD splits using the 2020 Census VTDs available in Maptitude and the VTD shapefile on the state legislature’s website and the results were the same.

- d. To evaluate district configurations, I downloaded the most recent race/ethnicity citizenship data from the Redistricting Data Hub.<sup>11</sup> This included 2020 5-Year ACS CVAP dataset at the block group level for the state of Louisiana.<sup>12</sup>
- e. In order to review the 2020 5-Year ACS CVAP data at various geographic levels for the Illustrative Plan, I utilized Maptitude for Redistricting's disaggregation/aggregation process. The disaggregation/aggregation process is an acceptable industry process when evaluating citizenship data or other data that is not provided at the census block or other levels.<sup>13</sup> Once the disaggregation/aggregation process was completed, estimated CVAP data were available for review at the district level (as well as other Census levels).
- f. I also obtained the congressional plan's geographic boundaries enacted by the Louisiana state legislature and the plaintiff's addresses from the plaintiff's counsel. Boundaries were provided in shapefile format and a list of plaintiffs' addresses which were geocoded<sup>14</sup> using Maptitude for Redistricting were provided by counsel (maps of the plaintiffs' addresses are located in Appendix B for reference). Also, links to testimony from Louisiana redistricting "roadshows"<sup>15</sup> were provided by counsel as well.

## V. Summary of Opinions

20. A summary of my conclusions and opinions includes the following:

- a. It is possible to draw an Illustrative Plan that adheres to federal and state redistricting criteria and contains two majority-Black congressional districts. The Illustrative Plan was drawn with race not predominating and continues to perform as well or better than the enacted plan HB1 on eight out of eight redistricting criteria including: 1) population deviation (equal population or "one person, one vote"); 2) contiguity; 3) compactness; 4) political subdivision splits for parishes; 5) political subdivision splits for Voting Tabulation Districts ("VTDs"); 6) preserving communities of interest for census places; 7) preserving communities of interest for landmark areas; and 8) fracking.
- b. Louisiana's Black population is sufficiently large and geographically compact to constitute a majority of the voting age population in two congressional districts in a plan that adheres to traditional and state redistricting criteria. Thus, the Illustrative Plan easily meets the first preconditions of *Thornburg v. Gingles*, 478 U.S. 30, 50-51 (1986).

<sup>11</sup> The Redistricting Data Hub (RDH) has aggregated various Census and election result data into a central website. RDH only reformats Census data into a readily available format for download.

<sup>12</sup> See <https://www.census.gov/programs-surveys/decennial-census/about/voting-rights/cvap.html>

<sup>13</sup> Disaggregation apportions a population to a lower geographic area from a higher geographic area using a percentage of a matching population field at both geographic levels. In this instance, voting age population was used as the weighted variable to apportion amounts to census blocks. Aggregation sums up the lower level results to all other higher geographic levels that are to be used. Maptitude also includes a pure geographic disaggregation/aggregation process that was not utilized during this analysis.

<sup>14</sup> Geocoding converts a list of addresses to geographic coordinates in digital format.

<sup>15</sup> Roadshows were meetings that were conducted throughout the state that solicited input and questions from the public on the redistricting process.

- c. The State of Louisiana has seen growth in the Black population such that it stands at a third, 33.13%, of the state's total population in 2020. Also, in 2020, the state's White population decreased to less than 55.75% of the total population.
- d. In most cases, Louisiana's White population outpaces the Black population on several socioeconomic indicators, according to 2019 ACS data. Black people had significantly higher percentages of people with no high school education and lower median household incomes than White people and households. Furthermore, Black people had higher poverty rates than White people.

## VI. Methodology

21. First, I analyzed the recent and past demographic and socioeconomic profiles of the state of Louisiana. This analysis specifically included a review of the state's Black populations over the 2010 and 2020 decennial censuses. The Black population was analyzed by reviewing total population, voting age population ("VAP"), and Citizen Voting Age Population<sup>16</sup> ("CVAP") for the state.
22. I used the category of "Any Part" Black<sup>17</sup> throughout this report for Black Total and Voting Age Populations. "Any Part" Black VAP ("APBVAP") was also used to determine the majority-Black district status.<sup>18</sup> Other races were reported using the Not Hispanic "Alone" category.<sup>19</sup> The race data reflecting CVAP were all Not Hispanic "Alone" categories.
23. I also reviewed socioeconomic data to observe various socioeconomic disparities and commonalities among racial and ethnic groups within the state at large and within local

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<sup>16</sup> Citizen voting age population includes persons who are citizens above the age of 18 years. CVAP data is typically provided by the American Community Survey (ACS).

<sup>17</sup> The "Any Part" or "All Parts" Black includes surveyed persons who select Black Alone and Black and in combination with any other race. Also, included within "Any Parts" Black are Hispanic Black persons as well. The Hispanic population data denotes the Latino population as well throughout this report.

<sup>18</sup> In *Georgia v. Ashcroft*, 539 U.S. 461, the Court found it acceptable to combine all persons who self-identified themselves in the 2000 Census survey as Black in determining majority-minority districts. This includes Black in combination with other races to contain both Hispanic and Not Hispanic Black persons.

<https://casetext.com/case/georgia-v-ashcroft-2>.

<sup>19</sup> The Alone category includes only surveyed persons who selected one race (e.g. single race Black or single race White, etc.).

communities.<sup>20</sup> This included data on education, income, poverty, housing values, and Food Stamps, or SNAP benefits. This review allowed me to understand common socioeconomic indicators pertaining to the state of Louisiana. Socioeconomic attributes, including the Community Resilience Estimates,<sup>21</sup> were also viewed during the development process to view and locate commonalities among areas contained within districts. This provided some insight into communities of interest while developing the plan.

24. I also listened to and reviewed testimony online from Louisiana's redistricting roadshows and legislative hearings. I used the testimony to provide me with additional context for district configurations and observing communities of interest.

25. Maptitude for Redistricting was utilized to draw the Illustrative Plan. I used Voting Tabulation Districts (VTDs) as the dominant building block for the plan.<sup>22</sup>

26. I also reviewed and followed Louisiana's relevant portions of the state constitution on redistricting<sup>23</sup> and the legislature's redistricting criteria (Joint Rule 21).<sup>24</sup>

27. Finally, after drawing a complete Illustrative Plan, I generated data reports that summarized the plan's performance on traditional redistricting criteria and generated maps presenting the geographic results produced by adhering to all of the redistricting criteria. I compared

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<sup>20</sup> Obtained from analyzing census tracts.

<sup>21</sup> The Community Resilience Estimates Equity data provides insight into the capacity of individuals and households within a community to absorb the external stresses of a disaster and provides context concerning social vulnerability and equity.

<sup>22</sup> For the most part, VTDs followed precinct boundaries with the exception of a handful of places. In some of these locations, the precinct appears to split census blocks.

<sup>23</sup> La. Const. Art. III, § 6 <http://legis.la.gov/Legis/Law.aspx?d=206421>

<sup>24</sup> <https://www.legis.la.gov/Legis/Law.aspx?d=1238755>

traditional redistricting criteria results to the enacted HB1 plan and documented the results.

My findings and conclusions are presented and discussed below.

## VII. Redistricting Criteria

28. Prior to plan development, I reviewed relevant portions of the Louisiana state constitution on redistricting and the legislature's redistricting criteria that outline guidelines for congressional and legislative plans (see Appendix C).

29. A summary of the redistricting criteria that were followed during the map-drawing process includes:

- a. **Equal Population (One person, One vote):** The “One person, One vote” principle of the Fourteenth Amendment’s Equal Protection Clause requires that congressional districts are equally populated as nearly as mathematically practicable.<sup>25</sup> The courts have ruled that congressional districts should be held under a “strict” equality standard.

Joint Rule 21 states: “The plan shall provide that each congressional district shall have a population as nearly equal to the ideal district population as practicable.”

- b. **Contiguity:** Contiguity ensures that there are no parts of a district separated from the district itself. Exceptions are generally used for water bodies that separate land areas.<sup>26</sup>

Joint Rule 21 states: “Each redistricting plan submitted for consideration shall provide that each district within the plan is composed of contiguous geography.”

- c. **Preserving or Minimizing Political Subdivision Splits:** Minimizing the splitting of political subdivisions<sup>27</sup> keeps intact political entities such as parishes and VTDs. This report only focused on parishes and VTDs as the primary political subdivisions. Minimizing political subdivision splits ensures that these voters can collectively vote for the same representatives and potentially reduce costs in administering elections (e.g., ballot modifications and additional staff).

Joint Rule 21 states: “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

<sup>25</sup> A series of Supreme Court cases helped define the equal population criteria, beginning with: *Baker v. Carr*, 369 U.S. 186 (1962); *Gray v. Sanders*, 372 U.S. 368 (1963); and *Wesberry v. Sanders*, 376 U.S. 1 (1964).

<sup>26</sup> <https://www.ncsl.org/research/redistricting/redistricting-criteria.aspx>

<sup>27</sup> See *Reynolds v. Sims*, 377 US 533(1964).

for the State of Louisiana which corresponds to the PL94-171 data released by the United States Bureau of the Census for the decade in which the redistricting is to occur.”

Joint Rule 21 also states: “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.

- d. **Preservation of Communities of Interest (COI):** Preservation of communities of interest aims to maintain a specific population group within a defined geographic area where the group shares one or more common interests (e.g., economic, social, cultural, or ethnic interests).<sup>28</sup> Similar to political subdivisions, minimizing splits tends to ensure that these voters can collectively vote for the same representatives.

Joint Rule 21 states: “...this criterion [minimizing the splitting of political subdivision] 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 endeavored to preserve communities of interest of census places<sup>29</sup> (including cities, towns, and census designated places or CDPs) and landmark areas (e.g., airports, major parks, colleges, and universities). In addition, specific socioeconomic characteristics of census tracts were analyzed for potential communities of interest.

30. In addition to the redistricting criteria included in Joint Rule 21, I analyzed compactness as a traditional redistricting criterion and as a precondition of *Gingles*, and analyzed fracking.

- a. **Compactness:** Compactness refers to the irregular shape or dispersion of the district boundary line. The *Gingles* preconditions require that majority-minority districts are “geographically compact.”<sup>30</sup> Geographic compactness can be demonstrated by analyzing statistical compactness measures.<sup>31</sup> Many compactness measures, such as the ones used in this report, are developed such that the resultant value exists between 0 and 1, whereby the closer the value is to 1, the more compact the district. The districts were analyzed using three of the most widely used compactness measures, Reock, Polsby-Popper, and Minimum Convex Hull.<sup>32</sup>

<sup>28</sup> <https://redistricting.ils.edu/redistricting-101/where-are-the-lines-drawn/#communities+of+interest>

<sup>29</sup> Census Places include cities, towns, and Census Designated Places (“CDPs”). CDPs are statistical geographic areas of unincorporated communities. They are usually locally recognized and identified using a particular name.

<sup>30</sup> See *Thornburg v. Gingles*, 478 U.S. 30 (1986). The *Gingles* case requires plaintiffs to show that the minority group “is sufficiently numerous and geographically compact to form a majority in a single-member district.”

<sup>31</sup> Compactness measures quantify the geographic shape of the districts as compared to a designated perfectly compact shape, such as a circle.

<sup>32</sup> *Maptitude for Redistricting* documentation defines the compactness measures: 1) Reock: “[T]he Reock test computes the ratio of the area of the district to the area of the minimum enclosing circle for the district.” 2) Polsby-Popper: “The Polsby-Popper test computes the ratio of the district area to the area of a circle with the same perimeter:



- b. **Fracking:** Fracking<sup>33</sup> occurs when a district boundary splits a jurisdiction (county or city) into two or more noncontiguous areas that are contained within the jurisdiction. Fracking may be used as a technique of gerrymandering. Analyzing maps using this criterion has recently become more popular as evidence of gerrymandering. The latest version of the Mapitude for Redistricting application provides an option for checking fracking.

## VIII. Demographic Profile of the State of Louisiana

### A. Louisiana – State Total Population

31. According to the decennial censuses of 2010 and 2020, Louisiana’s total population grew from 4,533,372 to 4,657,757 persons - an increase of 2.74% - between 2010 and 2020. (see Table 1).

**Table 1 –Total Population by Race/Ethnicity (2010 - 2020) for Louisiana**

Race/Ethnicity	2010		2020		Inc/Dec	
	#	%	#	%	#	%
Total Population	4,533,372	100.00%	4,657,757	100.00%	124,385	2.74%*
<b>Black</b>	<b>1,486,885</b>	<b>32.80%</b>	<b>1,543,119</b>	<b>33.13%</b>	<b>56,234</b>	<b>0.33%</b>
Hispanic or Latino	192,560	4.25%	322,549	6.92%	129,989	2.68%
White	2,734,884	60.33%	2,596,702	55.75%	-138,182	-4.58%
American Indian	28,092	0.62%	25,994	0.56%	-2,098	-0.06%
Asian	69,327	1.53%	85,336	1.83%	16,009	0.30%
Pacific Islander	1,544	0.03%	1,706	0.04%	162	0.00%
Some Other Race	6,779	0.15%	16,954	0.36%	10,175	0.21%
Two or More Races	57,766	1.27%	156,096	3.35%	98,330	2.08%

Note: Race categories are Alone (Single Race) Not Hispanic except for the Black population, which is “Any Part”

\*The increase in total population from 2010 to 2020

Source: U.S. Census Bureau PL94-171 data for 2010, 2020

32. From 2010 to 2020, the Black and Hispanic populations<sup>34</sup> also increased. During that span, the Black population grew from 1,486,885 to 1,543,119 (32.80% to 33.13%), and the Hispanic

4pArea/(Perimeter2).” 3) Convex Hull: “[The Convex Hull Test] computes only a ratio of the area of the district to the area of the convex hull of the district, without regard to population within the areas.” Convex Hull is routinely referred to as a “rubber-band” enclosure or polygon.

<sup>33</sup> Grofman, Bernard and Cervas, Jonathan, The Terminology of Districting (March 30, 2020). Available at SSRN: <https://ssrn.com/abstract=3540444>

<sup>34</sup> The Black populations noted in this report represent the “Any Part” Black combined categories for race.

population grew from 192,560 to 322,549 persons (4.25% to 6.92%). However, the White population decreased from 2,734,884 persons in 2010 to 2,596,702 persons in 2020 – a decrease of 138,182 persons from 60.33% to 55.75% (see Table 1).

B. Louisiana – State Voting Age Population (VAP)

33. According to the decennial census of 2010 and 2020, Louisiana’s Voting Age Population (VAP) grew from 3,415,357 to 3,570,548 persons—an increase of 4.54% —between 2010 and 2020 (see Table 2).

**Table 2 – Voting Age Population by Race/Ethnicity (2010 - 2020) for Louisiana**

Race/Ethnicity	2010		2020		Inc/Dec	
	#	%	#	%	#	%
Total VAP	3,415,357	100.00%	3,570,548	100.00%	155,191	4.54%*
<b>AP Black VAP</b>	<b>1,040,701</b>	<b>30.47%</b>	<b>1,115,769</b>	<b>31.25%</b>	<b>75,068</b>	<b>0.78%</b>
Hispanic VAP	138,091	4.04%	223,662	6.26%	85,571	2.22%
White VAP	2,147,661	62.88%	2,082,110	58.31%	-65,551	-4.57%
American Indian VAP	19,952	0.58%	19,531	0.55%	-421	-0.04%
Asian VAP	53,638	1.57%	67,983	1.90%	14,345	0.33%
Pacific Islander VAP	1,152	0.03%	1,322	0.04%	170	0.00%
Some Other Race VAP	4,526	0.13%	11,524	0.32%	6,998	0.19%
Two or More Races VAP	30,755	0.90%	97,905	2.74%	67,150	1.84%

Note: Race categories are Not Hispanic Alone (Single Race) except for Black, which is “Any Part.”

\*The increase in voting age population percentage from 2010 to 2020

Source: U.S. Census Bureau PL94-171 data for 2010, 2020

34. As with the total population, from 2010 to 2020, the Any Parts Black VAP (APBVAP) and Hispanic VAP (HVAP) also increased. From 2010 to 2020, the APBVAP grew from 1,040,701 to 1,115,769 (30.47% to 31.25%), and the HVAP grew from 138,091 to 223,662 persons (4.04% to 6.26%). However, the White VAP (WVAP) decreased from 2,147,661 persons in 2010 to 2,082,110 in 2020 - a decrease of 65,551 persons from 62.88% to 58.31% (see Table 2).

C. Louisiana – State Citizen Voting Age Population

35. According to the 2019 ACS 1-Year data, the Citizen Voting Age Population for the state of Louisiana is 3,463,372 (see Table 3).<sup>35</sup>

**Table 3 – CVAP by Major Race/Ethnicity (2019 1-Year ACS) for Louisiana**

Race/Ethnicity	2020	
	#	%
Total CVAP	3,463,372	100.0%
<b>Black CVAP</b>	<b>1,104,855</b>	<b>31.9%</b>
Hispanic CVAP	108,844	3.1%
White CVAP	2,142,840	61.9%
Asian CVAP	43,112	1.2%
American Indian CVAP	N/A	N/A
Pacific Islander CVAP	N/A	N/A
Some Other Race CVAP	26,803	0.8%
Two or More Races	51,054	1.5%

Note: Race categories are Not Hispanic Alone (Single Race), including Black.

N/A – Not Available

Source: U.S. Census Bureau 2019 1-Year ACS data (S2901 Table)

36. Reviewing the 2019 1-Year ACS data shows that the Hispanic CVAP (HCVAP) for Louisiana was 108,844 persons. This is a significant decrease from the Hispanic voting age population. Both the Black CVAP (BCVAP) and White CVAP (WCVAP) decreased slightly from the voting age populations down to 1,104,855 and 2,142,840, respectively.

37. However, the BCVAP and WCVAP percentages increased from their respective voting age populations. The BCVAP percentage increased from 31.25% to 31.90%, while the WCVAP increased from 58.31% to 61.90%. It is important to note that the BCVAP would be higher if combined race categories were added.

<sup>35</sup> The state level 2020 1-Year ACS citizen voting age population has not been released at the writing of this report.

D. Louisiana – State Major Socioeconomic Indicators

38. According to the 2019 1-Year ACS data, there are significant disparities across a variety of socioeconomic indices between Louisiana's White population and its Black population (see Table 4). For instance, for the White population of the state, the median household income in 2019 was \$61,967; 12.7% of the population were below the poverty level; 11.1% had no high school education (for those 25 years and above); 8.6% received food stamps or SNAP<sup>36</sup>; the median housing value was \$186,700; and 23.4% rented occupied housing units.

**Table 4 – Major Socioeconomic Indicators by Major Race/Ethnicity for Louisiana**

	Statewide	White*	Hispanic	Black*
Med. Household Income	\$51,073	\$61,967	\$42,933	\$32,782
Poverty%	19.0%	12.7%	26.1%	29.4%
No HS Education%^	14.0%	11.1%	26.1%	17.8%
Food Stamp/SNAP	14.4%	8.6%	11.4%	27.0%
Med. Housing Value	\$172,100	\$186,700	\$157,700	\$133,000
Renter%	33.5%	23.4%	55.2%	51.0%

\* The White population contains Not Hispanic Alone category while Black includes Black combined races

^ Calculated by subtracting percentage with High School or above from 100%

Source: U.S. Census Bureau 2019 1-Year ACS data <https://data.census.gov/cedsci/table?t=-00%20-%20All%20available%20races%3AIncome%20and%20Poverty%3ARace%20and%20Ethnicity&g=0400000US22&y=2019&tid=ACSSPPIY2019.S0201>

39. The Black population's median household income was \$32,782; the below poverty level was 29.4%; the percent with no High School education was 17.8%; 27.0% received Food Stamps or the SNAP programs; the median housing value was \$133,000; and 51.0% rented occupied housing units.

<sup>36</sup> SNAP is Supplemental Nutrition Assistance Program.

## IX. The Illustrative Plan

### A. Illustrative Plan Introduction

40. Figure 3 shows the Illustrative Plan that I developed adheres to state and federal laws as well as traditional redistricting criteria. In addition to these redistricting criteria, the plan's maps and data reports summarized below also show that Louisiana's Black population is sufficiently large and geographically compact to constitute a majority in a second single-member congressional district, thereby satisfying the first precondition of *Gingles*.<sup>37</sup>

41. The Illustrative Plan is only intended to demonstrate that a plan can be created that adheres to federal and state redistricting criteria and satisfy the first precondition of *Gingles*.<sup>38</sup>

### B. Illustrative Plan: Equal Population (One Person, One Vote)

42. The Illustrative Plan was developed using a single-member, six congressional district scheme. The plan's ideal population size is 776,293 for each district (see Table 5).<sup>39</sup> The Illustrative Plan has a resulting overall population deviation from the ideal of 51. HB1 has an overall population deviation of 65. Therefore, the Illustrative Plan's districts are closer to the ideal population than HB1. See Appendix C for the complete data analysis of all redistricting criteria for the Illustrative Plan, HB1, and the 2011 Plan.

<sup>37</sup>See *Thornburg v. Gingles*, 478 U.S. 30, 50-51 (1986). The first precondition of *Gingles* requires demonstration that the minority population is sufficiently numerous and geographically compact to enable the creation of at least one single-member majority-minority district.

<sup>38</sup> It should be understood that many variations of this plan could be generated that incorporate additional political and community desires and continue to adhere to federal and state redistricting criteria, and contain two majority Black districts to satisfy the first precondition of *Gingles*.

<sup>39</sup> The ideal population size is calculated by dividing the state's 2020 total population of 4,657,757 by the number of districts.

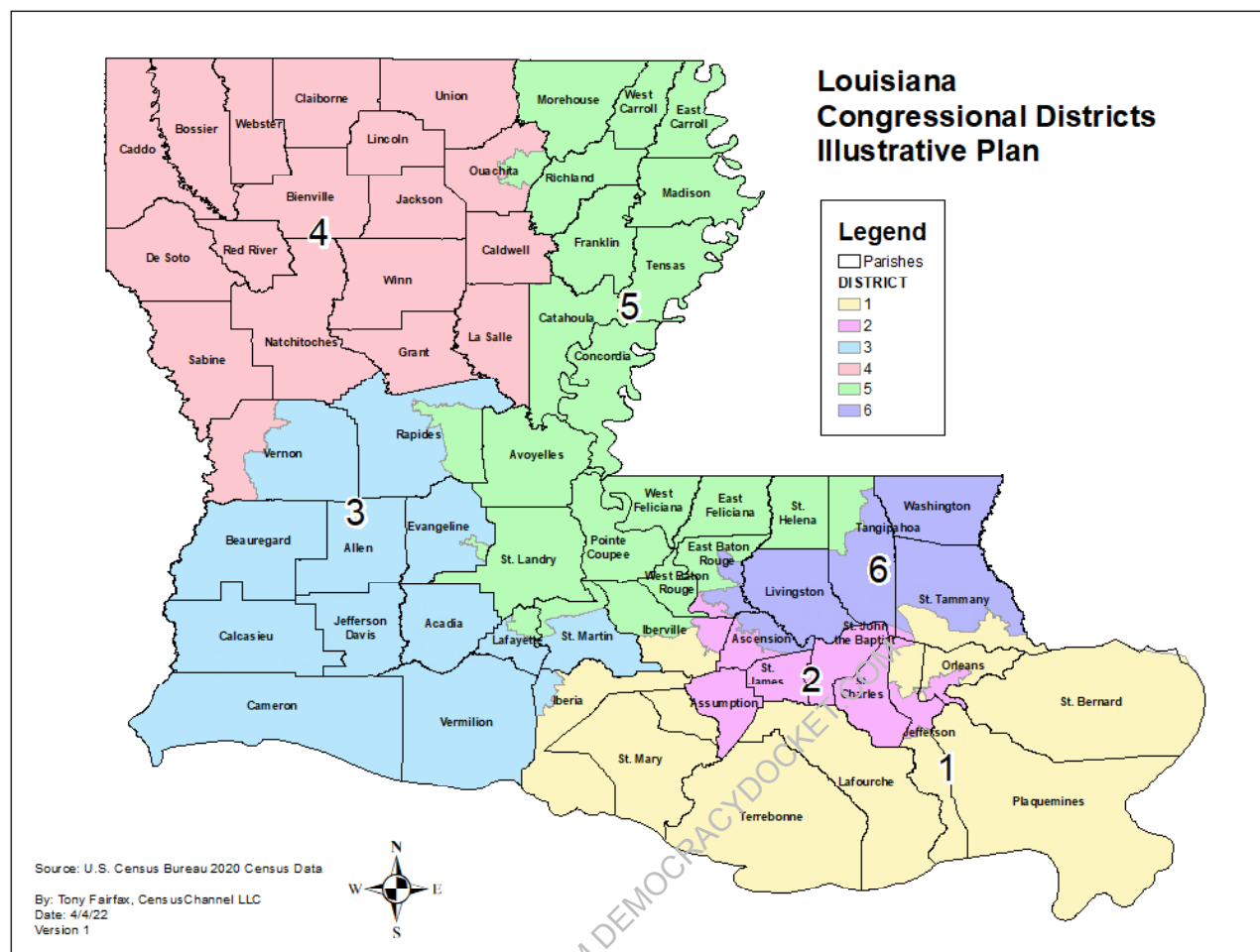


Figure 3 – Illustrative Plan for Louisiana Congressional Districts

Table 5 – Illustrative Plan 1 Population Deviation

District	Population	Ideal Population	Deviation	% Deviation
1	776,286	776,293	-7	0.00%
2	776,291	776,293	-2	0.00%
3	776,280	776,293	-13	0.00%
4	776,280	776,293	-13	0.00%
5	776,331	776,293	38	0.00%
6	776,289	776,293	-4	0.00%

Source: Illustrative Plan data extracted from Maptitude for Redistricting reports

C. Illustrative Plan: Contiguity

43. The Illustrative Plan's districts are contiguous with no separate landmasses or areas.<sup>40</sup> Thus, both the Illustrative Plan and HB1 perform the same for contiguity.<sup>41</sup>

D. Illustrative Plan: Political Subdivision Splits

44. The Illustrative Plan minimizes the parish and VTD splits. The Illustrative Plan splits zero VTDs and 14 parishes. However, HB1 splits zero VTDs and 15 parishes. Thus, the Illustrative Plan performs better with fewer split parishes.<sup>42</sup>

E. Illustrative Plan: Communities of Interest

45. The Illustrative Plan was developed with the goal of preserving communities of interest. Two dominant communities of interest were evaluated, census places and major landmark areas. Census places include governmental entities such as cities and towns as well as Census Designated Places or CDPs. Although CDPs are generated by the Census Bureau for statistical purposes, they usually reflect "named" areas that the local community designates but have no governmental body.<sup>43</sup> Major landmarks include areas such as airports, major parks, colleges, and universities. The goal is to preserve and keep intact CDPs and landmark areas to the extent practicable.

46. Thus, the splitting of census places (including cities, towns and CDPs) and major landmarks areas (such as airports, major parks, colleges, and universities) was minimized. The Illustrative

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<sup>40</sup> Areas separated by water bodies are typically excepted as contiguous.

<sup>41</sup> See Appendix C.

<sup>42</sup> See Appendix C.

<sup>43</sup> <https://www.federalregister.gov/documents/2018/11/13/2018-24571/census-designated-places-cdps-for-the-2020-census-final-criteria>

Plan split 31 cities and split 58 landmark areas. HB1 split 32 cities and 58 landmark areas. The Illustrative Plan performs better than HB1 with fewer split cities. It splits the same number of landmark areas as HB1.<sup>44</sup> For instance, North Fort Polk and South Fort Polk, two CDPs and parts of military bases, are not split and are wholly contained within the same congressional district.

F. Illustrative Plan: Compactness

47. I used three popular measures to determine compactness: Reock, Polsby-Popper, and Convex Hull. All of these measures indicate a more compact district as the value moves closer to 1.

48. The mean compactness measures for the Illustrative Plan are .42 (Reock), .18 (Polsby-Popper), and .69 (Convex Hull). Alternatively, the mean compactness measures for HB1 are .37 (Reock), .14 (Polsby-Popper), and .62 (Convex Hull). Thus, the Illustrative Plan is more compact than HB1 in all three mean measures.<sup>45</sup>

G. Illustrative Plan: Fracking

49. The Maptitude for Redistricting software detected five (5) instances of fracking for the Illustrative Plan. HB1 had eight (8) fracking instances. Therefore, the Illustrative Plan performs better than HB1 with fewer fracked pieces.<sup>46</sup>

H. Summary Criteria Comparison

50. The results reveal that the Illustrative Plan fares better than the enacted HB1 Plan using a variety of redistricting criteria (see Table 6). When comparing the Illustrative Plan to HB1, the

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<sup>44</sup> See Appendix C.

<sup>45</sup> See Appendix C.

<sup>46</sup> See Appendix C. It is important to note that there are three instances of fracking that occur because of the configuration of the parishes. These include Madison, St. Martin, and West Feliciana parishes.



Illustrative Plan performs equally or better than HB1 in eight of eight redistricting criteria measures. The Illustrative Plan performs better than HB1 on five (5) criteria: 1) equal population; 2) compactness; 3) parish splits; 4) census place splits; and 5) fracking. HB1 does not perform better than the Illustrative Plan on any criteria. In three criteria, the Illustrative and HB1 Plans perform the same (contiguity, VTD splits, and landmark splits).

**Table 6 – Illustrative and HB1 Plan Criteria Comparison**

<b>Criteria</b>	<b>Illustrative Plan</b>	<b>HB1 Plan</b>
Equal Population	<b>51</b>	65
Contiguity	Y	Y
Parish Splits	<b>14</b>	15
VTD Splits	0	0
COI Census Places Splits	<b>31</b>	32
COI Landmark Splits	58	58
Compactness (mean)	<b>.42, .18, .69</b>	.37, .14, and .62
Fracking	<b>5</b>	8

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

**I. Illustrative Plan District 2 (Majority-Black District)**

51. District 2 is a majority-Black district within the Illustrative Plan as well as the HB1 and 2011 Plans (see Appendix C). The Illustrative Plan's District 2's APBVAP% is 50.96%, while the BCVAP% is 54.10%. Comparing HB1's District 2 (the only majority-Black district within HB1), its APBVAP% is significantly higher at 58.65%, and the BCVAP% is even higher at 61.41% (see Appendix C).

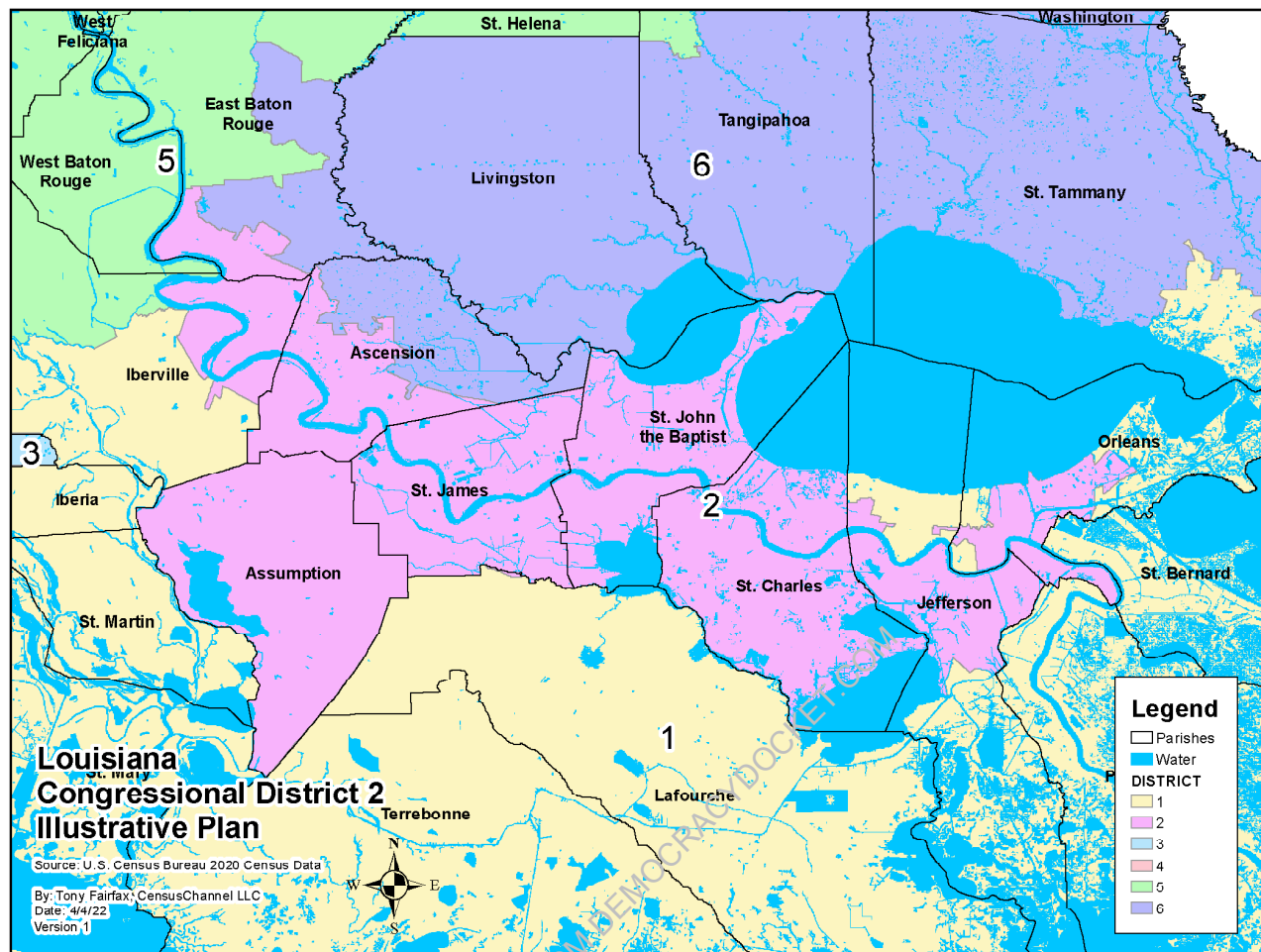


Figure 4 – Illustrative Plan for Louisiana Congressional District 2

52. The Illustrative Plan's District 2 (see Figure 4) follows the same route as the enacted HB1 Plan (see Figure 5), except it is significantly more compact and splits considerably fewer parishes, and continues to keep its majority-Black status. The Illustrative Plan's District 2 keeps four parishes whole: St. Charles, St. John the Baptist, St. James, and Assumption. HB1's District 2 keeps only one parish, St. James, whole.

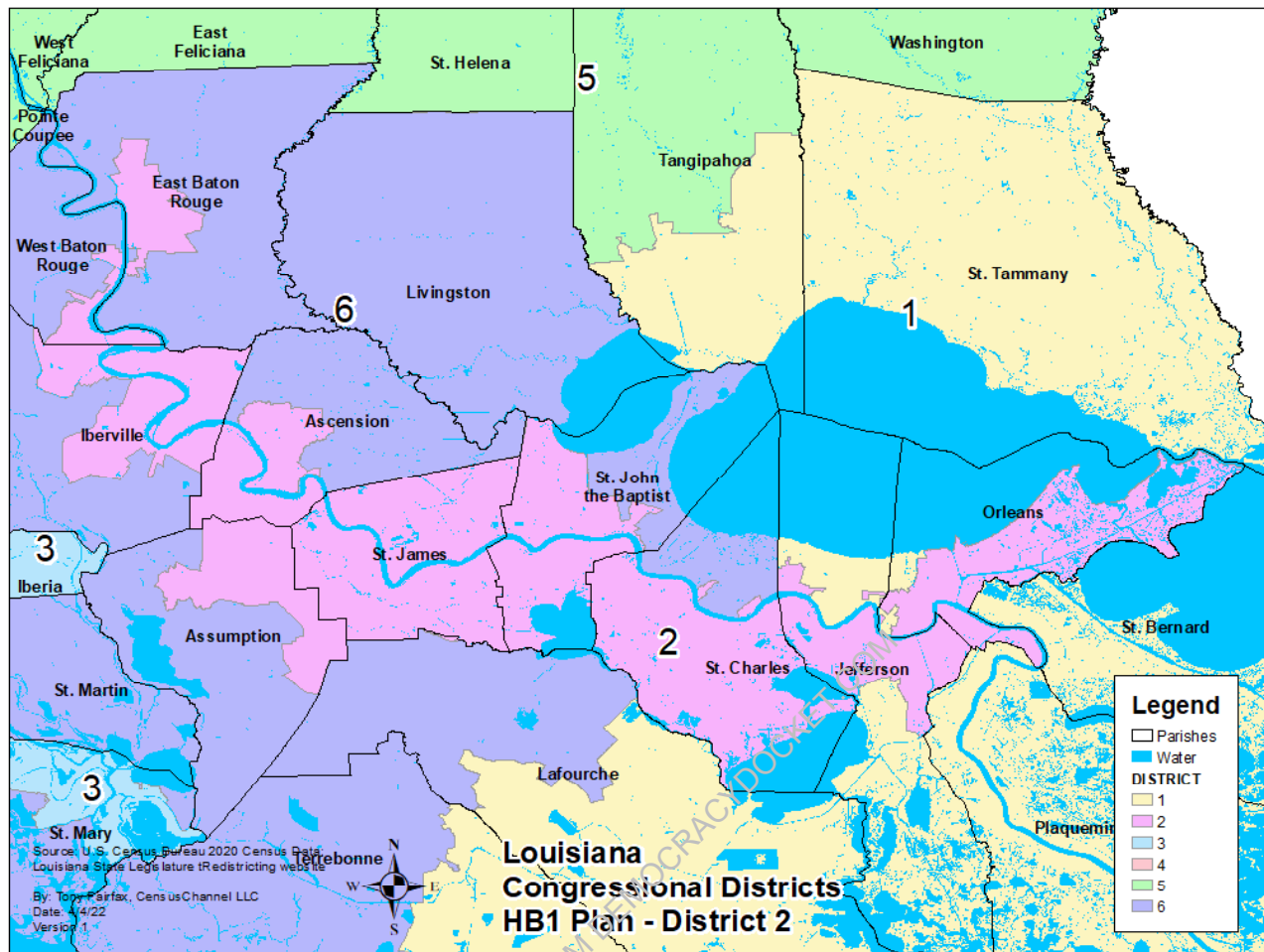


Figure 5 – HB1 Enacted Plan for Louisiana Congressional District 2

53. Similar to HB1, the Illustrative Plan’s District 2 continues to extend from the New Orleans region to the Baton Rouge region.<sup>47</sup> The eastern end of the district includes parts of Orleans and Jefferson parish (similar to HB1). The Illustrative Plan’s District 2 extends similarly westward like HB1, and includes mostly whole parishes of multiple “River Parishes.” These included St. Charles parish, St. James parish, St. John the Baptist parish, and Ascension parish (in part). In addition, the Illustrative Plan’s District 2 retains the Assumption parish, which is

<sup>47</sup> I developed alternative configurations where District 2 does not contain East Baton Rouge that also satisfy the first precondition of *Gingles*.

included in HB1, yet keeps it whole. District 2 continues northwestward through non-river parishes, including parts of Iberville and, finally, East Baton Rouge parish.<sup>48</sup>

54. In addition, comparing HB1's District 2 Black percentage (the only majority-Black district within HB1), the APBVAP% is significantly higher at 58.65%, and the BCVAP% is even higher at 61.41%.<sup>49</sup> Also, HB1's District 2 extends from the New Orleans region to the Baton Rouge region to contain significant populations of two major metro areas in Louisiana (see Figure 5).

J. Illustrative Plan District 5 (Majority-Black District)

55. District 5 is the second majority-Black district within the Illustrative Plan (see Figure 6). The APBVAP% is 52.05%, while the BCVAP% is 52.21%. District 5 includes many of the parishes contained within HB1. The north part of the district contains a higher percentage of the Louisiana Delta region<sup>50</sup>

56. Illustrative Plan's District 5 follows the Mississippi River and Delta parishes southward, similar to the enacted HB1 Plan. In addition, the Illustrative Plan follows essentially the same parishes as HB1 along the southern Mississippi border (see Figure 6). Specifically, West Feliciana, East Feliciana, and Helena parishes are kept whole in the Illustrative Plan's District 5.

<sup>48</sup> The plan was developed to lessen the presence of District 2 in Baton Rouge and create a more single metro district.

<sup>49</sup> See Appendix C.

<sup>50</sup> The Louisiana Delta region is characterized by unique communities of interest of culture and tradition. It is commonly represented by the parishes of Morehouse, Ouachita, West Carroll, East Carroll, Caldwell, Tensas, Catahoula, Richland, Madison, Franklin, LaSalle, and Concordia. See [https://www.louisianafolklife.org/LT/Articles\\_Essays/Deltaintrosr.html](https://www.louisianafolklife.org/LT/Articles_Essays/Deltaintrosr.html)

57. District 5 continues and extends further southward to include Pointe Coupee (whole), parts of West Barton Rouge, and parts of East Baton Rouge.

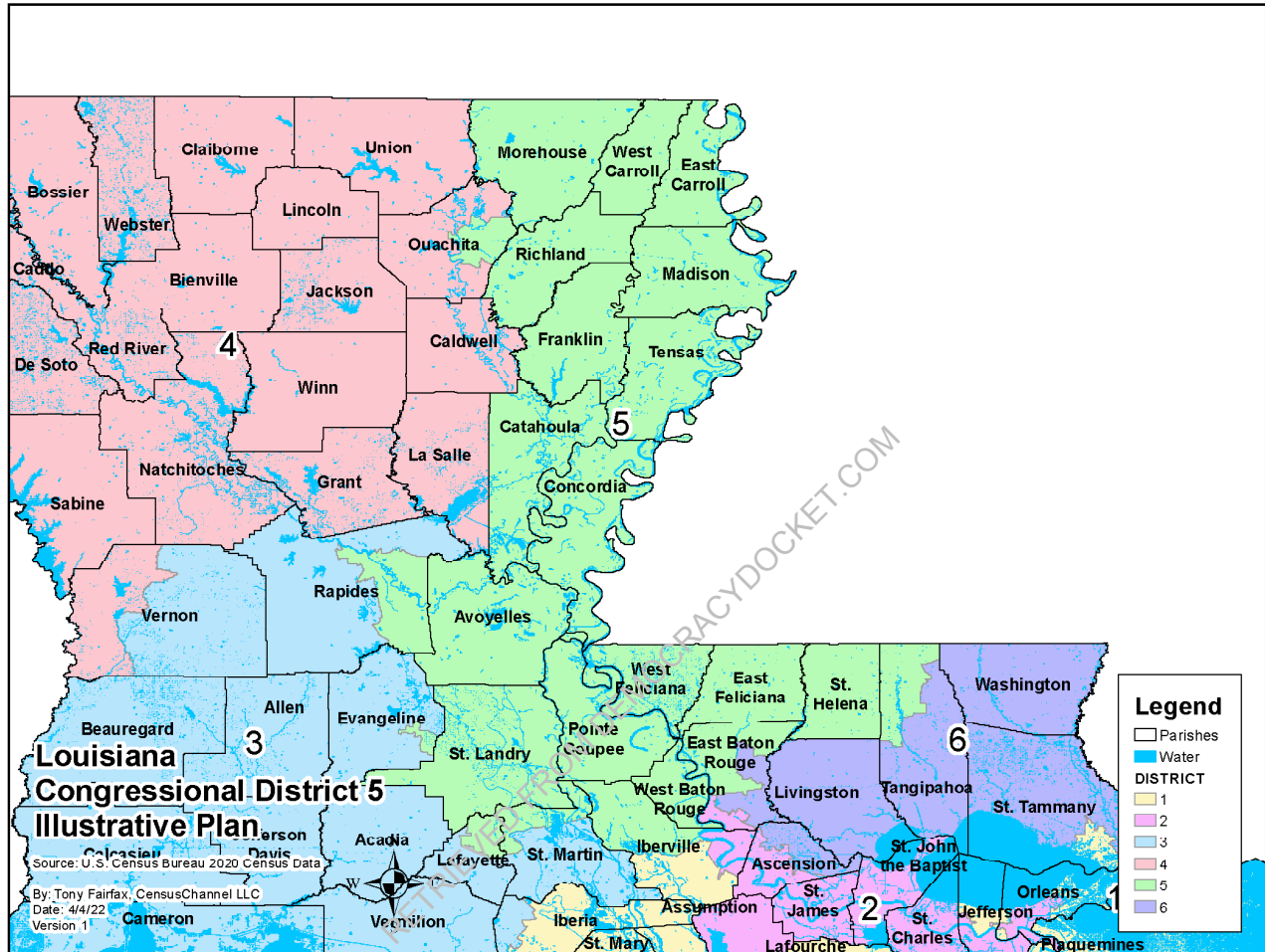


Figure 6 – Illustrative Plan for Louisiana Congressional District 5

K. Illustrative Plan: Satisfying *Gingles*’ Sufficiently Large Component

58. The first component of the precondition of *Gingles* requires demonstrating that one or more majority-minority districts can be developed in which the minority population is “sufficiently large” to constitute a majority.<sup>51</sup> In the context of this analysis, this means showing the creation

<sup>51</sup> *Thornburg v. Gingles*, 478 U.S. 30, 50-51 (1986).

of two or more majority-Black congressional districts within the state of Louisiana. The term “majority” has been reaffirmed to mean greater than 50% VAP for the minority population within the district.<sup>52</sup>

59. According to 2020 Census data, the state of Louisiana consisted of an APBVAP that was 31.25%. In addition, the 2019 1-Year ACS data yielded an even higher BCVAP percentage at 31.90% (see Table 7). As a result, the state’s APBVAP and BCVAP population, which is now almost a third (approximately 32%) of the state’s CVAP, is sufficiently large enough and geographically compact to draw a plan that included two majority-Black congressional districts out of the six total and meet the first *Gingles* precondition.

60. The Illustrative Plan includes two majority-Black districts (using VAP and CVAP<sup>53</sup>), District 2 and District 5 (see Table 7 & 8). The resulting demographic data for the Illustrative Plan demonstrates that the first *Gingles* precondition has been satisfied. In other words, Louisiana congressional map can contain two districts with a majority-Black population measured by both APBVAP and BCVAP. The Illustrative Plan also adheres to traditional and state redistricting criteria relating to congressional districts.

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<sup>52</sup> *Bartlett v. Strickland*, 556 U.S. 1 (2009)

<sup>53</sup> Although many times the focus is on voting age population, the Illustrative Plan has been developed to contain a majority of Black citizen voting age population for each majority Black district as well.

**Table 7 – Illustrative Plan’s Voting Age Population**

<b>District</b>	<b>VAP</b>	<b>HVAP</b>	<b>HVAP%</b>	<b>WVAP</b>	<b>WVAP%</b>	<b>AP BVAP</b>	<b>AP BVAP%</b>	<b>OTHR VAP</b>	<b>OTHR VAP%</b>
1	603,084	64,618	10.71%	394,140	65.35%	110,315	18.29%	34,011	5.64%
<b>2</b>	<b>603,764</b>	<b>51,402</b>	<b>8.51%</b>	<b>218,098</b>	<b>36.12%</b>	<b>307,670</b>	<b>50.96%</b>	<b>26,594</b>	<b>4.40%</b>
3	586,948	28,649	4.88%	428,229	72.96%	105,115	17.91%	24,955	4.25%
4	596,366	23,991	4.02%	357,220	59.90%	190,267	31.90%	24,888	4.17%
<b>5</b>	<b>589,193</b>	<b>18,680</b>	<b>3.17%</b>	<b>252,112</b>	<b>42.79%</b>	<b>306,701</b>	<b>52.05%</b>	<b>11,700</b>	<b>1.99%</b>
6	591,193	36,322	6.14%	432,311	73.13%	95,701	16.19%	26,859	4.54%

Note: WVAP includes Not Hispanic Alone category, APBVAP includes “Any Part” Black (which contains Hispanic Black VAP), and OTHR VAP (Other VAP) is calculated by subtracting HVAP, WVAP, and APBVAP from the total VAP.

Source: U.S. Census Bureau 2020 Census Data extracted from Maptitude for Redistricting reports

61. According to 2020 Census data, District 2 of the Plan, has an APBVAP of 307,670 (50.96%).

The WVAP is 218,098 (36.12%) and the HVAP is 51,402 (8.51%).

62. District 5 has a APBVAP of 306,701 (52.05%). The WVAP is 252,112 (42.79%) and the HVAP is 18,680 (3.17%).

63. Table 8 shows that according to the 2020 5-Year ACS data, District 2 of the Plan has a BCVAP of 314,398 (54.10%). The WCVAP is 224,377 (38.61%) and the HVAP is 23,924 (4.12%).

64. District 5 has a BCVAP of 305,956 (52.21%). The WCVAP is 265,437 (45.29%) and the HVAP is 7,829 (1.34%).

65. Reviewing the APBVAP and BCVAP results for District 2 and District 5 shows that the first component of the first precondition of *Gingles* is clearly met with both districts’ majority-Black.



**Table 8 – Illustrative Plan’s Citizen Voting Age Population**

District	CVAP	HCVAP	HCVAP %	WCVAP	WCVAP %	BCVAP	BCVAP %	OTHR CVAP	OTHR CVAP%
1	575,168	32,052	5.57%	417,900	72.66%	101,058	17.57%	24,158	4.20%
<b>2</b>	<b>581,178</b>	<b>23,924</b>	<b>4.12%</b>	<b>224,377</b>	<b>38.61%</b>	<b>314,398</b>	<b>54.10%</b>	<b>18,479</b>	<b>3.18%</b>
3	569,445	15,551	2.73%	438,685	77.04%	101,097	17.75%	14,112	2.48%
4	592,835	13,863	2.34%	371,342	62.64%	195,129	32.91%	12,501	2.11%
<b>5</b>	<b>586,061</b>	<b>7,829</b>	<b>1.34%</b>	<b>265,437</b>	<b>45.29%</b>	<b>305,956</b>	<b>52.21%</b>	<b>6,839</b>	<b>1.17%</b>
6	563,107	15,866	2.82%	441,188	78.35%	92,519	16.43%	13,534	2.40%

Note: All race data are Not Hispanic Alone categories. OTHR CVAP (Other CVAP) is calculated by subtracting HCVAP, WCVAP, and BCVAP from the total CVAP.

Source: U.S. Census Bureau 2020 5-Year ACS Data extracted from Maptitude for Redistricting reports

L. Illustrative Plan – Satisfying *Gingles*’ Geographically Compact Component

66. The second component of the first *Gingles* precondition is to show that the majority-minority districts are “geographically compact.” Various measures have been developed in order to quantify the compactness of a district and plan.

67. I used three measures to determine compactness: Reock, Polsby-Popper, and Convex Hull. As mentioned before, each of these measures indicates a more compact district as the value moves closer to 1. The Illustrative Plan District 2 has the values of .33 for Reock, .13 for Polsby-Popper, and .57 for Convex Hull. District 5 of the Illustrative Plan produces the values of 0.35 for Reock, .10 for Polsby-Popper, and .57 for the Convex Hull (see Table 9). The overall compactness measures for the Illustrative Plan range from .33 to .51 for Reock, .10 to .28 for Polsby-Popper, and .57 to .84 for Convex Hull (see Appendix C).



**Table 9 – Illustrative Plan’s Compactness Measurements**

<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>	<b>Convex Hull</b>
1	0.38	0.18	0.73
<b>2</b>	<b>0.33</b>	<b>0.13</b>	<b>0.57</b>
3	0.51	0.18	0.73
4	0.56	0.28	0.84
<b>5</b>	<b>0.35</b>	<b>0.10</b>	<b>0.57</b>
6	0.40	0.18	0.72

Source: Maptitude for Redistricting Compactness report for the Illustrative Plan.

68. The mean compactness measures for the Illustrative Plan are .42 (Reock), .18 (Polsby-Popper), and .69 (Convex Hull). See Appendix C for the detailed report.

69. Viewing the compactness measures of a particular plan itself provides some context to the compactness of the plan. However, a comparative analysis with one or more plans is desired when determining whether a plan is sufficiently compact. Preferably, a plan should be compared to a previously enacted plan that has been approved. Thus, Table 10 presents the compactness measures of the Illustrative Plan and HB1 in three different ways.

70. A primary way of comparing compactness between different plans is to compare the mean or average of the measures. The mean compactness measures for HB1 are .37 (Reock), .14 (Polsby-Popper), and .62 (Convex Hull). Thus, the Illustrative Plan is more compact than HB1 in three of three measures.

**Table 10 – Illustrative Plan and HB1 Mean Compactness Measurements**

<b>District</b>	<b>Reock</b>	<b>Polsby-Popper</b>	<b>Convex Hull</b>	<b>Performed Best</b>
Illustrative Plan Mean	<b>.42</b>	<b>.18</b>	<b>.69</b>	<b>3 of 3</b>
HB1 Plan Mean	.37	.14	.62	0 of 3

Source: Maptitude for Redistricting Compactness for Illustrative Plan and HB1 Plan

## **X. Conclusions**

71. The State of Louisiana has seen growth in the Black population such that it stands at a third of the state's total population (33%) in 2020. Also, in 2020, the state's White population has decreased to less than 56% of the total population.
72. Louisiana's Black voting age population increased from 2010 to 2020 as well and now stands at almost a third of the Total VAP. During the same period, the White voting age population decreased similarly to the total. In addition, according to 2020 Census data, the state of Louisiana consisted of an APBVAP that was 31.25%, and the 2019 1-Year ACS shows a higher BCVAP percentage of 31.90%. These demographic statistics play a role in the configuration of the Illustrative Plan.
73. The Illustrative Plan adheres to the federal, state, and commonly used traditional redistricting principles such as equal population, contiguity, compactness, minimizing political subdivision splits, and preserving communities of interest. In fact, the Illustrative Plan performs equal to or better than the enacted HB1 Plan on eight of eight redistricting criteria.
74. Given the analysis and results of the Illustrative Plan, I conclude that in Louisiana, a congressional districting plan that adheres to the federal, state, and commonly used traditional redistricting principles can be developed and drawn without race predominating the map making process. That is to say that the Black population in the state of Louisiana is sufficiently large and geographically compact to allow for the creation of two single-member majority-Black districts and continue to follow the requisite redistricting criteria. Thus, the Illustrative Plan satisfies the first precondition of *Gingles*.

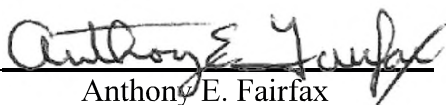
75. Finally, during the process of developing the final Illustrative Plan, other configurations that also resulted in majority-Black districts were observed. Therefore, although this analysis focused on one demonstrative plan, it does not represent the only configuration that can be developed for two majority-Black congressional districts in Louisiana. Thus, I conclude that other congressional plans can be generated that adhere to federal, state, and commonly used traditional redistricting criteria and include two majority-Black congressional districts.

## **XI. Appendices**

76. The following appendices are included with this report:

- Appendix A - Resume of Anthony E. Fairfax
- Appendix B - Maps of the Illustrative, HB1, and 2011 Congressional Plans
- Appendix C - Redistricting Criteria Comparison Reports (Maptitude Data Reports – Illustrative, HB1, and 2011 Plans)
- Appendix D - Other Data

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

  
Anthony E. Fairfax  
April 15, 2022

Appendix A  
Resume of Anthony E. Fairfax

RETRIEVED FROM DEMOCRACYDOCKET.COM

## Anthony "Tony" Fairfax

16 Castle Haven Road, Hampton, Virginia 23666

Office Telephone: (757) 838-3881

Email: fairfax@censuschannel.com

### Experience Highlights:

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- Demographic, Geographic & Voter Data Analysis
- Multiple GIS Software/Census Data Skillsets
- Redistricting Plan Development & Analysis
- Redistricting Expert Reports & Testimony
- Redistricting Presentations & Training
- ESRI ArcGIS Map Applications & Dashboards
- Maptitude for Redistricting Proficiency
- Professional Presentations/Training Experience

### Education:

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Master of Geospatial Information Science and Technology (2016)  
North Carolina State University, Raleigh, North Carolina

Graduate Certificate in Geographic Information Systems (2016)  
North Carolina State University, Raleigh, North Carolina

Bachelor of Science Degree in Electrical Engineering (1982)  
Virginia Tech, Blacksburg, Virginia

### Work Experience:

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#### **CensusChannel LLC, Hampton, VA (2009 - Present)**

CEO & Principal Consultant - Providing overall project management and operations as well as primary consulting services for clients. Also responsible for customer acquisition and support. Core tasks include GIS-centered services centering on: redistricting support (extensive use and analysis of traditional redistricting principles); demographic/socioeconomic, geographic, and voting data; GIS, Census Data, and Redistricting training; GIS data processing/conversion; expert redistricting plan development, analysis, depositions, testimony, and training. Major clientele and projects include:

- **The ACLU, New York, NY (2021 - Present)** – Providing expert plan development services centering on the states of Alabama and Arkansas.
- **The Power Coalition, New Orleans, LA (2021 - Present)** - Providing technical advice and input for building an equitable redistricting process in Louisiana for communities, legislators, and organizations. Providing analysis and plan alternatives for Louisiana state legislative House and Senate districts where Black voters could elect a candidate of choice.
- **Crescent City Media Group, New Orleans, LA (2021)** – Provided redistricting training to the PreRedistricting Lab. Training centers on various educational presentations and hands-on sessions to community leaders and local/state legislators.
- **NAACP Legal Defense Fund (LDF), New York, NY (2020 – Present)** - Providing redistricting development and analysis of various district configurations for city, county, and state-level plans.
- **Crowd Academy [an SCSJ sponsored effort], Durham, NC (2020 - Present)** - Providing redistricting training and support. Training centers on presentations on "How the Lines are Drawn" which focuses on pre-plan development and plan development activities of redistricting. The target attendee includes individuals in Georgia, North Carolina, South Carolina, Tennessee, and Texas. The effort also includes providing mentorship to Academy Fellows and Academy Mentors.

- **City of Everett, WA, Everett, WA (2020)** – Provided advice, consultation, and mapping services as Districting Master to the city of Everett, WA's Districting Commission. Efforts centered on the development of the city's first districting plan. Also assisted with answering questions at public forums and developed an ArcGIS web map application for public access of all plans.
- **NAACP, Baltimore, MD (2018 - Present)** – Providing GIS consulting services via the NAACP (as fiscal agent) to the *Racial Equity Anchor Collaborative* (consisting of the Advancement Project, APIA Health Forum, Demos, Faith in Action, NAACP, National Urban League, NCAI, Race Forward, and Unidos US). Efforts include the development of the Racial Equity 2020 Census Data Hub. The Data Hub utilized ESRI's Hub Cloud platform, that centralized web maps, mapping applications, and dashboards into a common platform that enabled collaborative partners to locate hard-to-count areas by major race or ethnicity.
- **Southern Echo, Jackson, MS (2018 - Present)** – Providing redistricting training sessions to Southern Echo partners throughout the south. Also provided GIS data, maps, and training to Southern Echo, community leaders, stakeholders, and subsequently in the field to groups working in the following states; Alabama, Arkansas, Georgia, Florida, Louisiana, Mississippi, New Mexico, North Carolina, South Carolina, and Texas. Specifically, deliverables include map-centered projects centering on education, GOTV, and redistricting.
- **Campaign Legal Center, Washington, DC (2018 –2021)** – Developed illustrative redistricting plans, associated expert reports, depositions, and testimony in the *Holloway v City of Virginia Beach* court case. The Illustrative plans included two majority Hispanic, Black, and Asian combined districts for the purpose of providing evidence of the first prong in *Gingles* for the city of Virginia Beach.
- **Southern Coalition for Social Justice [SCSJ], Durham, NC (2015 - 2018)** - Provided several expert reports, depositions, and testimony for multiple redistricting court cases in North Carolina. Testimony, depositions, and reports included numerous plans at the congressional, state Senate, state House, and local jurisdiction level. Analyses covered certain district characteristics, including population deviation, political subdivision splits, partisan performance, and incumbent effect analysis.
- **The Rehab Crew, Durham, NC (2017)** - Provided geospatial & demographic analysis as well as website development and the creation of a proprietary application for the use of targeting real estate investment properties.
- **Congressman G.K. Butterfield, NC (2016 & 2021)** - Developed several congressional district plan alternatives for the State of North Carolina. Provided analyses on alternative district configurations.
- **Alabama Democratic Conference (ADC), Montgomery, AL (2015 - 2016)** - Developed state Senate and House redistricting plans for the state of Alabama in response to the *ADC v Alabama* court case. Also, provided a series of thematic maps depicting areas added from the previous plan to the enacted plan, displaying concentrations of African American voters that were added to the enacted plan.
- **Net Communications, Tallahassee, FL (2014 - 2015)** - Generated offline mapping and online web services (ArcGIS.com) of client's energy company's resources and organizational assets. Mapping included demographic, socioeconomic, and other resources of the energy company.
- **National NAACP Office of General Counsel, Baltimore, MD (2012 - 2013)** - Provided project management and developmental support for the creation of a final report for the NAACP National Redistricting Project. Provided planning, organizing, supplemental writing, and interfacing with graphics entity for the complete development of the final report.
- **Congressional Black Caucus Institute (CBC Institute), Washington, DC (2011 - 2012)** - Provided contract duties as the Project Director and Consulting Demographer for the CBC Institute's

Redistricting Project. Provided project management, redistricting plan development, review, analysis, advice, and answers to various questions pertaining to redistricting plans, principles, and processes. Focus included districts where Black voters could elect a candidate of choice.

- **Mississippi NAACP, Jackson, MS (2011)** - Developed state Senate plans and analyzed enacted plans that were developed by the State Court.
- **African American Redistricting Collaborative (AARC) of California, Los Angeles, CA (2011)** - Provided demographic and redistricting contracted services. Responsible for developing congressional, state Senate, and state assembly plans for the collaborative. Special focus was given to the southern Los Angeles area (SOLA) and the Bay Area region. In addition to plan development, several socioeconomic maps were developed to show various communities of interest commonalities.

Also, developed a demographic profile using maps and reports of California's congressional, state Senate, and state Assembly districts for the purpose of preparing for the redistricting plan development process by identifying areas of growth throughout the state. The profiles included data from the American Community Survey (ACS) 2005-2009 and the 2010 Census.

- **The Advancement Project, Washington, DC (2011)** - Provided redistricting plan development services and training. Included was the development of a base map for a new seven (7) district plan in New Orleans that was further developed by community groups in Louisiana. The second effort included training a staff person on the use of Maptitude for Redistricting as well as on various redistricting scenarios.
- **Louisiana Legislative Black Caucus (LLBC), Baton Rouge, LA (2011)** - Provided redistricting plan development services. Responsibilities included supporting the Caucus members' efforts to develop state House, state Senate, and congressional redistricting plans. Developed or analyzed over eighty different redistricting plans. The effort also included testifying in front of the Louisiana Senate and Governmental Affairs committee.
- **Community Policy Research & Training Institute (One Voice), Jackson, MS (2011)** - Developed Mississippi State Senate plan along with appropriate reports and large-scaled map.
- **National Black Caucus of State Legislators (NBCSL), Washington, DC (2010)** - Provided services as the Project Director for a 2010 census outreach effort. Developed proposal and managed personnel to generate and execute a strategy to utilize Black state Senate and House legislators to place targeted posters in select hard-to-count (HTC) areas throughout the country.
- **Duke University's Center for REGSS & SCSJ, Durham, NC (2010 - 2011)** - Contracted to serve as one of two Project Coordinators to support an expert preparation workshop hosted by Duke University's REGSS and the SCSJ.

Project Coordinator duties included developing, managing, and providing hands-on training for the Political Cartographer's side of a week-long intensive "redistricting expert" preparation workshop. The workshop trained 18 political cartographers from various parts of the country on all aspects of redistricting plan development and principles. Also, two hands-on redistricting scenarios were created to train large audiences on the plan development process.

### **Democracy South, Virginia Beach, VA (2004 - 2008)**

Senior Technical Consultant - Provided technical, GIS mapping, data analysis, and management support for several projects and civic engagement-related efforts. Major project efforts included:

- Senior Technical Consultant for the National Unregistered Voter Map. Developed a web-based interactive map that allowed visitors to view state/county level information pertaining to the number of unregistered voters (2009)

- Co-Director of the Hampton Roads Missing Voter Project (a nonpartisan nonprofit voter engagement effort to increase voter participation with a focus on underrepresented population groups). The effort covered the seven major Independent cities in Hampton Roads. Responsibilities included co-managing the overall civic engagement effort and was solely responsible for integrating and processing Catalyst voter data into targeting maps and walk lists for all focus areas. Directly Responsible for overseeing the operations in Hampton, Newport News, Portsmouth, and Suffolk, Virginia (2008)
- Senior Technical Consultant for Civic Engagement Efforts. Provided telephone technical voter database support to 17 USAction state partners in 2004; and 12 USAction state partners in 2006. Trained client on VBASE voter data software; Performed voter data conversion; and voter targeting assistance.

#### **Congressional Black Caucus Institute, Redistricting Project, Washington D.C. (2001 - 2003)**

Consulting Demographer - Provided services that included the development, review, and analysis of over 75 congressional district plans. Responsible for all setup and configuration of hardware and GIS software and performed all development and analyses of redistricting plans. Congressional district plans were developed for 22 states. Also, performed as a redistricting expert advisor in a consolidated U.S. District Court Voting Rights case in Alabama.

#### **National Voter Fund, Washington, D.C. (2000)**

GIS Consultant (in a consulting partnership of Hagens & Fairfax) - Developed hundreds of precinct targeting maps for a civic engagement effort designed to increase the turnout in the November 2000 election. Efforts included: geocoding voter data, census data integration, and precinct mapping.

#### **Norfolk State University, Poli. Science & Computer Science Dept., Norfolk, Virginia (1996 - 2001)**

Adjunct Faculty - Provided instruction to students for BASIC Programming, Introduction to Computer Science, and Computer Literacy courses.

#### **GeoTek. Inc. (formally GIS Associates), Virginia Beach, VA (1992 - 1995)**

Consultant and Co-owner - Provided geodemographic research and analysis; client technical & training support; hardware/software system installation; and redistricting manual/ brochure development. Major clients and tasks included:

- New York City Housing Authority - Redistricting Training
- Maryland State Office of Planning - Redistricting Tech Support
- City of Virginia Beach, VA Planning Dept. - Redistricting Training/Tech Support
- City of Norfolk, VA Registrar - Redistricting Training/Tech Support
- City of Chesapeake, VA Registrar - Precinct Realignment

#### **Norfolk State University, Political Science Dept., Norfolk, Virginia (1991 - 1999)**

GIS Consultant - Provided a variety of geographic and demographically related tasks. Major Redistricting related tasks included:

- Installed and operated the LogiSYS ReapS software that was used to perform the bulk of redistricting plans. Performed the intricate ReapS processing of the U.S. Census Bureau Topographically Integrated Geographic Encoded Referencing (TIGER) line files, Public Law 94-171 (PL94-171) demographic data, and the STF socioeconomic data series.



- Developed over 200 hundred redistricting plans, located in over 60 jurisdictions, in the states of Florida, Louisiana, North Carolina, Texas, and Virginia. Developed plans from city/county to legislative to congressional district.
- Traveled to and trained several university faculty personnel on setting up and utilizing the ReapS redistricting system. Also, trained on redistricting plan development principles.

Major GIS-related tasks included:

- Performed a study commissioned by the U.S. Department of Transportation to analyze the ethnic differences in commuting behavior. This study extensively utilized the Summary Tape File 3 A (STF3 A) and Public Microdata Sample (PUMS) data to locate, map, and report the frequency and average travel time to and from work for: Miami, FL MSA; Kansas City, MO-KS MSA; and Detroit, MI MSA.
- Performed a study funded by the City of Norfolk, VA, and NSU School of Business that determined and analyzed the trade area of a section located in Norfolk, VA. Major duties included: geocoding customer addresses, producing address point maps, and developing demographic reports for the project.
- Performed a study commissioned by the U.S. Department of Housing and Urban Development (HUD) to revitalize a neighborhood located in Norfolk, VA. The purpose of the GIS component was to first establish a socioeconomic base-line then track the progress of the revitalized area as well select surrounding areas. Geocoded address locations, generated point as well as demographic thematic maps, and produced reports of the target areas.
- Provided demographic analysis of proposed newly incorporated areas in Florida for local Florida civic organizations.

#### **Cooperative Hampton Roads Org. for Minorities in Engineering, Norfolk, VA (1991 - 1992)**

Computer Consultant - Designed and developed a menu-driven student database, used to track hundreds of minority Junior High and High School students that were interested in pursuing science or engineering degrees.

#### **Norfolk State University, School of Education, Norfolk VA (1990 - 1991)**

Technical Consultant/Computer Lab Manager- Provided a variety of support to include hardware and software installation; faculty workshops; course instruction; Network Administrator; and technical support.

#### **Engineering and Economics Research (EER) Systems (1989)**

Technical Consultant - Coordinated and participated in writing, editing, and formatting technical test documents; central role in the development of the Acceptance Test Procedures for the initial phase of a multi-million dollar Combat Maneuver Training Complex (CMTC) in Hohenfels, Germany; the final review and editing of all test documentation.

#### **Executive Training Center (ETC). Newport News, VA (1988 - 1989)**

Vice President & Co-founder - Managed over 11 part-time and full-time employees; assisted in developing and implementing company policies; performed the duties of the Network Administrator for a Novell-based computer training network; and taught several courses by substituting for instructors when necessary.

#### **Engineering & Economics Research (EER) Systems. Newport News, VA (1986 - 1987)**

Hardware Design Engineer and Electronics Engineer - Provided engineering and select project management support for the development of the following million/multi-million dollar project efforts:

- Baseline Cost Estimate (BCE) to be used in the procurement of the Combat Maneuver Training Complex - Instrumentation System (CMTC-IS)
- Operational and Maintenance (O&M) Support Plan at the National Training Center (NTC)

- Quality Assurance Surveillance Plan for the O&M Support Plan at the NTC; Configuration Management Plan for CMTC
- Requirements Operational Capabilities (ROC) Analysis for an instrumentation System at the U.S. Army Ranger School, Georgia;
- ROC Analysis for an Instrumentation System at Fort Chaffee, Arkansas;
- Suggested Statement of Work for the Digital Data Entry Device (DDED); and the Concept Formulation Package and Requirements Definition to Support interface and integration of Red Flag at the NTC:
- Phase II of a multi-million dollar GIS-based concept test demonstration. Performing as Assistant Test Director (ATD) - liaison between the Government Director Army Ranges and Targets (DART) personnel and EER Systems' personnel; and assumed the role of Test Director when required (1987).
- Suggested Statement of Work (SOW) for a \$1 million procurement of Multivehicle Player Units (MVPUs) at the NTC. Performed as Project Task Manager for a team of engineers, computer programmers, and technical support personnel in the development of a position location player unit for the Army (1986).

#### **Teledyne Hastings-Raydist, Hampton, VA (1982 - 1986)**

Hardware Design Engineer - Designed and developed custom flow and vacuum measuring products; Project Manager for the production and completion of a \$.25 million flow measuring system; Electrical Engineer - Chiefly responsible for developing special products for customers.

### **Major Litigation Clients & Testimony Related Efforts:**

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#### **ACLU, New York, New York, NY (2021 – 2022)**

Developed an illustrative redistricting plan and associated expert report for the *Arkansas State Conference NAACP v. Arkansas Board of Apportionment* preliminary injunction case. The Illustrative plan included five additional majority Black districts as opposed to the Board of Apportionment plan. The plan, report and testimony provided evidence of the first prong in *Gingles* in proving dilution of Black voting strength in violation of Section 2 of the Voting Rights Act (VRA). The effort included plan development, expert report, rebuttal report, and testimony.

#### **Campaign Legal Center, Washington, DC (2018 – 2020)**

Developed multiple illustrative redistricting plans and associated expert reports for *Latasha Holloway v City of Virginia Beach* court case. The Illustrative Plans included two majority Hispanic, Black, and Asian combined (Coalition) districts for the purpose of providing evidence of the first prong in *Gingles* in the section 2 court case. The effort included an additional rebuttal, supplemental report, deposition, and testimony.

#### **Virginia NAACP, Richmond, VA (2018)**

Developed a statewide remedial plan for *Bethune-Hill v. Virginia State Bd. of Elections*. The plan corrected 11 unconstitutional racial gerrymandered state House districts in the Richmond, Peninsula, and Southside Hampton Roads areas.

#### **Southern Coalition for Social Justice (SCSJ), Durham, NC (2018)**

Developed a demonstrative remedial redistricting plan and associated expert report as well as provided a deposition for *North Carolina State Conference of NAACP Branches v. Lewis Wake County Superior Court* case. The demonstrative remedial plan corrected the two Wake County, N.C. House Districts declared by a federal court to be racially gerrymandered districts (HD33 & HD38). The expert report provided a narrative

that not only discussed my results but also provided insight for the Court on how a map drawer would reasonably go about fixing racially gerrymandered districts and still comply with the state constitution's prohibition on mid-decade redistricting.

#### **Texas NAACP, San Antonio, TX, (2017)**

Provided expert report, deposition, and testimony for the *Perez v. Abbott* US Federal District Court Case. Analyses focused on certain redistricting criteria, including population deviation, compactness, political subdivision splits, and communities of interest for congressional and House plans. Additional analysis was performed on demographic projections for certain congressional and state House districts.

#### **Southern Coalition for Social Justice (SCSJ), Durham, NC (2015 - 2016)**

Provided expert testimony, deposition, and expert report for the *City of Greensboro v The Guilford County Board of Elections* U.S. District Court Case. Deposition and report included several district plans for the city council of Greensboro, NC, and analyzed certain characteristics, including population deviation, political subdivision splits, partisan performance, and incumbent effect analysis.

Provided expert testimony and report for the *Covington v North Carolina* federal redistricting court case. The testimony included analysis from *Dickson v Rucho* (also *NAACP v North Carolina*) of compactness on state legislative House and Senate districts.

Provided expert testimony and report for the *Wright v North Carolina* federal redistricting court case. The testimony and report included analysis of population deviation, compactness, partisan impact, and incumbent residences for county commission and school board plans.

#### **Alabama Democratic Conference (ADC), Montgomery, AL (2015 - 2016)**

Developed Senate and House redistricting plans for the state of Alabama for the *ADC v Alabama* court case. Provided deposition on the creation of the plan. Also, generated a series of thematic maps depicting areas added from the previous benchmark plan to the enacted plan, displaying concentrations of African American voters that were added to the enacted plan.

#### **Southern Coalition for Social Justice (SCSJ), Durham, NC (2014)**

Provided expert testimony, report, and deposition for Federal redistricting court case, *Perez v. Perry* of Texas. The report included analysis of population extrapolations and projections for several submitted plans for select congressional and House districts.

#### **North Carolina NAACP, Raleigh, NC (2012)**

Provided expert opinions and analysis in an affidavit for the *NC NAACP v. State of North Carolina* federal redistricting case (later *Dickson v Rucho*). The affidavit included examination of compactness measurements pertaining to the Congressional, State Senate, and State House "Benchmark" plans, several approved plans, and several legislative submitted plans. The report also contained county splits for the target districts.

#### **Southern Coalition for Social Justice (SCSJ), Durham, NC (2011)**

Provided expert opinions and analysis in an affidavit for the *Moore v. State of Tennessee* redistricting case. The affidavit included analysis of county splits comparing State Senate "Benchmark" plans, the approved plan, and several legislative submitted plans.

#### **Texas NAACP, San Antonio, TX (2011)**

Provided expert report, deposition, and testimony for federal redistricting court case *Perez v. Perry*. Testimony covered the evaluation of traditional redistricting criteria of the Congressional and House-approved plans compared to several proposed or legislative submitted plans.

**Louisiana Legislative Black Caucus, Baton Rouge, LA (2011)**

Provided expert testimony in front of the Senate and Governmental Affairs committee. Testimony included the analysis of two redistricting plans comparing ideal population deviation, political subdivision splits (Parishes), and compactness ratios. Also, developed a redistricting plan and testified in front of the House and Governmental Affairs in support of a new majority-minority (African American) congressional district in Louisiana.

**Morrison & Foerster LLP, Los Angeles, CA (2004)**

Provided expert report on several state Senate plans for the *Metts v. Murphy* Rhode Island court case. The report contained analyses of communities of interest areas that were not included in the state's enacted plan of the only majority-minority district.

**Congressional Black Caucus Institute, Redistricting Project, Washington D.C. (2002)**

Performed as the redistricting mapping expert for Congressman Hilliard in a consolidated U.S. District redistricting court case in Alabama (*Montiel v. Davis* and *Barnett v. Alabama*). Developed the submitted plan and provided advice to legal counsel for the court case.

**Council of Black Elected Democrats (COBED) New York State, New York, NY (2002)**

Performed as one of the redistricting experts (*Allen v Pataki/Rodriguez v Pataki*) by developing several New York State congressional district plans that were presented by COBED.

**Miami-Dade, Florida (1993)**

Provided expert technical redistricting support as one-half of the Expert Master's Team for the remedial Plan (*Meek v. Metropolitan Dade County*). Developed over 50 commissioner district plans for the county as well as the final adopted Plan for the metro Dade County.

**NAACP Legal Defense and Educational Fund (LDEF), New York, NY (1993)**

Provided expert technical support for the *Shaw v. Reno* Supreme Court case (via Norfolk State University). Analyzed and compared various compactness ratios for congressional districts throughout the U.S. The results were compared to the 12<sup>th</sup> congressional district of North Carolina. Also, developed several alternative congressional district plans.

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### **Major GIS/Demographic/Redistricting Training and Presentations:**

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**Southern Echo (2021)**

Presented multiple training sessions (11 planned) on various aspects of redistricting. Included both presentations and ultimately hands-on (Dave's Redistricting)

**Crowd Academy (2020 – 2021)**

Presented multiple Training sessions (>25) that center on "How the lines are Drawn" which focuses on the plan development activities of redistricting.

**Crescent City Media Group (2021)**

Presented ten three-hour-long training sessions on various aspects of redistricting. Included both presentations and hands-on (Maptitude for Redistricting)

**NAACP LDF/MALDEF Expert Convening (2021)**

Provided multiple sessions to potential future experts on expert report development, giving depositions, and providing testimony.

**SIF Voting Rights Convening (2021)**

Presented on a panel the unique aspects and issues pertaining to the 2020 round of redistricting.

## **Major GIS/Demographic/Redistricting Training and Presentations (cont.):**

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### **SIF Voting Rights Convening (2020)**

Presented on a panel various preparatory aspects and questions that should be addressed prior to the development of plans.

### **Delta Days in the Nation's Capital, Washington, DC (2020)**

Provided panel presentation on suggested efforts in preparation for the next round of redistricting. Plenary presentation to several hundred Delta Sigma Theta (DST) sorority sisters throughout the country.

### **William and Mary, Williamsburg, VA (2019)**

Presented lecture to the GIS and Districting course students centering on improving as well as potential adverse trade-offs from improvements of the adopted redistricting plan chosen by the special masters of the *Bethune-Hill v. Virginia State Bd. of Elections* redistricting case.

### **Southern Echo, Jackson, Mississippi (2019)**

Provided detailed training/presentation (3 hours) on various aspects of redistricting. Topics included: Relevant redistricting court cases, traditional redistricting criteria, and redistricting data.

### **William and Mary, Williamsburg, VA (2018)**

Presented lecture to the GIS and Districting course students centering on aspects of the *Bethune-Hill v. Virginia State Bd. of Elections* redistricting case. Discussion pertained to how to develop a plan that corrected the 11 unconstitutional racial gerrymandered states House districts.

### **Congressional Black Caucus Institute, Washington, DC (2016)**

Presented at the annual legislative conference in Tunica, MS. Presented the election demographic analysis and for the 2016 presidential and Senate elections. Panel also included Congressman Cedrick Richmond (L.A.), Congressman Sanford Bishop (G.A.), and Professor Spencer Overton.

### **Coalition of Black Trade Unionists (CBTU), Chicago, IL (2015)**

Presented at the annual CBTU conference on the election panel that included Congressman Al Green (TX) and Congressman Bobby Rush (I.L.).

### **Nobel Women's Initiative, Washington, DC (2015)**

Presented on a panel at the annual conference in San Diego, CA, on the upcoming 2020 census.

### **Tennessee NAACP, Nashville, TN (2011)**

Provided redistricting training session on the mapping and demographic aspects of Redistricting.

### **Congressional Black Caucus Institute, Washington, DC (2002 - 2012, 2014)**

Presented "The Demographics of Campaigns" twelve times at the institute's annual political campaign "Boot Camp." The presentation covers how to locate and utilize demographic data for political campaigns.

### **Congressional Black Caucus Foundation (CBCF), Washington, DC (2011)**

Presented as one of the panelists at the "Judge A. Leon Higginbotham" Braintrust at the CBC Annual Legislative Conference. The panel was moderated by Congressman Mel Watt.

### **The Advancement Project, Washington, DC (2011)**

Trained staff GIS person on Maptitude for Redistricting as well as on redistricting scenarios.

### **National Association for the Advancement of Colored People, Baltimore, MA (2011)**

Provided training session on "Redistricting Mapping Overview" at the organization's national redistricting training seminar for state and local chapters.

## **Major GIS/Demographic/Redistricting Training and Presentations (cont.):**

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### **Congressional Black Caucus Institute, Washington, DC (2010)**

Presented at the annual CBC Institute conference in Tunica, MS (The panel included Congressman John Lewis and Congressman Jim Clyburn). Outlined two critical issues that would surface in the 2010 round of redistricting: 1) Prison-based Gerrymander; and 2) The use of Citizen Voting Age Population (CVAP).

### **Community Census and Redistricting Institute (CCRI), Durham, NC (2010)**

Developed, managed, and provided hands-on training for the Political Cartographer's side of a week-long intensive "redistricting expert" preparation workshop. The workshop trained 18 political cartographers on all aspects of plan development.

### **North Carolina University's Center for Civil Rights, Chapel Hill, NC (2010)**

Provided presentation on "Redistricting Laws & GIS" at the *Unfinished Work* conference. The presentation outlined the evolution of major redistricting laws and GIS and their impact on minority representation.

### **NAACP Legal Defense Fund AIRLIE Conference, AIRLIE, VA (2010)**

Provided training using hands-on "paper" redistricting scenario to voting rights advocates on developing a plan without the use of computers.

### **Young Elected Officials, Los Angeles, CA (2010)**

Provided training using hands-on "paper" redistricting scenario to young legislators on developing a plan without the use of computers.

### **Young Elected Officials, Alexandria, VA (2010)**

Provided overview training on the major aspects of redistricting to young legislators.

### **North Carolina University's Center for Civil Rights, Chapel Hill, NC (2006)**

Provided presentation on "Congressional Elections Won by African Americans Race & Ethnicity District Perspective (1960 - 2004)" at the *Who Draws the Lines? The Consequences of Redistricting Reform for Minority Voters* conference.

### **Howard University - Continuing Education - HBCU GIS Workshop, Washington, DC (2002)**

Provided presentation on redistricting and the use Maptitude for Redistricting to faculty members of Historically Black Colleges and Universities (HBCUs).

### **Norfolk State University Redistricting Project Training Workshops (1991 - 1998)**

Provided redistricting training to the following:

- Alabama State University, Montgomery, Alabama
- Albany State University, Albany, Georgia
- Florida A & M, Tallahassee, Florida
- National Conference of Black Political Scientists, Atlanta, Georgia Conference
- Norfolk State University, Norfolk, Virginia
- North Carolina A & T State University, Greensboro, North Carolina
- North Carolina Central University, Durham, North Carolina
- Southern University, Baton Rouge, Louisiana
- Williams College, Williamstown, Massachusetts



## Major GIS/Redistricting/Voter Data Software Experience:

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- ArcGIS - GIS Software - Primary GIS Software after 2012 ([ESRI](#))
- ArcGIS Online – Including Story Maps & Web Application Builder ([ArcGIS.com](#))
- GRASS GIS – Open Source GIS ([OSGeo](#))
- Maptitude for Redistricting - Primary Redistricting software, since 2001 ([Caliper](#))
- ESRI Redistricting Online - Beta Tester ([ESRI](#))
- Public Mapping Project – Initial Advisory Board Member ([an open source online software](#))
- GIS Plus (the precursor to Maptitude Software in the mid to late 1990s) - User ([Caliper](#))
- ReapS Redistricting and Reapportionment System - Redistricting software, 1990s ([LogiSYS](#))
- Voter Activation Network System [NPGVAN](#)
- Voterlistonline.com Aristotle software [Aristotle](#)

## GIS Skillset/Coding Languages:

---

- |                        |                        |
|------------------------|------------------------|
| • Geocoding Data       | • Image Classification |
| • Linear Referencing   | • ArcGIS Web Services  |
| • Digital Cardinality  | • pdAdmin              |
| • Spatial Statistics   | • Python               |
| • Suitability Analysis | • PostgreSQL           |

## ESRI Training Certificates:

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- Learning ArcGIS Desktop (for ArcGIS 10) - 24 hrs training
- Turning Data into Information Using ArcGIS 10 - 18 hrs training
- Basics of Raster Data (for ArcGIS 10) - 3 hrs training
- Using Raster Data for Site Selection (for ArcGIS 10) - 3 hrs training
- Working with Geodatabase Domains and Subtypes in ArcGIS - 3 hrs training
- Network Analysis Using ArcGIS - 3 hrs training

## Publications:

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### Books

- *An Introduction to the Presidential Trend*, Statistical Press, March 2015
- *The Presidential Trend*, Statistical Press, December 2013
- *A Step by Step Guide to Using Census 2000 Data*, MediaChannel LLC, March 2004. Also included was a companion CD-ROM (sold through various Census-related workshops and training sessions and used in a political science course).

### Manuals

- *A Beginner's Guide To Using Census 2000 Data*, November 2002 (Co-authored- developed for the U.S. Census Bureau's Census Information Centers)

### Articles

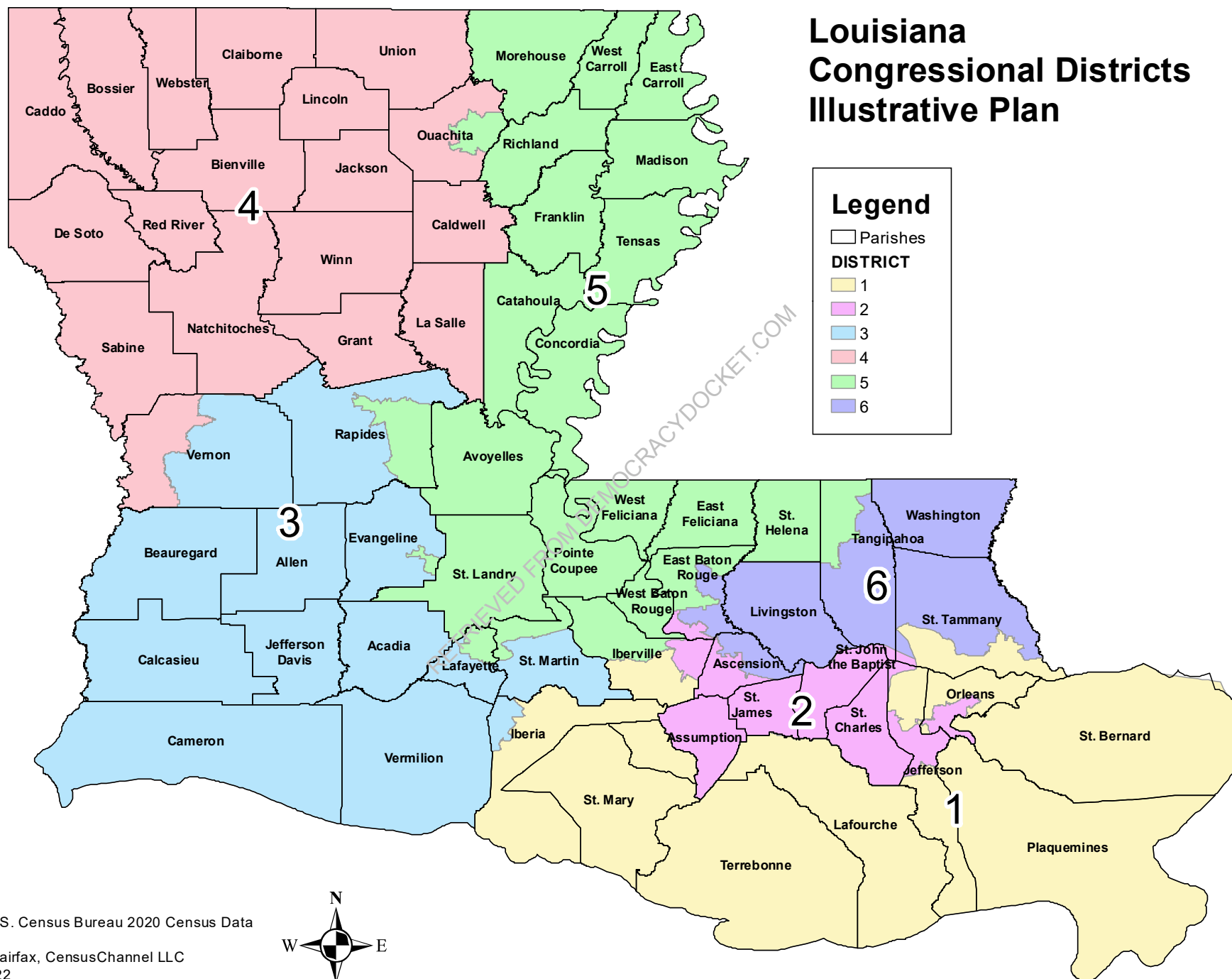
- "Precision Voter Targeting: GIS Maps Out a Strategy," Geo Info Systems, November 1996 (Co-authored one of the first articles published on using modern-day GIS for voter targeting).

## Appendix B

### Maps of the Illustrative, HB1, and 2011 Congressional Plans

1. Illustrative Plan - Congressional Districts Statewide
2. HB1 Plan - Congressional Districts Statewide
3. 2011 Plan - Congressional Districts Statewide
4. Illustrative Plan - Congressional Districts Zoom
5. HB1 Plan - Congressional Districts Zoom
6. 2011 Plan - Congressional Districts Zoom
7. Plaintiff's Address Locations





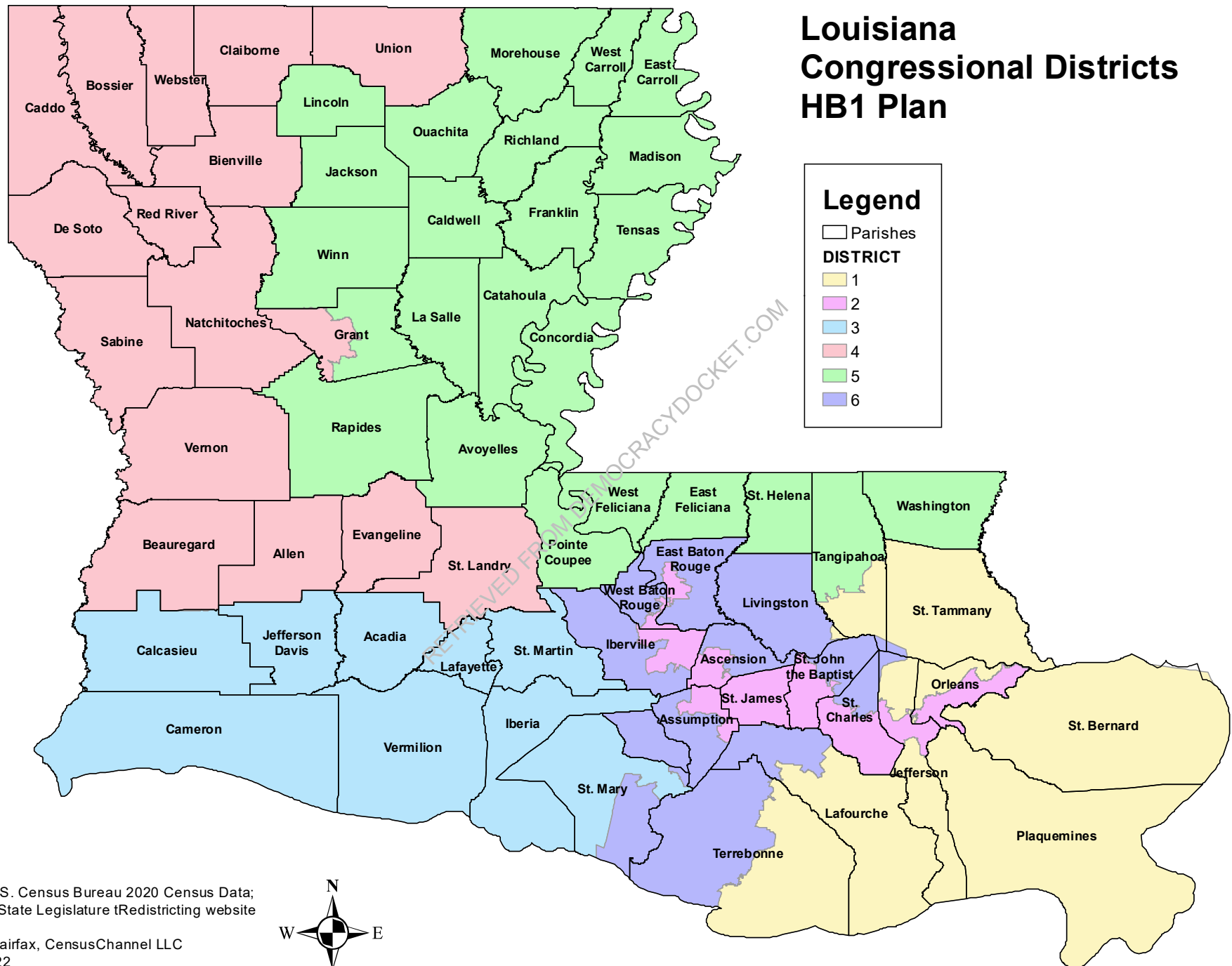
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By: Tony Fairfax, CensusChannel LLC

Date: 4/4/22

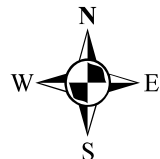
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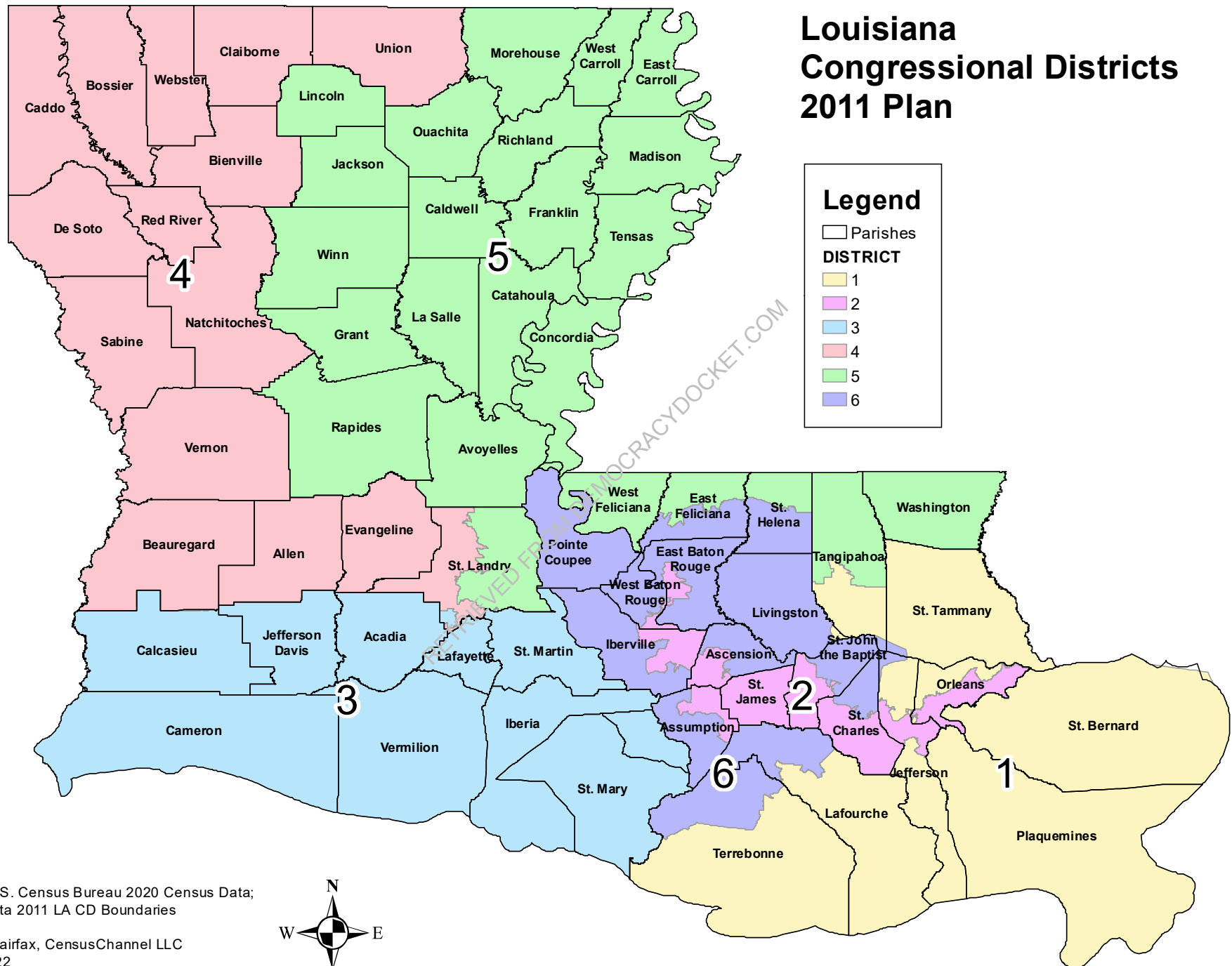




Source: U.S. Census Bureau 2020 Census Data;  
Louisiana State Legislature tRedistricting website

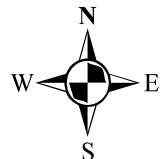
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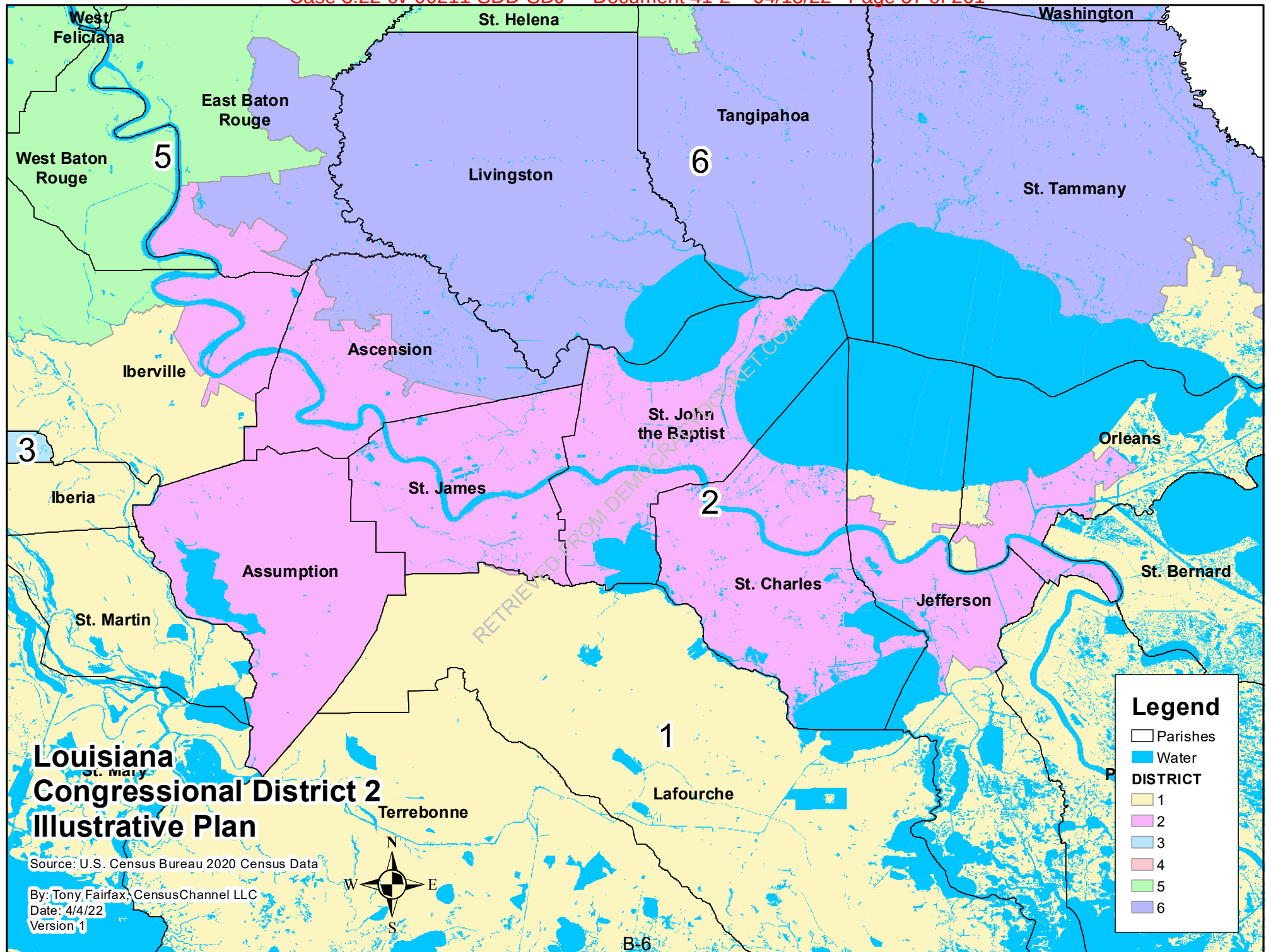


Source: U.S. Census Bureau 2020 Census Data;  
Caliper Data 2011 LA CD Boundaries

By: Tony Fairfax, CensusChannel LLC  
Date: 4/4/22  
Version 1









# Louisiana Congressional District 3 Illustrative Plan

Source: U.S. Census Bureau 2020 Census Data

By: Tony Fairfax, CensusChannel LLC  
Date: 4/4/22  
Version 1



## Legend

Parishes

Water

DISTRICT

1

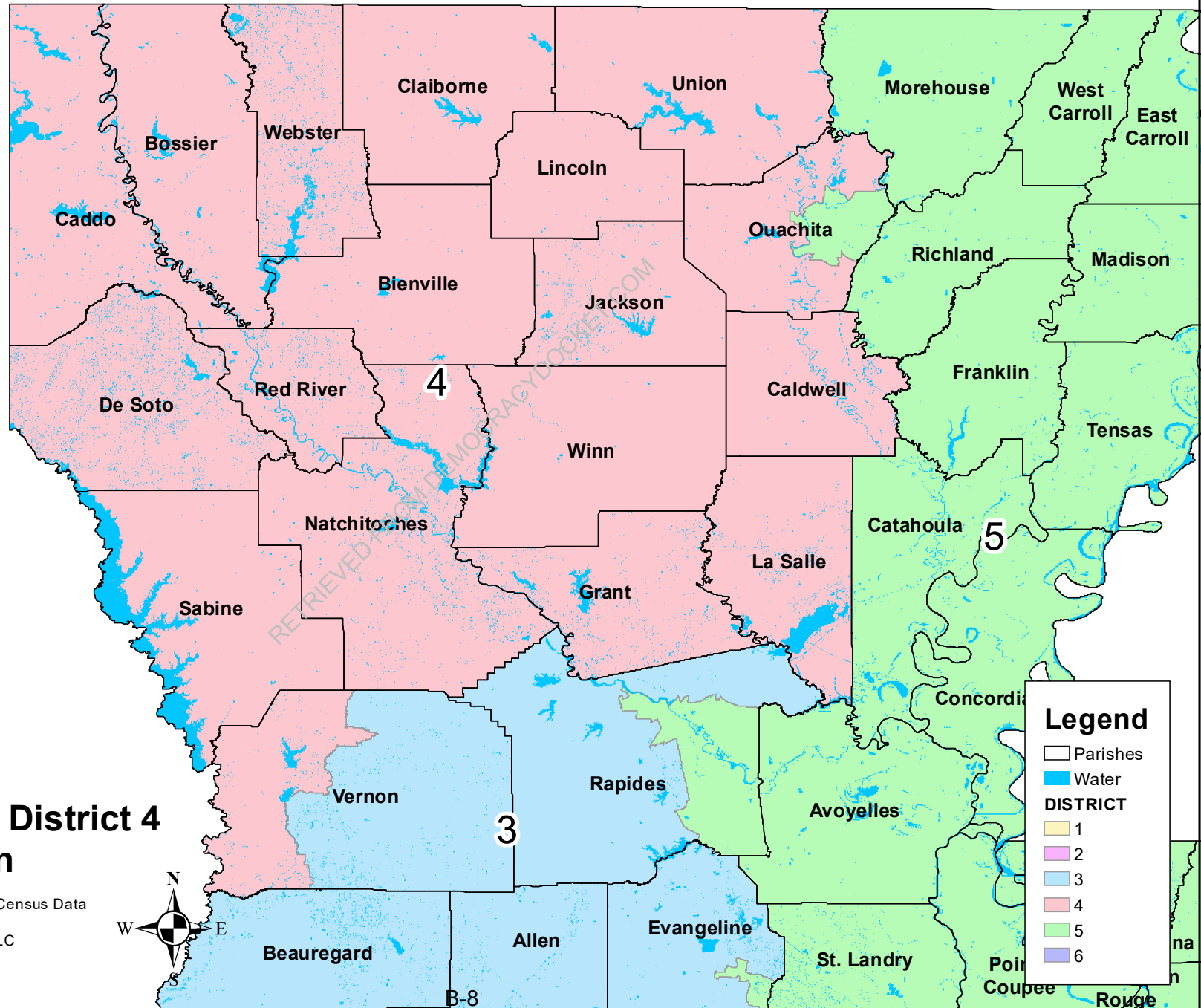
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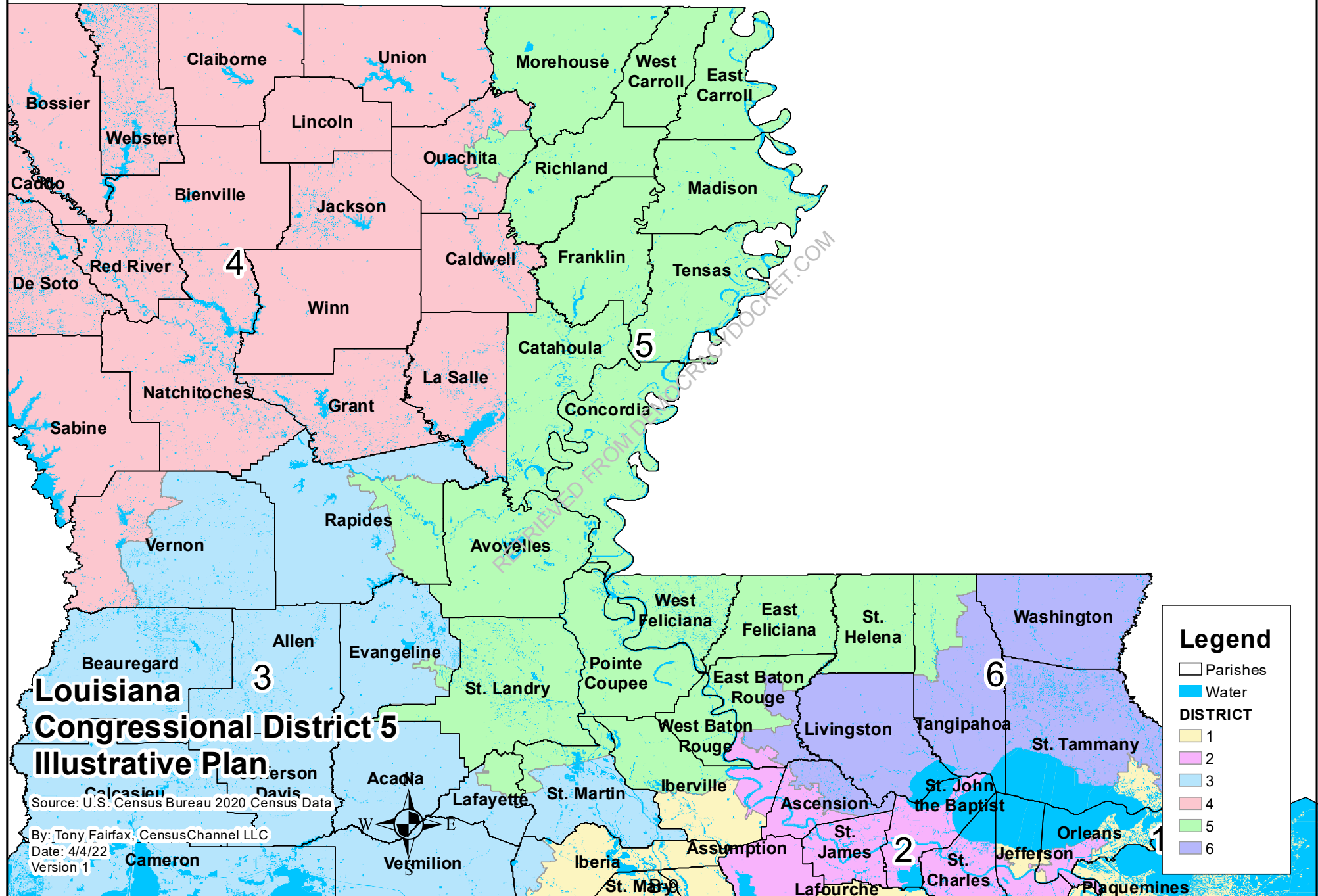
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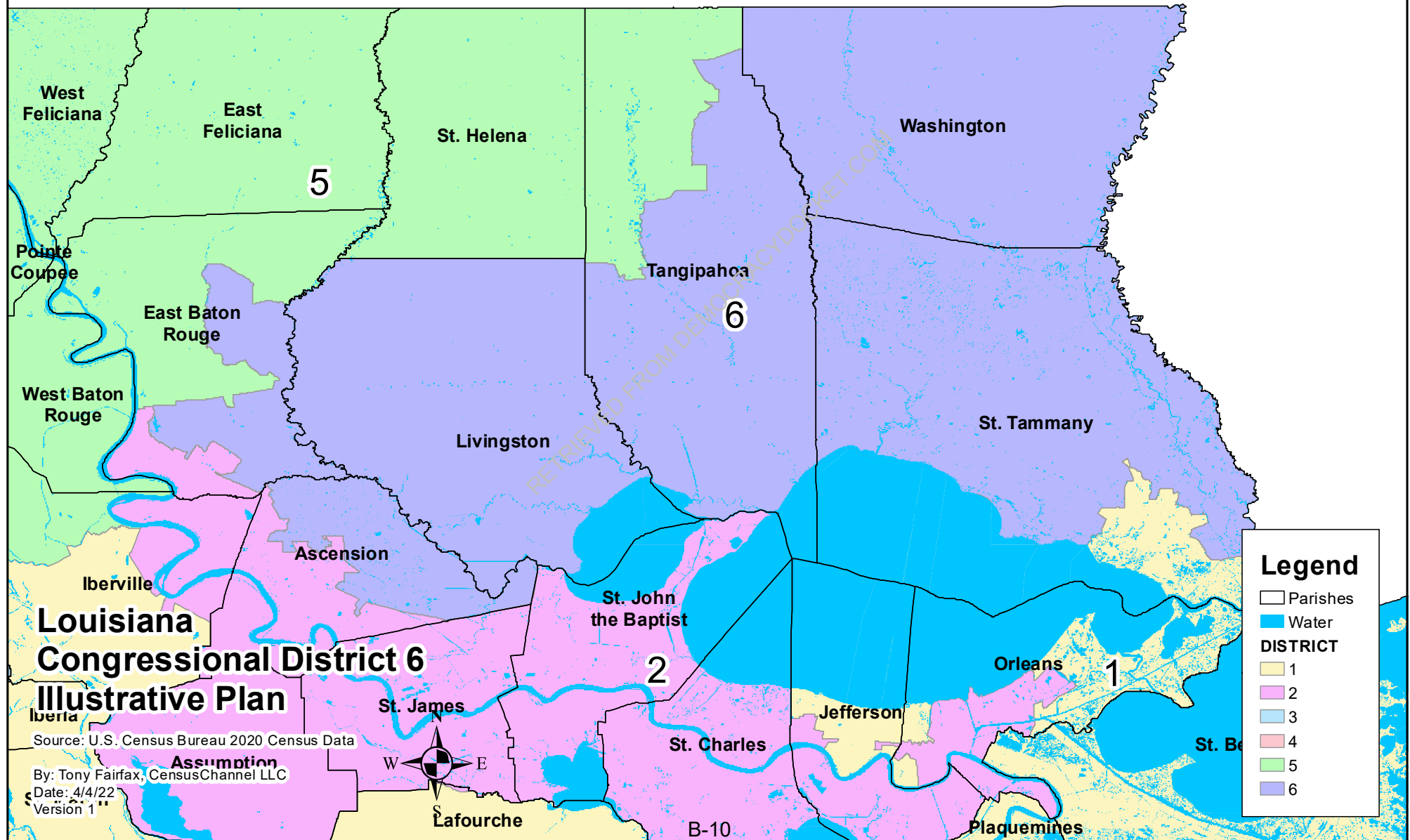
## Louisiana Congressional District 4 Illustrative Plan

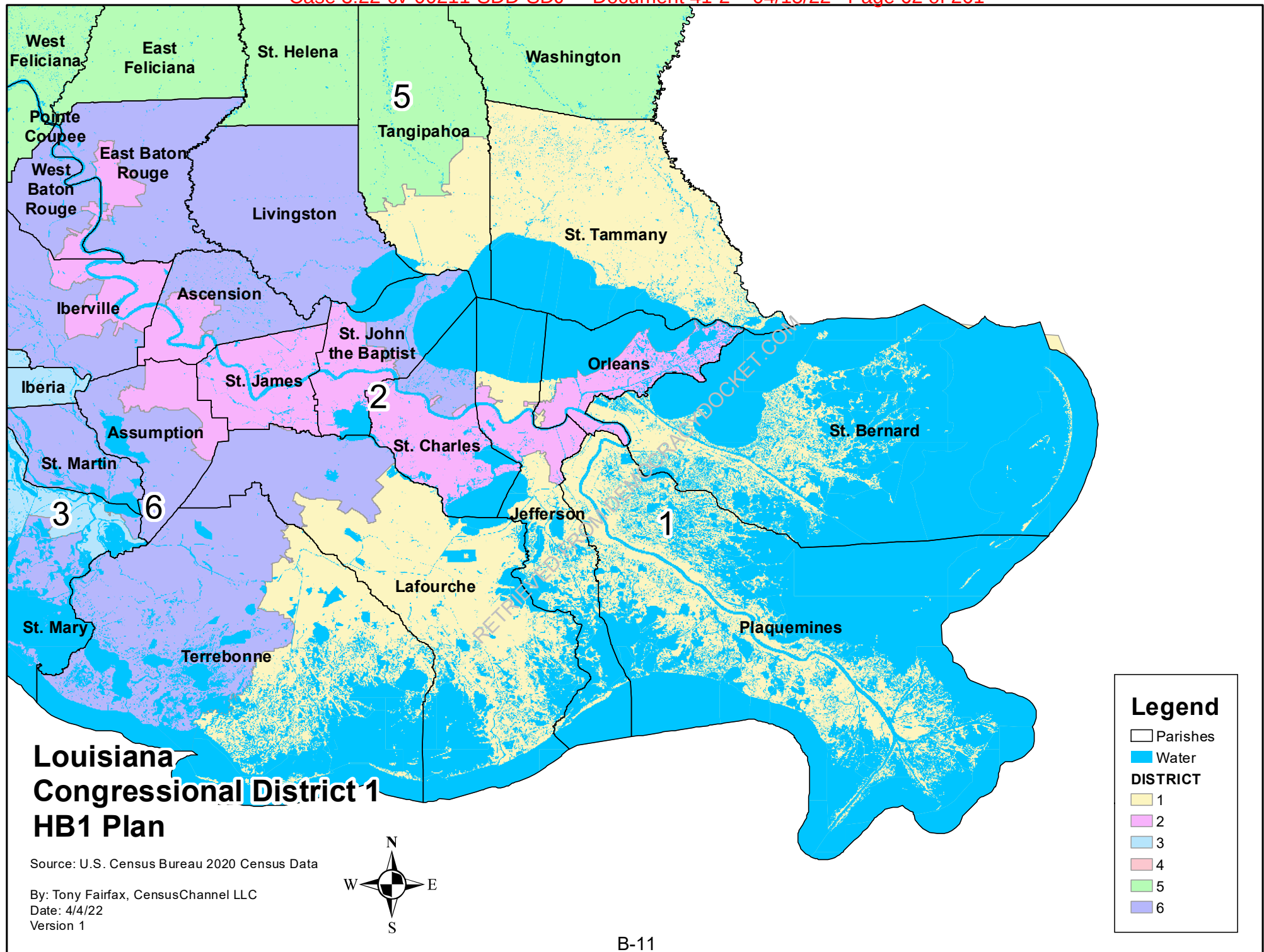
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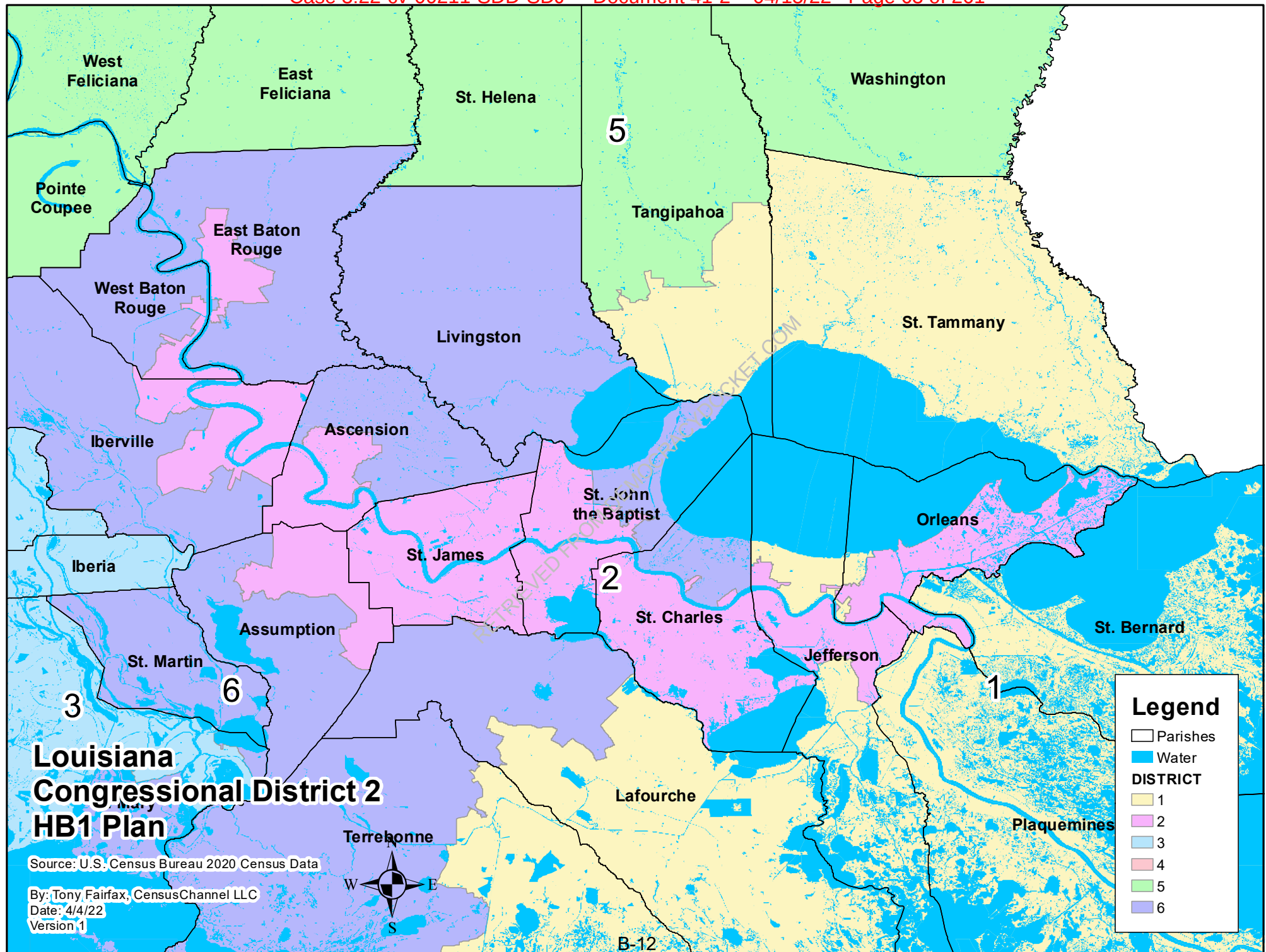
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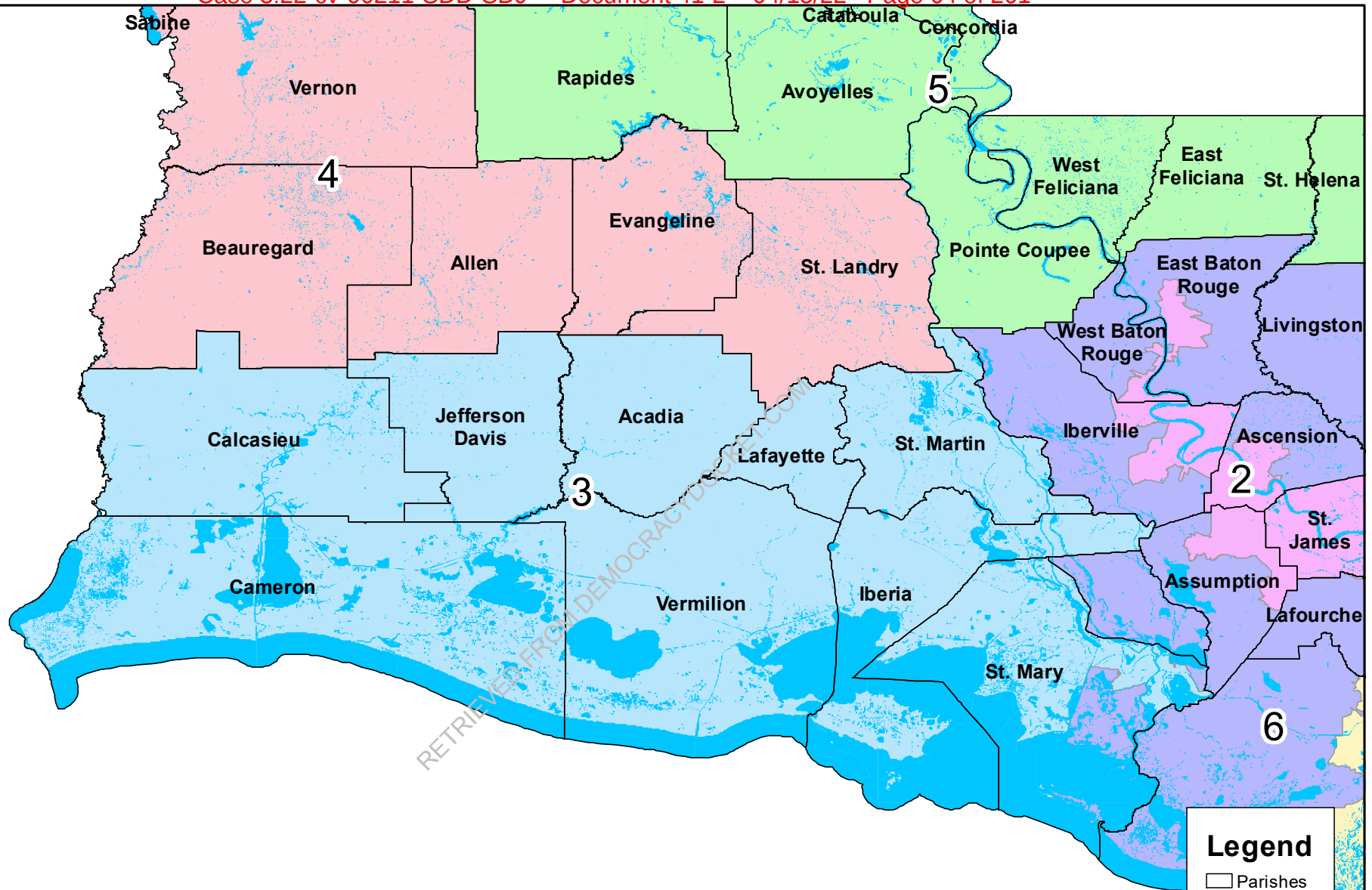








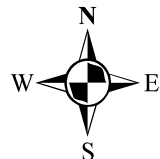


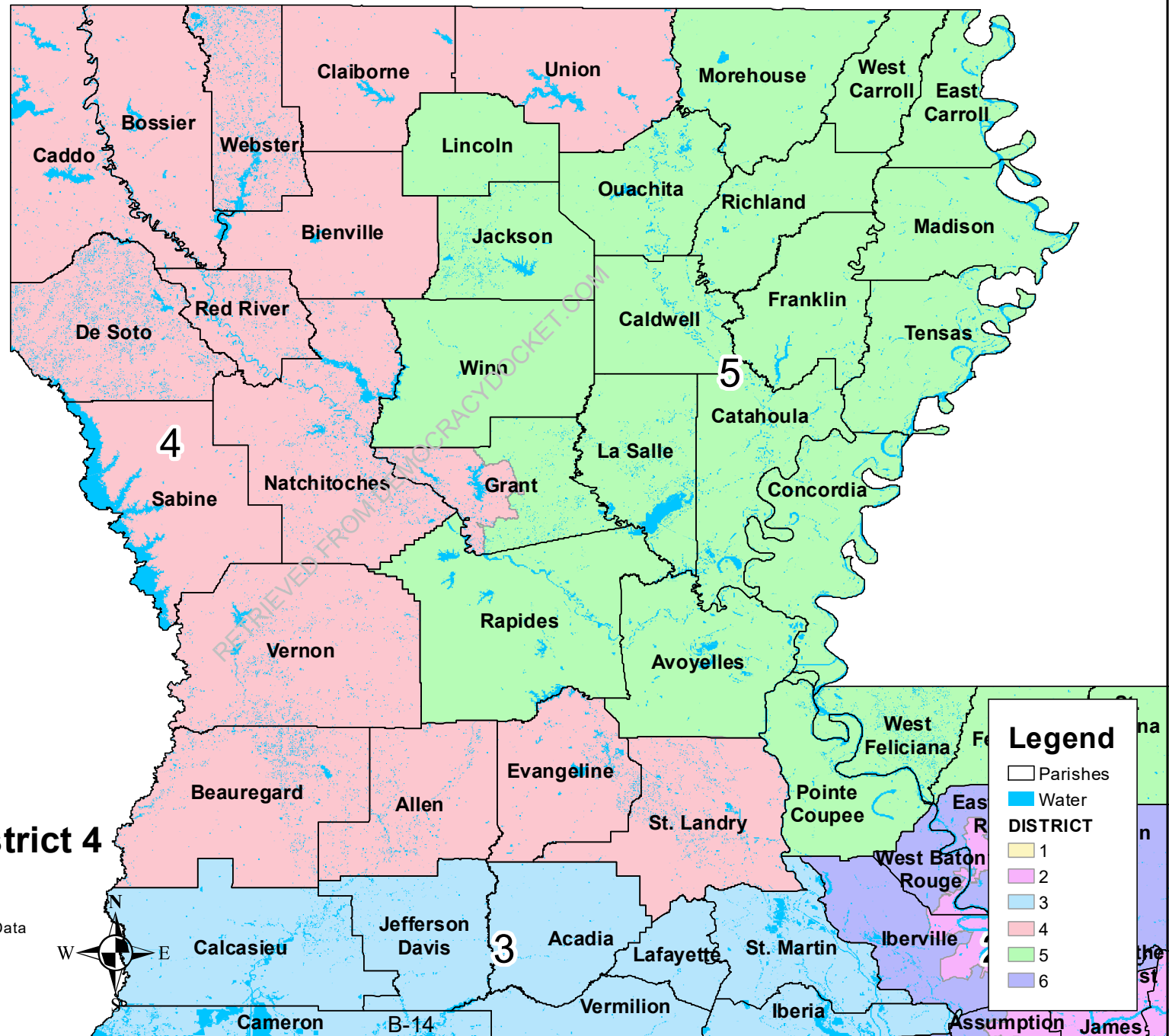


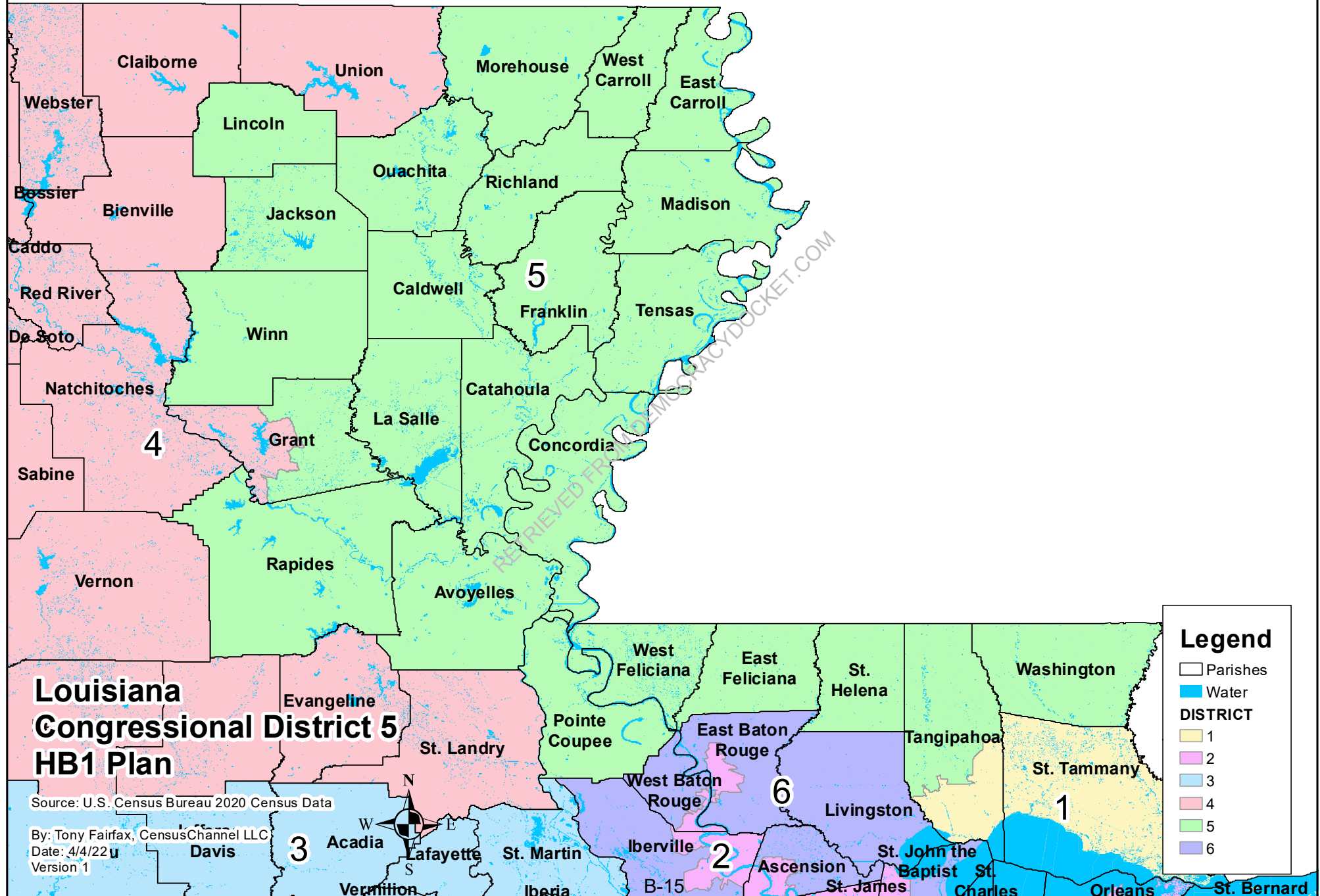
# Louisiana Congressional District 3 HB1 Plan

Source: U.S. Census Bureau 2020 Census Data

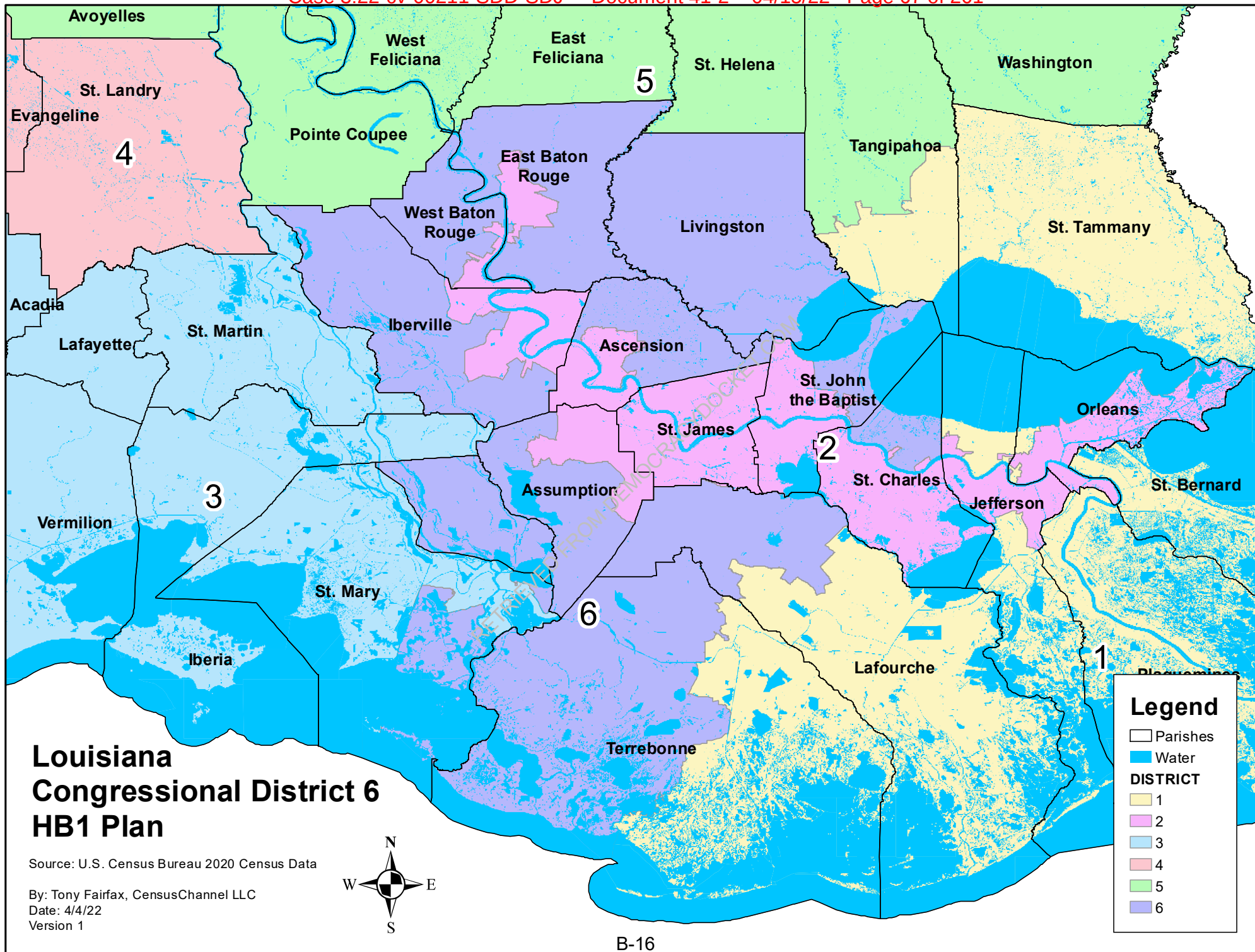
By: Tony Fairfax, CensusChannel LLC  
Date: 4/4/22  
Version 1

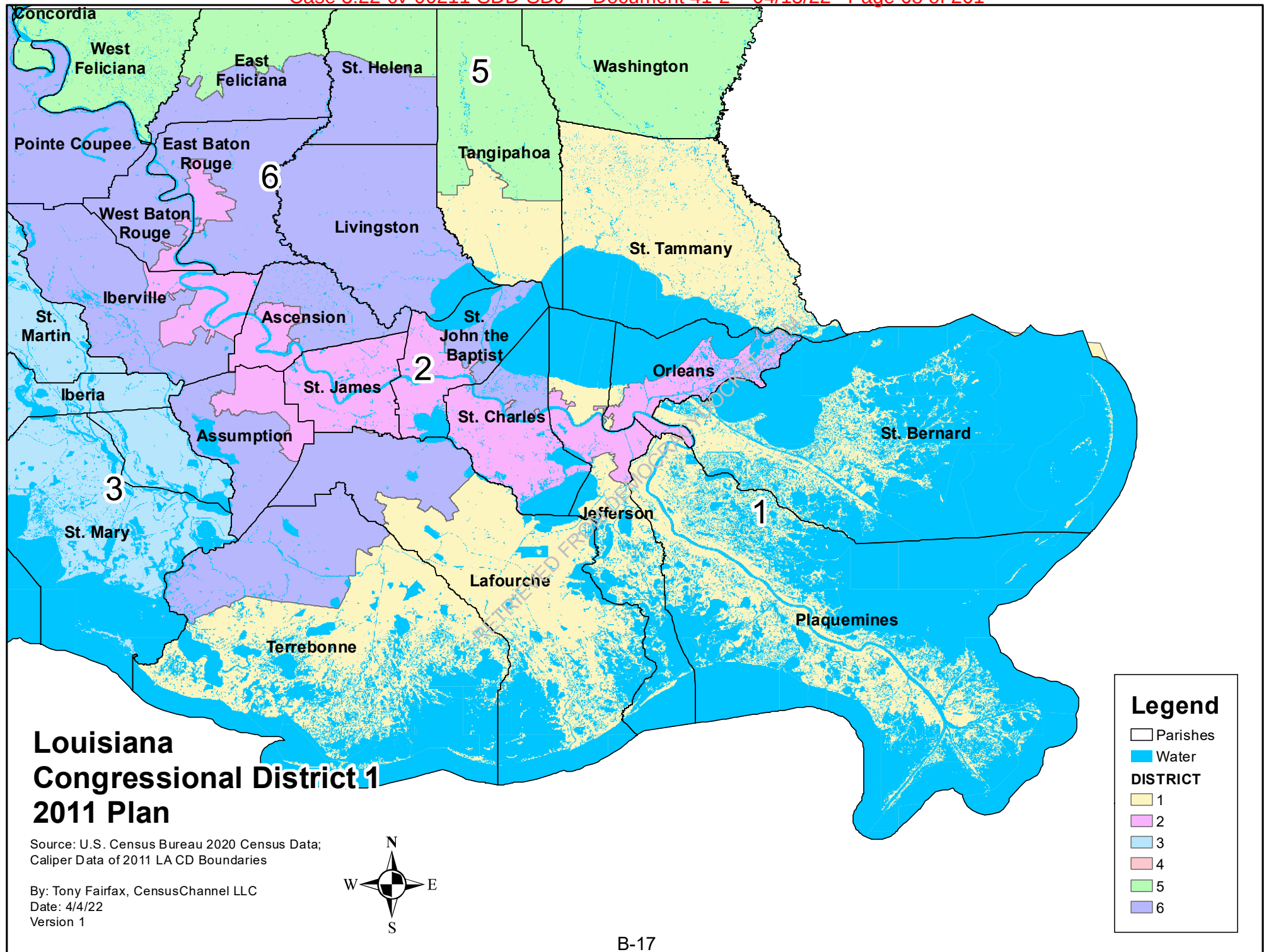




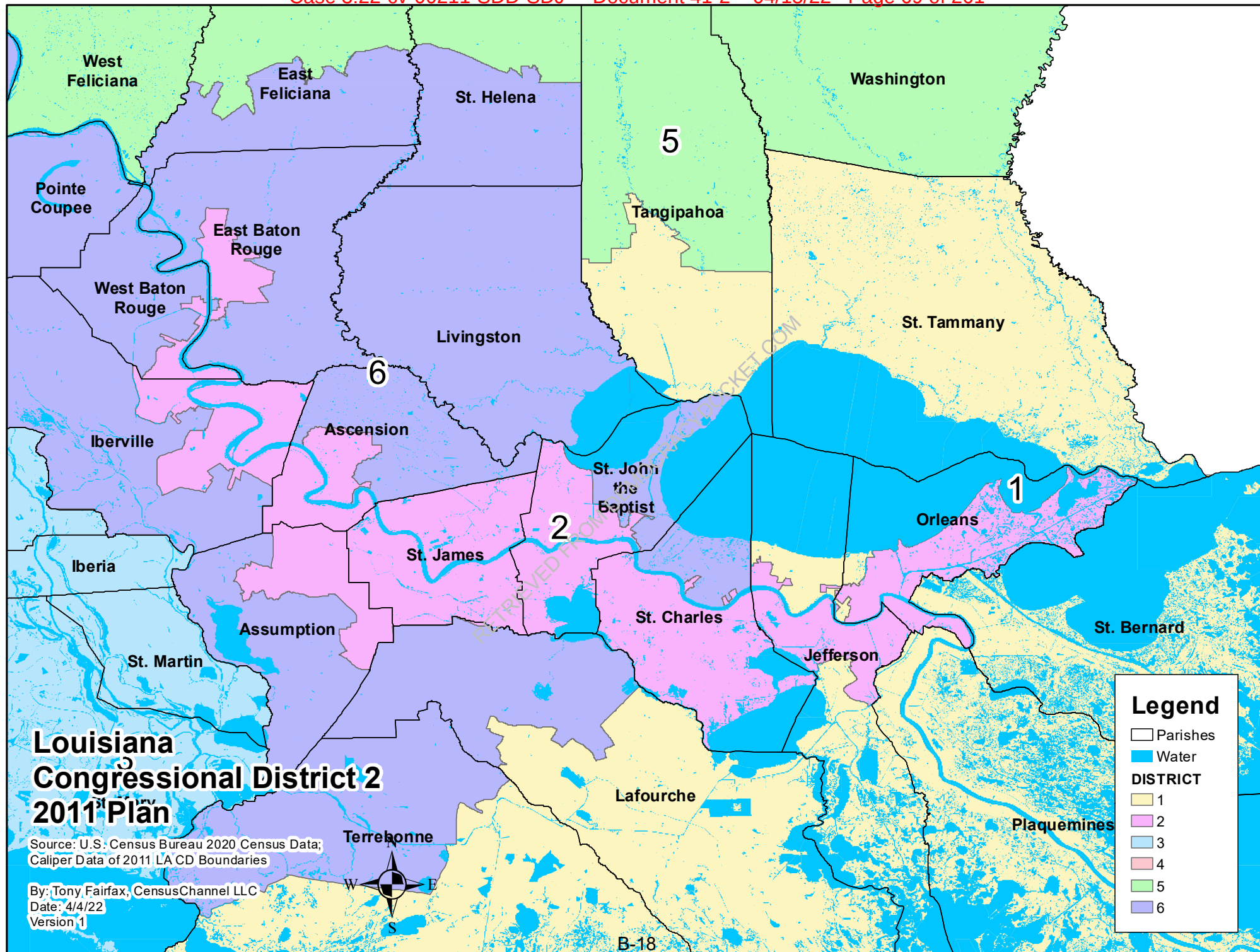


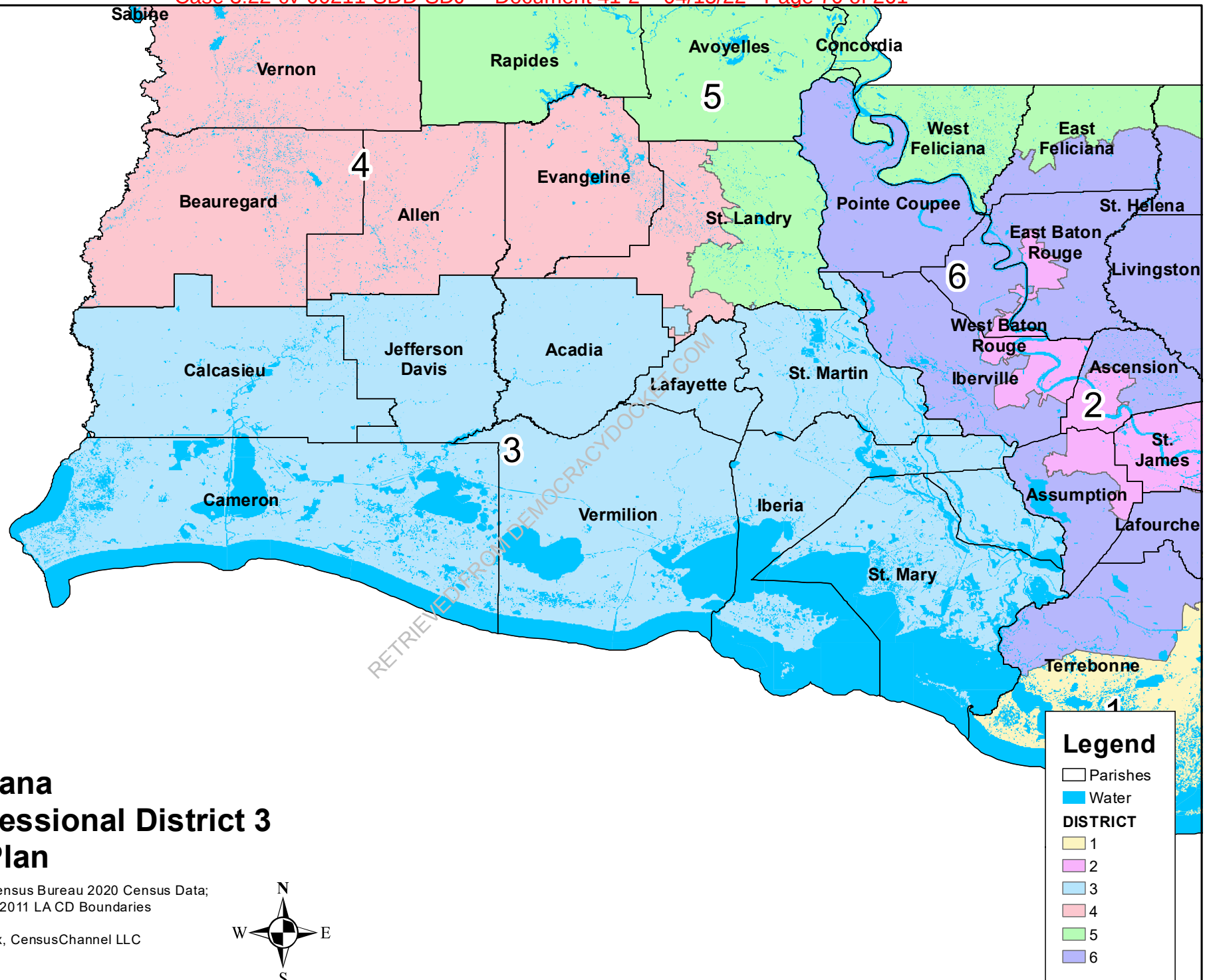


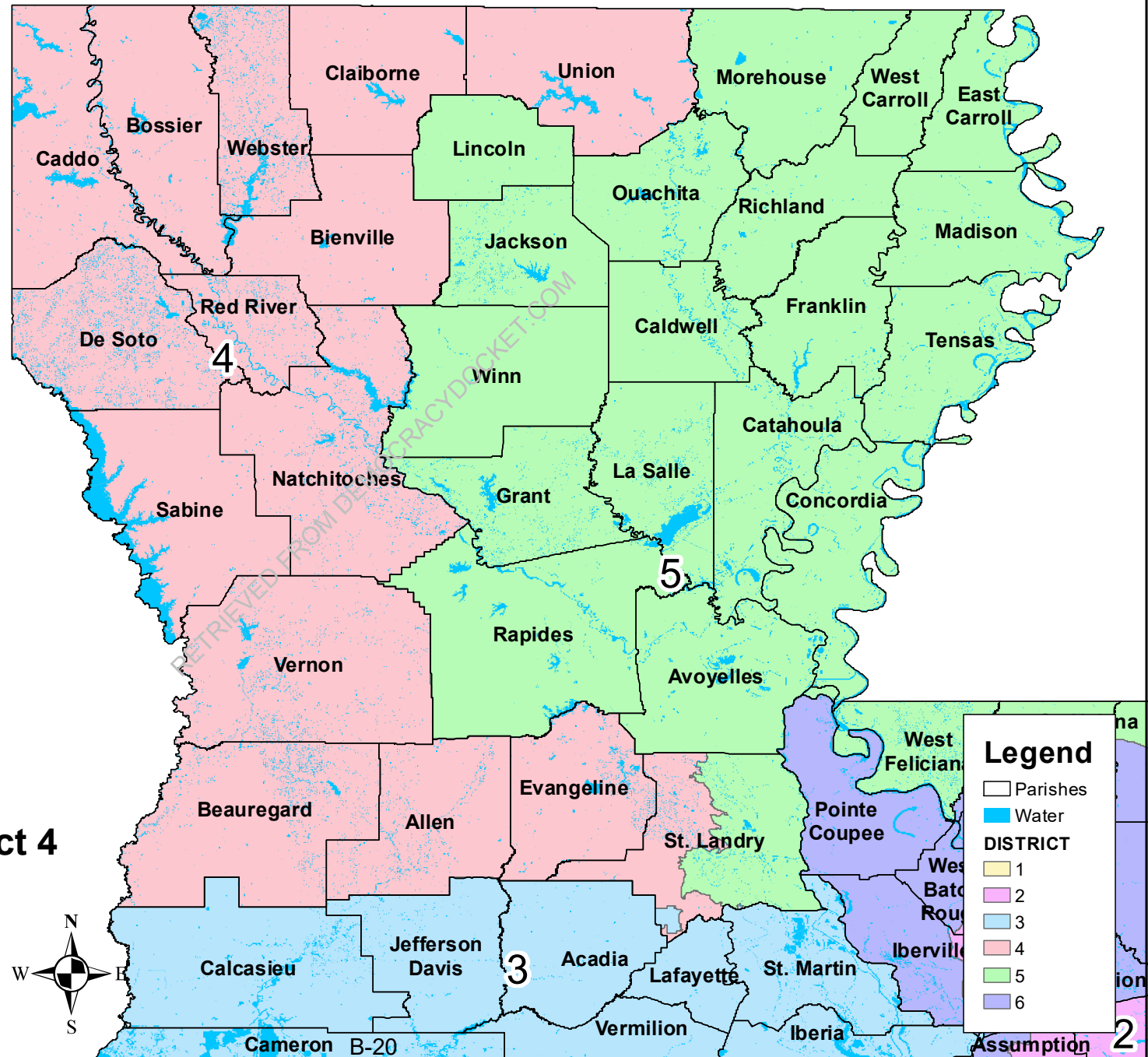




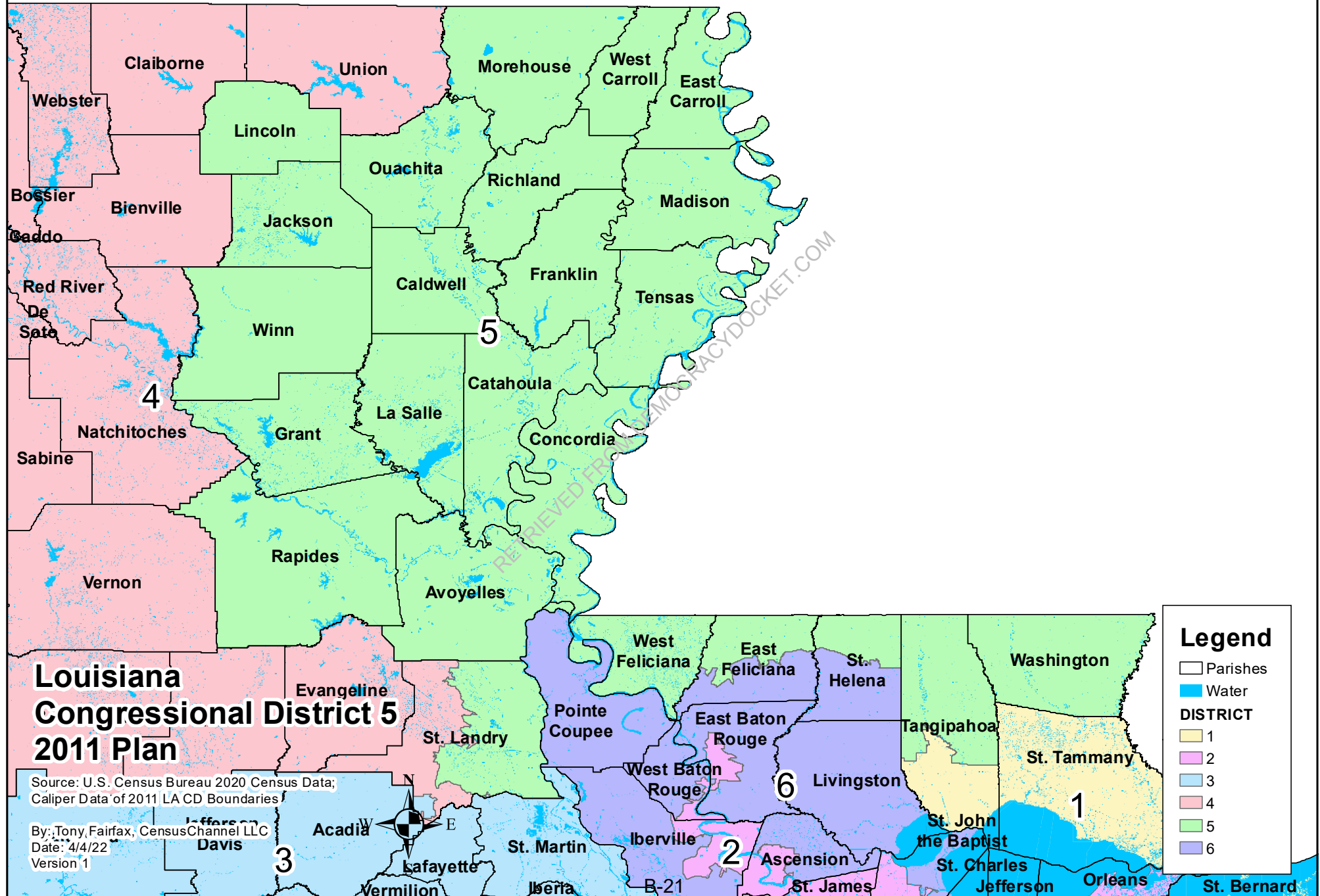


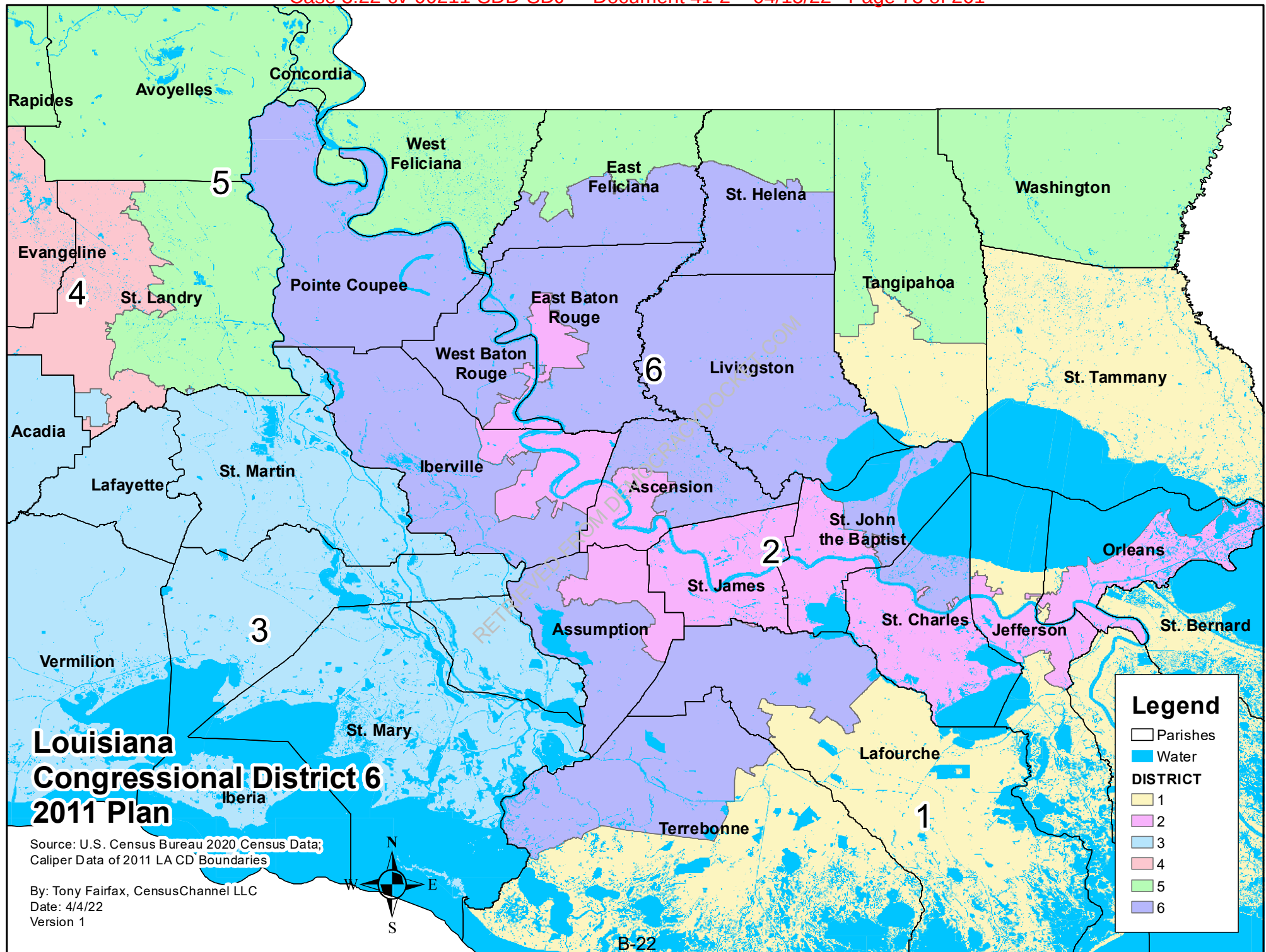












# Louisiana Congressional Districts Illustrative Plan & Plaintiffs

## Legend

● Plaintiffs

□ Parishes

### DISTRICT

1

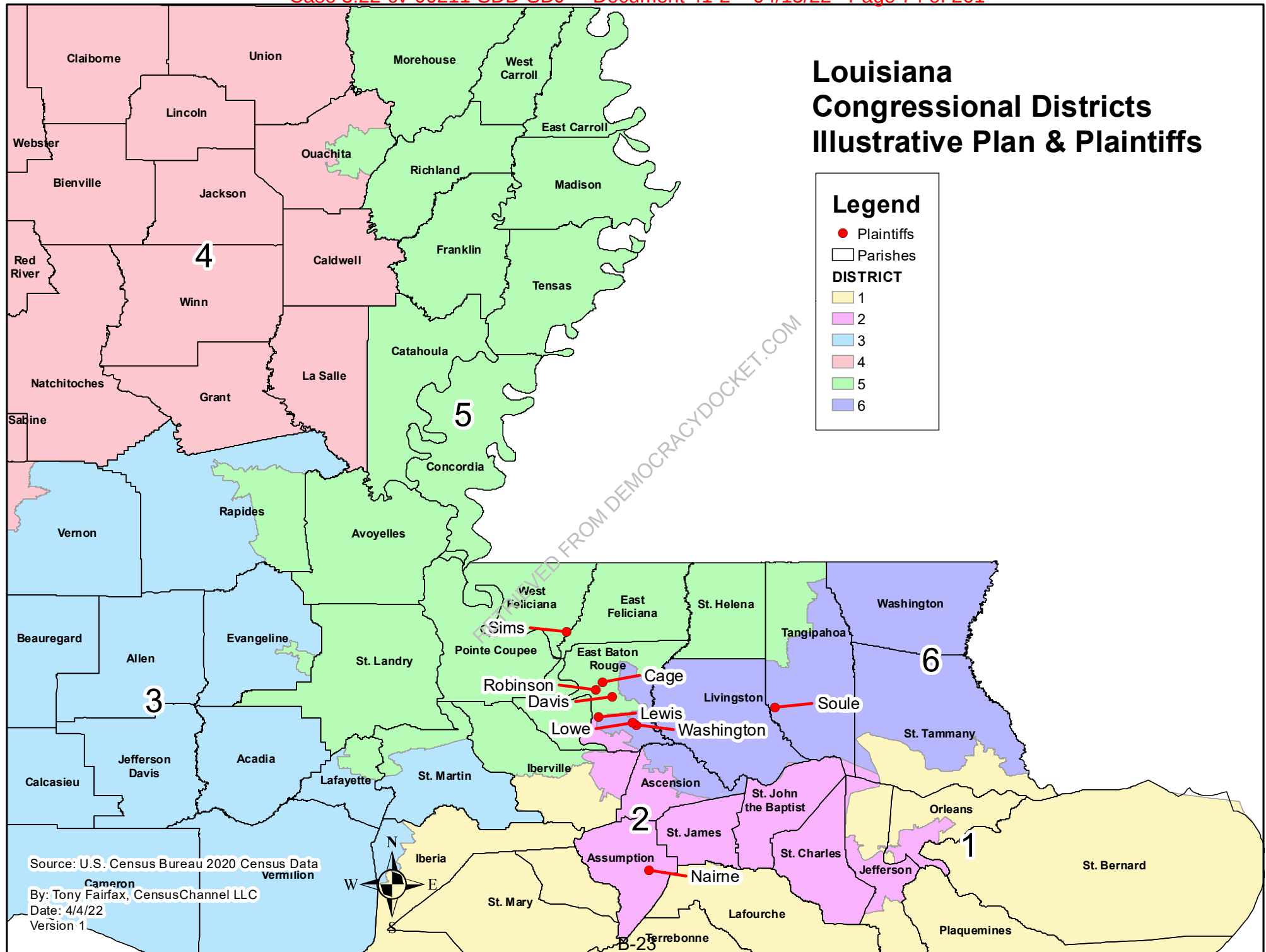
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6



## Appendix C

### Redistricting Criteria Comparison Reports

(Maptitude Data Reports – Illustrative, HB1, and 2011 Plans)

1. Louisiana Criteria - Joint Rule 21
2. Equal Population/Pop Deviation – TTL
3. Equal Population/Pop Deviation – VAP/CVAP
4. Contiguity
5. Compactness
6. Political Sub Division Splits - Parish
7. Political Sub Division Splits - VTDs
8. Community of Interest - Cities
9. Community of Interest - Landmark Splits
10. Fracking





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< 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.



User: Tony Fairfax

Plan Name: LA CD Illustrative Plan 1

Plan Type: LA Congressional Districts

## Population Summary

Monday, April 4, 2022

7:25 PM

District	Population	Deviation	% Devn.	[% Hispanic Origin]	[% NH_Wht]	[% AP_Blkl]	[18+_Pop]	CVAP_TOT20
1	776,286	-7	0.00%	11.81%	62.15%	20.11%	603,084	575,168
2	776,291	-2	0.00%	9.51%	33.19%	53.19%	603,764	581,178
3	776,280	-13	0.00%	5.39%	70.85%	19.42%	586,948	569,445
4	776,280	-13	0.00%	4.46%	57.63%	33.74%	596,366	592,835
5	776,331	38	0.00%	3.4%	40.04%	54.62%	589,193	586,061
6	776,289	-4	0.00%	6.99%	70.64%	17.69%	591,193	563,107

Total Population: 4,657,757

Ideal District Population: 776,293

### Summary Statistics:

Population Range: 776,280 to 776,331

Ratio Range: 0.00

Absolute Range: -13 to 38

Absolute Overall Range: 51

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.01%

Absolute Mean Deviation: 12.83

Relative Mean Deviation: 0.00%

Standard Deviation: 17.56

User: Tony Fairfax

Plan Name: LA CD Plan HB1

Plan Type: Congressional Districts

## Population Summary

Monday, April 4, 2022

8:12 PM

District	Population	Deviation	% Devn.	[% Hispanic Origin]	[% NH_Wht]	[% AP_Blkl]	[18+_Pop]	CVAP_TOT20
1	776,268	-25	0.00%	12.04%	67.02%	14.92%	601,559	559,973
2	776,317	24	0.00%	8.66%	27.05%	60.96%	600,203	589,607
3	776,275	-18	0.00%	5.29%	64.41%	26.51%	586,488	571,721
4	776,333	40	0.01%	4.54%	55.68%	35.78%	591,095	594,558
5	776,277	-16	0.00%	3.8%	57.92%	35.13%	597,389	590,308
6	776,287	-6	0.00%	7.22%	62.42%	25.47%	593,814	561,627

Total Population: 4,657,757

Ideal District Population: 776,293

### Summary Statistics:

Population Range: 776,268 to 776,333

Ratio Range: 0.00

Absolute Range: -25 to 40

Absolute Overall Range: 65

Relative Range: 0.00% to 0.01%

Relative Overall Range: 0.01%

Absolute Mean Deviation: 21.50

Relative Mean Deviation: 0.00%

Standard Deviation: 23.86

User:

Plan Name: LA CD 2011 Plan

Plan Type: Congress

## Population Summary

Thursday, April 7, 2022

5:24 PM

District	Population	Deviation	% Devn.	[% Hispanic Origin]	[% NH_Wht]	[% AP_Blkl]	[18+_Pop]	CVAP_TOT20
1	812,585	36,292	4.68%	11.6%	66.36%	16.17%	629,822	588,938
2	775,292	-1,001	-0.13%	8.72%	27.01%	60.94%	599,438	589,280
3	785,824	9,531	1.23%	5.41%	64.43%	26.35%	593,570	578,431
4	728,346	-47,947	-6.18%	4.71%	55.84%	35.3%	554,876	557,939
5	739,244	-37,049	-4.77%	3.63%	58.09%	35.15%	567,681	562,695
6	816,466	40,173	5.17%	6.99%	61.94%	26.36%	625,161	590,511

Total Population: 4,657,757

Ideal District Population: 776,293

### Summary Statistics:

Population Range: 728,346 to 816,466

Ratio Range: 0.12

Absolute Range: -47,947 to 40,173

Absolute Overall Range: 88,120

Relative Range: -6.18% to 5.17%

Relative Overall Range: 11.35%

Absolute Mean Deviation: 28,665.50

Relative Mean Deviation: 3.69%

Standard Deviation: 33,402.51

User: Tony Fairfax

Plan Name: LA CD Illustrative Plan 1

Plan Type: LA Congressional Districts

## Population Summary

Monday, April 4, 2022

7:26 PM

District	Population	Deviation	% Devn.	[% H18+ _Pop]	[% NH18+ _Wht]	[% 18+ _AP_Blkl	[% CVAP_HSP20]	[% CVAP_WHT20 _]	[% CVAP_BLK20]
1	776,286	-7	0.00%	10.71%	65.35%	18.29%	5.57%	72.66%	17.57%
2	776,291	-2	0.00%	8.51%	36.12%	50.96%	4.12%	38.61%	54.1%
3	776,280	-13	0.00%	4.88%	72.96%	17.91%	2.73%	77.04%	17.75%
4	776,280	-13	0.00%	4.02%	59.9%	31.9%	2.34%	62.64%	32.91%
5	776,331	38	0.00%	3.17%	42.79%	52.05%	1.34%	45.29%	52.21%
6	776,289	-4	0.00%	6.14%	73.13%	16.19%	2.82%	78.35%	16.43%

Total Population: 4,657,757

Ideal District Population: 776,293

### Summary Statistics:

Population Range: 776,280 to 776,331

Ratio Range: 0.00

Absolute Range: -13 to 38

Absolute Overall Range: 51

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.01%

Absolute Mean Deviation: 12.83

Relative Mean Deviation: 0.00%

Standard Deviation: 17.56

User: Tony Fairfax

Plan Name: LA CD Plan HB1

Plan Type: Congressional Districts

## Population Summary

Monday, April 4, 2022

8:13 PM

District	Population	Deviation	% Devn.	[% H18+ _Pop]	[% NH18+ _Wht]	[% 18+ _AP_Blkl	[% CVAP_HSP20]	[% CVAP_WHT20 _Wht]	[% CVAP_BLK20]
1	776,268	-25	0.00%	10.94%	69.86%	13.48%	5.75%	77.86%	12.58%
2	776,317	24	0.00%	7.84%	29.84%	58.65%	3.88%	31.9%	61.41%
3	776,275	-18	0.00%	4.69%	67.01%	24.63%	2.38%	70.97%	24.53%
4	776,333	40	0.01%	4.07%	58.12%	33.82%	2.67%	60.78%	34.25%
5	776,277	-16	0.00%	3.61%	60.29%	32.91%	1.7%	62.66%	34.17%
6	776,287	-6	0.00%	6.35%	65.01%	23.86%	2.58%	70.83%	23.51%

Total Population: 4,657,757

Ideal District Population: 776,293

### Summary Statistics:

Population Range: 776,268 to 776,333  
Ratio Range: 0.00  
Absolute Range: -25 to 40  
Absolute Overall Range: 65  
Relative Range: 0.00% to 0.01%  
Relative Overall Range: 0.01%  
Absolute Mean Deviation: 21.50  
Relative Mean Deviation: 0.00%  
Standard Deviation: 23.86

User:

Plan Name: LA CD 2011 Plan

Plan Type: Congress

## Population Summary

Thursday, April 7, 2022

6:11 PM

District	Population	Deviation	% Devn.	[% H18+ _Pop]	[% NH18+ _Wht]	[% 18+ _AP_Bl]	[% CVAP_HSP20]	[% CVAP_WHT20 _Wht]	[% CVAP_BLK20]
1	812,585	36,292	4.68%	10.55%	69.24%	14.63%	5.55%	77.01%	13.8%
2	775,292	-1,001	-0.13%	7.89%	29.8%	58.65%	3.91%	31.86%	61.41%
3	785,824	9,531	1.23%	4.78%	67.03%	24.47%	2.45%	71.04%	24.38%
4	728,346	-47,947	-6.18%	4.23%	58.26%	33.37%	2.76%	61.09%	33.76%
5	739,244	-37,049	-4.77%	3.47%	60.38%	32.97%	1.63%	62.44%	34.46%
6	816,466	40,173	5.17%	6.14%	64.54%	24.71%	2.49%	70.19%	24.34%

Total Population: 4,657,757

Ideal District Population: 776,293

### Summary Statistics:

Population Range: 728,346 to 816,466

Ratio Range: 0.12

Absolute Range: -47,947 to 40,173

Absolute Overall Range: 88,120

Relative Range: -6.18% to 5.17%

Relative Overall Range: 11.35%

Absolute Mean Deviation: 28,665.50

Relative Mean Deviation: 3.69%

Standard Deviation: 33,402.51

User: Tony Fairfax

Plan Name: LA CD Illustrative Plan 1

Plan Type: LA Congressional Districts

## Contiguity Report

Friday, April 1, 2022

10:30 PM

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

RETRIEVED FROM DEMOCRACYDOCKET.COM

User: Tony Fairfax

Plan Name: LA CD Plan HB1

Plan Type: Congressional Districts

## Contiguity Report

Friday, April 1, 2022

9:07 PM

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

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User:

Plan Name: LA CD 2011 Plan

Plan Type: Congress

## Contiguity Report

Thursday, April 7, 2022

6:37 PM

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

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User: Tony Fairfax

Plan Name: LA CD Illustrative Plan 1

Plan Type: LA Congressional Districts

## Measures of Compactness Report

Saturday, April 2, 2022

12:51 AM

	Reock	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A
Min	0.33	0.10	0.57
Max	0.56	0.28	0.84
Mean	0.42	0.18	0.69
Std. Dev.	0.09	0.06	0.11
District	Reock	Polsby-Popper	Area/Convex Hull
1	0.38	0.18	0.73
2	0.33	0.13	0.57
3	0.51	0.18	0.73
4	0.56	0.28	0.84
5	0.35	0.10	0.57
6	0.40	0.18	0.72

## Measures of Compactness Report

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LA CD Illustrative Plan 1

### Measures of Compactness Summary

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

RETRIEVED FROM DEMOCRACYDOCKET.COM

User: Tony Fairfax

Plan Name: LA CD Plan HB1

Plan Type: Congressional Districts

## Measures of Compactness Report

Friday, April 1, 2022

9:08 PM

	Reock	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A
Min	0.18	0.06	0.38
Max	0.50	0.29	0.79
Mean	0.37	0.14	0.62
Std. Dev.	0.11	0.08	0.14
District	Reock	Polsby-Popper	Area/Convex Hull
1	0.50	0.16	0.71
2	0.18	0.06	0.38
3	0.37	0.29	0.79
4	0.33	0.16	0.61
5	0.37	0.12	0.60
6	0.45	0.07	0.64

## Measures of Compactness Report

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LA CD Plan HB1

### Measures of Compactness Summary

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

RETRIEVED FROM DEMOCRACYDOCKET.COM

User:

Plan Name: LA CD 2011 Plan

Plan Type: Congress

## Measures of Compactness Report

Thursday, April 7, 2022

10:14 PM

	Reock	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A
Min	0.18	0.06	0.38
Max	0.46	0.32	0.80
Mean	0.36	0.15	0.61
Std. Dev.	0.09	0.10	0.14
District	Reock	Polsby-Popper	Area/Convex Hull
1	0.46	0.16	0.67
2	0.18	0.06	0.38
3	0.40	0.32	0.80
4	0.34	0.16	0.61
5	0.37	0.10	0.57
6	0.38	0.07	0.60

## Measures of Compactness Report

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LA CD 2011 Plan

### Measures of Compactness Summary

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

RETRIEVED FROM DEMOCRACYDOCKET.COM

User: Tony Fairfax

Plan Name: LA CD Illustrative Plan 1

Plan Type: LA Congressional Districts

## Political Subdivision Splits Between Districts

Saturday, April 2, 2022

12:50 AM

Number of subdivisions not split:

County 50

Number of subdivisions split into more than one district:

County 14

Number of splits involving no population:

County 0

### Split Counts

County

Cases where an area is split among 2 Districts: 11

Cases where an area is split among 3 Districts: 3

County	District	Population
<i>Split Counties:</i>		
Ascension LA	2	38,845
Ascension LA	6	87,655
East Baton Rouge LA	2	78,676
East Baton Rouge LA	5	177,263
East Baton Rouge LA	6	200,842
Evangeline LA	3	23,988
Evangeline LA	5	8,362
Iberia LA	1	57,438
Iberia LA	3	12,491
Iberville LA	1	5,187
Iberville LA	2	10,224
Iberville LA	5	14,830
Jefferson LA	1	237,070
Jefferson LA	2	203,711
Lafayette LA	3	172,780
Lafayette LA	5	68,973
Orleans LA	1	75,419
Orleans LA	2	308,578
Ouachita LA	4	90,953
Ouachita LA	5	69,415
Rapides LA	3	69,584
Rapides LA	5	60,439
St. Martin LA	1	1,368
St. Martin LA	3	35,420
St. Martin LA	5	14,979
St. Tammany LA	1	75,982



**Political Subdivision Splits Between Districts**

LA CD Illustrative Plan 1

<b>County</b>	<b>District</b>	<b>Population</b>
St. Tammany LA	6	188,588
Tangipahoa LA	5	21,698
Tangipahoa LA	6	111,459
Vernon LA	3	33,131
Vernon LA	4	15,619

RETRIEVED FROM DEMOCRACYDOCKET.COM

User: Tony Fairfax

Plan Name: LA CD Plan HB1

Plan Type: Congressional Districts

## Political Subdivision Splits Between Districts

Friday, April 1, 2022

10:42 PM

Number of subdivisions not split:

County 49

Number of subdivisions split into more than one district:

County 15

Number of splits involving no population:

County 0

### Split Counts

*County*

Cases where an area is split among 2 Districts: 15

*Voting District*

Cases where an area is split among 2 Districts: 1

County	District	Population
<i>Split Counties:</i>		
Ascension LA	2	20,892
Ascension LA	6	105,608
Assumption LA	2	6,710
Assumption LA	6	14,329
East Baton Rouge LA	2	94,325
East Baton Rouge LA	6	362,456
Grant LA	4	7,473
Grant LA	5	14,696
Iberville LA	2	21,073
Iberville LA	6	9,168
Jefferson LA	1	245,132
Jefferson LA	2	195,649
Lafourche LA	1	43,701
Lafourche LA	6	53,856
Orleans LA	1	48,050
Orleans LA	2	335,947
St. Charles LA	2	34,943
St. Charles LA	6	17,606
St. John the Baptist LA	2	32,678
St. John the Baptist LA	6	9,799
St. Martin LA	3	50,399
St. Martin LA	6	1,368
St. Mary LA	3	44,607
St. Mary LA	6	4,799
Tangipahoa LA	1	39,681

**Political Subdivision Splits Between Districts**

LA CD Plan HB1

<b>County</b>	<b>District</b>	<b>Population</b>
Tangipahoa LA	5	93,476
Terrebonne LA	1	67,855
Terrebonne LA	6	41,725
West Baton Rouge LA	2	13,908
West Baton Rouge LA	6	13,291
<i>Split VTDs:</i>		
West Baton Rouge LA	2	250
West Baton Rouge LA	6	1,869

RETRIEVED FROM DEMOCRACYDOCKET.COM

User:

Plan Name: LA CD 2011 Plan

Plan Type: Congress

## Political Subdivision Splits Between Districts

Thursday, April 7, 2022

6:39 PM

Number of subdivisions not split:

County 49

Number of subdivisions split into more than one district:

County 15

Number of splits involving no population:

County 0

### Split Counts

#### *County*

Cases where an area is split among 2 Districts: 14

Cases where an area is split among 3 Districts: 1

#### *Voting District*

Cases where an area is split among 2 Districts: 43

County	District	Population
<i>Split Counties:</i>		
Ascension LA	2	20,892
Ascension LA	6	105,608
Assumption LA	2	6,710
Assumption LA	6	14,329
East Baton Rouge LA	2	93,030
East Baton Rouge LA	6	363,751
East Feliciana LA	5	10,779
East Feliciana LA	6	8,760
Iberville LA	2	21,249
Iberville LA	6	8,992
Jefferson LA	1	238,491
Jefferson LA	2	202,290
Lafourche LA	1	43,252
Lafourche LA	6	54,305
Orleans LA	1	49,479
Orleans LA	2	334,518
St. Charles LA	2	33,751
St. Charles LA	6	18,798
St. Helena LA	5	2,584
St. Helena LA	6	8,336
St. John the Baptist LA	2	30,370
St. John the Baptist LA	6	12,107
St. Landry LA	3	3,382
St. Landry LA	4	42,026

**Political Subdivision Splits Between Districts**

LA CD 2011 Plan

<b>County</b>	<b>District</b>	<b>Population</b>
St. Landry LA	5	37,132
Tangipahoa LA	1	83,465
Tangipahoa LA	5	49,692
Terrebonne LA	1	66,049
Terrebonne LA	6	43,531
West Baton Rouge LA	2	12,290
West Baton Rouge LA	6	14,909
<i>Split VTDs:</i>		
East Baton Rouge LA	2	0
East Baton Rouge LA	6	2,002
East Baton Rouge LA	2	1,893
East Baton Rouge LA	6	1,970
East Baton Rouge LA	2	1,982
East Baton Rouge LA	6	0
East Baton Rouge LA	2	0
East Baton Rouge LA	6	2,121
East Feliciana LA	5	503
East Feliciana LA	6	201
East Feliciana LA	5	623
East Feliciana LA	6	1,353
East Feliciana LA	5	211
East Feliciana LA	6	1,979
Iberville LA	2	60
Iberville LA	6	411
Iberville LA	2	131
Iberville LA	6	837
Iberville LA	2	4
Iberville LA	6	1,006
Iberville LA	2	223
Iberville LA	6	19
Jefferson LA	1	0
Jefferson LA	2	1,337
Jefferson LA	1	0
Jefferson LA	2	719
Jefferson LA	1	1,901
Jefferson LA	2	0
Orleans LA	1	579
Orleans LA	2	0
St. Charles LA	2	285
St. Charles LA	6	2,879
St. Charles LA	2	18
St. Charles LA	6	1,541
St. Charles LA	2	1,592
St. Charles LA	6	19
St. Charles LA	2	0
St. Charles LA	6	1,254
St. Charles LA	2	0

**Political Subdivision Splits Between Districts**

LA CD 2011 Plan

<b>County</b>	<b>District</b>	<b>Population</b>
St. Charles LA	6	2,154
St. Charles LA	2	0
St. Charles LA	6	820
St. Charles LA	2	563
St. Charles LA	6	0
St. Charles LA	2	583
St. Charles LA	6	222
St. John the Baptist LA	2	746
St. John the Baptist LA	6	137
St. John the Baptist LA	2	1,395
St. John the Baptist LA	6	181
St. John the Baptist LA	2	1,037
St. John the Baptist LA	6	1,481
St. John the Baptist LA	2	0
St. John the Baptist LA	6	3,049
St. John the Baptist LA	2	1,328
St. John the Baptist LA	6	355
St. John the Baptist LA	2	786
St. John the Baptist LA	6	154
St. Landry LA	4	914
St. Landry LA	5	560
St. Landry LA	4	1,254
St. Landry LA	5	464
St. Landry LA	4	336
St. Landry LA	5	761
St. Landry LA	4	50
St. Landry LA	5	1,252
St. Landry LA	4	25
St. Landry LA	5	2,336
St. Landry LA	4	356
St. Landry LA	5	1,782
St. Landry LA	4	3,068
St. Landry LA	5	68
St. Landry LA	4	127
St. Landry LA	5	1,623
St. Landry LA	4	1,099
St. Landry LA	5	661
St. Landry LA	3	1,829
St. Landry LA	4	0
Terrebonne LA	1	2,276
Terrebonne LA	6	123
West Baton Rouge LA	2	1,436
West Baton Rouge LA	6	1,052
West Baton Rouge LA	2	0
West Baton Rouge LA	6	803
West Baton Rouge LA	2	0
West Baton Rouge LA	6	574

User: Tony Fairfax  
Plan Name: LA CD Illustrative Plan 1  
Plan Type: LA Congressional Districts

## Communities of Interest (Condensed)

Friday, April 8, 2022

3:57 PM

**Whole New VTDs : 3,530**

**New VTDs Splits: 0**

**Zero Population New VTDs Splits: 9**

District	New VTDs	Population	% Pop	District	New VTDs	Population	% Pop
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User: Tony Fairfax  
Plan Name: LA CD Plan HB1  
Plan Type: Congressional Districts

## Communities of Interest (Condensed)

Friday, April 8, 2022

2:58 PM

**Whole New VTDs : 3,530**

**New VTDs Splits: 0**

**Zero Population New VTDs Splits: 9**

District	New VTDs	Population	% Pop	District	New VTDs	Population	% Pop
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RETRIEVED FROM DEMOCRACYDOCKET.COM



User:

Plan Name: LA CD 2011 Plan

Plan Type: Congress

**Communities of Interest (Condensed)**

Friday, April 8, 2022

4:40 PM

**Whole New VTDs : 3,502****New VTDs Splits: 86****Zero Population New VTDs Splits: 24**

District	New VTDs	Population	% Pop	District	New VTDs	Population	% Pop
1	16	2,276	94.87%	4	2	50	3.84%
1	5-16	579	100.00%	5	13	761	69.37%
1	199	1,901	100.00%	5	4	211	9.63%
1	116	0	0.00%	5	29	1,623	92.74%
1	131	0	0.00%	5	20	2,336	98.94%
2	5-4	0	0.00%	5	22	1,782	83.35%
2	6-1	1,328	78.91%	5	1	560	37.99%
2	4-1	746	84.48%	5	24	68	2.17%
2	5-1	1,037	41.18%	5	34	661	37.56%
2	7-7	786	83.62%	5	2	623	31.53%
2	5	0	0.00%	5	11	464	27.01%
2	4	0	0.00%	5	11	503	71.45%
2	1B	1,436	57.72%	5	2	1,252	96.16%
2	3-2	285	9.01%	6	5-4	3,049	100.00%
2	3-3	18	1.15%	6	6-1	355	21.09%
2	5-3	0	0.00%	6	4-1	137	15.52%
2	5-1	1,592	98.82%	6	5-1	1,481	58.82%
2	4-14	1,395	88.52%	6	7-7	154	16.38%
2	6-1	0	0.00%	6	5	574	100.00%
2	6-8	583	72.42%	6	4	1,979	90.37%
2	6-6	563	100.00%	6	4	803	100.00%
2	1-5	1,893	49.00%	6	2	1,353	68.47%
2	5-16	0	0.00%	6	1B	1,052	42.28%
2	4	4	0.40%	6	11	201	28.55%
2	6	223	92.15%	6	16	123	5.13%
2	13	60	12.74%	6	3-2	2,879	90.99%
2	24	131	13.53%	6	3-3	1,541	98.85%
2	199	0	0.00%	6	5-3	1,254	100.00%
2	116	1,337	100.00%	6	5-1	19	1.18%
2	2-5	0	0.00%	6	4-14	181	11.48%
2	2-13	1,982	100.00%	6	6-1	2,154	100.00%
2	1-1	0	0.00%	6	6-8	222	27.58%
2	131	719	100.00%	6	6-6	0	0.00%
2	6-4	0	0.00%	6	1-5	1,970	51.00%
3	41	1,829	100.00%	6	4	1,006	99.60%
4	13	336	30.63%	6	6	19	7.85%
4	29	127	7.26%	6	13	411	87.26%
4	20	25	1.06%	6	24	837	86.47%
4	22	356	16.65%	6	2-5	2,121	100.00%
4	1	914	62.01%	6	2-13	0	0.00%
4	24	3,068	97.83%	6	1-1	2,002	100.00%
4	34	1,099	62.44%	6	6-4	820	100.00%
4	41	0	0.00%				
4	11	1,254	72.99%				

User: Tony Fairfax

Plan Name: LA CD Illustrative Plan 1

Plan Type: LA Congressional Districts

**Communities of Interest (Landscape, 11x8.5)**

Saturday, April 2, 2022

12:55 AM

City/Town	District	Population	%
Abbeville LA	3	11,186	100.0
Abita Springs LA	6	2,631	100.0
Addis LA	5	6,731	100.0
Albany LA	6	1,235	100.0
Alexandria LA	3	13,740	30.4
Alexandria LA	5	31,535	69.7
Ama LA	2	1,290	100.0
Amelia LA	1	2,132	100.0
Amite City LA	5	4,005	100.0
Anacoco LA	4	851	100.0
Angie LA	6	258	100.0
Arabi LA	1	4,533	100.0
Arcadia LA	4	2,746	100.0
Arnaudville LA	5	1,009	100.0
Ashland LA	4	194	100.0
Athens LA	4	237	100.0
Atlanta LA	4	149	100.0
Avondale LA	2	4,582	100.0
Baker LA	5	12,455	100.0
Baldwin LA	1	1,762	100.0
Ball LA	3	3,961	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

City/Town	District	Population	%
Banks Springs LA	4	1,136	100.0
Barataria LA	1	1,057	100.0
Basile LA	3	1,214	100.0
Baskin LA	5	210	100.0
Bastrop LA	5	9,691	100.0
Baton Rouge LA	2	34,805	15.3
Baton Rouge LA	5	101,118	44.5
Baton Rouge LA	6	91,547	40.3
Bawcomville LA	4	3,472	100.0
Bayou Blue LA	1	13,352	100.0
Bayou Cane LA	1	19,770	100.0
Bayou Corne LA	2	32	100.0
Bayou Country Club LA	1	1,304	100.0
Bayou Gauche LA	2	2,161	100.0
Bayou Goula LA	2	514	100.0
Bayou L'Ourse LA	2	1,806	100.0
Bayou Vista LA	1	4,213	100.0
Belcher LA	4	248	100.0
Belle Chasse LA	1	10,579	100.0
Belle Rose LA	2	1,698	100.0
Belmont LA	4	305	100.0
Benton LA	4	2,048	100.0
Bernice LA	4	1,356	100.0
Berwick LA	1	4,771	100.0
Bienville LA	4	191	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

City/Town	District	Population	%
Blanchard LA	4	3,538	100.0
Bogalusa LA	6	10,659	100.0
Bonita LA	5	170	100.0
Boothville LA	1	718	100.0
Bordelonville LA	5	458	100.0
Bossier City LA	4	62,701	100.0
Bourg LA	1	2,375	100.0
Boutte LA	2	3,054	100.0
Boyce LA	3	888	100.0
Branch LA	3	431	100.0
Breaux Bridge LA	3	5,165	68.8
Breaux Bridge LA	5	2,348	31.3
Bridge City LA	2	7,219	100.0
Broussard LA	3	13,417	100.0
Brownfields LA	5	5,145	100.0
Brownsville LA	4	4,014	92.2
Brownsville LA	5	339	7.8
Brusly LA	5	2,578	100.0
Bryceland LA	4	87	100.0
Bunkie LA	5	3,346	100.0
Buras LA	1	1,109	100.0
Cade LA	3	1,874	100.0
Calhoun LA	4	670	100.0
Calvin LA	4	242	100.0
Cameron LA	3	315	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

City/Town	District	Population	%
Campti LA	4	887	100.0
Cankton LA	5	583	100.0
Carencro LA	5	9,272	100.0
Carlyss LA	3	5,101	100.0
Castor LA	4	230	100.0
Catahoula LA	3	988	100.0
Cecilia LA	3	30	1.7
Cecilia LA	5	1,777	98.3
Center Point LA	5	520	100.0
Centerville LA	1	499	100.0
Central LA	5	2,135	7.2
Central LA	6	27,430	92.8
Chackbay LA	1	5,370	100.0
Chalmette LA	1	21,562	100.0
Charenton LA	1	1,699	100.0
Chataignier LA	3	259	100.0
Chatham LA	4	491	100.0
Chauvin LA	1	2,575	100.0
Cheneyville LA	5	468	100.0
Choctaw LA	1	775	100.0
Choudrant LA	4	989	100.0
Church Point LA	3	4,179	100.0
Claiborne LA	4	12,631	100.0
Clarence LA	4	326	100.0
Clarks LA	4	1,052	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

City/Town	District	Population	%
Clayton LA	5	584	100.0
Clinton LA	5	1,340	100.0
Colfax LA	4	1,428	100.0
Collinston LA	5	274	100.0
Columbia LA	4	277	100.0
Convent LA	2	483	100.0
Converse LA	4	379	100.0
Cotton Valley LA	4	787	100.0
Cottonport LA	5	2,023	100.0
Coushatta LA	4	1,752	100.0
Covington LA	6	11,564	100.0
Creola LA	4	242	100.0
Crescent LA	1	638	78.7
Crescent LA	5	173	21.3
Crowley LA	3	11,710	100.0
Cullen LA	4	716	100.0
Cut Off LA	1	5,533	100.0
Darrow LA	2	200	100.0
Delacroix LA	1	48	100.0
Delcambre LA	3	1,793	100.0
Delhi LA	5	2,622	100.0
Delta LA	5	232	100.0
Denham Springs LA	6	9,286	100.0
DeQuincy LA	3	3,144	100.0
DeRidder LA	3	9,852	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

City/Town	District	Population	%
Des Allemands LA	1	449	20.6
Des Allemands LA	2	1,730	79.4
Destrehan LA	2	11,340	100.0
Deville LA	3	1,761	100.0
Dixie Inn LA	4	293	100.0
Dodson LA	4	294	100.0
Donaldsonville LA	2	6,695	100.0
Dorseyville LA	1	159	100.0
Downsville LA	4	120	100.0
Doyline LA	4	674	100.0
Dry Prong LA	4	455	100.0
Dubach LA	4	908	100.0
Dubberly LA	4	250	100.0
Dulac LA	1	1,241	100.0
Duson LA	3	1,326	100.0
East Hodge LA	4	204	100.0
Eastwood LA	4	4,390	100.0
Echo LA	5	352	100.0
Eden Isle LA	1	7,782	100.0
Edgard LA	2	1,948	100.0
Edgefield LA	4	204	100.0
Egan LA	3	618	100.0
Elizabeth LA	3	417	100.0
Elmwood LA	1	5,649	100.0
Elton LA	3	992	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

City/Town	District	Population	%
Empire LA	1	905	100.0
Epps LA	5	358	100.0
Erath LA	3	2,028	100.0
Eros LA	4	130	100.0
Erwinville LA	5	2,275	100.0
Estelle LA	2	17,952	100.0
Estherwood LA	3	694	100.0
Eunice LA	3	302	3.2
Eunice LA	5	9,120	96.8
Evergreen LA	5	215	100.0
Farmerville LA	4	3,366	100.0
Fenton LA	3	226	100.0
Ferriday LA	5	3,189	100.0
Fifth Ward LA	5	921	100.0
Fisher LA	4	197	100.0
Florien LA	4	553	100.0
Folsom LA	6	769	100.0
Fordoche LA	5	910	100.0
Forest Hill LA	3	605	100.0
Forest LA	5	304	100.0
Fort Jesup LA	4	494	100.0
Fort Polk North LA	3	2,179	100.0
Fort Polk South LA	3	7,950	100.0
Franklin LA	1	6,728	100.0
Franklinton LA	6	3,662	100.0



**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

City/Town	District	Population	%
French Settlement LA	6	1,073	100.0
Frierson LA	4	132	100.0
Galliano LA	1	7,100	100.0
Gardere LA	2	13,203	100.0
Garyville LA	2	2,123	100.0
Georgetown LA	4	277	100.0
Gibbsland LA	4	773	100.0
Gilbert LA	5	449	100.0
Gilliam LA	4	123	100.0
Gillis LA	3	800	100.0
Glencoe LA	1	132	100.0
Glenmora LA	3	1,087	100.0
Gloster LA	4	53	100.0
Golden Meadow LA	1	1,761	100.0
Goldonna LA	4	428	100.0
Gonzales LA	2	12,209	99.8
Gonzales LA	6	22	0.2
Good Pine LA	4	259	100.0
Grambling LA	4	5,239	100.0
Gramercy LA	2	2,932	100.0
Grand Cane LA	4	217	100.0
Grand Coteau LA	5	776	100.0
Grand Isle LA	1	1,005	100.0
Grand Point LA	2	2,241	100.0
Gray LA	1	5,518	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

City/Town	District	Population	%
Grayson LA	4	449	100.0
Greensburg LA	5	629	100.0
Greenwood LA	4	3,166	100.0
Gretna LA	2	17,814	100.0
Grosse Tete LA	5	548	100.0
Gueydan LA	3	1,165	100.0
Hackberry LA	3	926	100.0
Hahnville LA	2	2,959	100.0
Hall Summit LA	4	268	100.0
Hammond LA	6	19,584	100.0
Harahan LA	1	9,116	100.0
Harrisonburg LA	5	277	100.0
Harvey LA	2	22,236	100.0
Haughton LA	4	4,539	100.0
Hayes LA	3	676	100.0
Haynesville LA	4	2,039	100.0
Heflin LA	4	213	100.0
Henderson LA	3	1,617	100.0
Hessmer LA	5	772	100.0
Hester LA	2	483	100.0
Hodge LA	4	382	100.0
Homer LA	4	2,747	100.0
Hornbeck LA	4	430	100.0
Hosston LA	4	244	100.0
Houma LA	1	33,406	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

City/Town	District	Population	%
Ida LA	4	217	100.0
Independence LA	5	1,619	99.0
Independence LA	6	16	1.0
Inniswold LA	6	5,987	100.0
Iota LA	3	1,304	100.0
Iowa LA	3	3,436	100.0
Jackson LA	5	3,990	100.0
Jamestown LA	4	100	100.0
Jean Lafitte LA	1	1,809	100.0
Jeanerette LA	1	4,813	100.0
Jefferson LA	1	9,432	88.7
Jefferson LA	2	1,201	11.3
Jena LA	4	4,155	100.0
Jennings LA	3	9,837	100.0
Jonesboro LA	4	4,106	100.0
Jonesville LA	5	1,728	100.0
Jordan Hill LA	4	196	100.0
Joyce LA	4	328	100.0
Junction City LA	4	437	100.0
Kaplan LA	3	4,352	100.0
Keachi LA	4	243	100.0
Kenner LA	1	54,578	82.1
Kenner LA	2	11,870	17.9
Kentwood LA	5	2,145	100.0
Kilbourne LA	5	351	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

City/Town	District	Population	%
Killian LA	6	1,177	100.0
Killona LA	2	724	100.0
Kinder LA	3	2,170	100.0
Kraemer LA	1	877	100.0
Krotz Springs LA	5	904	100.0
Labadieville LA	2	1,715	100.0
Lacassine LA	3	490	100.0
Lacombe LA	6	8,657	100.0
Lafayette LA	3	84,924	70.0
Lafayette LA	5	36,450	30.0
Lafitte LA	1	1,014	100.0
Lafourche Crossing LA	1	2,427	100.0
Lake Arthur LA	3	2,595	100.0
Lake Charles LA	3	84,872	100.0
Lake Providence LA	5	3,587	100.0
Lakeshore LA	5	1,988	100.0
Lakeview LA	4	818	100.0
Laplace LA	2	28,841	100.0
Larose LA	1	6,763	100.0
Lawtell LA	5	1,066	100.0
Lecompte LA	5	845	100.0
Leesville LA	3	1,979	35.0
Leesville LA	4	3,670	65.0
Lemannville LA	2	695	100.0
Leonville LA	5	868	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

City/Town	District	Population	%
Lewisburg LA	6	420	100.0
Lillie LA	4	111	100.0
Lisbon LA	4	173	100.0
Livingston LA	6	1,877	100.0
Livonia LA	5	1,212	100.0
Lockport Heights LA	1	1,171	100.0
Lockport LA	1	2,490	100.0
Logansport LA	4	1,340	100.0
Longstreet LA	4	115	100.0
Longville LA	3	545	100.0
Loreauville LA	1	658	100.0
Lucky LA	4	251	100.0
Luling LA	2	13,716	100.0
Lutcher LA	2	3,133	100.0
Lydia LA	1	892	100.0
Madisonville LA	6	850	100.0
Mamou LA	3	2,936	100.0
Mandeville LA	6	13,192	100.0
Mangham LA	5	624	100.0
Mansfield LA	4	4,714	100.0
Mansura LA	5	1,320	100.0
Many LA	4	2,571	100.0
Maringouin LA	5	891	100.0
Marion LA	4	623	100.0
Marksville LA	5	5,065	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

City/Town	District	Population	%
Marrero LA	2	32,382	100.0
Marthaville LA	4	90	100.0
Martin LA	4	524	100.0
Mathews LA	1	2,273	100.0
Maurice LA	3	2,118	100.0
McNary LA	3	201	100.0
Melville LA	5	759	100.0
Mer Rouge LA	5	491	100.0
Meraux LA	1	6,804	100.0
Mermentau LA	3	516	100.0
Merrydale LA	5	9,227	100.0
Merryville LA	3	967	100.0
Metairie LA	1	141,124	98.3
Metairie LA	2	2,383	1.7
Midland LA	3	249	100.0
Midway LA	4	1,157	100.0
Milton LA	3	2,590	100.0
Minden LA	4	11,928	100.0
Minorca LA	5	2,156	100.0
Monroe LA	4	10,565	22.2
Monroe LA	5	37,137	77.9
Montegut LA	1	1,465	100.0
Monterey LA	5	474	100.0
Montgomery LA	4	622	100.0
Monticello LA	5	5,431	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

City/Town	District	Population	%
Montpelier LA	5	196	100.0
Montz LA	2	2,106	100.0
Moonshine LA	2	168	100.0
Mooringsport LA	4	748	100.0
Moreauville LA	5	984	100.0
Morgan City LA	1	11,472	100.0
Morganza LA	5	525	100.0
Morrow LA	5	149	100.0
Morse LA	3	599	100.0
Moss Bluff LA	3	12,522	100.0
Mound LA	5	12	100.0
Mount Lebanon LA	4	66	100.0
Napoleonville LA	2	540	100.0
Natalbany LA	6	2,510	100.0
Natchez LA	4	489	100.0
Natchitoches LA	4	18,039	100.0
New Iberia LA	1	28,033	98.2
New Iberia LA	3	522	1.8
New Llano LA	3	634	28.7
New Llano LA	4	1,579	71.4
New Orleans LA	1	75,419	19.6
New Orleans LA	2	308,578	80.4
New Orleans Station LA	1	2,508	100.0
New Roads LA	5	4,549	100.0
New Sarpy LA	2	1,169	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

City/Town	District	Population	%
Newellton LA	5	886	100.0
Noble LA	4	200	100.0
Norco LA	2	2,984	100.0
North Hodge LA	4	296	100.0
North Vacherie LA	2	2,093	100.0
Norwood LA	5	279	100.0
Oak Grove LA	5	1,441	100.0
Oak Hills Place LA	2	9,239	100.0
Oak Ridge LA	5	124	100.0
Oakdale LA	3	6,692	100.0
Oberlin LA	3	1,402	100.0
Oil City LA	4	901	100.0
Old Jefferson LA	6	7,339	100.0
Olla LA	4	1,295	100.0
Opelousas LA	5	15,786	100.0
Oretta LA	3	371	100.0
Ossun LA	3	573	26.7
Ossun LA	5	1,572	73.3
Paincourtville LA	2	857	100.0
Palmetto LA	5	92	100.0
Paradis LA	2	1,242	100.0
Parks LA	3	640	100.0
Patterson LA	1	5,931	100.0
Paulina LA	2	1,778	100.0
Pearl River LA	6	2,565	100.0



**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

City/Town	District	Population	%
Perry LA	3	1,171	100.0
Pierre Part LA	2	3,024	100.0
Pine Prairie LA	3	1,490	100.0
Pineville LA	3	4,753	33.0
Pineville LA	5	9,631	67.0
Pioneer LA	5	149	100.0
Pitkin LA	3	455	100.0
Plain Dealing LA	4	893	100.0
Plaquemine LA	1	110	1.8
Plaquemine LA	5	6,159	98.3
Plaucheville LA	5	221	100.0
Pleasant Hill LA	4	617	100.0
Pleasure Bend LA	2	212	100.0
Point Place LA	4	382	100.0
Pointe a la Hache LA	1	183	100.0
Pollock LA	4	394	100.0
Ponchatoula LA	6	7,822	100.0
Port Allen LA	5	4,939	100.0
Port Barre LA	5	1,751	100.0
Port Sulphur LA	1	1,677	100.0
Port Vincent LA	6	646	100.0
Powhatan LA	4	101	100.0
Poydras LA	1	2,536	100.0
Prairieville LA	2	359	1.1
Prairieville LA	6	32,838	98.9

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

City/Town	District	Population	%
Presquille LA	1	1,703	100.0
Prien LA	3	7,745	100.0
Prospect LA	4	380	100.0
Provencal LA	4	528	100.0
Quitman LA	4	160	100.0
Raceland LA	1	9,768	100.0
Rayne LA	3	7,236	100.0
Rayville LA	5	3,347	100.0
Red Chute LA	4	7,065	100.0
Reddell LA	3	904	100.0
Reeves LA	3	221	100.0
Reserve LA	2	8,541	100.0
Richmond LA	5	511	100.0
Richwood LA	5	3,881	100.0
Ridgecrest LA	5	583	100.0
Ringgold LA	4	1,379	100.0
Rio LA	6	137	100.0
River Ridge LA	1	11,276	83.0
River Ridge LA	2	2,315	17.0
Roanoke LA	3	491	100.0
Robeline LA	4	117	100.0
Rock Hill LA	4	260	100.0
Rodessa LA	4	192	100.0
Romeville LA	2	99	100.0
Rosedale LA	5	664	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

City/Town	District	Population	%
Roseland LA	5	880	100.0
Rosepine LA	3	1,519	100.0
Ruston LA	4	22,166	100.0
Saline LA	4	265	100.0
Sarepta LA	4	717	100.0
Schriever LA	1	6,711	100.0
Scott LA	3	7,224	89.0
Scott LA	5	895	11.0
Shenandoah LA	6	19,292	100.0
Shongaloo LA	4	151	100.0
Shreveport LA	4	187,593	100.0
Sibley LA	4	1,127	100.0
Sicily Island LA	5	366	100.0
Sikes LA	4	112	100.0
Simmesport LA	5	1,468	100.0
Simpson LA	3	585	100.0
Simsboro LA	4	803	100.0
Singer LA	3	303	100.0
Siracusaville LA	1	297	100.0
Slaughter LA	5	1,035	100.0
Slidell LA	1	28,664	99.6
Slidell LA	6	117	0.4
Sorrel LA	1	711	100.0
Sorrento LA	6	1,514	100.0
South Mansfield LA	4	333	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

City/Town	District	Population	%
South Vacherie LA	2	3,388	100.0
Spearsville LA	4	126	100.0
Spokane LA	5	378	100.0
Springfield LA	6	427	100.0
Springhill LA	4	4,801	100.0
St. Francisville LA	5	1,557	100.0
St. Gabriel LA	2	6,433	100.0
St. James LA	2	592	100.0
St. Joseph LA	5	831	100.0
St. Martinville LA	3	5,379	100.0
St. Maurice LA	4	266	100.0
St. Rose LA	2	7,504	100.0
Stanley LA	4	132	100.0
Starks LA	3	659	100.0
Start LA	5	982	100.0
Sterlington LA	4	1,980	100.0
Stonewall LA	4	2,273	100.0
Sugartown LA	3	33	100.0
Sulphur LA	3	21,809	100.0
Sun LA	6	392	100.0
Sunset LA	5	2,909	100.0
Supreme LA	2	839	100.0
Swartz LA	4	2,165	49.7
Swartz LA	5	2,189	50.3
Taft LA	2	61	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

City/Town	District	Population	%
Tallulah LA	5	6,286	100.0
Tangipahoa LA	5	425	100.0
Terrytown LA	2	25,278	100.0
Thibodaux LA	1	15,948	100.0
Tickfaw LA	6	635	100.0
Timberlane LA	2	10,364	100.0
Triumph LA	1	268	100.0
Trout LA	4	104	100.0
Tullos LA	4	304	100.0
Turkey Creek LA	3	394	100.0
Union LA	2	735	100.0
Urania LA	4	698	100.0
Varnado LA	6	330	100.0
Venice LA	1	162	100.0
Ventress LA	5	800	100.0
Vidalia LA	5	4,027	100.0
Vienna Bend LA	4	1,314	100.0
Vienna LA	4	483	100.0
Village St. George LA	2	7,677	100.0
Ville Platte LA	3	962	15.3
Ville Platte LA	5	5,341	84.7
Vinton LA	3	3,400	100.0
Violet LA	1	5,758	100.0
Vivian LA	4	3,073	100.0
Waggaman LA	2	9,835	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

City/Town	District	Population	%
Walker LA	6	6,374	100.0
Wallace LA	2	755	100.0
Wallace Ridge LA	5	572	100.0
Washington LA	5	742	100.0
Waterproof LA	5	541	100.0
Watson LA	6	956	100.0
Welcome LA	2	672	100.0
Welsh LA	3	3,333	100.0
West Monroe LA	4	7,824	59.7
West Monroe LA	5	5,279	40.3
Westlake LA	3	4,781	100.0
Westminster LA	6	2,791	100.0
Westwego LA	2	8,568	100.0
White Castle LA	1	0	0.0
White Castle LA	2	1,722	100.0
Wilson LA	5	348	100.0
Winnfield LA	4	4,153	100.0
Winnsboro LA	5	4,862	100.0
Wisner LA	5	771	100.0
Woodmere LA	2	11,238	100.0
Woodworth LA	3	1,762	100.0
Youngsville LA	3	15,929	100.0
Zachary LA	5	19,316	100.0
Zwolle LA	4	1,638	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

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

Population

%

**District 1**

Amelia LA	2,132	100.0
Arabi LA	4,533	100.0
Baldwin LA	1,762	100.0
Barataria LA	1,057	100.0
Bayou Blue LA	13,352	100.0
Bayou Cane LA	19,770	100.0
Bayou Country Club LA	1,304	100.0
Bayou Vista LA	4,213	100.0
Belle Chasse LA	10,579	100.0
Berwick LA	4,771	100.0
Boothville LA	718	100.0
Bourg LA	2,375	100.0
Buras LA	1,109	100.0
Centerville LA	499	100.0
Chackbay LA	5,370	100.0
Chalmette LA	21,562	100.0
Charenton LA	1,699	100.0
Chauvin LA	2,575	100.0
Choctaw LA	775	100.0
Crescent LA (part)	638	78.7
Cut Off LA	5,533	100.0
Delacroix LA	48	100.0
Des Allemands LA (part)	449	20.6
Dorseyville LA	159	100.0
Dulac LA	1,241	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
Eden Isle LA	7,782	100.0
Elmwood LA	5,649	100.0
Empire LA	905	100.0
Franklin LA	6,728	100.0
Galliano LA	7,100	100.0
Glencoe LA	132	100.0
Golden Meadow LA	1,761	100.0
Grand Isle LA	1,005	100.0
Gray LA	5,518	100.0
Harahan LA	9,116	100.0
Houma LA	33,406	100.0
Jean Lafitte LA	1,809	100.0
Jeanerette LA	4,813	100.0
Jefferson LA (part)	9,432	88.7
Kenner LA (part)	54,578	82.1
Kraemer LA	877	100.0
Lafitte LA	1,014	100.0
Lafourche Crossing LA	2,427	100.0
Larose LA	6,763	100.0
Lockport Heights LA	1,171	100.0
Lockport LA	2,490	100.0
Loreauville LA	658	100.0
Lydia LA	892	100.0
Mathews LA	2,273	100.0
Meraux LA	6,804	100.0
Metairie LA (part)	141,124	98.3
Montegut LA	1,465	100.0
Morgan City LA	11,472	100.0
New Iberia LA (part)	28,033	98.2
New Orleans LA (part)	75,419	19.6



**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
New Orleans Station LA	2,508	100.0
Patterson LA	5,931	100.0
Plaquemine LA (part)	110	1.8
Pointe a la Hache LA	183	100.0
Port Sulphur LA	1,677	100.0
Poydras LA	2,536	100.0
Presquille LA	1,703	100.0
Raceland LA	9,768	100.0
River Ridge LA (part)	11,276	83.0
Schriever LA	6,711	100.0
Siracusaville LA	297	100.0
Slidell LA (part)	28,664	99.6
Sorrel LA	711	100.0
Thibodaux LA	15,948	100.0
Triumph LA	268	100.0
Venice LA	162	100.0
Violet LA	5,758	100.0
White Castle LA (part)	0	0.0
<b>District 1 Totals</b>	<b>635,050</b>	
<b>District 2</b>		
Ama LA	1,290	100.0
Avondale LA	4,582	100.0
Baton Rouge LA (part)	34,805	15.3
Bayou Corne LA	32	100.0
Bayou Gauche LA	2,161	100.0
Bayou Goula LA	514	100.0
Bayou L'Ourse LA	1,806	100.0
Belle Rose LA	1,698	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
Boutte LA	3,054	100.0
Bridge City LA	7,219	100.0
Convent LA	483	100.0
Darrow LA	200	100.0
Des Allemands LA (part)	1,730	79.4
Destrehan LA	11,340	100.0
Donaldsonville LA	6,695	100.0
Edgard LA	1,948	100.0
Estelle LA	17,952	100.0
Gardere LA	13,203	100.0
Garyville LA	2,123	100.0
Gonzales LA (part)	12,209	99.8
Gramercy LA	2,932	100.0
Grand Point LA	2,241	100.0
Gretna LA	17,814	100.0
Hahnville LA	2,959	100.0
Harvey LA	22,236	100.0
Hester LA	483	100.0
Jefferson LA (part)	1,201	11.3
Kenner LA (part)	11,870	17.9
Killona LA	724	100.0
Labadieville LA	1,715	100.0
Laplace LA	28,841	100.0
Lemannville LA	695	100.0
Luling LA	13,716	100.0
Lutcher LA	3,133	100.0
Marrero LA	32,382	100.0
Metairie LA (part)	2,383	1.7
Montz LA	2,106	100.0
Moonshine LA	168	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
Napoleonville LA	540	100.0
New Orleans LA (part)	308,578	80.4
New Sarpy LA	1,169	100.0
Norco LA	2,984	100.0
North Vacherie LA	2,093	100.0
Oak Hills Place LA	9,239	100.0
Paincourtville LA	857	100.0
Paradis LA	1,242	100.0
Paulina LA	1,778	100.0
Pierre Part LA	3,024	100.0
Pleasure Bend LA	212	100.0
Prairieville LA (part)	359	1.1
Reserve LA	8,541	100.0
River Ridge LA (part)	2,315	17.0
Romeville LA	99	100.0
South Vacherie LA	3,388	100.0
St. Gabriel LA	6,433	100.0
St. James LA	592	100.0
St. Rose LA	7,504	100.0
Supreme LA	839	100.0
Taft LA	61	100.0
Terrytown LA	25,278	100.0
Timberlane LA	10,364	100.0
Union LA	735	100.0
Village St. George LA	7,677	100.0
Waggaman LA	9,835	100.0
Wallace LA	755	100.0
Welcome LA	672	100.0
Westwego LA	8,568	100.0
White Castle LA (part)	1,722	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
Woodmere LA	11,238	100.0
<b>District 2 Totals</b>	<b>711,334</b>	
<b>District 3</b>		
Abbeville LA	11,186	100.0
Alexandria LA (part)	13,740	30.4
Ball LA	3,961	100.0
Basile LA	1,214	100.0
Boyce LA	888	100.0
Branch LA	431	100.0
Breaux Bridge LA (part)	5,165	68.8
Broussard LA	13,417	100.0
Cade LA	1,874	100.0
Cameron LA	315	100.0
Carlyss LA	5,101	100.0
Catahoula LA	988	100.0
Cecilia LA (part)	30	1.7
Chataignier LA	259	100.0
Church Point LA	4,179	100.0
Crowley LA	11,710	100.0
Delcambre LA	1,793	100.0
DeQuincy LA	3,144	100.0
DeRidder LA	9,852	100.0
Deville LA	1,761	100.0
Duson LA	1,326	100.0
Egan LA	618	100.0
Elizabeth LA	417	100.0
Elton LA	992	100.0
Erath LA	2,028	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
Estherwood LA	694	100.0
Eunice LA (part)	302	3.2
Fenton LA	226	100.0
Forest Hill LA	605	100.0
Fort Polk North LA	2,179	100.0
Fort Polk South LA	7,950	100.0
Gillis LA	800	100.0
Glenmora LA	1,087	100.0
Gueydan LA	1,165	100.0
Hackberry LA	926	100.0
Hayes LA	676	100.0
Henderson LA	1,617	100.0
Iota LA	1,304	100.0
Iowa LA	3,436	100.0
Jennings LA	9,837	100.0
Kaplan LA	4,352	100.0
Kinder LA	2,170	100.0
Lacassine LA	490	100.0
Lafayette LA (part)	84,924	70.0
Lake Arthur LA	2,595	100.0
Lake Charles LA	84,872	100.0
Leesville LA (part)	1,979	35.0
Longville LA	545	100.0
Mamou LA	2,936	100.0
Maurice LA	2,118	100.0
McNary LA	201	100.0
Mermentau LA	516	100.0
Merryville LA	967	100.0
Midland LA	249	100.0
Milton LA	2,590	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
Morse LA	599	100.0
Moss Bluff LA	12,522	100.0
New Iberia LA (part)	522	1.8
New Llano LA (part)	634	28.7
Oakdale LA	6,692	100.0
Oberlin LA	1,402	100.0
Oretta LA	371	100.0
Ossun LA (part)	573	26.7
Parks LA	640	100.0
Perry LA	1,171	100.0
Pine Prairie LA	1,490	100.0
Pineville LA (part)	4,753	33.0
Pitkin LA	455	100.0
Prien LA	7,745	100.0
Rayne LA	7,236	100.0
Reddell LA	904	100.0
Reeves LA	221	100.0
Roanoke LA	491	100.0
Rosepine LA	1,519	100.0
Scott LA (part)	7,224	89.0
Simpson LA	585	100.0
Singer LA	303	100.0
St. Martinville LA	5,379	100.0
Starks LA	659	100.0
Sugartown LA	33	100.0
Sulphur LA	21,809	100.0
Turkey Creek LA	394	100.0
Ville Platte LA (part)	962	15.3
Vinton LA	3,400	100.0
Welsh LA	3,333	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
Westlake LA	4,781	100.0
Woodworth LA	1,762	100.0
Youngsville LA	15,929	100.0
<b>District 3 Totals</b>	<b>437,190</b>	
<b>District 4</b>		
Anacoco LA	851	100.0
Arcadia LA	2,746	100.0
Ashland LA	194	100.0
Athens LA	237	100.0
Atlanta LA	149	100.0
Banks Springs LA	1,136	100.0
Bawcomville LA	3,472	100.0
Belcher LA	248	100.0
Belmont LA	305	100.0
Benton LA	2,048	100.0
Bernice LA	1,356	100.0
Bienville LA	191	100.0
Blanchard LA	3,538	100.0
Bossier City LA	62,701	100.0
Brownsville LA (part)	4,014	92.2
Bryceland LA	87	100.0
Calhoun LA	670	100.0
Calvin LA	242	100.0
Campti LA	887	100.0
Castor LA	230	100.0
Chatham LA	491	100.0
Choudrant LA	989	100.0
Claiborne LA	12,631	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
Clarence LA	326	100.0
Clarks LA	1,052	100.0
Colfax LA	1,428	100.0
Columbia LA	277	100.0
Converse LA	379	100.0
Cotton Valley LA	787	100.0
Coushatta LA	1,752	100.0
Creola LA	242	100.0
Cullen LA	716	100.0
Dixie Inn LA	293	100.0
Dodson LA	294	100.0
Downsville LA	120	100.0
Doyline LA	674	100.0
Dry Prong LA	455	100.0
Dubach LA	908	100.0
Dubberly LA	250	100.0
East Hodge LA	204	100.0
Eastwood LA	4,390	100.0
Edgefield LA	204	100.0
Eros LA	130	100.0
Farmerville LA	3,366	100.0
Fisher LA	197	100.0
Florien LA	553	100.0
Fort Jesup LA	494	100.0
Frierson LA	132	100.0
Georgetown LA	277	100.0
Gibbsland LA	773	100.0
Gilliam LA	123	100.0
Gloster LA	53	100.0
Goldonna LA	428	100.0



**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
Good Pine LA	259	100.0
Grambling LA	5,239	100.0
Grand Cane LA	217	100.0
Grayson LA	449	100.0
Greenwood LA	3,166	100.0
Hall Summit LA	268	100.0
Haughton LA	4,539	100.0
Haynesville LA	2,039	100.0
Heflin LA	213	100.0
Hodge LA	382	100.0
Homer LA	2,747	100.0
Hornbeck LA	430	100.0
Hosston LA	244	100.0
Ida LA	217	100.0
Jamestown LA	100	100.0
Jena LA	4,155	100.0
Jonesboro LA	4,106	100.0
Jordan Hill LA	196	100.0
Joyce LA	328	100.0
Junction City LA	437	100.0
Keachi LA	243	100.0
Lakeview LA	818	100.0
Leesville LA (part)	3,670	65.0
Lillie LA	111	100.0
Lisbon LA	173	100.0
Logansport LA	1,340	100.0
Longstreet LA	115	100.0
Lucky LA	251	100.0
Mansfield LA	4,714	100.0
Many LA	2,571	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
Marion LA	623	100.0
Marthaville LA	90	100.0
Martin LA	524	100.0
Midway LA	1,157	100.0
Minden LA	11,928	100.0
Monroe LA (part)	10,565	22.2
Montgomery LA	622	100.0
Mooringsport LA	748	100.0
Mount Lebanon LA	66	100.0
Natchez LA	489	100.0
Natchitoches LA	18,039	100.0
New Llano LA (part)	1,579	71.4
Noble LA	200	100.0
North Hodge LA	296	100.0
Oil City LA	901	100.0
Olla LA	1,295	100.0
Plain Dealing LA	893	100.0
Pleasant Hill LA	617	100.0
Point Place LA	382	100.0
Pollock LA	394	100.0
Powhatan LA	101	100.0
Prospect LA	380	100.0
Provencal LA	528	100.0
Quitman LA	160	100.0
Red Chute LA	7,065	100.0
Ringgold LA	1,379	100.0
Robeline LA	117	100.0
Rock Hill LA	260	100.0
Rodessa LA	192	100.0
Ruston LA	22,166	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
Saline LA	265	100.0
Sarepta LA	717	100.0
Shongaloo LA	151	100.0
Shreveport LA	187,593	100.0
Sibley LA	1,127	100.0
Sikes LA	112	100.0
Simsboro LA	803	100.0
South Mansfield LA	333	100.0
Spearsville LA	126	100.0
Springhill LA	4,801	100.0
St. Maurice LA	266	100.0
Stanley LA	132	100.0
Sterlington LA	1,980	100.0
Stonewall LA	2,273	100.0
Swartz LA (part)	2,165	49.7
Trout LA	104	100.0
Tullos LA	304	100.0
Urania LA	698	100.0
Vienna Bend LA	1,314	100.0
Vienna LA	483	100.0
Vivian LA	3,073	100.0
West Monroe LA (part)	7,824	59.7
Winnfield LA	4,153	100.0
Zwolle LA	1,638	100.0
<b>District 4 Totals</b>	<b>470,618</b>	
<b>District 5</b>		
Addis LA	6,731	100.0
Alexandria LA (part)	31,535	69.7

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
Amite City LA	4,005	100.0
Arnaudville LA	1,009	100.0
Baker LA	12,455	100.0
Baskin LA	210	100.0
Bastrop LA	9,691	100.0
Baton Rouge LA (part)	101,118	44.5
Bonita LA	170	100.0
Bordelonville LA	458	100.0
Breaux Bridge LA (part)	2,348	31.3
Brownfields LA	5,145	100.0
Brownsville LA (part)	339	7.8
Brusly LA	2,578	100.0
Bunkie LA	3,346	100.0
Cankton LA	583	100.0
Carencro LA	9,272	100.0
Cecilia LA (part)	1,777	98.3
Center Point LA	520	100.0
Central LA (part)	2,135	7.2
Cheneyville LA	468	100.0
Clayton LA	584	100.0
Clinton LA	1,340	100.0
Collinston LA	274	100.0
Cottonport LA	2,023	100.0
Crescent LA (part)	173	21.3
Delhi LA	2,622	100.0
Delta LA	232	100.0
Echo LA	352	100.0
Epps LA	358	100.0
Erwinville LA	2,275	100.0
Eunice LA (part)	9,120	96.8

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
Evergreen LA	215	100.0
Ferriday LA	3,189	100.0
Fifth Ward LA	921	100.0
Fordoche LA	910	100.0
Forest LA	304	100.0
Gilbert LA	449	100.0
Grand Coteau LA	776	100.0
Greensburg LA	629	100.0
Grosse Tete LA	548	100.0
Harrisonburg LA	277	100.0
Hessmer LA	772	100.0
Independence LA (part)	1,619	99.0
Jackson LA	3,990	100.0
Jonesville LA	1,728	100.0
Kentwood LA	2,145	100.0
Kilbourne LA	351	100.0
Krotz Springs LA	904	100.0
Lafayette LA (part)	36,450	30.0
Lake Providence LA	3,587	100.0
Lakeshore LA	1,988	100.0
Lawtell LA	1,066	100.0
Lecompte LA	845	100.0
Leonville LA	868	100.0
Livonia LA	1,212	100.0
Mangham LA	624	100.0
Mansura LA	1,320	100.0
Maringouin LA	891	100.0
Marksville LA	5,065	100.0
Melville LA	759	100.0
Mer Rouge LA	491	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
Merrydale LA	9,227	100.0
Minorca LA	2,156	100.0
Monroe LA (part)	37,137	77.9
Monterey LA	474	100.0
Monticello LA	5,431	100.0
Montpelier LA	196	100.0
Moreauville LA	984	100.0
Morganza LA	525	100.0
Morrow LA	149	100.0
Mound LA	12	100.0
New Roads LA	4,549	100.0
Newellton LA	886	100.0
Norwood LA	279	100.0
Oak Grove LA	1,441	100.0
Oak Ridge LA	124	100.0
Opelousas LA	15,786	100.0
Ossun LA (part)	1,572	73.3
Palmetto LA	92	100.0
Pineville LA (part)	9,631	67.0
Pioneer LA	149	100.0
Plaquemine LA (part)	6,159	98.3
Plaucheville LA	221	100.0
Port Allen LA	4,939	100.0
Port Barre LA	1,751	100.0
Rayville LA	3,347	100.0
Richmond LA	511	100.0
Richwood LA	3,881	100.0
Ridgecrest LA	583	100.0
Rosedale LA	664	100.0
Roseland LA	880	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
Scott LA (part)	895	11.0
Sicily Island LA	366	100.0
Simmesport LA	1,468	100.0
Slaughter LA	1,035	100.0
Spokane LA	378	100.0
St. Francisville LA	1,557	100.0
St. Joseph LA	831	100.0
Start LA	982	100.0
Sunset LA	2,909	100.0
Swartz LA (part)	2,189	50.3
Tallulah LA	6,286	100.0
Tangipahoa LA	425	100.0
Ventress LA	800	100.0
Vidalia LA	4,027	100.0
Ville Platte LA (part)	5,341	84.7
Wallace Ridge LA	572	100.0
Washington LA	742	100.0
Waterproof LA	541	100.0
West Monroe LA (part)	5,279	40.3
Wilson LA	348	100.0
Winnsboro LA	4,862	100.0
Wisner LA	771	100.0
Zachary LA	19,316	100.0
<b>District 5 Totals</b>	<b>465,795</b>	
<b>District 6</b>		
Abita Springs LA	2,631	100.0
Albany LA	1,235	100.0
Angie LA	258	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
Baton Rouge LA (part)	91,547	40.3
Bogalusa LA	10,659	100.0
Central LA (part)	27,430	92.8
Covington LA	11,564	100.0
Denham Springs LA	9,286	100.0
Folsom LA	769	100.0
Franklinton LA	3,662	100.0
French Settlement LA	1,073	100.0
Gonzales LA (part)	22	0.2
Hammond LA	19,584	100.0
Independence LA (part)	16	1.0
Inniswold LA	5,987	100.0
Killian LA	1,177	100.0
Lacombe LA	8,657	100.0
Lewisburg LA	420	100.0
Livingston LA	1,877	100.0
Madisonville LA	850	100.0
Mandeville LA	13,192	100.0
Natalbany LA	2,510	100.0
Old Jefferson LA	7,339	100.0
Pearl River LA	2,565	100.0
Ponchatoula LA	7,822	100.0
Port Vincent LA	646	100.0
Prairieville LA (part)	32,838	98.9
Rio LA	137	100.0
Shenandoah LA	19,292	100.0
Slidell LA (part)	117	0.4
Sorrento LA	1,514	100.0
Springfield LA	427	100.0
Sun LA	392	100.0



**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
Tickfaw LA	635	100.0
Varnado LA	330	100.0
Walker LA	6,374	100.0
Watson LA	956	100.0
Westminster LA	2,791	100.0
<b>District 6 Totals</b>	<b>298,581</b>	

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**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

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**Summary Statistics**

Number of City/Town not split	457
Number of City/Town split	31
Number of City/Town split in 2	30
Number of City/Town split in 3	1
Total number of splits	63

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User: Tony Fairfax

Plan Name: LA CD Plan HB1

Plan Type: Congressional Districts

**Communities of Interest (Landscape, 11x8.5)**

Friday, April 1, 2022

10:47 PM

City/Town	District	Population	%
Abbeville LA	3	11,186	100.0
Abita Springs LA	1	2,631	100.0
Addis LA	2	6,700	99.5
Addis LA	6	31	0.5
Albany LA	6	1,235	100.0
Alexandria LA	5	45,275	100.0
Ama LA	2	1,290	100.0
Amelia LA	6	2,132	100.0
Amite City LA	5	4,005	100.0
Anacoco LA	4	851	100.0
Angie LA	5	258	100.0
Arabi LA	1	4,533	100.0
Arcadia LA	4	2,746	100.0
Arnaudville LA	3	39	3.9
Arnaudville LA	4	970	96.1
Ashland LA	4	194	100.0
Athens LA	4	237	100.0
Atlanta LA	5	149	100.0
Avondale LA	2	4,582	100.0
Baker LA	2	3,119	25.0
Baker LA	6	9,336	75.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

City/Town	District	Population	%
Baldwin LA	3	1,762	100.0
Ball LA	5	3,961	100.0
Banks Springs LA	5	1,136	100.0
Barataria LA	1	1,057	100.0
Basile LA	3	0	0.0
Basile LA	4	1,214	100.0
Baskin LA	5	210	100.0
Bastrop LA	5	9,691	100.0
Baton Rouge LA	2	79,011	34.7
Baton Rouge LA	6	148,459	65.3
Bawcomville LA	5	3,472	100.0
Bayou Blue LA	1	6,801	50.9
Bayou Blue LA	6	6,551	49.1
Bayou Cane LA	1	4,962	25.1
Bayou Cane LA	6	14,808	74.9
Bayou Corne LA	6	32	100.0
Bayou Country Club LA	6	1,304	100.0
Bayou Gauche LA	2	2,161	100.0
Bayou Goula LA	2	514	100.0
Bayou L'Ourse LA	6	1,806	100.0
Bayou Vista LA	3	4,213	100.0
Belcher LA	4	248	100.0
Belle Chasse LA	1	10,579	100.0
Belle Rose LA	2	1,698	100.0
Belmont LA	4	305	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

City/Town	District	Population	%
Benton LA	4	2,048	100.0
Bernice LA	4	1,356	100.0
Berwick LA	3	4,771	100.0
Bienville LA	4	191	100.0
Blanchard LA	4	3,538	100.0
Bogalusa LA	5	10,659	100.0
Bonita LA	5	170	100.0
Boothville LA	1	718	100.0
Bordelonville LA	5	458	100.0
Bossier City LA	4	62,701	100.0
Bourg LA	1	2,375	100.0
Boutte LA	2	3,054	100.0
Boyce LA	5	888	100.0
Branch LA	3	431	100.0
Breaux Bridge LA	3	7,513	100.0
Bridge City LA	2	7,219	100.0
Broussard LA	3	13,417	100.0
Brownfields LA	6	5,145	100.0
Brownsville LA	5	4,353	100.0
Brusly LA	2	694	26.9
Brusly LA	6	1,884	73.1
Bryceland LA	4	87	100.0
Bunkie LA	5	3,346	100.0
Buras LA	1	1,109	100.0
Cade LA	3	1,874	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

City/Town	District	Population	%
Calhoun LA	5	670	100.0
Calvin LA	5	242	100.0
Cameron LA	3	315	100.0
Campti LA	4	887	100.0
Cankton LA	4	583	100.0
Carencro LA	3	9,272	100.0
Carlyss LA	3	5,101	100.0
Castor LA	4	230	100.0
Catahoula LA	3	988	100.0
Cecilia LA	3	1,807	100.0
Center Point LA	5	520	100.0
Centerville LA	3	499	100.0
Central LA	6	29,565	100.0
Chackbay LA	6	5,370	100.0
Chalmette LA	1	21,562	100.0
Charenton LA	3	1,699	100.0
Chataignier LA	4	259	100.0
Chatham LA	5	491	100.0
Chauvin LA	1	2,575	100.0
Cheneyville LA	5	468	100.0
Choctaw LA	6	775	100.0
Choudrant LA	5	989	100.0
Church Point LA	3	4,179	100.0
Claiborne LA	5	12,631	100.0
Clarence LA	4	326	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

City/Town	District	Population	%
Clarks LA	5	1,052	100.0
Clayton LA	5	584	100.0
Clinton LA	5	1,340	100.0
Colfax LA	4	1,428	100.0
Collinston LA	5	274	100.0
Columbia LA	5	277	100.0
Convent LA	2	483	100.0
Converse LA	4	379	100.0
Cotton Valley LA	4	787	100.0
Cottonport LA	5	2,023	100.0
Coushatta LA	4	1,752	100.0
Covington LA	1	11,564	100.0
Creola LA	5	242	100.0
Crescent LA	6	811	100.0
Crowley LA	3	11,710	100.0
Cullen LA	4	716	100.0
Cut Off LA	1	5,533	100.0
Darrow LA	2	200	100.0
Delacroix LA	1	48	100.0
Delcambre LA	3	1,793	100.0
Delhi LA	5	2,622	100.0
Delta LA	5	232	100.0
Denham Springs LA	6	9,286	100.0
DeQuincy LA	3	3,144	100.0
DeRidder LA	4	9,852	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

City/Town	District	Population	%
Des Allemands LA	1	449	20.6
Des Allemands LA	2	1,730	79.4
Destrehan LA	2	1,364	12.0
Destrehan LA	6	9,976	88.0
Deville LA	5	1,761	100.0
Dixie Inn LA	4	293	100.0
Dodson LA	5	294	100.0
Donaldsonville LA	2	6,695	100.0
Dorseyville LA	2	159	100.0
Downsville LA	4	96	80.0
Downsville LA	5	24	20.0
Doyline LA	4	674	100.0
Dry Prong LA	4	455	100.0
Dubach LA	5	908	100.0
Dubberly LA	4	250	100.0
Dulac LA	1	1,241	100.0
Duson LA	3	1,326	100.0
East Hodge LA	5	204	100.0
Eastwood LA	4	4,390	100.0
Echo LA	5	352	100.0
Eden Isle LA	1	7,782	100.0
Edgard LA	2	1,948	100.0
Edgefield LA	4	204	100.0
Egan LA	3	618	100.0
Elizabeth LA	4	417	100.0



**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

City/Town	District	Population	%
Elmwood LA	1	5,649	100.0
Elton LA	3	992	100.0
Empire LA	1	905	100.0
Epps LA	5	358	100.0
Erath LA	3	2,028	100.0
Eros LA	5	130	100.0
Erwinville LA	6	2,275	100.0
Estelle LA	1	5,700	31.8
Estelle LA	2	12,252	68.3
Estherwood LA	3	694	100.0
Eunice LA	3	302	3.2
Eunice LA	4	9,120	96.8
Evergreen LA	5	215	100.0
Farmerville LA	4	3,366	100.0
Fenton LA	3	226	100.0
Ferriday LA	5	3,189	100.0
Fifth Ward LA	5	921	100.0
Fisher LA	4	197	100.0
Florien LA	4	553	100.0
Folsom LA	1	769	100.0
Fordoche LA	5	910	100.0
Forest Hill LA	5	605	100.0
Forest LA	5	304	100.0
Fort Jesup LA	4	494	100.0
Fort Polk North LA	4	2,179	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

City/Town	District	Population	%
Fort Polk South LA	4	7,950	100.0
Franklin LA	3	6,728	100.0
Franklinton LA	5	3,662	100.0
French Settlement LA	6	1,073	100.0
Frierson LA	4	132	100.0
Galliano LA	1	7,100	100.0
Gardere LA	6	13,203	100.0
Garyville LA	2	2,123	100.0
Georgetown LA	5	277	100.0
Gibbsland LA	4	773	100.0
Gilbert LA	5	449	100.0
Gilliam LA	4	123	100.0
Gillis LA	3	800	100.0
Glencoe LA	3	132	100.0
Glenmora LA	5	1,087	100.0
Gloster LA	4	53	100.0
Golden Meadow LA	1	1,761	100.0
Goldonna LA	4	428	100.0
Gonzales LA	2	5,972	48.8
Gonzales LA	6	6,259	51.2
Good Pine LA	5	259	100.0
Grambling LA	5	5,239	100.0
Gramercy LA	2	2,932	100.0
Grand Cane LA	4	217	100.0
Grand Coteau LA	4	776	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

City/Town	District	Population	%
Grand Isle LA	1	1,005	100.0
Grand Point LA	2	2,241	100.0
Gray LA	6	5,518	100.0
Grayson LA	5	449	100.0
Greensburg LA	5	629	100.0
Greenwood LA	4	3,166	100.0
Gretna LA	2	17,814	100.0
Grosse Tete LA	6	548	100.0
Gueydan LA	3	1,165	100.0
Hackberry LA	3	926	100.0
Hahnville LA	2	2,959	100.0
Hall Summit LA	4	268	100.0
Hammond LA	1	3,001	15.3
Hammond LA	5	16,583	84.7
Harahan LA	1	9,116	100.0
Harrisonburg LA	5	277	100.0
Harvey LA	2	22,236	100.0
Haughton LA	4	4,539	100.0
Hayes LA	3	676	100.0
Haynesville LA	4	2,039	100.0
Heflin LA	4	213	100.0
Henderson LA	3	1,617	100.0
Hessmer LA	5	772	100.0
Hester LA	2	483	100.0
Hodge LA	5	382	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

City/Town	District	Population	%
Homer LA	4	2,747	100.0
Hornbeck LA	4	430	100.0
Hosston LA	4	244	100.0
Houma LA	1	31,448	94.1
Houma LA	6	1,958	5.9
Ida LA	4	217	100.0
Independence LA	5	1,635	100.0
Inniswold LA	6	5,987	100.0
Iota LA	3	1,304	100.0
Iowa LA	3	3,436	100.0
Jackson LA	5	3,990	100.0
Jamestown LA	4	100	100.0
Jean Lafitte LA	1	1,809	100.0
Jeanerette LA	3	4,813	100.0
Jefferson LA	1	8,882	83.5
Jefferson LA	2	1,751	16.5
Jena LA	5	4,155	100.0
Jennings LA	3	9,837	100.0
Jonesboro LA	5	4,106	100.0
Jonesville LA	5	1,728	100.0
Jordan Hill LA	5	196	100.0
Joyce LA	5	328	100.0
Junction City LA	4	437	100.0
Kaplan LA	3	4,352	100.0
Keachi LA	4	243	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

City/Town	District	Population	%
Kenner LA	1	52,353	78.8
Kenner LA	2	14,095	21.2
Kentwood LA	5	2,145	100.0
Kilbourne LA	5	351	100.0
Killian LA	6	1,177	100.0
Killona LA	2	724	100.0
Kinder LA	4	2,170	100.0
Kraemer LA	6	877	100.0
Krotz Springs LA	4	904	100.0
Labadieville LA	6	1,715	100.0
Lacassine LA	3	490	100.0
Lacombe LA	1	8,657	100.0
Lafayette LA	3	121,374	100.0
Lafitte LA	1	1,014	100.0
Lafourche Crossing LA	6	2,427	100.0
Lake Arthur LA	3	2,595	100.0
Lake Charles LA	3	84,872	100.0
Lake Providence LA	5	3,587	100.0
Lakeshore LA	5	1,988	100.0
Lakeview LA	4	818	100.0
Laplace LA	2	19,063	66.1
Laplace LA	6	9,778	33.9
Larose LA	1	6,763	100.0
Lawtell LA	4	1,066	100.0
Lecompte LA	5	845	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

City/Town	District	Population	%
Leesville LA	4	5,649	100.0
Lemannville LA	2	695	100.0
Leonville LA	4	868	100.0
Lewisburg LA	1	420	100.0
Lillie LA	4	111	100.0
Lisbon LA	4	173	100.0
Livingston LA	6	1,877	100.0
Livonia LA	5	1,212	100.0
Lockport Heights LA	1	1,171	100.0
Lockport LA	1	2,490	100.0
Logansport LA	4	1,340	100.0
Longstreet LA	4	115	100.0
Longville LA	4	545	100.0
Loreauville LA	3	658	100.0
Lucky LA	4	251	100.0
Luling LA	2	13,716	100.0
Lutcher LA	2	3,133	100.0
Lydia LA	3	892	100.0
Madisonville LA	1	850	100.0
Mamou LA	4	2,936	100.0
Mandeville LA	1	13,192	100.0
Mangham LA	5	624	100.0
Mansfield LA	4	4,714	100.0
Mansura LA	5	1,320	100.0
Many LA	4	2,571	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

City/Town	District	Population	%
Maringouin LA	6	891	100.0
Marion LA	4	623	100.0
Marksville LA	5	5,065	100.0
Marrero LA	2	32,382	100.0
Marthaville LA	4	90	100.0
Martin LA	4	524	100.0
Mathews LA	1	2,191	96.4
Mathews LA	6	82	3.6
Maurice LA	3	2,118	100.0
McNary LA	5	201	100.0
Melville LA	4	759	100.0
Mer Rouge LA	5	491	100.0
Meraux LA	1	6,804	100.0
Mermentau LA	3	516	100.0
Merrydale LA	2	9,227	100.0
Merryville LA	4	967	100.0
Metairie LA	1	141,267	98.4
Metairie LA	2	2,240	1.6
Midland LA	3	249	100.0
Midway LA	5	1,157	100.0
Milton LA	3	2,590	100.0
Minden LA	4	11,928	100.0
Minorca LA	5	2,156	100.0
Monroe LA	5	47,702	100.0
Montegut LA	1	1,465	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

City/Town	District	Population	%
Monterey LA	5	474	100.0
Montgomery LA	4	622	100.0
Monticello LA	6	5,431	100.0
Montpelier LA	5	196	100.0
Montz LA	6	2,106	100.0
Moonshine LA	2	168	100.0
Mooringsport LA	4	748	100.0
Moreauville LA	5	984	100.0
Morgan City LA	3	10,449	91.1
Morgan City LA	6	1,023	8.9
Morganza LA	5	525	100.0
Morrow LA	4	149	100.0
Morse LA	3	599	100.0
Moss Bluff LA	3	12,522	100.0
Mound LA	5	12	100.0
Mount Lebanon LA	4	66	100.0
Napoleonville LA	6	540	100.0
Natalbany LA	5	2,510	100.0
Natchez LA	4	489	100.0
Natchitoches LA	4	18,039	100.0
New Iberia LA	3	28,555	100.0
New Llano LA	4	2,213	100.0
New Orleans LA	1	48,050	12.5
New Orleans LA	2	335,947	87.5
New Orleans Station LA	1	2,508	100.0



**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

City/Town	District	Population	%
New Roads LA	5	4,549	100.0
New Sarpy LA	2	917	78.4
New Sarpy LA	6	252	21.6
Newellton LA	5	886	100.0
Noble LA	4	200	100.0
Norco LA	6	2,984	100.0
North Hodge LA	5	296	100.0
North Vacherie LA	2	2,093	100.0
Norwood LA	5	279	100.0
Oak Grove LA	5	1,441	100.0
Oak Hills Place LA	6	9,239	100.0
Oak Ridge LA	5	124	100.0
Oakdale LA	4	6,692	100.0
Oberlin LA	4	1,402	100.0
Oil City LA	4	901	100.0
Old Jefferson LA	6	7,339	100.0
Olla LA	5	1,295	100.0
Opelousas LA	4	15,786	100.0
Oretta LA	4	371	100.0
Ossun LA	3	2,145	100.0
Paincourtville LA	2	857	100.0
Palmetto LA	4	92	100.0
Paradis LA	2	1,242	100.0
Parks LA	3	640	100.0
Patterson LA	3	4,325	72.9

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

City/Town	District	Population	%
Patterson LA	6	1,606	27.1
Paulina LA	2	1,778	100.0
Pearl River LA	1	2,565	100.0
Perry LA	3	1,171	100.0
Pierre Part LA	6	3,024	100.0
Pine Prairie LA	4	1,490	100.0
Pineville LA	5	14,384	100.0
Pioneer LA	5	149	100.0
Pitkin LA	4	455	100.0
Plain Dealing LA	4	893	100.0
Plaquemine LA	2	6,159	98.3
Plaquemine LA	6	110	1.8
Plaucheville LA	5	221	100.0
Pleasant Hill LA	4	617	100.0
Pleasure Bend LA	2	212	100.0
Point Place LA	4	382	100.0
Pointe a la Hache LA	1	183	100.0
Pollock LA	5	394	100.0
Ponchatoula LA	1	7,647	97.8
Ponchatoula LA	5	175	2.2
Port Allen LA	2	4,315	87.4
Port Allen LA	6	624	12.6
Port Barre LA	4	1,751	100.0
Port Sulphur LA	1	1,677	100.0
Port Vincent LA	6	646	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

City/Town	District	Population	%
Powhatan LA	4	101	100.0
Poydras LA	1	2,536	100.0
Prairieville LA	6	33,197	100.0
Presquille LA	1	1,703	100.0
Prien LA	3	7,745	100.0
Prospect LA	5	380	100.0
Provencal LA	4	528	100.0
Quitman LA	5	160	100.0
Raceland LA	1	4,030	41.3
Raceland LA	6	5,738	58.7
Rayne LA	3	7,236	100.0
Rayville LA	5	3,347	100.0
Red Chute LA	4	7,065	100.0
Reddell LA	4	904	100.0
Reeves LA	4	221	100.0
Reserve LA	2	8,541	100.0
Richmond LA	5	511	100.0
Richwood LA	5	3,881	100.0
Ridgecrest LA	5	583	100.0
Ringgold LA	4	1,379	100.0
Rio LA	5	137	100.0
River Ridge LA	1	12,613	92.8
River Ridge LA	2	978	7.2
Roanoke LA	3	491	100.0
Robeline LA	4	117	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

City/Town	District	Population	%
Rock Hill LA	5	260	100.0
Rodessa LA	4	192	100.0
Romeville LA	2	99	100.0
Rosedale LA	6	664	100.0
Roseland LA	5	880	100.0
Rosepine LA	4	1,519	100.0
Ruston LA	5	22,166	100.0
Saline LA	4	265	100.0
Sarepta LA	4	717	100.0
Schriever LA	6	6,711	100.0
Scott LA	3	8,119	100.0
Shenandoah LA	6	19,292	100.0
Shongaloo LA	4	151	100.0
Shreveport LA	4	187,593	100.0
Sibley LA	4	1,127	100.0
Sicily Island LA	5	366	100.0
Sikes LA	5	112	100.0
Simmesport LA	5	1,462	100.0
Simpson LA	4	585	100.0
Simsboro LA	5	803	100.0
Singer LA	4	303	100.0
Siracusaville LA	3	297	100.0
Slaughter LA	5	1,035	100.0
Slidell LA	1	28,781	100.0
Sorrel LA	3	711	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

City/Town	District	Population	%
Sorrento LA	6	1,514	100.0
South Mansfield LA	4	333	100.0
South Vacherie LA	2	3,388	100.0
Spearsville LA	4	126	100.0
Spokane LA	5	378	100.0
Springfield LA	6	427	100.0
Springhill LA	4	4,801	100.0
St. Francisville LA	5	1,557	100.0
St. Gabriel LA	2	6,433	100.0
St. James LA	2	592	100.0
St. Joseph LA	5	831	100.0
St. Martinville LA	3	5,379	100.0
St. Maurice LA	5	266	100.0
St. Rose LA	2	5,269	70.2
St. Rose LA	6	2,235	29.8
Stanley LA	4	132	100.0
Starks LA	3	659	100.0
Start LA	5	982	100.0
Sterlington LA	5	1,980	100.0
Stonewall LA	4	2,273	100.0
Sugartown LA	4	33	100.0
Sulphur LA	3	21,809	100.0
Sun LA	1	392	100.0
Sunset LA	4	2,909	100.0
Supreme LA	6	839	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

City/Town	District	Population	%
Swartz LA	5	4,354	100.0
Taft LA	2	61	100.0
Tallulah LA	5	6,286	100.0
Tangipahoa LA	5	425	100.0
Terrytown LA	2	25,278	100.0
Thibodaux LA	6	15,948	100.0
Tickfaw LA	5	635	100.0
Timberlane LA	2	10,364	100.0
Triumph LA	1	268	100.0
Trout LA	5	104	100.0
Tullos LA	5	304	100.0
Turkey Creek LA	4	394	100.0
Union LA	2	735	100.0
Urania LA	5	698	100.0
Varnado LA	5	330	100.0
Venice LA	1	162	100.0
Ventress LA	5	800	100.0
Vidalia LA	5	4,027	100.0
Vienna Bend LA	4	1,314	100.0
Vienna LA	5	483	100.0
Village St. George LA	6	7,677	100.0
Ville Platte LA	4	6,303	100.0
Vinton LA	3	3,400	100.0
Violet LA	1	5,758	100.0
Vivian LA	4	3,073	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

City/Town	District	Population	%
Waggaman LA	2	9,835	100.0
Walker LA	6	6,374	100.0
Wallace LA	2	755	100.0
Wallace Ridge LA	5	572	100.0
Washington LA	4	742	100.0
Waterproof LA	5	541	100.0
Watson LA	6	956	100.0
Welcome LA	2	672	100.0
Welsh LA	3	3,333	100.0
West Monroe LA	5	13,103	100.0
Westlake LA	3	4,781	100.0
Westminster LA	6	2,791	100.0
Westwego LA	2	8,568	100.0
White Castle LA	2	1,722	100.0
White Castle LA	6	0	0.0
Wilson LA	5	348	100.0
Winnfield LA	5	4,153	100.0
Winnsboro LA	5	4,862	100.0
Wisner LA	5	771	100.0
Woodmere LA	2	11,238	100.0
Woodworth LA	5	1,762	100.0
Youngsville LA	3	15,929	100.0
Zachary LA	6	19,316	100.0
Zwolle LA	4	1,638	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

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

Population

%

**District 1**

Abita Springs LA	2,631	100.0
Arabi LA	4,533	100.0
Barataria LA	1,057	100.0
Bayou Blue LA (part)	6,801	50.9
Bayou Cane LA (part)	4,962	25.1
Belle Chasse LA	10,579	100.0
Boothville LA	718	100.0
Bourg LA	2,375	100.0
Buras LA	1,109	100.0
Chalmette LA	21,562	100.0
Chauvin LA	2,575	100.0
Covington LA	11,564	100.0
Cut Off LA	5,533	100.0
Delacroix LA	48	100.0
Des Allemands LA (part)	449	20.6
Dulac LA	1,241	100.0
Eden Isle LA	7,782	100.0
Elmwood LA	5,649	100.0
Empire LA	905	100.0
Estelle LA (part)	5,700	31.8
Folsom LA	769	100.0
Galliano LA	7,100	100.0
Golden Meadow LA	1,761	100.0
Grand Isle LA	1,005	100.0
Hammond LA (part)	3,001	15.3



**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Harahan LA	9,116	100.0
Houma LA (part)	31,448	94.1
Jean Lafitte LA	1,809	100.0
Jefferson LA (part)	8,882	83.5
Kenner LA (part)	52,353	78.8
Lacombe LA	8,657	100.0
Lafitte LA	1,014	100.0
Larose LA	6,763	100.0
Lewisburg LA	420	100.0
Lockport Heights LA	1,171	100.0
Lockport LA	2,490	100.0
Madisonville LA	850	100.0
Mandeville LA	13,192	100.0
Mathews LA (part)	2,191	96.4
Meraux LA	6,804	100.0
Metairie LA (part)	141,267	98.4
Montegut LA	1,465	100.0
New Orleans LA (part)	48,050	12.5
New Orleans Station LA	2,508	100.0
Pearl River LA	2,565	100.0
Pointe a la Hache LA	183	100.0
Ponchatoula LA (part)	7,647	97.8
Port Sulphur LA	1,677	100.0
Poydras LA	2,536	100.0
Presquille LA	1,703	100.0
Raceland LA (part)	4,030	41.3
River Ridge LA (part)	12,613	92.8
Slidell LA	28,781	100.0
Sun LA	392	100.0
Triumph LA	268	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Venice LA	162	100.0
Violet LA	5,758	100.0
<b>District 1 Totals</b>	<b>520,174</b>	
<b>District 2</b>		
Addis LA (part)	6,700	99.5
Ama LA	1,290	100.0
Avondale LA	4,582	100.0
Baker LA (part)	3,119	25.0
Baton Rouge LA (part)	79,011	34.7
Bayou Gauche LA	2,161	100.0
Bayou Goula LA	514	100.0
Belle Rose LA	1,698	100.0
Boutte LA	3,054	100.0
Bridge City LA	7,219	100.0
Brusly LA (part)	694	26.9
Convent LA	483	100.0
Darrow LA	200	100.0
Des Allemands LA (part)	1,730	79.4
Destrehan LA (part)	1,364	12.0
Donaldsonville LA	6,695	100.0
Dorseyville LA	159	100.0
Edgard LA	1,948	100.0
Estelle LA (part)	12,252	68.3
Garyville LA	2,123	100.0
Gonzales LA (part)	5,972	48.8
Gramercy LA	2,932	100.0
Grand Point LA	2,241	100.0
Gretna LA	17,814	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Hahnville LA	2,959	100.0
Harvey LA	22,236	100.0
Hester LA	483	100.0
Jefferson LA (part)	1,751	16.5
Kenner LA (part)	14,095	21.2
Killona LA	724	100.0
Laplace LA (part)	19,063	66.1
Lemannville LA	695	100.0
Luling LA	13,716	100.0
Lutcher LA	3,133	100.0
Marrero LA	32,382	100.0
Merrydale LA	9,227	100.0
Metairie LA (part)	2,240	1.6
Moonshine LA	168	100.0
New Orleans LA (part)	335,947	87.5
New Sarpy LA (part)	917	78.4
North Vacherie LA	2,093	100.0
Paincourtville LA	857	100.0
Paradis LA	1,242	100.0
Paulina LA	1,778	100.0
Plaquemine LA (part)	6,159	98.3
Pleasure Bend LA	212	100.0
Port Allen LA (part)	4,315	87.4
Reserve LA	8,541	100.0
River Ridge LA (part)	978	7.2
Romeville LA	99	100.0
South Vacherie LA	3,388	100.0
St. Gabriel LA	6,433	100.0
St. James LA	592	100.0
St. Rose LA (part)	5,269	70.2

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Taft LA	61	100.0
Terrytown LA	25,278	100.0
Timberlane LA	10,364	100.0
Union LA	735	100.0
Waggaman LA	9,835	100.0
Wallace LA	755	100.0
Welcome LA	672	100.0
Westwego LA	8,568	100.0
White Castle LA (part)	1,722	100.0
Woodmere LA	11,238	100.0
<b>District 2 Totals</b>	<b>736,875</b>	
<b>District 3</b>		
Abbeville LA	11,186	100.0
Arnaudville LA (part)	39	3.9
Baldwin LA	1,762	100.0
Basile LA (part)	0	0.0
Bayou Vista LA	4,213	100.0
Berwick LA	4,771	100.0
Branch LA	431	100.0
Breaux Bridge LA	7,513	100.0
Broussard LA	13,417	100.0
Cade LA	1,874	100.0
Cameron LA	315	100.0
Carencro LA	9,272	100.0
Carlyss LA	5,101	100.0
Catahoula LA	988	100.0
Cecilia LA	1,807	100.0
Centerville LA	499	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Charenton LA	1,699	100.0
Church Point LA	4,179	100.0
Crowley LA	11,710	100.0
Delcambre LA	1,793	100.0
DeQuincy LA	3,144	100.0
Duson LA	1,326	100.0
Egan LA	618	100.0
Elton LA	992	100.0
Erath LA	2,028	100.0
Estherwood LA	694	100.0
Eunice LA (part)	302	3.2
Fenton LA	226	100.0
Franklin LA	6,728	100.0
Gillis LA	800	100.0
Glencoe LA	132	100.0
Gueydan LA	1,165	100.0
Hackberry LA	926	100.0
Hayes LA	676	100.0
Henderson LA	1,617	100.0
Iota LA	1,304	100.0
Iowa LA	3,436	100.0
Jeanerette LA	4,813	100.0
Jennings LA	9,837	100.0
Kaplan LA	4,352	100.0
Lacassine LA	490	100.0
Lafayette LA	121,374	100.0
Lake Arthur LA	2,595	100.0
Lake Charles LA	84,872	100.0
Loreauville LA	658	100.0
Lydia LA	892	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Maurice LA	2,118	100.0
Mermentau LA	516	100.0
Midland LA	249	100.0
Milton LA	2,590	100.0
Morgan City LA (part)	10,449	91.1
Morse LA	599	100.0
Moss Bluff LA	12,522	100.0
New Iberia LA	28,555	100.0
Ossun LA	2,145	100.0
Parks LA	640	100.0
Patterson LA (part)	4,325	72.9
Perry LA	1,171	100.0
Prien LA	7,745	100.0
Rayne LA	7,236	100.0
Roanoke LA	491	100.0
Scott LA	8,119	100.0
Siracusaville LA	297	100.0
Sorrel LA	711	100.0
St. Martinville LA	5,379	100.0
Starks LA	659	100.0
Sulphur LA	21,809	100.0
Vinton LA	3,400	100.0
Welsh LA	3,333	100.0
Westlake LA	4,781	100.0
Youngsville LA	15,929	100.0

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**District 3 Totals 484,334**
***District 4***


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Anacoco LA	851	100.0
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**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Arcadia LA	2,746	100.0
Arnaudville LA (part)	970	96.1
Ashland LA	194	100.0
Athens LA	237	100.0
Basile LA (part)	1,214	100.0
Belcher LA	248	100.0
Belmont LA	305	100.0
Benton LA	2,048	100.0
Bernice LA	1,356	100.0
Bienville LA	191	100.0
Blanchard LA	3,538	100.0
Bossier City LA	62,701	100.0
Bryceland LA	87	100.0
Campti LA	887	100.0
Cankton LA	583	100.0
Castor LA	230	100.0
Chataignier LA	259	100.0
Clarence LA	326	100.0
Colfax LA	1,428	100.0
Converse LA	379	100.0
Cotton Valley LA	787	100.0
Coushatta LA	1,752	100.0
Cullen LA	716	100.0
DeRidder LA	9,852	100.0
Dixie Inn LA	293	100.0
Downsville LA (part)	96	80.0
Doyline LA	674	100.0
Dry Prong LA	455	100.0
Dubberly LA	250	100.0
Eastwood LA	4,390	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Edgefield LA	204	100.0
Elizabeth LA	417	100.0
Eunice LA (part)	9,120	96.8
Farmerville LA	3,366	100.0
Fisher LA	197	100.0
Florien LA	553	100.0
Fort Jesup LA	494	100.0
Fort Polk North LA	2,179	100.0
Fort Polk South LA	7,950	100.0
Frierson LA	132	100.0
Gibbsland LA	773	100.0
Gilliam LA	123	100.0
Gloster LA	53	100.0
Goldonna LA	428	100.0
Grand Cane LA	217	100.0
Grand Coteau LA	776	100.0
Greenwood LA	3,166	100.0
Hall Summit LA	268	100.0
Haughton LA	4,539	100.0
Haynesville LA	2,039	100.0
Heflin LA	213	100.0
Homer LA	2,747	100.0
Hornbeck LA	430	100.0
Hosston LA	244	100.0
Ida LA	217	100.0
Jamestown LA	100	100.0
Junction City LA	437	100.0
Keachi LA	243	100.0
Kinder LA	2,170	100.0
Krotz Springs LA	904	100.0



**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Lakeview LA	818	100.0
Lawtell LA	1,066	100.0
Leesville LA	5,649	100.0
Leonville LA	868	100.0
Lillie LA	111	100.0
Lisbon LA	173	100.0
Logansport LA	1,340	100.0
Longstreet LA	115	100.0
Longville LA	545	100.0
Lucky LA	251	100.0
Mamou LA	2,936	100.0
Mansfield LA	4,714	100.0
Many LA	2,571	100.0
Marion LA	623	100.0
Marthaville LA	90	100.0
Martin LA	524	100.0
Melville LA	759	100.0
Merryville LA	967	100.0
Minden LA	11,928	100.0
Montgomery LA	622	100.0
Mooringsport LA	748	100.0
Morrow LA	149	100.0
Mount Lebanon LA	66	100.0
Natchez LA	489	100.0
Natchitoches LA	18,039	100.0
New Llano LA	2,213	100.0
Noble LA	200	100.0
Oakdale LA	6,692	100.0
Oberlin LA	1,402	100.0
Oil City LA	901	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Opelousas LA	15,786	100.0
Oretta LA	371	100.0
Palmetto LA	92	100.0
Pine Prairie LA	1,490	100.0
Pitkin LA	455	100.0
Plain Dealing LA	893	100.0
Pleasant Hill LA	617	100.0
Point Place LA	382	100.0
Port Barre LA	1,751	100.0
Powhatan LA	101	100.0
Provencal LA	528	100.0
Red Chute LA	7,065	100.0
Reddell LA	904	100.0
Reeves LA	221	100.0
Ringgold LA	1,379	100.0
Robeline LA	117	100.0
Rodessa LA	192	100.0
Rosepine LA	1,519	100.0
Saline LA	265	100.0
Sarepta LA	717	100.0
Shongaloo LA	151	100.0
Shreveport LA	187,593	100.0
Sibley LA	1,127	100.0
Simpson LA	585	100.0
Singer LA	303	100.0
South Mansfield LA	333	100.0
Spearsville LA	126	100.0
Springhill LA	4,801	100.0
Stanley LA	132	100.0
Stonewall LA	2,273	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Sugartown LA	33	100.0
Sunset LA	2,909	100.0
Turkey Creek LA	394	100.0
Vienna Bend LA	1,314	100.0
Ville Platte LA	6,303	100.0
Vivian LA	3,073	100.0
Washington LA	742	100.0
Zwolle LA	1,638	100.0
<b>District 4 Totals</b>	<b>460,986</b>	
<b>District 5</b>		
Alexandria LA	45,275	100.0
Amite City LA	4,005	100.0
Angie LA	258	100.0
Atlanta LA	149	100.0
Ball LA	3,961	100.0
Banks Springs LA	1,136	100.0
Baskin LA	210	100.0
Bastrop LA	9,691	100.0
Bawcomville LA	3,472	100.0
Bogalusa LA	10,659	100.0
Bonita LA	170	100.0
Bordelonville LA	458	100.0
Boyce LA	888	100.0
Brownsville LA	4,353	100.0
Bunkie LA	3,346	100.0
Calhoun LA	670	100.0
Calvin LA	242	100.0
Center Point LA	520	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Chatham LA	491	100.0
Cheneyville LA	468	100.0
Choudrant LA	989	100.0
Claiborne LA	12,631	100.0
Clarks LA	1,052	100.0
Clayton LA	584	100.0
Clinton LA	1,340	100.0
Collinston LA	274	100.0
Columbia LA	277	100.0
Cottonport LA	2,023	100.0
Creola LA	242	100.0
Delhi LA	2,622	100.0
Delta LA	232	100.0
Denville LA	1,761	100.0
Dodson LA	294	100.0
Downsville LA (part)	24	20.0
Dubach LA	908	100.0
East Hodge LA	204	100.0
Echo LA	352	100.0
Epps LA	358	100.0
Eros LA	130	100.0
Evergreen LA	215	100.0
Ferriday LA	3,189	100.0
Fifth Ward LA	921	100.0
Fordoche LA	910	100.0
Forest Hill LA	605	100.0
Forest LA	304	100.0
Franklinton LA	3,662	100.0
Georgetown LA	277	100.0
Gilbert LA	449	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Glenmora LA	1,087	100.0
Good Pine LA	259	100.0
Grambling LA	5,239	100.0
Grayson LA	449	100.0
Greensburg LA	629	100.0
Hammond LA (part)	16,583	84.7
Harrisonburg LA	277	100.0
Hessmer LA	772	100.0
Hodge LA	382	100.0
Independence LA	1,635	100.0
Jackson LA	3,990	100.0
Jena LA	4,155	100.0
Jonesboro LA	4,106	100.0
Jonesville LA	1,728	100.0
Jordan Hill LA	196	100.0
Joyce LA	328	100.0
Kentwood LA	2,145	100.0
Kilbourne LA	351	100.0
Lake Providence LA	3,587	100.0
Lakeshore LA	1,988	100.0
Lecompte LA	845	100.0
Livonia LA	1,212	100.0
Mangham LA	624	100.0
Mansura LA	1,320	100.0
Marksville LA	5,065	100.0
McNary LA	201	100.0
Mer Rouge LA	491	100.0
Midway LA	1,157	100.0
Minorca LA	2,156	100.0
Monroe LA	47,702	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Monterey LA	474	100.0
Montpelier LA	196	100.0
Moreauville LA	984	100.0
Morganza LA	525	100.0
Mound LA	12	100.0
Natalbany LA	2,510	100.0
New Roads LA	4,549	100.0
Newellton LA	886	100.0
North Hodge LA	296	100.0
Norwood LA	279	100.0
Oak Grove LA	1,441	100.0
Oak Ridge LA	124	100.0
Olla LA	1,295	100.0
Pineville LA	14,384	100.0
Pioneer LA	149	100.0
Plaucheville LA	221	100.0
Pollock LA	394	100.0
Ponchatoula LA (part)	175	2.2
Prospect LA	380	100.0
Quitman LA	160	100.0
Rayville LA	3,347	100.0
Richmond LA	511	100.0
Richwood LA	3,881	100.0
Ridgecrest LA	583	100.0
Rio LA	137	100.0
Rock Hill LA	260	100.0
Roseland LA	880	100.0
Ruston LA	22,166	100.0
Sicily Island LA	366	100.0
Sikes LA	112	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Simmesport LA	1,468	100.0
Simsboro LA	803	100.0
Slaughter LA	1,035	100.0
Spokane LA	378	100.0
St. Francisville LA	1,557	100.0
St. Joseph LA	831	100.0
St. Maurice LA	266	100.0
Start LA	982	100.0
Sterlington LA	1,980	100.0
Swartz LA	4,354	100.0
Tallulah LA	6,286	100.0
Tangipahoa LA	425	100.0
Tickfaw LA	635	100.0
Trout LA	104	100.0
Tullos LA	304	100.0
Urania LA	698	100.0
Varnado LA	330	100.0
Ventress LA	800	100.0
Vidalia LA	4,027	100.0
Vienna LA	483	100.0
Wallace Ridge LA	572	100.0
Waterproof LA	541	100.0
West Monroe LA	13,103	100.0
Wilson LA	348	100.0
Winnfield LA	4,153	100.0
Winnsboro LA	4,862	100.0
Wisner LA	771	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Woodworth LA	1,762	100.0
<b>District 5 Totals</b>	<b>353,445</b>	
<b>District 6</b>		
Addis LA (part)	31	0.5
Albany LA	1,235	100.0
Amelia LA	2,132	100.0
Baker LA (part)	9,336	75.0
Baton Rouge LA (part)	148,459	65.3
Bayou Blue LA (part)	6,551	49.1
Bayou Cane LA (part)	14,808	74.9
Bayou Corne LA	32	100.0
Bayou Country Club LA	1,304	100.0
Bayou L'Ourse LA	1,806	100.0
Brownfields LA	5,145	100.0
Brusly LA (part)	1,884	73.1
Central LA	29,565	100.0
Chackbay LA	5,370	100.0
Choctaw LA	775	100.0
Crescent LA	811	100.0
Denham Springs LA	9,286	100.0
Destrehan LA (part)	9,976	88.0
Erwinville LA	2,275	100.0
French Settlement LA	1,073	100.0
Gardere LA	13,203	100.0
Gonzales LA (part)	6,259	51.2
Gray LA	5,518	100.0
Grosse Tete LA	548	100.0
Houma LA (part)	1,958	5.9



**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Inniswold LA	5,987	100.0
Killian LA	1,177	100.0
Kraemer LA	877	100.0
Labadieville LA	1,715	100.0
Lafourche Crossing LA	2,427	100.0
Laplace LA (part)	9,778	33.9
Livingston LA	1,877	100.0
Maringouin LA	891	100.0
Mathews LA (part)	82	3.6
Monticello LA	5,431	100.0
Montz LA	2,106	100.0
Morgan City LA (part)	1,023	8.9
Napoleonville LA	540	100.0
New Sarpy LA (part)	252	21.6
Norco LA	2,984	100.0
Oak Hills Place LA	9,239	100.0
Old Jefferson LA	7,339	100.0
Patterson LA (part)	1,606	27.1
Pierre Part LA	3,024	100.0
Plaquemine LA (part)	110	1.8
Port Allen LA (part)	624	12.6
Port Vincent LA	646	100.0
Prairieville LA	33,197	100.0
Raceland LA (part)	5,738	58.7
Rosedale LA	664	100.0
Schriever LA	6,711	100.0
Shenandoah LA	19,292	100.0
Sorrento LA	1,514	100.0
Springfield LA	427	100.0
St. Rose LA (part)	2,235	29.8

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Supreme LA	839	100.0
Thibodaux LA	15,948	100.0
Village St. George LA	7,677	100.0
Walker LA	6,374	100.0
Watson LA	956	100.0
Westminster LA	2,791	100.0
White Castle LA (part)	0	0.0
Zachary LA	19,316	100.0
<b>District 6 Totals</b>	<b>462,754</b>	

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## Communities of Interest (Landscape, 11x8.5)

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LA CD Plan HB1

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### Summary Statistics

Number of City/Town not split	456
Number of City/Town split	32
Number of City/Town split in 2	32
Total number of splits	64

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User:

Plan Name: LA CD 2011 Plan

Plan Type: Congress

**Communities of Interest (Landscape, 11x8.5)**

Thursday, April 7, 2022

9:55 PM

City/Town	District	Population	%
Abbeville LA	3	11,186	100.0
Abita Springs LA	1	2,631	100.0
Addis LA	2	5,648	83.9
Addis LA	6	1,083	16.1
Albany LA	6	1,235	100.0
Alexandria LA	5	45,275	100.0
Ama LA	2	1,290	100.0
Amelia LA	3	2,132	100.0
Amite City LA	5	4,005	100.0
Anacoco LA	4	851	100.0
Angie LA	5	258	100.0
Arabi LA	1	4,533	100.0
Arcadia LA	4	2,746	100.0
Arnaudville LA	3	1,009	100.0
Ashland LA	4	194	100.0
Athens LA	4	237	100.0
Atlanta LA	5	149	100.0
Avondale LA	2	4,582	100.0
Baker LA	2	3,119	25.0
Baker LA	6	9,336	75.0
Baldwin LA	3	1,762	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

City/Town	District	Population	%
Ball LA	5	3,961	100.0
Banks Springs LA	5	1,136	100.0
Barataria LA	1	1,057	100.0
Basile LA	3	0	0.0
Basile LA	4	1,214	100.0
Baskin LA	5	210	100.0
Bastrop LA	5	9,691	100.0
Baton Rouge LA	2	77,716	34.2
Baton Rouge LA	6	149,754	65.8
Bawcomville LA	5	3,472	100.0
Bayou Blue LA	1	5,301	39.7
Bayou Blue LA	6	8,051	60.3
Bayou Cane LA	1	2,081	10.5
Bayou Cane LA	6	17,689	89.5
Bayou Corne LA	6	32	100.0
Bayou Country Club LA	6	1,304	100.0
Bayou Gauche LA	2	2,161	100.0
Bayou Goula LA	2	514	100.0
Bayou L'Ourse LA	6	1,806	100.0
Bayou Vista LA	3	4,213	100.0
Belcher LA	4	248	100.0
Belle Chasse LA	1	10,579	100.0
Belle Rose LA	2	1,698	100.0
Belmont LA	4	305	100.0
Benton LA	4	2,048	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

City/Town	District	Population	%
Bernice LA	4	1,356	100.0
Berwick LA	3	4,771	100.0
Bienville LA	4	191	100.0
Blanchard LA	4	3,538	100.0
Bogalusa LA	5	10,659	100.0
Bonita LA	5	170	100.0
Boothville LA	1	718	100.0
Bordelonville LA	5	458	100.0
Bossier City LA	4	62,701	100.0
Bourg LA	1	2,375	100.0
Boutte LA	2	3,054	100.0
Boyce LA	5	888	100.0
Branch LA	3	431	100.0
Breaux Bridge LA	3	7,513	100.0
Bridge City LA	2	7,219	100.0
Broussard LA	3	13,417	100.0
Brownfields LA	6	5,145	100.0
Brownsville LA	5	4,353	100.0
Brusly LA	2	481	18.7
Brusly LA	6	2,097	81.3
Bryceland LA	4	87	100.0
Bunkie LA	5	3,346	100.0
Buras LA	1	1,109	100.0
Cade LA	3	1,874	100.0
Calhoun LA	5	670	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

City/Town	District	Population	%
Calvin LA	5	242	100.0
Cameron LA	3	315	100.0
Campti LA	4	887	100.0
Cankton LA	3	583	100.0
Carencro LA	3	9,272	100.0
Carlyss LA	3	5,101	100.0
Castor LA	4	230	100.0
Catahoula LA	3	988	100.0
Cecilia LA	3	1,807	100.0
Center Point LA	5	520	100.0
Centerville LA	3	499	100.0
Central LA	6	29,565	100.0
Chackbay LA	6	5,370	100.0
Chalmette LA	1	21,562	100.0
Charenton LA	3	1,699	100.0
Chataignier LA	4	259	100.0
Chatham LA	5	491	100.0
Chauvin LA	1	2,575	100.0
Cheneyville LA	5	468	100.0
Choctaw LA	6	775	100.0
Choudrant LA	5	989	100.0
Church Point LA	3	4,179	100.0
Claiborne LA	5	12,631	100.0
Clarence LA	4	326	100.0
Clarks LA	5	1,052	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

City/Town	District	Population	%
Clayton LA	5	584	100.0
Clinton LA	5	1,340	100.0
Colfax LA	5	1,428	100.0
Collinston LA	5	274	100.0
Columbia LA	5	277	100.0
Convent LA	2	483	100.0
Converse LA	4	379	100.0
Cotton Valley LA	4	787	100.0
Cottonport LA	5	2,023	100.0
Coushatta LA	4	1,752	100.0
Covington LA	1	11,564	100.0
Creola LA	5	242	100.0
Crescent LA	6	811	100.0
Crowley LA	3	11,710	100.0
Cullen LA	4	716	100.0
Cut Off LA	1	5,533	100.0
Darrow LA	2	200	100.0
Delacroix LA	1	48	100.0
Delcambre LA	3	1,793	100.0
Delhi LA	5	2,622	100.0
Delta LA	5	232	100.0
Denham Springs LA	6	9,286	100.0
DeQuincy LA	3	3,144	100.0
DeRidder LA	4	9,852	100.0
Des Allemands LA	2	1,730	79.4



**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

City/Town	District	Population	%
Des Allemands LA	6	449	20.6
Destrehan LA	2	1,445	12.7
Destrehan LA	6	9,895	87.3
Deville LA	5	1,761	100.0
Dixie Inn LA	4	293	100.0
Dodson LA	5	294	100.0
Donaldsonville LA	2	6,695	100.0
Dorseyville LA	2	159	100.0
Downsville LA	4	96	80.0
Downsville LA	5	24	20.0
Doyline LA	4	674	100.0
Dry Prong LA	5	455	100.0
Dubach LA	5	908	100.0
Dubberly LA	4	250	100.0
Dulac LA	1	1,241	100.0
Duson LA	3	1,326	100.0
East Hodge LA	5	204	100.0
Eastwood LA	4	4,390	100.0
Echo LA	5	352	100.0
Eden Isle LA	1	7,782	100.0
Edgard LA	2	1,948	100.0
Edgefield LA	4	204	100.0
Egan LA	3	618	100.0
Elizabeth LA	4	417	100.0
Elmwood LA	1	5,649	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

City/Town	District	Population	%
Elton LA	3	992	100.0
Empire LA	1	905	100.0
Epps LA	5	358	100.0
Erath LA	3	2,028	100.0
Eros LA	5	130	100.0
Erwinville LA	6	2,275	100.0
Estelle LA	1	3,854	21.5
Estelle LA	2	14,098	78.5
Estherwood LA	3	694	100.0
Eunice LA	3	302	3.2
Eunice LA	4	9,120	96.8
Evergreen LA	5	215	100.0
Farmerville LA	4	3,366	100.0
Fenton LA	3	226	100.0
Ferriday LA	5	3,189	100.0
Fifth Ward LA	5	921	100.0
Fisher LA	4	197	100.0
Florien LA	4	553	100.0
Folsom LA	1	769	100.0
Fordoche LA	6	910	100.0
Forest Hill LA	5	605	100.0
Forest LA	5	304	100.0
Fort Jesup LA	4	494	100.0
Fort Polk North LA	4	2,179	100.0
Fort Polk South LA	4	7,950	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

City/Town	District	Population	%
Franklin LA	3	6,728	100.0
Franklinton LA	5	3,662	100.0
French Settlement LA	6	1,073	100.0
Frierson LA	4	132	100.0
Galliano LA	1	7,100	100.0
Gardere LA	6	13,203	100.0
Garyville LA	2	2,123	100.0
Georgetown LA	5	277	100.0
Gibbsland LA	4	773	100.0
Gilbert LA	5	449	100.0
Gilliam LA	4	123	100.0
Gillis LA	3	800	100.0
Glencoe LA	3	132	100.0
Glenmora LA	5	1,087	100.0
Gloster LA	4	53	100.0
Golden Meadow LA	1	1,761	100.0
Goldonna LA	4	428	100.0
Gonzales LA	2	5,972	48.8
Gonzales LA	6	6,259	51.2
Good Pine LA	5	259	100.0
Grambling LA	5	5,239	100.0
Gramercy LA	2	2,932	100.0
Grand Cane LA	4	217	100.0
Grand Coteau LA	4	776	100.0
Grand Isle LA	1	1,005	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

City/Town	District	Population	%
Grand Point LA	2	2,241	100.0
Gray LA	6	5,518	100.0
Grayson LA	5	449	100.0
Greensburg LA	5	0	0.0
Greensburg LA	6	629	100.0
Greenwood LA	4	3,166	100.0
Gretna LA	2	17,814	100.0
Grosse Tete LA	6	548	100.0
Gueydan LA	3	1,165	100.0
Hackberry LA	3	926	100.0
Hahnville LA	2	2,959	100.0
Hall Summit LA	4	268	100.0
Hammond LA	1	19,584	100.0
Harahan LA	1	9,116	100.0
Harrisonburg LA	5	277	100.0
Harvey LA	2	22,236	100.0
Haughton LA	4	4,539	100.0
Hayes LA	3	676	100.0
Haynesville LA	4	2,039	100.0
Heflin LA	4	213	100.0
Henderson LA	3	1,617	100.0
Hessmer LA	5	772	100.0
Hester LA	2	483	100.0
Hodge LA	5	382	100.0
Homer LA	4	2,747	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

City/Town	District	Population	%
Hornbeck LA	4	430	100.0
Hosston LA	4	244	100.0
Houma LA	1	33,406	100.0
Ida LA	4	217	100.0
Independence LA	5	1,635	100.0
Inniswold LA	6	5,987	100.0
Iota LA	3	1,304	100.0
Iowa LA	3	3,436	100.0
Jackson LA	5	3,990	100.0
Jamestown LA	4	100	100.0
Jean Lafitte LA	1	1,809	100.0
Jeanerette LA	3	4,813	100.0
Jefferson LA	1	8,882	83.5
Jefferson LA	2	1,751	16.5
Jena LA	5	4,155	100.0
Jennings LA	3	9,837	100.0
Jonesboro LA	5	4,106	100.0
Jonesville LA	5	1,728	100.0
Jordan Hill LA	5	196	100.0
Joyce LA	5	328	100.0
Junction City LA	4	437	100.0
Kaplan LA	3	4,352	100.0
Keachi LA	4	243	100.0
Kenner LA	1	50,906	76.6
Kenner LA	2	15,542	23.4

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

City/Town	District	Population	%
Kentwood LA	5	2,145	100.0
Kilbourne LA	5	351	100.0
Killian LA	6	1,177	100.0
Killona LA	2	724	100.0
Kinder LA	4	2,170	100.0
Kraemer LA	6	877	100.0
Krotz Springs LA	5	904	100.0
Labadieville LA	6	1,715	100.0
Lacassine LA	3	490	100.0
Lacombe LA	1	8,657	100.0
Lafayette LA	3	121,374	100.0
Lafitte LA	1	1,014	100.0
Lafourche Crossing LA	6	2,427	100.0
Lake Arthur LA	3	2,595	100.0
Lake Charles LA	3	84,872	100.0
Lake Providence LA	5	3,587	100.0
Lakeshore LA	5	1,988	100.0
Lakeview LA	4	812	100.0
Laplace LA	2	16,755	58.1
Laplace LA	6	12,086	41.9
Larose LA	1	6,763	100.0
Lawtell LA	4	1,066	100.0
Lecompte LA	5	845	100.0
Leesville LA	4	5,649	100.0
Lemannville LA	2	695	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

City/Town	District	Population	%
Leonville LA	5	868	100.0
Lewisburg LA	1	420	100.0
Lillie LA	4	111	100.0
Lisbon LA	4	173	100.0
Livingston LA	6	1,877	100.0
Livonia LA	6	1,212	100.0
Lockport Heights LA	1	1,171	100.0
Lockport LA	1	2,490	100.0
Logansport LA	4	1,340	100.0
Longstreet LA	4	115	100.0
Longville LA	4	545	100.0
Loreauville LA	3	658	100.0
Lucky LA	4	251	100.0
Luling LA	2	13,716	100.0
Lutcher LA	2	3,133	100.0
Lydia LA	3	892	100.0
Madisonville LA	1	850	100.0
Mamou LA	4	2,936	100.0
Mandeville LA	1	13,192	100.0
Mangham LA	5	624	100.0
Mansfield LA	4	4,714	100.0
Mansura LA	5	1,320	100.0
Many LA	4	2,571	100.0
Maringouin LA	6	891	100.0
Marion LA	4	623	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

City/Town	District	Population	%
Marksville LA	5	5,065	100.0
Marrero LA	2	32,382	100.0
Marthaville LA	4	90	100.0
Martin LA	4	524	100.0
Mathews LA	1	2,191	96.4
Mathews LA	6	82	3.6
Maurice LA	3	2,118	100.0
McNary LA	5	201	100.0
Melville LA	5	759	100.0
Mer Rouge LA	5	491	100.0
Meraux LA	1	6,804	100.0
Mermentau LA	3	516	100.0
Merrydale LA	2	9,227	100.0
Merryville LA	4	967	100.0
Metairie LA	1	139,256	97.0
Metairie LA	2	4,251	3.0
Midland LA	3	249	100.0
Midway LA	5	1,157	100.0
Milton LA	3	2,590	100.0
Minden LA	4	11,928	100.0
Minorca LA	5	2,156	100.0
Monroe LA	5	47,702	100.0
Montegut LA	1	1,465	100.0
Monterey LA	5	474	100.0
Montgomery LA	5	622	100.0



**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

City/Town	District	Population	%
Monticello LA	6	5,431	100.0
Montpelier LA	6	196	100.0
Montz LA	2	0	0.0
Montz LA	6	2,106	100.0
Moonshine LA	2	168	100.0
Mooringsport LA	4	748	100.0
Moreauville LA	5	984	100.0
Morgan City LA	3	11,472	100.0
Morganza LA	6	525	100.0
Morrow LA	4	149	100.0
Morse LA	3	599	100.0
Moss Bluff LA	3	12,522	100.0
Mound LA	5	12	100.0
Mount Lebanon LA	4	66	100.0
Napoleonville LA	6	540	100.0
Natalbany LA	1	1,709	68.1
Natalbany LA	5	801	31.9
Natchez LA	4	489	100.0
Natchitoches LA	4	18,039	100.0
New Iberia LA	3	28,555	100.0
New Llano LA	4	2,213	100.0
New Orleans LA	1	49,479	12.9
New Orleans LA	2	334,518	87.1
New Orleans Station LA	1	2,508	100.0
New Roads LA	6	4,549	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

City/Town	District	Population	%
New Sarpy LA	2	917	78.4
New Sarpy LA	6	252	21.6
Newellton LA	5	886	100.0
Noble LA	4	200	100.0
Norco LA	6	2,984	100.0
North Hodge LA	5	296	100.0
North Vacherie LA	2	2,093	100.0
Norwood LA	5	279	100.0
Oak Grove LA	5	1,441	100.0
Oak Hills Place LA	6	9,239	100.0
Oak Ridge LA	5	124	100.0
Oakdale LA	4	6,692	100.0
Oberlin LA	4	1,402	100.0
Oil City LA	4	901	100.0
Old Jefferson LA	6	7,339	100.0
Olla LA	5	1,295	100.0
Opelousas LA	4	566	3.6
Opelousas LA	5	15,220	96.4
Oretta LA	4	371	100.0
Ossun LA	3	2,145	100.0
Paincourtville LA	2	857	100.0
Palmetto LA	5	92	100.0
Paradis LA	2	1,242	100.0
Parks LA	3	640	100.0
Patterson LA	3	5,931	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

City/Town	District	Population	%
Paulina LA	2	1,778	100.0
Pearl River LA	1	2,565	100.0
Perry LA	3	1,171	100.0
Pierre Part LA	6	3,024	100.0
Pine Prairie LA	4	1,490	100.0
Pineville LA	5	14,384	100.0
Pioneer LA	5	149	100.0
Pitkin LA	4	455	100.0
Plain Dealing LA	4	893	100.0
Plaquemine LA	2	6,269	100.0
Plaquemine LA	6	0	0.0
Plaucheville LA	5	221	100.0
Pleasant Hill LA	4	617	100.0
Pleasure Bend LA	2	212	100.0
Point Place LA	4	382	100.0
Pointe a la Hache LA	1	183	100.0
Pollock LA	5	394	100.0
Ponchatoula LA	1	7,822	100.0
Port Allen LA	2	4,315	87.4
Port Allen LA	6	624	12.6
Port Barre LA	5	1,751	100.0
Port Sulphur LA	1	1,677	100.0
Port Vincent LA	6	646	100.0
Powhatan LA	4	101	100.0
Poydras LA	1	2,536	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

City/Town	District	Population	%
Prairieville LA	6	33,197	100.0
Presquille LA	1	1,703	100.0
Prien LA	3	7,745	100.0
Prospect LA	5	380	100.0
Provencal LA	4	528	100.0
Quitman LA	5	160	100.0
Raceland LA	1	4,030	41.3
Raceland LA	6	5,738	58.7
Rayne LA	3	7,236	100.0
Rayville LA	5	3,347	100.0
Red Chute LA	4	7,065	100.0
Reddell LA	4	904	100.0
Reeves LA	4	221	100.0
Reserve LA	2	8,541	100.0
Richmond LA	5	511	100.0
Richwood LA	5	3,881	100.0
Ridgecrest LA	5	583	100.0
Ringgold LA	4	1,379	100.0
Rio LA	5	137	100.0
River Ridge LA	1	11,276	83.0
River Ridge LA	2	2,315	17.0
Roanoke LA	3	491	100.0
Robeline LA	4	117	100.0
Rock Hill LA	5	260	100.0
Rodessa LA	4	192	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

City/Town	District	Population	%
Romeville LA	2	99	100.0
Rosedale LA	6	664	100.0
Roseland LA	5	880	100.0
Rosepine LA	4	1,519	100.0
Ruston LA	5	22,166	100.0
Saline LA	4	265	100.0
Sarepta LA	4	717	100.0
Schriever LA	6	6,711	100.0
Scott LA	3	8,119	100.0
Shenandoah LA	6	19,292	100.0
Shongaloo LA	4	151	100.0
Shreveport LA	4	187,593	100.0
Sibley LA	4	1,127	100.0
Sicily Island LA	5	366	100.0
Sikes LA	5	112	100.0
Simmesport LA	5	1,468	100.0
Simpson LA	4	585	100.0
Simsboro LA	5	803	100.0
Singer LA	4	303	100.0
Siracusaville LA	3	297	100.0
Slaughter LA	6	1,035	100.0
Slidell LA	1	28,781	100.0
Sorrel LA	3	711	100.0
Sorrento LA	6	1,514	100.0
South Mansfield LA	4	333	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

City/Town	District	Population	%
South Vacherie LA	2	3,388	100.0
Spearsville LA	4	126	100.0
Spokane LA	5	378	100.0
Springfield LA	6	427	100.0
Springhill LA	4	4,801	100.0
St. Francisville LA	5	1,557	100.0
St. Gabriel LA	2	6,433	100.0
St. James LA	2	592	100.0
St. Joseph LA	5	831	100.0
St. Martinville LA	3	5,379	100.0
St. Maurice LA	5	266	100.0
St. Rose LA	2	3,996	53.3
St. Rose LA	6	3,508	46.8
Stanley LA	4	132	100.0
Starks LA	3	659	100.0
Start LA	5	982	100.0
Sterlington LA	5	1,980	100.0
Stonewall LA	4	2,273	100.0
Sugartown LA	4	33	100.0
Sulphur LA	3	21,809	100.0
Sun LA	1	392	100.0
Sunset LA	4	2,909	100.0
Supreme LA	6	839	100.0
Swartz LA	5	4,354	100.0
Taft LA	2	61	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

City/Town	District	Population	%
Tallulah LA	5	6,286	100.0
Tangipahoa LA	5	425	100.0
Terrytown LA	2	25,278	100.0
Thibodaux LA	6	15,948	100.0
Tickfaw LA	5	635	100.0
Timberlane LA	2	10,364	100.0
Triumph LA	1	268	100.0
Trout LA	5	104	100.0
Tullos LA	5	304	100.0
Turkey Creek LA	4	394	100.0
Union LA	2	735	100.0
Urania LA	5	698	100.0
Varnado LA	5	330	100.0
Venice LA	1	162	100.0
Ventress LA	6	800	100.0
Vidalia LA	5	4,027	100.0
Vienna Bend LA	4	1,314	100.0
Vienna LA	5	483	100.0
Village St. George LA	6	7,677	100.0
Ville Platte LA	4	6,303	100.0
Vinton LA	3	3,400	100.0
Violet LA	1	5,758	100.0
Vivian LA	4	3,073	100.0
Waggaman LA	2	9,835	100.0
Walker LA	6	6,374	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

City/Town	District	Population	%
Wallace LA	2	755	100.0
Wallace Ridge LA	5	572	100.0
Washington LA	4	742	100.0
Waterproof LA	5	541	100.0
Watson LA	6	956	100.0
Welcome LA	2	672	100.0
Welsh LA	3	3,333	100.0
West Monroe LA	5	13,103	100.0
Westlake LA	3	4,781	100.0
Westminster LA	6	2,791	100.0
Westwego LA	2	8,568	100.0
White Castle LA	2	1,722	100.0
White Castle LA	6	0	0.0
Wilson LA	5	348	100.0
Winnfield LA	5	4,153	100.0
Winnsboro LA	5	4,862	100.0
Wisner LA	5	771	100.0
Woodmere LA	2	11,238	100.0
Woodworth LA	5	1,762	100.0
Youngsville LA	3	15,929	100.0
Zachary LA	6	19,316	100.0
Zwolle LA	4	1,638	100.0



**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

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

Population

%

**District 1**

Abita Springs LA	2,631	100.0
Arabi LA	4,533	100.0
Barataria LA	1,057	100.0
Bayou Blue LA (part)	5,301	39.7
Bayou Cane LA (part)	2,081	10.5
Belle Chasse LA	10,579	100.0
Boothville LA	718	100.0
Bourg LA	2,375	100.0
Buras LA	1,109	100.0
Chalmette LA	21,562	100.0
Chauvin LA	2,575	100.0
Covington LA	11,564	100.0
Cut Off LA	5,533	100.0
Delacroix LA	48	100.0
Dulac LA	1,241	100.0
Eden Isle LA	7,782	100.0
Elmwood LA	5,649	100.0
Empire LA	905	100.0
Estelle LA (part)	3,854	21.5
Folsom LA	769	100.0
Galliano LA	7,100	100.0
Golden Meadow LA	1,761	100.0
Grand Isle LA	1,005	100.0
Hammond LA	19,584	100.0
Harahan LA	9,116	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
Houma LA	33,406	100.0
Jean Lafitte LA	1,809	100.0
Jefferson LA (part)	8,882	83.5
Kenner LA (part)	50,906	76.6
Lacombe LA	8,657	100.0
Lafitte LA	1,014	100.0
Larose LA	6,763	100.0
Lewisburg LA	420	100.0
Lockport Heights LA	1,171	100.0
Lockport LA	2,490	100.0
Madisonville LA	850	100.0
Mandeville LA	13,192	100.0
Mathews LA (part)	2,191	96.4
Meraux LA	6,804	100.0
Metairie LA (part)	139,256	97.0
Montegut LA	1,465	100.0
Natalbany LA (part)	1,709	68.1
New Orleans LA (part)	49,479	12.9
New Orleans Station LA	2,508	100.0
Pearl River LA	2,565	100.0
Pointe a la Hache LA	183	100.0
Ponchatoula LA	7,822	100.0
Port Sulphur LA	1,677	100.0
Poydras LA	2,536	100.0
Presquille LA	1,703	100.0
Raceland LA (part)	4,030	41.3
River Ridge LA (part)	11,276	83.0
Slidell LA	28,781	100.0
Sun LA	392	100.0
Triumph LA	268	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
Venice LA	162	100.0
Violet LA	5,758	100.0
<b>District 1 Totals</b>	<b>530,557</b>	
<b>District 2</b>		
Addis LA (part)	5,648	83.9
Ama LA	1,290	100.0
Avondale LA	4,582	100.0
Baker LA (part)	3,119	25.0
Baton Rouge LA (part)	77,716	34.2
Bayou Gauche LA	2,161	100.0
Bayou Goula LA	514	100.0
Belle Rose LA	1,698	100.0
Boutte LA	3,054	100.0
Bridge City LA	7,219	100.0
Brusly LA (part)	481	18.7
Convent LA	483	100.0
Darrow LA	200	100.0
Des Allemands LA (part)	1,730	79.4
Destrehan LA (part)	1,445	12.7
Donaldsonville LA	6,695	100.0
Dorseyville LA	159	100.0
Edgard LA	1,948	100.0
Estelle LA (part)	14,098	78.5
Garyville LA	2,123	100.0
Gonzales LA (part)	5,972	48.8
Gramercy LA	2,932	100.0
Grand Point LA	2,241	100.0
Gretna LA	17,814	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
Hahnville LA	2,959	100.0
Harvey LA	22,236	100.0
Hester LA	483	100.0
Jefferson LA (part)	1,751	16.5
Kenner LA (part)	15,542	23.4
Killona LA	724	100.0
Laplace LA (part)	16,755	58.1
Lemannville LA	695	100.0
Luling LA	13,716	100.0
Lutcher LA	3,133	100.0
Marrero LA	32,382	100.0
Merrydale LA	9,227	100.0
Metairie LA (part)	4,251	3.0
Montz LA (part)	0	0.0
Moonshine LA	168	100.0
New Orleans LA (part)	334,518	87.1
New Sarpy LA (part)	917	78.4
North Vacherie LA	2,093	100.0
Paincourtville LA	857	100.0
Paradis LA	1,242	100.0
Paulina LA	1,778	100.0
Plaquemine LA (part)	6,269	100.0
Pleasure Bend LA	212	100.0
Port Allen LA (part)	4,315	87.4
Reserve LA	8,541	100.0
River Ridge LA (part)	2,315	17.0
Romeville LA	99	100.0
South Vacherie LA	3,388	100.0
St. Gabriel LA	6,433	100.0
St. James LA	592	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
St. Rose LA (part)	3,996	53.3
Taft LA	61	100.0
Terrytown LA	25,278	100.0
Timberlane LA	10,364	100.0
Union LA	735	100.0
Waggaman LA	9,835	100.0
Wallace LA	755	100.0
Welcome LA	672	100.0
Westwego LA	8,568	100.0
White Castle LA (part)	1,722	100.0
Woodmere LA	11,238	100.0
<b>District 2 Totals</b>	<b>736,137</b>	
<b>District 3</b>		
Abbeville LA	11,186	100.0
Amelia LA	2,132	100.0
Arnaudville LA	1,009	100.0
Baldwin LA	1,762	100.0
Basile LA (part)	0	0.0
Bayou Vista LA	4,213	100.0
Berwick LA	4,771	100.0
Branch LA	431	100.0
Breaux Bridge LA	7,513	100.0
Broussard LA	13,417	100.0
Cade LA	1,874	100.0
Cameron LA	315	100.0
Cankton LA	583	100.0
Carencro LA	9,272	100.0
Carlyss LA	5,101	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
Catahoula LA	988	100.0
Cecilia LA	1,807	100.0
Centerville LA	499	100.0
Charenton LA	1,699	100.0
Church Point LA	4,179	100.0
Crowley LA	11,710	100.0
Delcambre LA	1,793	100.0
DeQuincy LA	3,144	100.0
Duson LA	1,326	100.0
Egan LA	618	100.0
Elton LA	992	100.0
Erath LA	2,028	100.0
Estherwood LA	694	100.0
Eunice LA (part)	302	3.2
Fenton LA	226	100.0
Franklin LA	6,728	100.0
Gillis LA	800	100.0
Glencoe LA	132	100.0
Gueydan LA	1,165	100.0
Hackberry LA	926	100.0
Hayes LA	676	100.0
Henderson LA	1,617	100.0
Iota LA	1,304	100.0
Iowa LA	3,436	100.0
Jeanerette LA	4,813	100.0
Jennings LA	9,837	100.0
Kaplan LA	4,352	100.0
Lacassine LA	490	100.0
Lafayette LA	121,374	100.0
Lake Arthur LA	2,595	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
Lake Charles LA	84,872	100.0
Loreauville LA	658	100.0
Lydia LA	892	100.0
Maurice LA	2,118	100.0
Mermentau LA	516	100.0
Midland LA	249	100.0
Milton LA	2,590	100.0
Morgan City LA	11,472	100.0
Morse LA	599	100.0
Moss Bluff LA	12,522	100.0
New Iberia LA	28,555	100.0
Ossun LA	2,145	100.0
Parks LA	640	100.0
Patterson LA	5,931	100.0
Perry LA	1,171	100.0
Prien LA	7,745	100.0
Rayne LA	7,236	100.0
Roanoke LA	491	100.0
Scott LA	8,119	100.0
Siracusaville LA	297	100.0
Sorrel LA	711	100.0
St. Martinville LA	5,379	100.0
Starks LA	659	100.0
Sulphur LA	21,809	100.0
Vinton LA	3,400	100.0
Welsh LA	3,333	100.0
Westlake LA	4,781	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
Youngsville LA	15,929	100.0
<b>District 3 Totals</b>	<b>490,648</b>	
<b>District 4</b>		
Anacoco LA	851	100.0
Arcadia LA	2,746	100.0
Ashland LA	194	100.0
Athens LA	237	100.0
Basile LA (part)	1,214	100.0
Belcher LA	248	100.0
Belmont LA	305	100.0
Benton LA	2,048	100.0
Bernice LA	1,356	100.0
Bienville LA	191	100.0
Blanchard LA	3,538	100.0
Bossier City LA	62,701	100.0
Bryceland LA	87	100.0
Campti LA	887	100.0
Castor LA	230	100.0
Chataignier LA	259	100.0
Clarence LA	326	100.0
Converse LA	379	100.0
Cotton Valley LA	787	100.0
Coushatta LA	1,752	100.0
Cullen LA	716	100.0
DeRidder LA	9,852	100.0
Dixie Inn LA	293	100.0
Downsville LA (part)	96	80.0
Doyline LA	674	100.0



**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
Dubberly LA	250	100.0
Eastwood LA	4,390	100.0
Edgefield LA	204	100.0
Elizabeth LA	417	100.0
Eunice LA (part)	9,120	96.8
Farmerville LA	3,366	100.0
Fisher LA	197	100.0
Florien LA	553	100.0
Fort Jesup LA	494	100.0
Fort Polk North LA	2,179	100.0
Fort Polk South LA	7,950	100.0
Frierson LA	132	100.0
Gibbsland LA	773	100.0
Gilliam LA	123	100.0
Gloster LA	53	100.0
Goldonna LA	428	100.0
Grand Cane LA	217	100.0
Grand Coteau LA	776	100.0
Greenwood LA	3,166	100.0
Hall Summit LA	268	100.0
Haughton LA	4,539	100.0
Haynesville LA	2,039	100.0
Heflin LA	213	100.0
Homer LA	2,747	100.0
Hornbeck LA	430	100.0
Hosston LA	244	100.0
Ida LA	217	100.0
Jamestown LA	100	100.0
Junction City LA	437	100.0
Keachi LA	243	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
Kinder LA	2,170	100.0
Lakeview LA	818	100.0
Lawtell LA	1,066	100.0
Leesville LA	5,649	100.0
Lillie LA	111	100.0
Lisbon LA	173	100.0
Logansport LA	1,340	100.0
Longstreet LA	115	100.0
Longville LA	545	100.0
Lucky LA	251	100.0
Mamou LA	2,936	100.0
Mansfield LA	4,714	100.0
Many LA	2,571	100.0
Marion LA	623	100.0
Marthaville LA	90	100.0
Martin LA	524	100.0
Merryville LA	967	100.0
Minden LA	11,928	100.0
Mooringsport LA	748	100.0
Morrow LA	149	100.0
Mount Lebanon LA	66	100.0
Natchez LA	489	100.0
Natchitoches LA	18,039	100.0
New Llano LA	2,213	100.0
Noble LA	200	100.0
Oakdale LA	6,692	100.0
Oberlin LA	1,402	100.0
Oil City LA	901	100.0
Opelousas LA (part)	566	3.6
Oretta LA	371	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
Pine Prairie LA	1,490	100.0
Pitkin LA	455	100.0
Plain Dealing LA	893	100.0
Pleasant Hill LA	617	100.0
Point Place LA	382	100.0
Powhatan LA	101	100.0
Provencal LA	528	100.0
Red Chute LA	7,065	100.0
Reddell LA	904	100.0
Reeves LA	221	100.0
Ringgold LA	1,379	100.0
Robeline LA	117	100.0
Rodessa LA	192	100.0
Rosepine LA	1,519	100.0
Saline LA	265	100.0
Sarepta LA	717	100.0
Shongaloo LA	151	100.0
Shreveport LA	187,593	100.0
Sibley LA	1,127	100.0
Simpson LA	585	100.0
Singer LA	303	100.0
South Mansfield LA	333	100.0
Spearsville LA	126	100.0
Springhill LA	4,801	100.0
Stanley LA	132	100.0
Stonewall LA	2,273	100.0
Sugartown LA	33	100.0
Sunset LA	2,909	100.0
Turkey Creek LA	394	100.0
Vienna Bend LA	1,314	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
Ville Platte LA	6,303	100.0
Vivian LA	3,073	100.0
Washington LA	742	100.0
Zwolle LA	1,638	100.0
<b>District 4 Totals</b>	<b>437,334</b>	
<b>District 5</b>		
Alexandria LA	45,275	100.0
Amite City LA	4,005	100.0
Angie LA	258	100.0
Atlanta LA	149	100.0
Ball LA	3,961	100.0
Banks Springs LA	1,136	100.0
Baskin LA	210	100.0
Bastrop LA	9,691	100.0
Bawcomville LA	3,472	100.0
Bogalusa LA	10,659	100.0
Bonita LA	170	100.0
Bordelonville LA	458	100.0
Boyce LA	888	100.0
Brownsville LA	4,353	100.0
Bunkie LA	3,346	100.0
Calhoun LA	670	100.0
Calvin LA	242	100.0
Center Point LA	520	100.0
Chatham LA	491	100.0
Cheneyville LA	468	100.0
Choudrant LA	989	100.0
Claiborne LA	12,631	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
Clarks LA	1,052	100.0
Clayton LA	584	100.0
Clinton LA	1,340	100.0
Colfax LA	1,428	100.0
Collinston LA	274	100.0
Columbia LA	277	100.0
Cottonport LA	2,023	100.0
Creola LA	242	100.0
Delhi LA	2,622	100.0
Delta LA	232	100.0
Deville LA	1,761	100.0
Dodson LA	294	100.0
Downsville LA (part)	24	20.0
Dry Prong LA	455	100.0
Dubach LA	908	100.0
East Hodge LA	204	100.0
Echo LA	352	100.0
Epps LA	358	100.0
Eros LA	130	100.0
Evergreen LA	215	100.0
Ferriday LA	3,189	100.0
Fifth Ward LA	921	100.0
Forest Hill LA	605	100.0
Forest LA	304	100.0
Franklinton LA	3,662	100.0
Georgetown LA	277	100.0
Gilbert LA	449	100.0
Glenmora LA	1,087	100.0
Good Pine LA	259	100.0
Grambling LA	5,239	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
Grayson LA	449	100.0
Greensburg LA (part)	0	0.0
Harrisonburg LA	277	100.0
Hessmer LA	772	100.0
Hodge LA	382	100.0
Independence LA	1,635	100.0
Jackson LA	3,990	100.0
Jena LA	4,155	100.0
Jonesboro LA	4,106	100.0
Jonesville LA	1,728	100.0
Jordan Hill LA	196	100.0
Joyce LA	328	100.0
Kentwood LA	2,145	100.0
Kilbourne LA	351	100.0
Krotz Springs LA	904	100.0
Lake Providence LA	3,587	100.0
Lakeshore LA	1,988	100.0
Lecompte LA	845	100.0
Leonville LA	868	100.0
Mangham LA	624	100.0
Mansura LA	1,320	100.0
Marksville LA	5,065	100.0
McNary LA	201	100.0
Melville LA	759	100.0
Mer Rouge LA	491	100.0
Midway LA	1,157	100.0
Minorca LA	2,156	100.0
Monroe LA	47,702	100.0
Monterey LA	474	100.0
Montgomery LA	622	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
Moreauville LA	984	100.0
Mound LA	12	100.0
Natalbany LA (part)	801	31.9
Newellton LA	886	100.0
North Hodge LA	296	100.0
Norwood LA	279	100.0
Oak Grove LA	1,441	100.0
Oak Ridge LA	124	100.0
Olla LA	1,295	100.0
Opelousas LA (part)	15,220	96.4
Palmetto LA	92	100.0
Pineville LA	14,384	100.0
Pioneer LA	149	100.0
Plaucheville LA	221	100.0
Pollock LA	394	100.0
Port Barre LA	1,751	100.0
Prospect LA	380	100.0
Quitman LA	160	100.0
Rayville LA	3,347	100.0
Richmond LA	511	100.0
Richwood LA	3,881	100.0
Ridgecrest LA	583	100.0
Rio LA	137	100.0
Rock Hill LA	260	100.0
Roseland LA	880	100.0
Ruston LA	22,166	100.0
Sicily Island LA	366	100.0
Sikes LA	112	100.0
Simmesport LA	1,468	100.0
Simsboro LA	803	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
Spokane LA	378	100.0
St. Francisville LA	1,557	100.0
St. Joseph LA	831	100.0
St. Maurice LA	266	100.0
Start LA	982	100.0
Sterlington LA	1,980	100.0
Swartz LA	4,354	100.0
Tallulah LA	6,286	100.0
Tangipahoa LA	425	100.0
Tickfaw LA	635	100.0
Trout LA	104	100.0
Tullos LA	304	100.0
Urania LA	698	100.0
Varnado LA	330	100.0
Vidalia LA	4,027	100.0
Vienna LA	483	100.0
Wallace Ridge LA	572	100.0
Waterproof LA	541	100.0
West Monroe LA	13,103	100.0
Wilson LA	348	100.0
Winnfield LA	4,153	100.0
Winnsboro LA	4,862	100.0
Wisner LA	771	100.0
Woodworth LA	1,762	100.0
<b>District 5 Totals</b>	<b>347,221</b>	
<b>District 6</b>		
Addis LA (part)	1,083	16.1
Albany LA	1,235	100.0



**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
Baker LA (part)	9,336	75.0
Baton Rouge LA (part)	149,754	65.8
Bayou Blue LA (part)	8,051	60.3
Bayou Cane LA (part)	17,689	89.5
Bayou Corne LA	32	100.0
Bayou Country Club LA	1,304	100.0
Bayou L'Ourse LA	1,806	100.0
Brownfields LA	5,145	100.0
Brusly LA (part)	2,097	81.3
Central LA	29,565	100.0
Chackbay LA	5,370	100.0
Choctaw LA	775	100.0
Crescent LA	811	100.0
Denham Springs LA	9,286	100.0
Des Allemands LA (part)	449	20.6
Destrehan LA (part)	9,895	87.3
Erwinville LA	2,275	100.0
Fordoche LA	910	100.0
French Settlement LA	1,073	100.0
Gardere LA	13,203	100.0
Gonzales LA (part)	6,259	51.2
Gray LA	5,518	100.0
Greensburg LA (part)	629	100.0
Grosse Tete LA	548	100.0
Inniswold LA	5,987	100.0
Killian LA	1,177	100.0
Kraemer LA	877	100.0
Labadieville LA	1,715	100.0
Lafourche Crossing LA	2,427	100.0
Laplace LA (part)	12,086	41.9

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
Livingston LA	1,877	100.0
Livonia LA	1,212	100.0
Maringouin LA	891	100.0
Mathews LA (part)	82	3.6
Monticello LA	5,431	100.0
Montpelier LA	196	100.0
Montz LA (part)	2,106	100.0
Morganza LA	525	100.0
Napoleonville LA	540	100.0
New Roads LA	4,549	100.0
New Sarpy LA (part)	252	21.6
Norco LA	2,984	100.0
Oak Hills Place LA	9,239	100.0
Old Jefferson LA	7,339	100.0
Pierre Part LA	3,024	100.0
Plaquemine LA (part)	0	0.0
Port Allen LA (part)	624	12.6
Port Vincent LA	646	100.0
Prairieville LA	33,197	100.0
Raceland LA (part)	5,738	58.7
Rosedale LA	664	100.0
Schriever LA	6,711	100.0
Shenandoah LA	19,292	100.0
Slaughter LA	1,035	100.0
Sorrento LA	1,514	100.0
Springfield LA	427	100.0
St. Rose LA (part)	3,508	46.8
Supreme LA	839	100.0
Thibodaux LA	15,948	100.0
Ventress LA	800	100.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

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	Population	%
Village St. George LA	7,677	100.0
Walker LA	6,374	100.0
Watson LA	956	100.0
Westminster LA	2,791	100.0
White Castle LA (part)	0	0.0
Zachary LA	19,316	100.0

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<b>District 6 Totals</b>	<b>476,671</b>	
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## Communities of Interest (Landscape, 11x8.5)

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LA CD 2011 Plan

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### Summary Statistics

Number of City/Town not split	458
Number of City/Town split	30
Number of City/Town split in 2	30
Total number of splits	60

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User: Tony Fairfax

Plan Name: LA CD Illustrative Plan 1

Plan Type: LA Congressional Districts

**Communities of Interest (Landscape, 11x8.5)**

Saturday, April 2, 2022

12:53 AM

Landmark Area	District	Population	%
Jean Lafitte National Historical Park an	1	48	63.2
Jean Lafitte National Historical Park an	2	28	36.8
Louisiana State Univ	2	4,768	54.0
Louisiana State Univ	2	0	0.0
Louisiana State Univ	6	4,070	46.1
Louisiana State Univ	6	57	100.0

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**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

Landmark Area	-- Listed by District	
	Population	%
Audobon Park Golf Course	0	0.0
East Jefferson General Hosp	0	0.0
Franklin Foundation Hosp	0	0.0
Green St Cmtry	0	0.0
Jean Lafitte National Historical Park an (part)	48	63.2
Jean Lafitte National Historical Park an	0	0.0
Jean Lafitte National Historical Park an	0	0.0
Lawrence Park	0	0.0
Leonard J Chabert Medical Ctr	0	0.0
New Orleans Adolescent Hosp	0	0.0
Ochsner Baptist Medical Ctr	0	0.0
Ochsner Medical Ctr	0	0.0
Plaquemines Parish Sheriff's Office-Bell	0	0.0
Slidell Memorial Hosp	0	0.0
Southern Surgical Hosp	0	0.0
St Mary Cmtry	0	0.0
St Mary Parish Correctional Ctr	0	0.0
Teche Regional Medical Ctr	0	0.0
Terrebonne General Medical Ctr	0	0.0
US Army Corps of Engineers	0	0.0
West End Park	0	0.0
<b>District 1 Totals</b>	<b>7,493</b>	

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
Algiers Technology Acdmy	0	0.0
Behrman Memorial Pk	0	0.0
Couba-Island	0	0.0
Folgers Coffee	0	0.0
Jambalaya Park	0	0.0
Jean Lafitte National Historical Park an (part)	28	36.8
Jean Lafitte National Historical Park an	0	0.0
Jean Lafitte National Historical Park an	0	0.0
Jean Lafitte National Historical Park an	0	0.0
Louis Armstrong New Orleans Internationa	0	0.0
Louis Armstrong New Orleans Internationa	0	0.0
Louisiana Correctional Institute for Wom	0	0.0
Louisiana Correctional Institute for Wom	0	0.0
Louisiana State Univ (part)	4,768	54.0
Louisiana State Univ (part)	0	0.0
Louisiana State University Health Scienc	0	0.0
Orleans Parish Intake Processing Ctr	0	0.0
Orleans Parish Prison	0	0.0
Orleans Parish Temporary Jails	0	0.0
South White Street Female Division	0	0.0
Touro Infirmary	0	0.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
Tulane Univ	0	0.0
Tulane Univ	0	0.0
University Medical Ctr	0	0.0
Xavier Univ of Louisiana	0	0.0
Xavier Univ of Louisiana	0	0.0
<b>District 2 Totals</b>	<b>11,485</b>	
A Kaplan Memorial Pk	0	0.0
Abrom Kaplan Memorial Hosp	0	0.0
Acadia Parish Detention Ctr	0	0.0
Acadia Parish Jail	0	0.0
Acadiana Rgnl Arprt	0	0.0
American Legion Hosp	0	0.0
C Paul Phelps Correctional Ctr	0	0.0
Cameron Parish Jail	0	0.0
Chicot State Park	0	0.0
Chicot State Park	0	0.0
Chicot State Park	0	0.0
Christus St Patrick Hosp	0	0.0
City Park	0	0.0
Dequincy City Jail	0	0.0
Duson Park	0	0.0
Jean Lafitte National Historical Park an	0	0.0
Jennings City Jail	0	0.0
Kaplan Indl Park	0	0.0
Lafayette General Medical Ctr	0	0.0
Lafayette General Surgical Hosp	0	0.0
Lafayette Regional	0	0.0
Lake Charles Regional	0	0.0



**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
Levy Park	0	0.0
Louisiana State University Eunice	0	0.0
M L King Park	0	0.0
McNeese State Univ	0	0.0
North Side City Park	0	0.0
Riverside Park	0	0.0
South Louisiana Correctional Ctr	0	0.0
St Martin Sheriff's Office Juvenile Trai	0	0.0
Univ of Louisiana Lafayette	0	0.0
<b>District 3 Totals</b>	<b>5,649</b>	
Caldwell Detention Ctr	0	0.0
Caldwell Memorial Hosp	0	0.0
Caldwell Parish Jail	0	0.0
Cane River Creole Natl Hist Pk	0	0.0
Catholic Cmtry	0	0.0
Centenary College of Louisiana	0	0.0
Claiborne Parish Womens Jail	0	0.0
David Wade Correctional Ctr	0	0.0
Desoto Parish Detention Ctr	0	0.0
Desoto Regional Health System	0	0.0
Forcht-Wade Correctional Ctr	0	0.0
Grambling State Univ	0	0.0
Hardtner Medical Ctr	0	0.0
Hart Arprt	0	0.0
Hart Arprt	0	0.0
Jackson Parish Hosp	0	0.0
L S U Health Shreveport	0	0.0
Louisiana Tech Univ	0	0.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
Louisiana Tech Univ	0	0.0
Natchitoches Regional Medical Ctr	0	0.0
New Llano City Park	0	0.0
Northern Louisiana Medical Ctr	0	0.0
Northwestern State Univ	0	0.0
Shreveport City Jail	0	0.0
Shreveport Regional	0	0.0
Specialists Hospital Shreveport	0	0.0
Springhill Police Dept	0	0.0
Squires Cmtry	0	0.0
Stonewall Park	0	0.0
United States Penitentiary Pollock	0	0.0
United States Penitentiary Pollock	0	0.0
Webster Parish Jail	0	0.0
White Rock Cmtry	0	0.0
Willis Knighton Medical Ctr	0	0.0
Winn Parish Jail	0	0.0
Winn Parish Medical Ctr	0	0.0
Winnfield City Jail	0	0.0
<b>District 4 Totals</b>	<b>12,529</b>	
Amite City Jail	0	0.0
Arsenal Park	0	0.0
Avoyelles Hosp	0	0.0
Baton Rouge General Medical Ctr	0	0.0
Baton Rouge Metropolitan	0	0.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

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

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

	Population	%
<b>District 5 Totals</b>	<b>16,907</b>	
Athletic Park	0	0.0
Bogalusa Medical Ctr	0	0.0
Carver Park	0	0.0
Fontainebleau St Park Preserve	0	0.0
Louisiana State Univ (part)	4,070	46.1
Our Lady of the Lake Livingston	0	0.0
Our Lady of the Lake Regional Medical Ct	0	0.0
Pearl River Wildlife Mngt Area	0	0.0
St Tammany Parish Hosp	0	0.0
Summit Hosp	0	0.0
Summit Hosp	0	0.0
Washington St Tammany Regional Medical C	0	0.0
Woman's Hosp	0	0.0
Woman's Hosp	0	0.0
<b>District 6 Totals</b>	<b>8,448</b>	

**Communities of Interest (Landscape, 11x8.5)**

LA CD Illustrative Plan 1

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**Summary Statistics**

Number of Landmark Area not split	384
Number of Landmark Area split	58
Number of Landmark Area split in 2	41
Number of Landmark Area split in 3	8
Number of Landmark Area split in 4	4
Number of Landmark Area split in 5	4
Number of Landmark Area split in 6	0
Number of Landmark Area split in 7	0
Number of Landmark Area split in 8	0
Number of Landmark Area split in 9	1
Total number of splits	151

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User: Tony Fairfax

Plan Name: LA CD Plan HB1

Plan Type: Congressional Districts

## Communities of Interest (Landscape, 11x8.5)

Friday, April 1, 2022

10:41 PM

Landmark Area	District	Population	%
Louisiana State Univ	2	0	0.0
Louisiana State Univ	6	8,838	100.0

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**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

Landmark Area	-- Listed by District	
	Population	%
Athletic Park	0	0.0
Audobon Park Golf Course	0	0.0
East Jefferson General Hosp	0	0.0
Fontainebleau St Park Preserve	0	0.0
Jean Lafitte National Historical Park an	0	0.0
Leonard J Chabert Medical Ctr	0	0.0
New Orleans Adolescent Hosp	0	0.0
Ochsner Medical Ctr	0	0.0
Pearl River Wildlife Mngt Area	0	0.0
Plaquemines Parish Sheriff's Office-Bell	0	0.0
Slidell Memorial Hosp	0	0.0
Southern Surgical Hosp	0	0.0
St Tammany Parish Hosp	0	0.0
Terrebonne General Medical Ctr	0	0.0
West End Park	0	0.0
<b>District 1 Totals</b>	<b>6,260</b>	
Algiers Technology Acdmy	0	0.0
Baton Rouge Metropolitan	0	0.0
Baton Rouge Metropolitan	0	0.0
Behrman Memorial Pk	0	0.0
Camelot Colg	0	0.0
Couba-Island	0	0.0
Folgers Coffee	0	0.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Greater Baton Rouge Surgical Hosp	0	0.0
Green St Cmtry	0	0.0
Jean Lafitte National Historical Park an	0	0.0
Jean Lafitte National Historical Park an	0	0.0
Jean Lafitte National Historical Park an	0	0.0
Louis Armstrong New Orleans Internationa	0	0.0
Louisiana Correctional Institute for Wom	0	0.0
Louisiana Correctional Institute for Wom	0	0.0
Louisiana State Univ (part)	0	0.0
Louisiana State University Health Scienc	0	0.0
Ochsner Baptist Medical Ctr	0	0.0
Orleans Parish Intake Processing Ctr	0	0.0
Orleans Parish Prison	0	0.0
Orleans Parish Temporary Jails	0	0.0
South White Street Female Division	0	0.0
St John Schl	0	0.0
St Mary Cmtry	0	0.0
Touro Infirmary	0	0.0
Tulane Univ	0	0.0
Tulane Univ	0	0.0
University Medical Ctr	0	0.0
US Army Corps of Engineers	0	0.0



**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Xavier Univ of Louisiana	0	0.0
Xavier Univ of Louisiana	0	0.0
<b>District 2 Totals</b>	<b>10,481</b>	
A Kaplan Memorial Pk	0	0.0
Abrom Kaplan Memorial Hosp	0	0.0
Acadia Parish Detention Ctr	0	0.0
Acadia Parish Jail	0	0.0
Acadiana Rgnl Arprt	0	0.0
American Legion Hosp	0	0.0
Cameron Parish Jail	0	0.0
Christus St Patrick Hosp	0	0.0
City Park	0	0.0
Dequincy City Jail	0	0.0
Duson Park	0	0.0
Franklin Foundation Hosp	0	0.0
Jean Lafitte National Historical Park an	0	0.0
Jennings City Jail	0	0.0
Kaplan Indl Park	0	0.0
Lafayette General Medical Ctr	0	0.0
Lafayette General Surgical Hosp	0	0.0
Lafayette Regional	0	0.0
Lake Charles Regional	0	0.0
Lawrence Park	0	0.0
Levy Park	0	0.0
Louisiana State University Eunice	0	0.0
M L King Park	0	0.0
McNeese State Univ	0	0.0
North Side City Park	0	0.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Riverside Park	0	0.0
St Martin Sheriff's Office Juvenile Trai	0	0.0
St Mary Parish Correctional Ctr	0	0.0
Teche Regional Medical Ctr	0	0.0
Univ of Louisiana Lafayette	0	0.0
<b>District 3 Totals</b>	<b>2,732</b>	
C Paul Phelps Correctional Ctr	0	0.0
Cane River Creole Natl Hist Pk	0	0.0
Catholic Cmtry	0	0.0
Centenary College of Louisiana	0	0.0
Chicot State Park	0	0.0
Chicot State Park	0	0.0
Chicot State Park	0	0.0
Claiborne Parish Womens Jail	0	0.0
David Wade Correctional Ctr	0	0.0
Desoto Parish Detention Ctr	0	0.0
Desoto Regional Health System	0	0.0
Evangeline Parish Jail	0	0.0
Forcht-Wade Correctional Ctr	0	0.0
Hart Arprt	0	0.0
Hart Arprt	0	0.0
L S U Health Shreveport	0	0.0
Natchitoches Regional Medical Ctr	0	0.0
New Llano City Park	0	0.0
Northwestern State Univ	0	0.0
Opelousas City Jail	0	0.0
Shreveport City Jail	0	0.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Shreveport Regional	0	0.0
South Louisiana Correctional Ctr	0	0.0
Specialists Hospital Shreveport	0	0.0
Springhill Police Dept	0	0.0
Stonewall Park	0	0.0
Webster Parish Jail	0	0.0
Willis Knighton Medical Ctr	0	0.0
<hr/>		
<b>District 4 Totals</b>	<b>7,021</b>	
Amite City Jail	0	0.0
Avoyelles Hosp	0	0.0
Blakeman Park	0	0.0
Bogalusa Medical Ctr	0	0.0
Bunkie General Hosp	0	0.0
Caldwell Detention Ctr	0	0.0
Caldwell Memorial Hosp	0	0.0
Caldwell Parish Jail	0	0.0
Civitan Park	0	0.0
Delhi Hosp	0	0.0
Evans Correctional Ctr	0	0.0
Evans Correctional Ctr	0	0.0
Glenwood Regional Medical Ctr	0	0.0
Grambling State Univ	0	0.0
Hardtner Medical Ctr	0	0.0
Jackson Parish Hosp	0	0.0
Lallie Kemp Medical Ctr	0	0.0
Louisiana Tech Univ	0	0.0
Louisiana Tech Univ	0	0.0
Monroe Regional	0	0.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Monroe Regional	0	0.0
Newman Park	0	0.0
Northern Louisiana Medical Ctr	0	0.0
Old City Cmtry	0	0.0
P&S Surgical Hosp	0	0.0
Palmetto Is	0	0.0
Pecanland Mall	0	0.0
Poverty Point Natl Mnmt	0	0.0
Rapides Regional Medical Ctr	0	0.0
Rapides Regional Medical Ctr	0	0.0
Squires Cmtry	0	0.0
Tensas Parish Jail	0	0.0
United States Penitentiary Pollock	0	0.0
United States Penitentiary Pollock	0	0.0
Washington St Tammany Regional Medical C	0	0.0
West Carroll Parish Jail	0	0.0
White Rock Cmtry	0	0.0
Winn Parish Jail	0	0.0
Winn Parish Medical Ctr	0	0.0
Winnfield City Jail	0	0.0
<b>District 5 Totals</b>	<b>24,935</b>	

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

	Population	%
Arsenal Park	0	0.0
Baton Rouge General Medical Ctr	0	0.0
Carver Park	0	0.0
Jambalaya Park	0	0.0
Jean Lafitte National Historical Park an	0	0.0
Louis Armstrong New Orleans Internationa	0	0.0
Louisiana State Capitol	0	0.0
Our Lady of the Lake Livingston	0	0.0
Our Lady of the Lake Regional Medical Ct	0	0.0
State Capitol Park	0	0.0
Summit Hosp	0	0.0
Summit Hosp	0	0.0
Woman's Hosp	0	0.0
Woman's Hosp	0	0.0
<b>District 6 Totals</b>	<b>11,082</b>	

**Communities of Interest (Landscape, 11x8.5)**

LA CD Plan HB1

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**Summary Statistics**

Number of Landmark Area not split	384
Number of Landmark Area split	58
Number of Landmark Area split in 2	41
Number of Landmark Area split in 3	9
Number of Landmark Area split in 4	3
Number of Landmark Area split in 5	4
Number of Landmark Area split in 6	0
Number of Landmark Area split in 7	0
Number of Landmark Area split in 8	1
Total number of splits	149

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Plan Name: LA CD 2011 Plan

Plan Type: Congress

**Communities of Interest (Landscape, 11x8.5)**

Thursday, April 7, 2022

10:12 PM

Landmark Area	District	Population	%
Jean Lafitte National Historical Park an	1	76	100.0
Jean Lafitte National Historical Park an	2	0	0.0

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**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

**Landmark Area -- Listed by District**

	Population	%
Athletic Park	0	0.0
Audobon Park Golf Course	0	0.0
East Jefferson General Hosp	0	0.0
Fontainebleau St Park Preserve	0	0.0
Jean Lafitte National Historical Park an	0	0.0
Leonard J Chabert Medical Ctr	0	0.0
New Orleans Adolescent Hosp	0	0.0
Ochsner Medical Ctr	0	0.0
Pearl River Wildlife Mngt Area	0	0.0
Plaquemines Parish Sheriff's Office-Bell	0	0.0
Slidell Memorial Hosp	0	0.0
Southern Surgical Hosp	0	0.0
St Tammany Parish Hosp	0	0.0
Terrebonne General Medical Ctr	0	0.0
West End Park	0	0.0

**District 1 Totals 8,630**

Algiers Technology Acdmy	0	0.0
Baton Rouge Metropolitan	0	0.0
Baton Rouge Metropolitan	0	0.0
Behrman Memorial Pk	0	0.0
Camelot Colg	0	0.0
Couba-Island	0	0.0
Folgers Coffee	0	0.0



**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
Greater Baton Rouge Surgical Hosp	0	0.0
Green St Cmtry	0	0.0
Jean Lafitte National Historical Park an (part)	0	0.0
Jean Lafitte National Historical Park an	0	0.0
Jean Lafitte National Historical Park an	0	0.0
Jean Lafitte National Historical Park an	0	0.0
Louis Armstrong New Orleans Internationa	0	0.0
Louisiana Correctional Institute for Wom	0	0.0
Louisiana Correctional Institute for Wom	0	0.0
Louisiana State University Health Scienc	0	0.0
Ochsner Baptist Medical Ctr	0	0.0
Orleans Parish Intake Processing Ctr	0	0.0
Orleans Parish Prison	0	0.0
Orleans Parish Temporary Jails	0	0.0
South White Street Female Division	0	0.0
St John Schl	0	0.0
St Mary Cmtry	0	0.0
Touro Infirmary	0	0.0
Tulane Univ	0	0.0
Tulane Univ	0	0.0
University Medical Ctr	0	0.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
US Army Corps of Engineers	0	0.0
Xavier Univ of Louisiana	0	0.0
Xavier Univ of Louisiana	0	0.0
<hr/>		
<b>District 2 Totals</b>	<b>10,481</b>	
A Kaplan Memorial Pk	0	0.0
Abrom Kaplan Memorial Hosp	0	0.0
Acadia Parish Detention Ctr	0	0.0
Acadia Parish Jail	0	0.0
Acadiana Rgnl Arprt	0	0.0
American Legion Hosp	0	0.0
Cameron Parish Jail	0	0.0
Christus St Patrick Hosp	0	0.0
City Park	0	0.0
Dequincy City Jail	0	0.0
Duson Park	0	0.0
Franklin Foundation Hosp	0	0.0
Jean Lafitte National Historical Park an	0	0.0
Jennings City Jail	0	0.0
Kaplan Indl Park	0	0.0
Lafayette General Medical Ctr	0	0.0
Lafayette General Surgical Hosp	0	0.0
Lafayette Regional	0	0.0
Lake Charles Regional	0	0.0
Lawrence Park	0	0.0
Levy Park	0	0.0
Louisiana State University Eunice	0	0.0
M L King Park	0	0.0
McNeese State Univ	0	0.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
North Side City Park	0	0.0
Riverside Park	0	0.0
St Martin Sheriff's Office Juvenile Trai	0	0.0
St Mary Parish Correctional Ctr	0	0.0
Teche Regional Medical Ctr	0	0.0
Univ of Louisiana Lafayette	0	0.0
<b>District 3 Totals</b>	<b>2,732</b>	
C Paul Phelps Correctional Ctr	0	0.0
Cane River Creole Natl Hist Pk	0	0.0
Catholic Cmtry	0	0.0
Centenary College of Louisiana	0	0.0
Chicot State Park	0	0.0
Chicot State Park	0	0.0
Chicot State Park	0	0.0
Claiborne Parish Womens Jail	0	0.0
David Wade Correctional Ctr	0	0.0
Desoto Parish Detention Ctr	0	0.0
Desoto Regional Health System	0	0.0
Evangeline Parish Jail	0	0.0
Forcht-Wade Correctional Ctr	0	0.0
Hart Arprt	0	0.0
Hart Arprt	0	0.0
L S U Health Shreveport	0	0.0
Natchitoches Regional Medical Ctr	0	0.0
New Llano City Park	0	0.0
Northwestern State Univ	0	0.0
Shreveport City Jail	0	0.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
Shreveport Regional	0	0.0
South Louisiana Correctional Ctr	0	0.0
Specialists Hospital Shreveport	0	0.0
Springhill Police Dept	0	0.0
Stonewall Park	0	0.0
Webster Parish Jail	0	0.0
Willis Knighton Medical Ctr	0	0.0
<hr/>		
<b>District 4 Totals</b>	<b>6,674</b>	
Amite City Jail	0	0.0
Avoyelles Hosp	0	0.0
Blakeman Park	0	0.0
Bogalusa Medical Ctr	0	0.0
Bunkie General Hosp	0	0.0
Caldwell Detention Ctr	0	0.0
Caldwell Memorial Hosp	0	0.0
Caldwell Parish Jail	0	0.0
Civitan Park	0	0.0
Delhi Hosp	0	0.0
Evans Correctional Ctr	0	0.0
Evans Correctional Ctr	0	0.0
Glenwood Regional Medical Ctr	0	0.0
Grambling State Univ	0	0.0
Hardtner Medical Ctr	0	0.0
Jackson Parish Hosp	0	0.0
Lallie Kemp Medical Ctr	0	0.0
Louisiana Tech Univ	0	0.0
Louisiana Tech Univ	0	0.0
Monroe Regional	0	0.0

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
Monroe Regional	0	0.0
Newman Park	0	0.0
Northern Louisiana Medical Ctr	0	0.0
Old City Cmtry	0	0.0
Opelousas City Jail	0	0.0
P&S Surgical Hosp	0	0.0
Palmetto Is	0	0.0
Pecanland Mall	0	0.0
Poverty Point Natl Mnmt	0	0.0
Rapides Regional Medical Ctr	0	0.0
Rapides Regional Medical Ctr	0	0.0
Squires Cmtry	0	0.0
Tensas Parish Jail	0	0.0
United States Penitentiary Pollock	0	0.0
United States Penitentiary Pollock	0	0.0
Washington St Tammany Regional Medical C	0	0.0
West Carroll Parish Jail	0	0.0
White Rock Cmtry	0	0.0
Winn Parish Jail	0	0.0
Winn Parish Medical Ctr	0	0.0
Winnfield City Jail	0	0.0
<b>District 5 Totals</b>	<b>22,887</b>	

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

	Population	%
Arsenal Park	0	0.0
Baton Rouge General Medical Ctr	0	0.0
Carver Park	0	0.0
Jambalaya Park	0	0.0
Jean Lafitte National Historical Park an	0	0.0
Louis Armstrong New Orleans Internationa	0	0.0
Louisiana State Capitol	0	0.0
Our Lady of the Lake Livingston	0	0.0
Our Lady of the Lake Regional Medical Ct	0	0.0
State Capitol Park	0	0.0
Summit Hosp	0	0.0
Summit Hosp	0	0.0
Woman's Hosp	0	0.0
Woman's Hosp	0	0.0
<b>District 6 Totals</b>	<b>11,107</b>	

**Communities of Interest (Landscape, 11x8.5)**

LA CD 2011 Plan

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**Summary Statistics**

Number of Landmark Area not split	384
Number of Landmark Area split	58
Number of Landmark Area split in 2	42
Number of Landmark Area split in 3	8
Number of Landmark Area split in 4	3
Number of Landmark Area split in 5	4
Number of Landmark Area split in 6	0
Number of Landmark Area split in 7	0
Number of Landmark Area split in 8	0
Number of Landmark Area split in 9	1
Total number of splits	149

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User: Tony Fairfax

Plan Name: LA CD Illustrative Plan 1

Plan Type: LA Congressional Districts

## Fracking

Wednesday, April 6, 2022

9:09 PM

Pieces

**District 1**

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

**District 2**

County: Jefferson LA (22051)	2
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**District 5**

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

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User: Tony Fairfax

Plan Name: LA CD Plan HB1

Plan Type: Congressional Districts

**Fracking**

Friday, April 1, 2022

10:39 PM

Pieces

**District 1**

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

**District 2**

County: Jefferson LA (22051)	3
County: Orleans LA (22071)	2

**District 5**

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

**District 6**

County: East Baton Rouge LA (22033)	2
County: St. Mary LA (22101)	2

RETRIEVED FROM DEMOCRACYDOCKET.COM

User:

Plan Name: LA CD 2011 Plan

Plan Type: Congress

## Fracking

Thursday, April 7, 2022

10:22 PM

Pieces

**District 1**

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

**District 2**

County: Jefferson LA (22051)	3
County: Orleans LA (22071)	2

**District 3**

County: St. Landry LA (22097)	2
County: St. Martin LA (22099)	2

**District 5**

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

**District 6**

County: East Baton Rouge LA (22033)	2
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RETRIEVED FROM DEMOCRACYDOCKET.COM

## Appendix D

### Other Data

1. Illustrative Plan Congressional District 5 - 2019 5-Year ACS Census Tract Data Select Socioeconomic Attributes

RETRIEVED FROM DEMOCRACYDOCKET.COM

**Illustrative Plan**  
**Congressional District 5**  
**2019 5-Year ACS Census Tract Data**  
**Select Socioeconomic Attributes**

Tract	MedHHInc	Poverty%	NoHSEdu%	FdStmpsSNAP%	MedHseVal	Renter%
22009030100	\$ 43,875	12.88	25.67	9.95%	\$ 79,400	18.1%
22009030200	\$ 42,833	15.71	23.33	14.86%	\$ 113,400	14.2%
22009030300	\$ 46,656	22.82	21.26	17.46%	\$ 113,100	27.0%
22009030400	\$ 28,049	40.53	23.25	20.10%	\$ 102,900	35.9%
22009030500	\$ 36,875	20.91	13.93	20.36%	\$ 113,400	39.4%
22009030600	\$ 33,646	10.70	15.54	21.36%	\$ 96,500	29.9%
22009030700	\$ 42,230	28.22	35.56	20.46%	\$ 118,400	30.1%
22009030800	\$ 43,047	12.20	18.21	10.84%	\$ 107,200	24.3%
22009030900	\$ 26,582	43.97	26.44	28.51%	\$ 72,600	37.9%
22025000100	\$ 45,956	23.79	26.44	15.80%	\$ 106,100	19.4%
22025000200	\$ 26,736	32.47	29.40	28.35%	\$ 71,600	31.8%
22025000300	\$ 50,614	13.92	22.41	7.15%	\$ 88,500	11.9%
22029000100	\$ 51,176	15.58	27.62	9.18%	\$ 110,500	25.1%
22029000200	\$ 23,586	29.95	18.31	22.36%	\$ 56,600	52.0%
22029000300	\$ 28,077	36.07	21.64	22.70%	\$ 64,000	32.5%
22029000400	\$ 37,616	18.88	15.92	10.67%	\$ 102,400	31.4%
22029000500	\$ 43,828	18.61	19.21	8.27%	\$ 150,700	14.3%
22033000100	\$ 21,271	39.74	31.22	48.47%	\$ 63,500	62.7%
22033000200	\$ 22,765	56.22	28.22	48.98%	\$ 78,300	65.8%
22033000300	\$ 29,929	33.25	27.22	41.91%	\$ 57,700	61.6%
22033000400	\$ 25,205	53.49	29.83	34.61%	\$ 76,000	60.3%
22033000500	\$ 24,388	38.39	32.72	40.69%	\$ 67,600	65.9%
22033000601	\$ 24,213	39.37	19.80	43.48%	\$ 86,400	43.0%
22033000602	\$ 26,902	25.57	17.10	41.55%	\$ 72,100	40.6%
22033000701	\$ 25,926	54.37	21.00	42.68%	\$ 113,100	49.4%
22033000702	\$ 34,276	37.31	15.72	28.21%	\$ 93,300	47.6%
22033000900	\$ 27,581	31.19	17.56	34.93%	\$ 70,500	50.3%
22033001000	\$ 25,469	33.83	19.52	36.84%	\$ 61,700	51.6%
22033001102	\$ 25,066	31.04	24.92	39.53%	\$ 145,700	80.6%
22033001103	\$ 37,386	31.25	10.11	37.01%	\$ 88,400	46.8%
22033001104	\$ 22,238	48.45	36.35	44.58%		100.0%
22033001600	\$ 64,236	14.11	6.75	8.46%	\$ 240,900	50.5%
22033003000	\$ 18,762	38.93	19.93	47.99%	\$ 70,000	59.0%
22033003101	\$ 25,299	37.73	15.29	40.03%	\$ 88,900	51.5%
22033003103	\$ 21,399	36.47	24.47	52.54%	\$ 65,000	70.1%
22033003201	\$ 50,069	26.91	9.47	23.99%	\$ 117,000	20.5%
22033003202	\$ 73,043	4.80	7.80	18.51%	\$ 154,800	15.4%

**Illustrative Plan**  
**Congressional District 5**  
**2019 5-Year ACS Census Tract Data**  
**Select Socioeconomic Attributes**

Tract	MedHHInc	Poverty%	NoHSEdu%	FdStmpsSNAP%	MedHseVal	Renter%
22033003300	\$ 43,214	23.56	20.45	26.23%	\$ 82,300	51.0%
22033003400	\$ 32,377	30.09	18.94	36.63%	\$ 88,400	56.7%
22033003501	\$ 42,015	27.81	26.09	13.92%	\$ 141,500	44.5%
22033003504	\$ 35,033	34.26	10.16	26.99%	\$ 114,800	40.6%
22033003505	\$ 35,185	23.97	16.46	29.79%	\$ 97,900	42.4%
22033003506	\$ 51,118	11.18	8.82	14.57%	\$ 157,700	26.7%
22033003507	\$ 53,305	11.58	12.06	14.39%	\$ 145,700	19.4%
22033003601	\$ 47,159	13.82	15.40	14.03%	\$ 144,500	34.7%
22033003603	\$ 32,946	29.44	5.94	33.98%	\$ 101,800	56.5%
22033003604	\$ 41,167	24.02	20.44	21.74%	\$ 99,800	58.9%
22033003702	\$ 68,173	9.79	7.66	15.93%	\$ 167,900	20.9%
22033004201	\$ 42,771	26.84	13.61	8.73%	\$ 113,400	51.8%
22033004203	\$ 52,733	22.12	15.42	13.35%	\$ 114,400	33.9%
22033004204	\$ 43,229	15.13	17.33	35.45%	\$ 91,300	34.4%
22033004205	\$ 60,975	4.72	5.44	12.02%	\$ 136,000	20.8%
22033004302	\$ 65,446	7.61	9.00	6.49%	\$ 186,800	12.0%
22033004503	\$ 64,159	9.24	12.75	10.52%	\$ 144,000	29.4%
22033004602	\$ 53,340	14.66	7.38	8.67%	\$ 181,200	38.1%
22033004603	\$ 73,819	9.46	6.26	9.07%	\$ 264,000	30.2%
22033004604	\$ 97,717	9.37	4.89	7.55%	\$ 237,000	13.5%
22033004700	\$ 50,304	6.94	14.92	7.97%	\$ 198,000	25.9%
22033005100	\$ 28,992	35.64	17.31	21.60%	\$ 128,400	74.1%
22033005300	\$ 14,002	61.01	33.48	30.21%	\$ 70,000	66.9%
22033980000	No Data	No Data	No Data	No Data	No Data	No Data
22035000100	\$ 21,250	34.66	15.53	22.40%	\$ 100,000	45.3%
22035000200	\$ 37,344	29.01	33.52	16.37%	\$ 88,200	13.3%
22035000300	\$ 17,788	60.54	34.12	45.90%	\$ 36,900	70.7%
22037951300	\$ 48,516	15.38	14.15	9.23%	\$ 126,500	12.7%
22037951400	\$ 45,889	23.56	19.33	17.59%	\$ 97,300	27.8%
22037951501	\$ 56,250	4.49	6.68	3.95%	\$ 151,100	18.0%
22037951502	\$ 51,061	21.27	28.69	19.95%	\$ 132,700	16.9%
22037951600	\$ 56,932	13.51	10.26	13.68%	\$ 178,600	20.8%
22039950600	\$ 14,955	44.57	39.12	37.65%	\$ 56,500	68.0%
22041950100	\$ 42,039	24.79	25.07	16.92%	\$ 88,200	10.3%
22041950200	\$ 34,855	25.07	27.89	22.34%	\$ 90,100	18.1%
22041950300	\$ 19,961	44.12	30.94	39.86%	\$ 88,700	56.2%
22041950400	\$ 37,569	17.58	15.16	6.42%	\$ 82,300	20.8%

**Illustrative Plan**  
**Congressional District 5**  
**2019 5-Year ACS Census Tract Data**  
**Select Socioeconomic Attributes**

Tract	MedHHInc	Poverty%	NoHSEdu%	FdStmpsSNAP%	MedHseVal	Renter%
22041950500	\$ 41,447	17.62	15.62	16.62%	\$ 97,200	15.7%
22041950600	\$ 33,040	29.31	26.69	24.10%	\$ 81,300	30.9%
22047952600	\$ 41,479	20.44	22.53	26.46%	\$ 65,600	15.0%
22047952700	\$ 47,273	17.98	14.93	16.60%	\$ 155,800	20.2%
22047953101	\$ 55,210	24.91	18.22	19.27%	\$ 158,700	41.3%
22055000100	\$ 31,250	39.11	23.99	21.84%	\$ 150,000	71.1%
22055000200	\$ 24,958	29.96	30.80	21.04%	\$ 89,400	54.2%
22055000700	\$ 28,574	27.21	24.34	31.71%	\$ 113,200	56.7%
22055000800	\$ 22,360	47.93	33.28	37.33%	\$ 65,000	65.6%
22055000900	\$ 19,242	47.86	44.23	32.25%	\$ 80,900	49.5%
22055001001	\$ 48,415	27.85	11.04	21.97%	\$ 145,800	36.7%
22055001002	\$ 38,037	22.64	8.54	13.79%	\$ 165,400	64.5%
22055001003	\$ 53,750	10.19	7.12	15.58%	\$ 166,000	24.4%
22055001100	\$ 26,197	36.45	24.28	33.58%	\$ 81,700	55.7%
22055001200	\$ 38,813	27.79	13.09	24.67%	\$ 148,200	38.5%
22055001300	\$ 25,697	25.33	27.90	26.54%	\$ 146,000	49.9%
22055002002	\$ 57,760	17.49	10.24	7.69%	\$ 135,700	25.2%
22055002101	\$ 60,818	14.94	10.95	9.71%	\$ 158,000	19.5%
22055002102	\$ 77,472	9.80	11.99	9.42%	\$ 165,200	14.6%
22055002103	\$ 36,526	14.88	23.21	20.40%	\$ 156,400	33.0%
22055002104	\$ 54,306	11.47	11.90	5.07%	\$ 195,300	20.2%
22065960100	\$ 50,234	16.50	14.98	12.41%	\$ 142,300	23.0%
22065960200	\$ 32,986	14.92	35.81	24.29%	\$ 74,200	41.2%
22065960300	\$ 17,625	60.20	25.35	37.34%	\$ 54,500	56.4%
22065960400	\$ 17,188	57.71	30.85	53.05%	\$ 72,800	74.2%
22065960500	\$ 36,013	35.18	17.07	24.57%	\$ 77,200	44.1%
22067950100	\$ 35,645	17.44	25.38	12.67%	\$ 65,900	27.0%
22067950200	\$ 57,293	10.31	10.04	9.21%	\$ 125,200	20.8%
22067950300	\$ 51,375	15.50	11.66	6.91%	\$ 161,700	11.5%
22067950400	\$ 17,227	44.98	27.08	42.85%	\$ 79,900	57.5%
22067950500	\$ 17,619	47.91	26.38	34.77%	\$ 78,600	59.0%
22067950600	\$ 26,695	25.93	21.19	20.53%	\$ 96,500	25.7%
22067950700	\$ 40,870	14.70	23.13	20.28%	\$ 86,800	22.1%
22067950800	\$ 22,482	42.47	25.80	29.45%	\$ 53,700	32.3%
22073000100	\$ 45,907	13.41	5.12	12.54%	\$ 161,100	61.6%
22073000401	\$ 43,272	37.09	5.06	8.71%	\$ 181,900	63.8%
22073000402	\$ 24,817	43.43	13.35	19.93%	\$ 78,900	81.8%

**Illustrative Plan**  
**Congressional District 5**  
**2019 5-Year ACS Census Tract Data**  
**Select Socioeconomic Attributes**

Tract	MedHHInc	Poverty%	NoHSEdu%	FdStmpsSNAP%	MedHseVal	Renter%
22073000500	\$ 25,351	42.05	15.05	38.11%	\$ 123,400	62.5%
22073000600	\$ 27,464	37.97	23.06	40.53%	\$ 48,200	61.2%
22073000700	\$ 15,233	71.54	26.69	55.16%	\$ 68,300	78.9%
22073000900	\$ 14,836	54.83	34.39	63.88%	\$ 50,500	87.3%
22073001100	\$ 15,000	61.83	27.93	49.45%	\$ 67,200	63.2%
22073001400	\$ 24,536	55.87	16.80	45.08%	\$ 58,400	54.1%
22073001500	\$ 18,333	54.09	35.68	42.42%	\$ 62,000	54.9%
22073001700	\$ 41,875	11.79	6.76	5.29%	\$ 194,300	40.5%
22073005500	\$ 34,715	29.62	14.28	15.48%	\$ 126,300	68.7%
22073010102	\$ 24,760	42.93	16.69	31.13%	\$ 122,600	48.5%
22073010201	\$ 37,834	14.54	8.04	17.12%	\$ 155,700	59.5%
22073010603	\$ 27,912	37.83	28.47	32.22%	\$ 57,800	41.2%
22073010700	\$ 15,691	61.25	19.52	58.29%	\$ 52,800	78.7%
22073010800	\$ 15,191	32.60	23.87	36.15%	\$ 44,800	88.5%
22073010900	\$ 27,126	40.17	23.18	30.43%	\$ 54,800	42.0%
22073011000	\$ 25,544	56.86	22.13	44.03%	\$ 85,000	61.5%
22073980000	No Data	No Data	No Data	No Data	No Data	No Data
22077951900	\$ 34,731	29.93	21.69	22.92%	\$ 152,000	34.7%
22077952000	\$ 39,474	17.06	24.99	18.88%	\$ 95,000	21.7%
22077952100	\$ 45,809	13.49	18.64	13.45%	\$ 138,000	24.4%
22077952200	\$ 45,594	21.04	13.14	13.63%	\$ 183,000	12.4%
22077952300	\$ 46,250	12.88	18.01	15.95%	\$ 165,000	29.3%
22077952400	\$ 49,676	22.55	24.17	15.59%	\$ 131,500	17.9%
22079011000	\$ 29,609	47.48	32.86	43.24%	\$ 56,100	80.6%
22079012000	\$ 14,419	57.23	37.12	46.25%	\$ 50,900	59.6%
22079012100	\$ 32,009	32.25	9.73	26.89%	\$ 106,800	56.2%
22079012200	\$ 33,704	29.38	12.53	22.46%	\$ 158,300	54.6%
22079012500	\$ 57,511	17.47	11.34	18.74%	\$ 130,300	30.9%
22079012600	\$ 36,458	11.23	16.17	17.26%	\$ 133,600	39.6%
22079012700	\$ 16,512	55.27	25.34	40.50%	\$ 82,800	68.5%
22079012800	\$ 24,583	25.81	17.36	29.86%	\$ 78,500	42.7%
22079012900	\$ 23,882	29.89	30.77	40.51%	\$ 51,900	63.0%
22079013000	\$ 39,403	12.07	19.96	15.07%	\$ 86,100	20.8%
22079013100	\$ 34,773	41.89	31.86	16.63%	\$ 83,100	43.8%
22079013200	\$ 74,521	7.88	11.38	8.87%	\$ 213,400	15.1%
22079013300	\$ 41,599	21.97	14.27	10.54%	\$ 125,400	28.9%
22079013800	\$ 44,862	13.80	11.20	12.07%	\$ 114,100	53.5%

**Illustrative Plan**  
**Congressional District 5**  
**2019 5-Year ACS Census Tract Data**  
**Select Socioeconomic Attributes**

Tract	MedHHInc	Poverty%	NoHSEdu%	FdStmpsSNAP%	MedHseVal	Renter%
22079013900	\$ 17,373	49.26	38.07	44.15%	\$ 46,100	74.3%
22079980000		0.00	0.00	0.00%		0.0%
22083970100	\$ 26,567	37.01	19.88	18.79%	\$ 88,600	39.4%
22083970200	\$ 36,083	28.49	33.00	24.22%	\$ 76,100	35.5%
22083970300	\$ 46,111	24.22	12.83	13.78%	\$ 114,500	26.8%
22083970400	\$ 44,000	16.07	25.85	21.43%	\$ 117,300	21.1%
22083970500	\$ 22,320	43.75	16.00	41.98%	\$ 83,100	55.3%
22083970600	\$ 39,139	26.38	25.04	18.26%	\$ 86,500	18.6%
22091951100	\$ 47,778	9.59	16.47	11.32%	\$ 113,000	20.7%
22091951200	\$ 38,891	22.78	25.80	32.34%	\$ 94,500	21.3%
22097960100	\$ 27,273	32.73	26.26	17.59%	\$ 96,600	28.8%
22097960200	\$ 41,528	26.18	17.54	16.38%	\$ 118,300	24.4%
22097960300	\$ 31,458	32.03	27.67	17.29%	\$ 101,200	30.5%
22097960400	\$ 33,625	27.06	29.64	11.01%	\$ 81,900	24.6%
22097960500	\$ 51,179	13.70	19.82	7.92%	\$ 77,300	19.3%
22097960600	\$ 31,543	19.16	26.95	6.73%	\$ 99,200	18.7%
22097960700	\$ 37,500	24.63	25.39	17.84%	\$ 106,400	18.7%
22097960800	\$ 54,335	10.63	18.84	7.18%	\$ 124,300	11.9%
22097960900	\$ 24,450	48.41	29.90	33.73%	\$ 99,400	60.2%
22097961000	\$ 42,780	26.67	32.58	25.66%	\$ 116,800	50.5%
22097961100	\$ 42,193	13.10	26.01	13.12%	\$ 106,800	48.4%
22097961200	\$ 48,594	15.30	22.70	10.04%	\$ 172,000	21.9%
22097961300	\$ 17,230	53.08	36.86	34.42%	\$ 66,100	57.6%
22097961400	\$ 25,694	32.44	33.36	29.78%	\$ 89,200	45.3%
22097961500	\$ 47,016	27.09	19.78	21.21%	\$ 150,800	42.3%
22097961600	\$ 19,904	59.01	29.19	33.78%	\$ 80,200	49.7%
22097961700	\$ 43,522	12.41	15.14	14.68%	\$ 140,100	23.2%
22097961800	\$ 51,622	20.57	12.14	9.40%	\$ 135,900	23.3%
22097961900	\$ 38,482	26.94	20.88	23.85%	\$ 137,500	37.7%
22099020200	\$ 54,260	14.27	21.65	10.99%	\$ 131,500	19.3%
22099020301	\$ 72,054	10.16	12.93	10.78%	\$ 190,100	9.3%
22099020501	\$ 35,724	32.73	16.71	27.11%	\$ 75,500	25.7%
22105953200	\$ 45,208	13.35	15.44	24.44%	\$ 118,300	27.5%
22105953300	\$ 32,991	37.49	24.20	34.34%	\$ 78,600	36.1%
22105953400	\$ 35,402	25.63	24.04	35.32%	\$ 165,000	33.5%
22105953600	\$ 32,888	30.15	22.49	36.16%	\$ 114,400	36.6%
22107000100	\$ 27,143	38.48	20.23	18.32%	\$ 86,200	28.7%



**Illustrative Plan**  
**Congressional District 5**  
**2019 5-Year ACS Census Tract Data**  
**Select Socioeconomic Attributes**

Tract	MedHHInc	Poverty%	NoHSEdu%	FdStmpsSNAP%	MedHseVal	Renter%
22107000200	\$ 36,250	21.36	26.44	23.90%	\$ 78,400	21.7%
22107000300	\$ 22,433	39.61	22.00	33.63%	\$ 48,400	41.1%
22121020100	\$ 47,500	12.62	13.94	16.38%	\$ 126,400	31.3%
22121020200	\$ 56,284	19.96	26.64	25.80%	\$ 154,800	57.6%
22121020300	\$ 72,270	16.62	12.69	14.72%	\$ 207,900	17.9%
22121020401	\$ 57,365	9.46	14.99	12.45%	\$ 205,400	30.7%
22121020402	\$ 85,735	8.37	2.80	9.53%	\$ 228,200	14.7%
22123000100	\$ 36,051	22.51	24.84	10.84%	\$ 96,300	28.6%
22123000200	\$ 46,688	19.03	16.16	16.73%	\$ 93,900	18.3%
22123000300	\$ 40,000	25.40	22.52	11.04%	\$ 82,900	20.4%
22125951701	\$ 52,500	9.29	9.17	13.80%	\$ 182,900	24.0%
22125951702	\$ 58,125	11.53	41.09	13.24%	\$ 9,999	76.5%
22125951800	\$ 64,694	13.45	6.94	12.36%	\$ 244,300	25.5%

**Legend**

Tract - Census Tract ID  
MedHHInc - Median Household Income  
Poverty% - Percentage of All Persons in Poverty  
NoHSEdu - Percentage of Persons with No High School Education (age > 25)  
FdStmpsSNAP% - Percentage of Households receiving Food Stamps or SNAP  
MedHseVal - Median Housing Values  
Renter% - Percentage of Renter Occupied Housing Units

# Exhibit 2

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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.*

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

EDWARD GALMON, SR., et al.,  
*Plaintiffs,*

v.

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

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

**Preliminary Expert Report of Dr. Lisa Handley**

**I. Introduction**

**Summary Conclusion** Voting in the State of Louisiana is racially polarized. This racial polarization impedes the ability of Black voters to elect candidates of their choice unless congressional districts are drawn that provide Black voters with an opportunity to elect their preferred candidates to the U.S. House of Representatives. The 2011 congressional districting plan<sup>1</sup> (2011 Plan) and the recently enacted congressional districting plan<sup>2</sup> (Enacted Plan) provide only one such district. As an illustrative plan (Illustrative Plan) drawn by Plaintiffs' expert demographer, Anthony Fairfax, demonstrates, it is possible to create an additional congressional district that would provide Black voters with an opportunity to elect their candidates of choice. By failing to provide an additional Black opportunity district, the Enacted Plan dilutes the opportunity

<sup>1</sup> La. Rev. Stat. § 18:1276.1.

<sup>2</sup> H.B.1, Veto Session ((La. 2022).

of Black voters to participate in the electoral process and elect candidates of their choice to the U.S. House of Representatives.

***Scope of Project*** I was retained by Plaintiffs in this case as an expert to conduct an analysis of voting patterns by race in the State of Louisiana to determine whether voting is racially polarized. In addition, I was asked to assess the opportunities provided to Black voters to elect their candidates of choice to Congress in the Enacted and Illustrative Plans.<sup>3</sup>

## II. Professional Background and Experience

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

I have been actively involved in researching, writing, and teaching on subjects relating to voting rights, including minority representation, electoral system design, and redistricting. I co-authored a book, *Minority Representation and the Quest for Voting Equality* (Cambridge University Press, 1992), and co-edited a volume, *Redistricting in Comparative Perspective* (Oxford University Press, 2008), on these subjects. In addition, my research on these topics has appeared in peer-reviewed journals such as *Journal of Politics*, *Legislative Studies Quarterly*, *American Politics Quarterly*, *Journal of Law and Politics*, and *Law and Policy*, as well as law reviews (e.g., *North Carolina Law Review*) and a number of edited books. I hold a Ph.D. in political science from The George Washington University.

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

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<sup>3</sup> I am being compensated at a rate of \$300 an hour for work on this project.

### III. Analyzing Voting Patterns by Race

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

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

***Standard Statistical Techniques*** Three standard statistical techniques have been developed over time to estimate vote choices by race: homogeneous precinct analysis, ecological regression, and ecological inference.<sup>4</sup> Two of these analytic procedures – homogeneous precinct analysis and ecological regression – were employed by the plaintiffs’ expert in *Thornburg v. Gingles*, have the benefit of the Supreme Court’s approval in that case, and have been used in most subsequent voting rights cases. The third technique, ecological inference, was developed after the *Gingles* decision and was designed, in part, to address some of the disadvantages associated with ecological regression analysis. Ecological inference analysis has been introduced and accepted in numerous district court proceedings.

*Homogeneous precinct* (HP) analysis is the simplest technique. It involves comparing the percentage of votes received by each of the candidates in precincts that are racially or ethnically homogeneous. The general practice is to label a precinct as homogeneous if at least 90 percent of the voters or voting age population is composed of a single race. In fact, the homogeneous results

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<sup>4</sup> For a detailed explanation of homogeneous precinct analysis and ecological regression, see Bernard Grofman, Lisa Handley, and Richard Niemi, *Minority Representation and the Quest for Voting Equality* (Cambridge University Press, 1992). See Gary King, *A Solution to the Ecological Inference Problem* (Princeton University Press, 1997) for a more detailed explanation of ecological inference.

reported are not estimates – they are the actual precinct results. However, most voters in Louisiana do not reside in homogeneous precincts and voters who reside in homogeneous precincts may not be representative of voters who live in more racially diverse precincts. For this reason, I refer to these percentages as estimates.

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

The third technique, *ecological inference* (EI), was developed by Professor Gary King. This approach also uses information from all precincts but, unlike ecological regression, it does not rely on an assumption of linearity. Instead, it incorporates maximum likelihood statistics to produce estimates of voting patterns by race. In addition, it utilizes the method of bounds, which uses more of the available information from the precinct returns than ecological regression.<sup>5</sup> Unlike ecological regression, which can produce percentage estimates of less than 0 or more than 100 percent, ecological inference was designed to produce only estimates that fall within the possible limits. However, EI does not guarantee that the estimates for all of the candidates add to 100 percent for each of the racial groups examined. In conducting my analysis of voting patterns by race in recent elections in Louisiana, I also used a more recently developed version of ecological inference, which I have labeled “EI RxC” in the summary tables. The advantage of EI RxC is that it produces generally accepted confidence intervals for the estimates of minority and white voters supporting each of the candidates. I have included these confidence intervals in the summary tables in the *Appendices*.

**Database** To analyze voting patterns by race using aggregate level information, a database that combines election results with demographic information is required. This database is almost always constructed using election precincts as the unit of analysis. The demographic composition of the precincts is based on voter registration or turnout by race if this information is available.

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<sup>5</sup> The following is an example of how the method of bounds works: if a given precinct has 100 voters, of whom 75 are Black and 25 are white, and the Black candidate received 80 votes, then at least 55 of the Black voters voted for the Black candidate and at most all 75 did. (The method of bounds is less useful for calculating estimates for white voters, as anywhere between none of the whites and all of the whites could have voted for the candidate.)

Where this is not available, voting age population or citizen voting age population is used. Louisiana collects voter registration data by race (registering voters self-identify their race). The 2015, 2016, 2017, 2018, 2019, and 2020 election turnout results by race, for all precincts and election cycles, are publicly available on the Louisiana Secretary of State's website.

To build the Louisiana dataset for the purpose of the racial bloc voting analysis, 2016, 2017, 2018, 2019, and 2020 precinct-level shapefiles were acquired from the Voting and Election Science Team.<sup>6</sup> These shapefiles were joined to precinct-level election returns and turnout counts by race from the Louisiana Secretary of State's office, both of which were processed and cleaned by OpenElections. Early and absentee votes cast for each of the candidates, reported only at the parish level in Louisiana, were allocated to the parish precincts on the basis of the candidate vote totals on Election Day.<sup>7</sup> The 2020 census block shapefiles, and total and voting age populations by race and ethnicity, were obtained from the Census FTP portal.

The election returns for the 2015–2020 election cycles were disaggregated down to the level of the 2020 census block. This block-level dataset was then reaggregated up to the level of the within-cycle voting precinct for each election year cycle separately, taking into account splits in precincts across district boundaries by the various enacted and proposed plans.

***Elections analyzed*** All recent statewide election contests that included Black candidates were analyzed.<sup>8</sup> These elections are listed in Table 1, below.<sup>9</sup>

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<sup>6</sup> The 2015 precinct-level shapefiles are publicly available on the Louisiana Secretary of State's office website.

<sup>7</sup> Early and absentee votes are reported only at the parish level in Louisiana – they are not allocated back to the precincts where the voters reside. Rather than simply ignore these votes, they have been allocated to the parish precincts proportionally based on the votes received by each of the candidates on Election Day. For example, if Candidate X received 80% of her Election Day parish-wide vote in two-precinct Parish Z from Precinct A and 20% from Precinct B, then 80% of her early and absentee votes would be allocated to Precinct A and 20% to Precinct B.

<sup>8</sup> Courts consider election contests that include minority candidates more probative than contests that include only white candidates for determining if voting is racially polarized. This is because it is not sufficient for minority voters to be able to elect their candidates of choice only if these candidates are white. On the other hand, it is important to recognize that not all minority candidates are the preferred candidates of minority voters.

<sup>9</sup> In one of the elections analyzed – the November 2020 election for U.S. President – it was the running mate, Kamala Harris, who is Black.

**Table 1: Louisiana Statewide Elections Analyzed**

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

Because endogenous elections (elections for the office at issue) are particularly probative in a vote dilution claim, I also conducted a racial bloc voting analysis of all recent congressional elections (2016–2020) that included Black candidates. Table 2, below, lists these contests.



**Table 2: Louisiana Congressional Elections Analyzed**

<b>Congressional District</b>	<b>Election Cycle</b>	<b>Black Candidate(s)</b>
District 2	October 2020	Cedrick Richmond
		Glenn Harris
	October 2018	Cedric Richmond
		Belden Batiste
		Shawndra Rodriguez
	October 2016	Cedric Richmond
District 3	October 2020	Kip Holden
		Kenneth Cutno
	October 2016	Braylon Harris
District 4	October 2020	Larry Rader
District 5	October 2020	Kenny Houston
District 6	October 2020	Sandra Christophe
	October 2016	Dartanyon Williams
		Jermaine Sampson

***Geographic areas analyzed*** I analyzed voting patterns in all recent statewide elections that included Black candidates (exogenous elections). I also conducted a district-specific racial bloc voting analysis of all recent congressional elections that included Black candidates (endogenous elections). In addition, I examined voting patterns in all of the congressional districts in the Enacted Plan that are likely to contribute voters to an additional majority Black district and are at issue in this litigation.

#### **IV. Voting in Recent Louisiana Elections is Racially Polarized**

***Statewide elections*** Voting in recent elections in Louisiana is starkly racially polarized. In every one of the recent 15 statewide contests that included Black candidates, Black voters were very cohesive in support of their preferred candidates and white voters consistently bloc voted

against these candidates. Estimates of the percentage of Black and white voters who supported each of the candidates in these 15 statewide contests can be found in *Appendix A*.

The average percentage of Black voter support for their preferred candidates (“Black-preferred candidates”) was 83.8% across all 15 contests.<sup>10</sup> When contests with only two candidates are considered, the level of cohesion was even higher, with Black voters’ support averaging 93.5% for the Black-preferred candidates across these nine contests. The average percentage of white voter support for the Black-preferred candidate, on the other hand, was 11.7% across the 15 contests and rose only slightly to 14.1% when contests with only two candidates are considered. While the candidate preferred by Black voters made it to a runoff election on four occasions, the Black-preferred candidates ultimately lost all 15 of these elections. No Black candidate preferred by Black voters was elected to statewide office in the period studied for this report.<sup>11</sup>

***Congressional elections*** Nine recent congressional election contests in Louisiana included Black candidates. The results of my analysis of these contests can be found in *Appendix B*. Three of these contests were conducted in Congressional District 2, which is majority Black in population and represented by Cedric Richmond, a Black Democrat. These election contests were probably not racially polarized, although the estimates for the 2020 contest are not conclusive.<sup>12</sup>

The six elections that occurred in districts other than District 2 were all racially polarized. The Black-preferred candidate did not win any of these six contests. The results of the election contests in these other districts are as follows:<sup>13</sup>

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<sup>10</sup> In all 15 of the contests analyzed, the Black candidate or, if there was more than one Black candidate, one of the Black candidates, was the candidate of choice of Black voters. This means that in the two-candidate contests the candidate of choice of Black voters received more than 50% of the vote. However, in the six out of the 15 elections where more than two candidates competed, the candidate of choice of Black voters may have received only a plurality of the Black vote. I averaged the percentage of the vote received by the candidate of choice of Black voters in all 15 contests and in the nine contests with only two candidates. The Black-preferred candidate was always a Black candidate in the statewide elections but not all Black candidates who ran statewide were the candidates of choice and hence are not included in the averages.

<sup>11</sup> While Joe Biden and Kamala Harris actually won the 2020 race for U.S. President/Vice President, they did not carry the State of Louisiana.

<sup>12</sup> In the 2020 election in District 2, the HP, ER and EI 2x2 estimates indicate that voting was polarized, with the plurality of white voters supporting Richmond’s white Republican opponent, David Schilling. However, the EI RxC estimate points to Richmond as the plurality choice of white voters.

<sup>13</sup> No Black candidates competed in District 1 in congressional elections in 2016, 2018, or 2020.

- *District 3:* In the 2020 election, a majority of Black voters supported Black Democrat Braylon Harris, who lost to the white-preferred candidate, white Republican Clay Higgins. In 2016, the plurality of Black voters supported Black Democrat Larry Rader, who did not even make it to the runoff – nor did the second choice of Black voters, white Democrat Jacob Hebert. (No Black candidates ran in District 3 in 2018.)
- *District 4:* In 2020, Black Democrat Kenny Houston was supported by a strong majority of Black voters. He was easily defeated by the white-preferred candidate, white Republican Mike Johnson. No Black candidates competed in 2016 or 2018 for this seat.
- *District 5:* In the October 2020 election in District 5, nine candidates ran to replace retiring congressman Ralph Abraham, a white Republican. Black Democrat Sandra Christophe was the plurality choice of Black voters. She received less than 5% of white vote and did not even advance to the runoff.
- *District 6:* In 2020, a strong majority of Black voters supported Black Democrat Dartanyon Williams, who lost to the white-preferred candidate, white Republican Garret Graves. In 2016, the plurality of Black voters supported the white Democrat, Richard Lieberman, with the Black Democrat, Jermaine Sampson, the second choice of Black voters. Neither of these two top choices won or advanced to a runoff. Instead, the candidate preferred by white voters, white Republican Garret Graves, easily won the election. (No Black candidates ran in District 6 in 2018.)

## **V. The Enacted Congressional Plan Dilutes Black Voting Strength**

The 2011 Plan limited Black voters’ opportunity to elect their candidates of choice to one congressional district, Congressional District 2. This assessment is based on more than simply the demographic composition of the districts; it takes into account whether a district was “effective” in electing Black-preferred candidates. As the racial bloc voting analysis of recent congressional elections indicates (see the discussion of congressional elections in Section IV), the Black-preferred candidates that ran in districts other than Congressional District 2 consistently failed to win, or even to advance to a runoff, in any of the districts in which Black candidates competed.

The Enacted Plan, like the 2011 Plan, creates only one majority Black district, limiting Black voters’ opportunity to elect their candidates of choice to only that district. The Black

voting age populations (BVAP) of all of the districts in the 2011 Plan and the Enacted Plan are listed in Table 3.<sup>14</sup>

**Table 3: Percent Black Voting Age Population in 2011 and Enacted Congressional Districts**

District	2011 Plan	Enacted Plan
	BVAP%	BVAP%
1	14.6%	13.4%
2	58.6%	58.7%
3	24.5%	24.6%
4	33.4%	33.8%
5	33.0%	32.9%
6	24.7%	24.0%

To assess whether a proposed district is likely to provide Black voters with an opportunity to elect their candidates of choice, a district-specific, functional analysis should be conducted. This assessment depends not only upon the demographic composition of the district but the voting patterns in that district and whether the candidates preferred by minority voters are likely to usually win in the district – this is what is meant by “functional.” To assess the Enacted Plan, election results recompiled to conform to the boundaries of the proposed districts must be used because no elections have occurred since the new districts were adopted. The best election contests to use for a functional analysis are recent elections that included a Black candidate supported by Black voters, but not by white voters. All 15 of the election contests I analyzed meet these two criteria.

The election results for all 15 recent statewide elections that included Black candidates were recompiled to conform to the congressional district boundaries in the Enacted Plan. These recompiled results were then used to construct two indices, or “effectiveness scores.” The first

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<sup>14</sup> Black voting age population has been calculated by counting all persons who checked “Black or African American” on their census form.

score (Effectiveness Score #1) indicates the percent of election contests (out of the total 15 statewide contests) that the Black-preferred candidate would have won or advanced to a runoff. The second score (Effectiveness Score #2) reports the percent of two-candidate elections (out of the nine two-candidate contests) that the Black-preferred candidate would have won. It makes it clear that while the Black-preferred candidate may advance to the runoff in some instances, winning the runoff is far more challenging. The two scores for each of the districts in the Enacted Plan can be found in Table 4.

**Table 4: Effectiveness Scores for Congressional Districts in Enacted Plan**

<b>Enacted Plan District</b>	<b>Effectiveness Score #1:</b>	<b>Effectiveness Score #2:</b>
	<b>Percent of Contests Black-Preferred Candidate Wins or Advances to Runoff From All 15 Elections</b>	<b>Percent of Two-Candidate Contests Black-Preferred Candidate Wins</b>
1	0.0%	0.0%
2	100.0%	100.0%
3	6.7%	0.0%
4	26.7%	0.0%
5	26.7%	0.0%
6	6.7%	0.0%

As this table makes clear, the Enacted Plan, like the 2011 Plan, offers only one district – District 2 – that will provide Black voters with an opportunity to elect their preferred candidates to Congress. The effectiveness scores of the other five districts in the Enacted Plan indicate that while the Black-preferred candidates may occasionally make it to a runoff, they are very unlikely to ultimately win the congressional seat in Enacted Districts 1, 3, 4, 5, or 6.

## VI. An Additional Majority Black Congressional District Can Be Created

I reviewed an Illustrative Plan created by Plaintiffs' expert Tony Fairfax. This Plan demonstrates that it is possible to create a second majority Black congressional district in Louisiana. Table 5 provides the BVAP percentages of the six districts in the Illustrative Plan.

**Table 5: Percent Black Voting Age Population in Illustrative Plan Congressional Districts**

District	Illustrative Plan
	BVAP%
1	18.3%
2	51.0%
3	17.9%
4	31.9%
5	52.1%
6	16.2%

A district-specific, functional analysis of this plan reveals that it offers two districts that are likely to provide Black voters with an opportunity to elect their candidates of choice to Congress: Districts 2 and 5. Table 6 mirrors Table 4 but provides the effectiveness scores for the six districts in the Illustrative Plan. The methodology for this functional analysis was the same as used for the analysis for Enacted Plan shown in Table 4.

**Table 6: Effectiveness Scores for Congressional Districts in Illustrative Plan**

Illustrative Plan District	Effectiveness Score #1:	Effectiveness Score #2:
	Percent of Contests Black-	Percent of Two-
	Preferred Candidate Wins	Candidate Contests
	or Advances to Runoff From all 15 Elections	Black-Preferred Candidate Wins
1	13.3%	0.0%
2	100.0%	100.0%
3	0.0%	0.0%
4	26.7%	0.0%
5	80.0%	77.8%
6	0.0%	0.0%

The effectiveness scores for District 5 indicate that the Black-preferred candidate is likely to win or to advance to a runoff in 80% of the contests held. And in 77.8% of the two-candidate contests (either because only two candidates competed or there was a runoff featuring two candidates), the candidate of choice of Black voters is likely to win.

## **VII. Voting Patterns in the Enacted Map Districts at Issue**

I conducted an analysis of voting patterns for recompiled statewide elections in Enacted Districts 2, 3, 4, 5, and 6 because these are the districts that are likely to contribute voters to an additional majority Black district and are at issue in this litigation. The estimates for Black and white voters for each of the candidates in the 15 contests can be found in *Appendices C–F*, with Enacted District 2 estimates in *Appendix C*, Enacted District 3 in *Appendix D*, Enacted District 4 in *Appendix E*, Enacted District 5 in *Appendix F*, and Enacted District 6 in *Appendix G*.

Voting in all of the districts examined was racially polarized. This polarization was particularly stark in Enacted Districts 3, 4, 5, and 6. Black voters were consistently cohesive in all districts, with the average support for Black-preferred candidates ranging from 82.8% (Enacted District 3) to 84.5% (Enacted District 4) in the 15 contests analyzed. When contests

with only two candidates are considered, Black support averages ranges from 91.5% (Enacted District 6) to 94.3% (Enacted District 2).

The percentage of white support for the Black-preferred candidates is remarkably low in all of the Enacted districts except District 2. The average white support for Black voters' candidates of choice, for all contests and for the nine contests with only two candidates, are reported in Table 7.

**Table 7: Average White Support for Black-Preferred Candidates**

<b>Enacted District</b>	<b>Average White Support for Black-Preferred Candidates</b>	<b>Average White Support for Black-Preferred Candidates, Contests with Two Candidates</b>
2	31.3%	36.1%
3	9.8%	12.3%
4	8.6%	10.8%
5	7.7%	9.8%
6	12.9%	15.0%

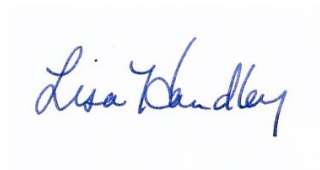
Congressional District 2 in the Enacted Plan, like District 2 in the 2011 Plan, is majority Black in population. District 2 in the 2011 Plan consistently elected a Black-preferred Black candidate, Cedric Richmond, to Congress. However, in the elections that he won in 2016 and 2018, when a majority or plurality of white voters supported him, he did not face a white Republican. In 2020, Richmond may not have been the preferred candidate of white voters – a plurality of white voters may have preferred his white Republican opponent. The racial bloc voting analysis in Enacted District 2 indicates that white Republicans are consistently the candidate of choice of white voters in statewide elections – but none of these elections included Black incumbents. Clearly, while a higher percentage of white voters support Black-preferred candidates in this district than in Enacted Districts 3, 4, 5, and 6, it cannot be said that voting is not racially polarized in Enacted District 2.



### **VIII. Conclusion**

On the basis of my analysis of voting patterns by race I have concluded that voting in Louisiana is racially polarized. The Black community is cohesive in support of their preferred candidates and white voters consistently bloc vote to defeat the candidates of choice of Black voters. This is true statewide, in previous congressional elections in all but Congressional District 2, and in the Enacted Plan districts that would contribute voters to an additional Black opportunity congressional district should one be created. The Enacted Plan dilutes the voting strength of Black voters in Louisiana by failing to create a second district that would offer Black voters an opportunity to elect their candidates of choice to the U.S. House of Representatives.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed April 13, 2022.

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

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Lisa Handley, Ph. D.

**Lisa R. Handley**  
CURRICULUM VITAE

## **Professional Experience**

Dr. Handley has over thirty years of experience in the areas of redistricting and voting rights, both as a practitioner and an academician, and is recognized nationally and internationally as an expert on these subjects. She has advised numerous clients on redistricting and has served as an expert in dozens of redistricting and voting rights court cases. Her clients have included the U.S. Department of Justice, civil rights organizations, independent redistricting commissions and scores of state and local jurisdictions. Internationally, Dr. Handley has provided electoral assistance in more than a dozen countries, serving as a consultant on electoral system design and redistricting for the United Nations, UNDP, IFES, and International IDEA. In addition, Dr. Handley served as Chairman of the Electoral Boundaries Commission in the Cayman Islands.

Dr. Handley has been actively involved in research, writing and teaching on the subjects of redistricting and voting rights. She has co-written a book, Minority Representation and the Quest for Voting Equality (Cambridge University Press, 1992) and co-edited a volume (Redistricting in Comparative Perspective, Oxford University Press, 2008) on these subjects. Her research has also appeared in peer-reviewed journals such as *Journal of Politics*, *Legislative Studies Quarterly*, *American Politics Quarterly*, *Journal of Law and Politics*, and *Law and Policy*, as well as law reviews and edited books. She has taught political science undergraduate and graduate courses related to these subjects at several universities including the University of Virginia and George Washington University. Dr. Handley is a Visiting Research Academic at Oxford Brookes University in the United Kingdom.

Dr. Handley is the President of Frontier International Consulting, a consulting firm that specializes in providing electoral assistance in transitional and post-conflict democracies. She also works as an independent election consultant both in the United States and internationally.

## **Education**

Ph.D. The George Washington University, Political Science, 1991

## **Present Employment**

**President**, Frontier International Electoral Consulting LLC (since co-founding company in 1998).

**Senior International Electoral Consultant**, Technical assistance for clients such as the UN, UNDP and IFES on electoral system design and boundary delimitation

**Visiting Research Academic**, Centre for Development and Emergency Practice (CENDEP), Oxford Brookes University

## **U.S. Clients since 2000**

American Civil Liberties Union – expert testimony in Voting Right Act challenges in several states, expert testimony in Ohio partisan gerrymander challenge and challenge to Commerce Department inclusion of citizenship question on 2020 census form

Lawyers Committee for Civil Rights Under Law – expert testimony in challenges to statewide judicial elections in Texas and Alabama

US Department of Justice – expert witness testimony in several Section 2 and Section 5 cases

Alaska: Redistricting Board (2001 and 2011) – redistricting consultation, expert witness testimony

Arizona: Independent Redistricting Board (2001 and 2021) – redistricting consultation

Colorado: Redistricting Commission (2021), Redistricting Board (2001 and 2011) – redistricting consultation

Connecticut: State Senate and State House of Representatives (2001 and 2011) – redistricting consultation

Florida: State Senate (2000) – redistricting consultation

Kansas: State Legislative Research Department (2001, 2011, 2021) – redistricting consultation

Louisiana: Louisiana Legislative Black Caucus (2001) – expert witness testimony

Massachusetts: State Senate (2001 and 2011) – redistricting consultation

Maryland: Attorney General (2001) – redistricting consultation

Michigan: Michigan Independent Citizens Redistricting Commission (2021) – redistricting consultation

Miami-Dade County, Florida: County Attorney (2001 and 2011) – redistricting consultation

Nassau County, New York: Redistricting Commission (2001) – redistricting consultation

New Mexico: State House (2001) – redistricting consultation, expert witness testimony

New York: State Assembly (2001), State Senate (2021) – redistricting consultation

New York City: Redistricting Commission and Charter Commission (2001, 2011) – redistricting consultation and Section 5 submission assistance

New York State Court: Expert to the Special Master (drew congressional lines for state court)

Rhode Island: State Senate and State House (2001 and 2021) – redistricting consultation

Vermont: Secretary of State (2001) – redistricting consultation

## International Clients since 2000

### United Nations

- Afghanistan – electoral system design and district delimitation expert
- Bangladesh (UNDP) – redistricting expert
- Sierra Leone (UNDP) – redistricting expert
- Liberia (UNMIL, UN peacekeeping mission) – redistricting expert
- Democratic Republic of the Congo (MONUC, UN peacekeeping mission) – election feasibility mission, electoral system design and redistricting expert
- Kenya (UN) – electoral system design and redistricting expert
- Haiti (UN) – election feasibility mission, electoral system design and redistricting expert
- Zimbabwe (UNDP) – redistricting expert
- Lead Writer on the topic of boundary delimitation (redistricting) for ACE (Joint UN, IFES and IDEA project on the Administration and Cost of Elections Project)

### International Foundation for Election Systems (IFES)

- Afghanistan – district delimitation expert
- Sudan – redistricting expert
- Kosovo – electoral system design and redistricting expert
- Nigeria – redistricting expert
- Nepal – redistricting expert
- Georgia – electoral system design and district delimitation expert
- Yemen – redistricting expert
- Lebanon – electoral system design and redistricting expert
- Malaysia – electoral system design and redistricting expert
- Myanmar – electoral system design and redistricting expert
- Ukraine – electoral system design and redistricting expert
- Pakistan – consultant for developing redistricting software
- Principal consultant for the Delimitation Equity Project – conducted research, wrote reference manual and developed training curriculum
- Writer on electoral boundary delimitation (redistricting), Elections Standards Project
- Training – developed training curriculum and conducted training workshops on electoral boundary delimitation (redistricting) in Azerbaijan and Jamaica

### International Institute for Democracy and Electoral Assistance (International IDEA):

- Consultant on electoral dispute resolution systems
- Technology consultant on use of GIS for electoral district delimitation
- Training – developed training material and conducted training workshop on electoral boundary delimitation (redistricting) for African election officials (Mauritius)
- Curriculum development – boundary delimitation curriculum for the BRIDGE Project

Other international clients have included The Cayman Islands; the Australian Election Commission; the Boundary Commission of British Columbia, Canada; and the Global Justice Project for Iraq.

## **Publications**

### ***Books:***

Does Torture Prevention Work? Liverpool University Press, 2016 (served as editor and author, with Richard Carver)

Comparative Redistricting in Perspective, Oxford University Press, 2008 (first editor, with Bernard Grofman).

Delimitation Equity Project: Resource Guide, Center for Transitional and Post-Conflict Governance at IFES and USAID publication, 2006 (lead author).

Minority Representation and the Quest for Voting Equality, Cambridge University Press, 1992 (with Bernard Grofman and Richard Niemi).

### ***Academic Journal Articles:***

"Drawing Electoral Districts to Promote Minority Representation" Representation, forthcoming, published online DOI:10.1080/00344893.2020.1815076.

"Evaluating national preventive mechanisms: a conceptual model," Journal of Human Rights Practice, Volume 12 (2), July 2020 (with Richard Carver).

"Minority Success in Non-Majority Minority Districts: Finding the 'Sweet Spot'," Journal of Race, Ethnicity and Politics, forthcoming (with David Lublin, Thomas Brunell and Bernard Grofman).

"Has the Voting Rights Act Outlived its Usefulness: In a Word, "No," Legislative Studies Quarterly, volume 34 (4), November 2009 (with David Lublin, Thomas Brunell and Bernard Grofman).

"Delimitation Consulting in the US and Elsewhere," Zeitschrift für Politikberatung, volume 1 (3/4), 2008 (with Peter Schrott).

"Drawing Effective Minority Districts: A Conceptual Framework and Some Empirical Evidence," North Carolina Law Review, volume 79 (5), June 2001 (with Bernard Grofman and David Lublin).

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## Recent Court Cases

### Pending cases:

- Louisiana: *Robinson, et al., v. Ardoin* (Docket Number: 3:22-cv-0211-SDD-SDJ) (Middle District of Louisiana)
- Georgia: *Alpha Phi Alpha Fraternity, Inc., et al., v. Raffensperger, et al.* (Docket Number: 1:21-CV-05337-SCJ) (Northern District of Georgia)
- Arkansas: *Arkansas State Conference NAACP, et al., v. Arkansas Board of Apportionment, et al.* (Case Number: 4:21-cv-01239-LPR) (Eastern District of Arkansas, Eighth Circuit Court of Appeals)
- Ohio: *League of Women Voters of Ohio, et al., v. Ohio Redistricting Commission, et al.* (Case Number: 2021-1193) (Supreme Court of Ohio); *League of Women Voters of Ohio, et al., v. Governor DeWine* (Case Number: 2021-1449) (Supreme Court of Ohio)

*Ohio Philip Randolph Institute v. Larry Householder* (2019) – partisan gerrymander challenge to Ohio congressional districts; testifying expert for ACLU on minority voting patterns

*State of New York v. U.S. Department of Commerce* (2018-2019) – challenge to inclusion of citizenship question on 2020 census form; testifying expert on behalf of ACLU

*U.S. v. City of Eastpointe* (settled 2019) – minority vote dilution challenge to City of Eastpointe, Michigan, at-large city council election system; testifying expert on behalf of U.S. Department of Justice

*Alabama NAACP v. State of Alabama* (decided 2020) – minority vote dilution challenge to Alabama statewide judicial election system; testifying expert on behalf of Lawyers Committee for Civil Rights Under Law

*Lopez v. Abbott* (2017-2018) – minority vote dilution challenge to Texas statewide judicial election system; testifying expert on behalf of Lawyers Committee for Civil Rights Under Law

*Personhuballuah v. Alcorn* (2015-2017) – racial gerrymandering challenge to Virginia congressional districts; expert for the Attorney General and Governor of the State of Virginia

*Perry v. Perez* (2014) – Section 2 case challenging Texas congressional and state house districts; testifying expert for the U.S. Department of Justice

*Jeffers v. Beebe* (2012) – Arkansas state house districts; testifying expert for the Plaintiffs

*State of Texas v. U.S.* (2011-2012) – Section 5 case challenging Texas congressional and state house districts; testifying expert for the U.S. Department of Justice



Ike Jackson  
Jeff Landry  
*Black turnout/BVAP*  
*White turnout/WVAP*

[illegible]

Gwen Collins-Greenup  
Renee Fontenot Free  
Julie Stokes  
Kyle Ardoin  
Rick Edmonds  
Thomas Kennedy III  
Others  
*Black turnout/BVAP*  
*White turnout/WVAP*

[illegible]

**95%  
confidence**

**95%  
confidence**

Party	Race	Vote	El RxC interval	El 2x2	ER	HP	El RxC interval	El 2x2	ER	HP
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[illegible]

30.0

37.8

## Appendix A

### Statewide

Appendix A Statewide	Estimates for Black Voters								Estimates for White Voters				
	Party	Race	Vote	EI RxC	95% confidence interval	EI 2x2	ER	HP	EI RxC	95% confidence interval	EI 2x2	ER	HP
Attorney General													
Ike Jackson	D	B	10.8	33.1	(32.8, 33.4)	33.6	33.0	30.6	1.7	(1.5, 1.9)	1.8	1.9	2.9
Geri Broussard Baloney	D	B	17.6	46.7	(44.6, 47.2)	48.7	49.1	46.1	5.3	(5.0, 6.3)	5.6	5.3	6.8
Buddy Caldwell	R	W	35.4	14.9	(14.5, 15.6)	13.7	14.1	16.8	44.5	(44.2, 44.7)	44.4	44.2	42.6
Jeff Landry	R	W	32.7	3.3	(3.0, 4.8)	2.4	1.5	4.0	45.0	(44.3, 45.3)	45.3	44.5	43.8
Marty Maley	R	W	3.6	2.0	(1.8, 2.1)	2.2	2.3	2.5	3.6	(3.4, 3.7)	4.1	4.1	3.9
Black turnout/BVAP			30.0										
White turnout/WVAP			37.8										
Secretary of State													
Chris Tyson	D	B	37.8	93.5	(93.2, 93.9)	94.0	95.5	91.5	14.2	(14.0, 14.8)	14.2	15.4	17.8
Tom Schedler	R	W	62.2	6.5	(6.1, 6.8)	5.9	4.5	8.5	85.8	(85.2, 86.0)	85.8	84.6	82.2
Black turnout/BVAP			30.0										
White turnout/WVAP			37.8										
2015 November													
Lieutenant Governor													
Kip Holden	D	B	44.6	96.2	(95.9, 96.5)	96.4	98.7	93.2	20.5	(20.2, 20.9)	19.9	19.4	22.2
Billy Nungesser	R	W	55.4	3.8	(3.5, 4.1)	3.6	1.3	6.8	79.5	(79.1, 79.8)	80.0	80.6	77.8
Black turnout/BVAP			33.2										
White turnout/WVAP			37.5										

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**95%  
confidence**

**95%  
confidence**

[illegible][illegible][illegible][illegible]

Sandra Christophe  
Martin Lemelle  
Other Dems (2)  
Luke Letlow  
Lance Harris  
Others (3)  
*Black turnout/BVAP*  
*White turnout/WVAP*

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**Appendix B**  
**Congressional Elections**

Appendix D

Congressional Elections				95% confidence interval				95% confidence interval					
	Party	Race	Vote	EI RxC		EI 2x2	ER	HP	EI RxC		EI 2x2	ER	HP
Congressional District 6													
2020 October													
Dartanyon Williams	D	B	25.6	74.9	(69.6, 76.3)	72.9	77.6	81.5	7.4	(6.6, 11.0)	6.2	3.3	8.1
Garret Graves	R	W	71.1	22.4	(21.0, 27.7)	22.5	17.8	14.7	91.1	(87.6, 91.8)	91.3	93.8	89.2
Others (2)			3.3	2.7	(2.2, 3.2)	4.6	4.7	3.7	1.5	(1.2, 1.8)	2.8	3.0	2.7
Black turnout/BVAP			22.3										
White turnout/WVAP			16.4										
2016 October													
Richard Lieberman	D	W	14.9	45.7	(40.3, 47.2)	48.8	48.4	44.0	5.6	(5.0, 8.6)	4.3	4.5	6.9
Jermaine Sampson	D	B	9.0	36.3	(33.4, 37.2)	38.6	36.8	36.2	1.1	(.8, 2.4)	0.6	0.0	2.1
Garret Graves	R	W	62.7	10.1	(8.4, 19.8)	7.4	5.2	13.1	79.8	(75.4, 80.5)	80.4	79.4	77.1
Bob Bell	R	W	10.2	5.0	(4.0, 5.8)	5.3	5.6	3.7	11.9	(11.6, 12.3)	11.7	12.7	10.9
Others (2)			3.3	2.9	(2.3, 3.4)	3.1	3.9	2.9	1.6	(1.3, 1.8)	2.9	3.3	2.9
Black turnout/BVAP			51.7										
White turnout/WVAP			67.3										

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Appendix C Enacted Plan District 2			Estimates for Black Voters					Estimates for White Voters					
			95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval		
Party	Race	El	RxC	El	2x2	ER	HP	El	RxC	El	2x2	ER	HP
2020 November													
U.S. President													
Biden/Harris	D	W/B	94.0	(88.4, 96.5)	97.5	99.3	95.1	45.4	(40.9, 53.4)	36.3	36.4	16.4	
Trump/Pence	R	W/W	5.2	(2.8, 10.7)	1.6	-0.7	3.5	53.5	(45.3, 57.9)	61.4	61.5	82.3	
Others			0.8	(.7, 1.0)	1.2	1.4	1.4	1.2	(1.0, 1.4)	2.0	2.1	1.3	
U.S. Senator													
Adrian Perkins	D	B	48.9	(48.3, 49.5)	48.4	48.8	48.3	28.3	(27.1, 29.5)	24.8	24.8	8.7	
Derrick Edwards	D	B	32.4	(31.9, 33.0)	33.6	33.9	30.8	4.0	(3.4, 4.6)	3.1	3.5	3.5	
Bill Cassidy	R	W	4.2	(3.8, 4.6)	3.4	1.4	5.7	62.1	(61.0, 63.0)	63.3	63.0	81.7	
Others			14.4	(13.9, 14.9)	15.7	15.9	15.2	5.7	(4.9, 6.5)	8.5	8.7	6.0	
2019 October													
Lieutenant Governor													
Willie Jones	D	B	86.4	(85.7, 87.0)	86.7	88.4	83.6	25.2	(24.0, 26.5)	26.4	26.8	15.7	
Billy Nungesser	R	W	13.6	(13.0, 14.3)	13.3	11.6	16.4	74.8	(73.5, 76.0)	73.5	73.1	84.3	
Attorney General													
Ike Jackson	D	B	91.8	(91.2, 92.4)	92.9	93.7	89.5	31.8	(30.6, 33.4)	32.0	33.5	19.3	
Jeff Landry	R	W	8.2	(7.6, 8.8)	7.1	6.2	10.5	68.2	(66.6, 69.4)	67.9	66.4	80.7	
Secretary of State													
Gwen Collins-Greenup	D	B	90.9	(90.4, 91.4)	91.7	93.2	89.1	31.2	(30.2, 32.4)	30.3	31.3	18.3	
Kyle Ardoin	R	W	4.5	(4.0, 4.8)	3.8	2.6	5.5	42.8	(41.7, 43.6)	43.1	42.7	51.0	
Thomas Kennedy III	R	W	2.8	(2.5, 3.2)	2.6	2.4	3.3	20.9	(20.4, 21.5)	21.3	20.5	24.3	
Amanda Smith	R	W	1.8	(1.6, 2.0)	1.5	1.9	2.1	5.0	(4.6, 5.5)	6.7	5.6	6.4	
Treasurer													
Derrick Edwards	D	B	95.2	(93.9, 95.6)	95.3	96.1	92.5	31.6	(30.4, 33.7)	25.5	27.9	19.4	
John Schroder	R	W	2.2	(1.8, 3.5)	1.0	-0.4	3.7	63.7	(61.2, 64.6)	63.7	62.6	75.4	
Teresa Kenny		W	2.6	(2.4, 2.9)	3.7	4.3	3.8	4.7	(4.1, 5.3)	9.8	9.6	5.2	
2019 November													
Secretary of State													
Gwen Collins-Greenup	D	B	96.8	(96.3, 97.3)	96.8	98.0	94.7	40.0	(38.6, 41.6)	38.5	37.5	24.6	
Kyle Ardoin	R	W	3.2	(2.7, 3.7)	3.1	2.0	5.3	60.0	(58.4, 61.4)	61.5	62.4	75.4	



Appendix C Enacted Plan District 2			Estimates for Black Voters					Estimates for White Voters				
			95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval
Party	Race	Estimate	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval
<b>2018 November</b>												
<b>Secretary of State</b>												
Gwen Collins-Greenup	D	B	55.7	(55.1, 56.3)	56.4	56.1	53.8	12.5	(11.2, 13.9)	10.5	10.4	8.2
Renee Fontenot Free	D	W	33.7	(33.1, 34.2)	34.0	35.0	33.3	24.1	(22.8, 25.1)	21.8	20.7	11.5
Julie Stokes	R	W	2.8	(2.5, 3.1)	2.7	2.0	3.7	20.9	(20.1, 21.7)	21.7	21.6	21.3
Kyle Ardoin	R	W	2.4	(2.2, 2.7)	2.2	1.8	2.9	17.7	(17.2, 18.2)	18.0	19.2	24.1
Rick Edmonds	R	W	1.5	(1.3, 1.7)	1.4	1.3	1.8	6.6	(6.2, 6.9)	7.1	7.3	9.3
Thomas Kennedy III	R	W	1.1	(.9, 1.2)	1.0	0.9	1.3	8.2	(7.8, 8.7)	9.0	9.1	10.6
Others			2.8	(2.5, 3.1)	3.0	2.9	3.2	10.0	(9.3, 10.6)	11.7	11.6	15.0
<b>2018 December</b>												
<b>Secretary of State</b>												
Gwen Collins-Greenup	D	B	97.0	(96.6, 97.5)	96.9	99.0	95.1	42.7	(41.5, 43.9)	44.4	40.4	30.8
Kyle Ardoin	R	W	3.0	(2.5, 3.4)	3.1	1.0	4.9	57.3	(56.1, 58.5)	55.5	59.8	69.2
<b>2017 October</b>												
<b>Treasurer</b>												
Derrick Edwards	D	B	83.4	(82.9, 84.1)	84.1	85.9	79.8	34.8	(33.6, 36.1)	29.2	24.2	20.1
Angele Davis	R	W	7.0	(6.6, 7.3)	6.7	6.3	7.4	16.2	(15.5, 16.9)	16.0	19.2	22.2
Neil Riser	R	W	4.9	(4.6, 5.3)	3.6	4.5	6.5	13.4	(12.4, 14.4)	16.3	12.9	13.1
John Schroder	R	W	2.1	(1.8, 2.4)	2.0	0.5	3.0	30.7	(30.0, 31.4)	31.3	37.5	38.3
Others			2.6	(2.3, 2.9)	3.1	2.7	3.2	4.8	(4.2, 5.5)	6.7	6.2	6.3
<b>2017 November</b>												
<b>Treasurer</b>												
Derrick Edwards	D	B	98.2	(97.7, 98.6)	97.4	100.4	95.9	48.7	(47.1, 50.1)	47.2	33.8	30.9
John Schroder	R	W	1.8	(1.4, 2.3)	2.4	-0.3	4.1	51.3	(49.9, 52.9)	52.6	66.2	69.1
<b>2015 October</b>												
<b>Lieutenant Governor</b>												
Kip Holden	D	B	84.5	(82.8, 85.1)	85.0	84.4	83.1	21.7	(20.8, 22.8)	17.8	19.1	14.1
Billy Nungesser	R	W	5.9	(5.5, 6.6)	5.3	5.3	6.3	42.5	(41.1, 43.4)	43.2	41.5	49.3
John Young	R	W	7.4	(6.9, 8.3)	7.8	7.8	8.1	33.0	(32.2, 33.9)	35.9	35.7	32.4
Elbert Guillory	R	B	2.2	(2.0, 2.5)	2.5	2.5	2.5	2.8	(2.5, 3.1)	3.6	3.7	4.2

Appendix C Enacted Plan District 2			Estimates for Black Voters					Estimates for White Voters					
			Party	Race	EI RxC	95% confidence interval	EI 2x2	ER	HP	EI RxC	95% confidence interval	EI 2x2	ER
Attorney General													
Ike Jackson	D	B	31.3	(30.8, 31.9)	31.9	31.4	30.7	3.3	(2.7, 4.2)	2.9	3.5	3.4	
Geri Broussard Baloney	D	B	49.4	(48.6, 50.0)	50.0	51.5	47.1	16.2	(15.2, 17.5)	15.1	17.2	9.7	
Buddy Caldwell	R	W	13.5	(13.0, 14.0)	12.7	11.9	15.6	41.0	(40.0, 41.8)	41.2	40.6	40.0	
Jeff Landry	R	W	2.7	(2.3, 3.1)	2.2	1.9	3.3	34.8	(34.0, 35.5)	35.6	33.4	39.9	
Marty Maley	R	W	3.1	(2.9, 3.4)	3.1	3.3	3.3	4.7	(4.2, 5.1)	5.7	5.3	7.1	
Secretary of State													
Chris Tyson	D	B	94.4	(94.0, 93.9)	95.4	96.3	92.8	26.1	(25.1, 27.3)	25.4	28.5	21.9	
Tom Schedler	R	W	5.6	(5.1, 6.0)	4.6	3.6	7.2	73.9	(72.7, 74.9)	74.6	71.5	78.1	
2015 November													
Lieutenant Governor													
Kip Holden	D	B	94.5	(93.9, 94.9)	94.3	95.0	91.8	33.5	(32.3, 34.6)	29.7	31.4	20.5	
Billy Nungesser	R	W	5.5	(5.1, 6.1)	5.7	5.0	8.2	66.5	(65.4, 67.7)	70.2	68.5	79.5	

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Appendix D Enacted Plan District 3			Estimates for Black Voters					Estimates for White Voters					
			Party	Race	El RxC	95% confidence interval	El 2x2	ER	HP	El RxC	95% confidence interval	El 2x2	ER
2020 November													
U.S. President													
Biden/Harris	D	W/B	81.6	(58.9, 91.8)	96.4	100.6	94.1	16.3	(12.5, 23.4)	9.3	7.9	12.9	
Trump/Pence	R	W/W	16.8	(6.8, 39.2)	3.1	-2.6	4.2	83.2	(76.0, 87.0)	89.0	90.5	85.6	
Others			1.6	(1.3, 2.0)	2.2	2.0	1.7	0.5	(.4, .6)	1.6	1.6	1.5	
U.S. Senator													
Adrian Perkins	D	B	41.1	(40.2, 42.0)	42.3	41.6	37.2	3.9	(3.6, 4.3)	2.9	3.0	4.9	
Derrick Edwards	D	B	34.6	(33.7, 35.5)	36.5	36.5	36.6	2.8	(2.4, 3.2)	1.9	1.7	4.0	
Bill Cassidy	R	W	5.1	(4.4, 5.9)	3.4	1.4	7.4	88.7	(88.2, 89.0)	89.1	89.2	84.1	
Others			19.2	(18.2, 20.1)	20.6	20.4	18.9	4.6	(4.2, 5.1)	5.7	6.2	6.9	
2019 October													
Lieutenant Governor													
Willie Jones	D	B	90.9	(90.0, 91.9)	92.4	93.2	88.5	6.1	(5.7, 6.6)	5.9	5.8	10.7	
Billy Nungesser	R	W	9.1	(8.1, 10.1)	7.6	6.9	11.5	93.9	(93.4, 94.3)	94.1	94.2	89.3	
Attorney General													
Ike Jackson	D	B	90.0	(89.0, 91.0)	91.6	92.1	88.0	7.5	(7.1, 7.9)	7.3	7.1	12.1	
Jeff Landry	R	W	10.0	(9.0, 11.0)	8.4	8.0	12.0	92.5	(92.1, 92.9)	92.7	92.9	87.9	
Secretary of State													
Gwen Collins-Greenup	D	B	91.0	(90.0, 91.9)	92.8	93.0	88.7	8.2	(7.7, 8.6)	6.8	6.8	11.6	
Kyle Ardoin	R	W	3.1	(2.3, 3.9)	2.7	1.3	4.9	64.1	(63.6, 64.5)	64.5	63.5	60.3	
Thomas Kennedy III	R	W	4.3	(3.6, 5.0)	3.8	3.9	4.3	22.3	(22.0, 22.6)	22.7	23.2	22.0	
Amanda Smith	R	W	1.6	(1.2, 2.1)	2.5	1.9	2.1	5.4	(5.1, 5.7)	6.3	6.5	6.1	
Treasurer													
Derrick Edwards	D	B	93.9	(93.0, 94.8)	94.2	95.8	90.4	9.4	(9.0, 9.8)	7.4	7.4	12.4	
John Schroder	R	W	2.3	(1.6, 3.3)	2.8	-0.6	5.0	86.5	(86.1, 86.8)	86.5	86.6	81.9	
Teresa Kenny		W	3.8	(3.2, 4.4)	4.4	4.9	4.5	4.2	(3.9, 4.5)	5.9	5.9	5.7	
2019 November													
Secretary of State													
Gwen Collins-Greenup	D	B	94.5	(93.7, 95.4)	95.9	97.0	91.2	9.8	(9.4, 10.5)	9.4	9.6	14.9	
Kyle Ardoin	R	W	5.5	(4.6, 6.3)	4.1	3.1	8.8	90.2	(89.5, 90.6)	90.6	90.4	85.1	

Appendix D Enacted Plan District 3			Estimates for Black Voters					Estimates for White Voters				
			95% confidence interval		El Rx2	ER	HP	95% confidence interval		El Rx2	ER	HP
<b>2018 November</b>												
<b>Secretary of State</b>												
Gwen Collins-Greenup	D	B	51.8	(51.0, 52.6)	53.9	53.2	49.5	3.4	(3.0, 3.7)	2.5	2.8	5.5
Renee Fontenot Free	D	W	38.2	(37.3, 39.0)	39.5	39.4	37.3	7.4	(7.0, 7.8)	6.7	6.7	8.6
Julie Stokes	R	W	1.1	(.9, 1.4)	0.9	0.6	1.7	11.2	(10.9, 11.4)	11.5	11.3	11.2
Kyle Ardoin	R	W	2.3	(1.8, 2.7)	1.8	1.5	3.4	35.7	(35.4, 36.0)	35.9	36.0	33.4
Rick Edmonds	R	W	1.0	(.8, 1.3)	1.1	0.2	1.8	15.8	(15.5, 16.1)	16.0	15.6	15.5
Thomas Kennedy III	R	W	1.9	(1.5, 2.2)	1.1	1.4	2.0	13.2	(13.0, 13.4)	13.4	14.2	12.9
Others			3.8	(3.2, 4.3)	3.6	3.7	4.3	13.3	(13.0, 13.7)	13.7	13.5	12.9
<b>2018 December</b>												
<b>Secretary of State</b>												
Gwen Collins-Greenup	D	B	96.2	(95.4, 97.0)	95.0	100.0	92.9	11.7	(11.2, 12.2)	11.9	10.7	15.8
Kyle Ardoin	R	W	3.8	(3.0, 4.6)	5.0	0.0	7.1	88.3	(87.8, 88.8)	87.9	89.3	84.2
<b>2017 October</b>												
<b>Treasurer</b>												
Derrick Edwards	D	B	87.5	(85.6, 89.2)	87.1	92.4	85.8	9.1	(8.6, 9.6)	8.7	8.2	11.4
Angele Davis	R	W	6.6	(5.3, 8.1)	6.8	5.7	8.3	33.8	(33.3, 34.4)	33.6	33.3	32.5
Neil Riser	R	W	1.8	(1.3, 2.4)	1.0	-0.2	1.7	22.6	(22.1, 23.1)	22.9	23.0	22.5
John Schroder	R	W	1.5	(1.0, 2.0)	2.3	-0.4	1.2	28.5	(28.0, 28.9)	28.3	29.1	27.2
Others			2.7	(2.0, 3.5)	2.0	2.5	3.1	6.0	(5.6, 6.4)	6.7	6.4	6.3
<b>2017 November</b>												
<b>Treasurer</b>												
Derrick Edwards	D	B	97.3	(96.4, 98.2)	95.9	101.1	96.5	14.8	(14.3, 15.4)	15.1	14.8	18.1
John Schroder	R	W	2.7	(2.0, 3.6)	4.1	-1.0	3.5	85.2	(84.6, 85.7)	84.9	85.2	81.9
<b>2015 October</b>												
<b>Lieutenant Governor</b>												
Kip Holden	D	B	84.8	(83.8, 85.7)	87.7	86.4	82.0	9.8	(9.3, 10.3)	8.3	9.3	12.7
Billy Nungesser	R	W	2.3	(1.9, 2.8)	1.9	1.2	3.7	42.9	(42.5, 43.3)	43.3	43.3	40.9
John Young	R	W	4.5	(3.8, 5.2)	4.0	3.7	5.7	35.1	(34.6, 35.4)	35.3	35.4	34.1
Elbert Guillory	R	B	8.4	(7.6, 9.2)	8.6	8.7	8.6	12.2	(11.8, 12.6)	12.7	11.9	12.2

Appendix D Enacted Plan District 3			Estimates for Black Voters					Estimates for White Voters					
			Party	Race	EI RxC	95% confidence interval	EI 2x2	ER	HP	EI RxC	95% confidence interval	EI 2x2	ER
Attorney General													
Ike Jackson	D	B	32.5	(28.0, 33.7)	32.6	33.2	29.4	1.6	(1.3, 3.0)	1.5	1.7	3.0	
Geri Broussard Baloney	D	B	47.5	(41.1, 49.1)	49.3	49.6	51.0	5.1	(4.6, 7.1)	4.3	4.2	6.7	
Buddy Caldwell	R	W	9.6	(8.7, 10.6)	8.8	8.6	10.2	31.1	(30.7, 31.6)	31.2	31.4	31.5	
Jeff Landry	R	W	9.4	(7.6, 19.4)	7.1	7.7	8.1	60.6	(56.9, 61.3)	61.5	60.5	56.5	
Marty Maley	R	W	1.1	(.9, 1.5)	1.0	1.0	1.2	1.6	(1.3, 1.8)	2.2	2.2	2.3	
Secretary of State													
Chris Tyson	D	B	94.0	(93.0, 94.9)	94.6	95.4	91.2	15.8	(15.3, 16.3)	14.8	15.9	19.0	
Tom Schedler	R	W	6.0	(5.1, 7.0)	5.4	4.7	8.8	84.2	(83.7, 84.7)	85.2	84.1	81.0	
2015 November													
Lieutenant Governor													
Kip Holden	D	B	97.1	(96.3, 97.8)	98.2	99.2	93.9	18.9	(18.4, 19.6)	18.1	19.0	22.9	
Billy Nungesser	R	W	2.9	(2.2, 3.7)	2.3	0.8	6.1	81.1	(80.4, 81.6)	81.9	81.0	77.1	

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Appendix E Enacted Plan District 4			Estimates for Black Voters					Estimates for White Voters				
			Party	Race	El RxC	95% confidence interval	El 2x2	ER	HP	El RxC	95% confidence interval	El 2x2
2020 November												
U.S. President												
Biden/Harris	D	W/B	87.4	(68.3, 94.5)	95.6	101.1	93.9	15.3	(11.3, 25.5)	8.5	4.9	9.9
Trump/Pence	R	W/W	11.1	(4.1, 30.2)	3.8	-3.2	4.3	84.1	(73.8, 88.1)	89.8	94.0	89.0
Others			1.5	(1.3, 1.7)	1.9	2.2	1.9	0.6	(.5, .8)	1.2	1.1	1.1
U.S. Senator												
Adrian Perkins	D	B	63.8	(63.2, 64.5)	65.6	62.7	62.3	4.0	(3.7, 4.4)	2.9	1.1	4.3
Derrick Edwards	D	B	20.8	(20.1, 21.2)	21.3	22.6	18.8	1.4	(1.2, 1.7)	1.7	1.8	2.7
Bill Cassidy	R	W	3.0	(2.5, 3.5)	4.3	0.1	6.0	90.2	(89.7, 90.6)	90.0	92.0	87.0
Others			12.5	(11.9, 13.2)	14.0	14.6	12.8	4.4	(4.0, 4.8)	5.0	5.1	6.0
2019 October												
Lieutenant Governor												
Willie Jones	D	B	91.0	(90.3, 91.7)	91.1	92.8	87.0	6.2	(5.8, 6.7)	6.1	5.7	9.9
Billy Nungesser	R	W	9.0	(8.3, 9.7)	8.9	7.2	13.0	93.8	(93.3, 94.2)	94.0	94.4	90.1
Attorney General												
Ike Jackson	D	B	88.0	(87.2, 88.7)	88.7	89.2	83.0	6.4	(5.9, 6.8)	6.0	5.6	9.6
Jeff Landry	R	W	12.0	(11.3, 12.8)	11.3	10.7	17.0	93.6	(93.2, 94.1)	94.1	94.4	90.4
Secretary of State												
Gwen Collins-Greenup	D	B	92.4	(91.5, 93.1)	92.2	93.9	89.7	6.8	(6.4, 7.3)	6.1	5.0	9.3
Kyle Ardoin	R	W	2.3	(1.8, 2.9)	3.5	1.1	3.5	57.0	(56.5, 57.3)	56.4	56.1	54.4
Thomas Kennedy III	R	W	3.6	(3.1, 4.2)	3.3	3.2	4.3	28.4	(27.9, 28.8)	29.2	29.7	27.6
Amanda Smith	R	W	1.7	(1.4, 2.1)	1.6	1.9	2.5	7.9	(7.5, 8.2)	9.0	9.3	8.7
Treasurer												
Derrick Edwards	D	B	94.5	(92.4, 95.2)	94.3	96.0	92.0	8.1	(7.5, 9.6)	6.9	6.3	10.7
John Schroder	R	W	2.1	(1.5, 4.5)	3.1	-0.4	4.4	88.4	(87.3, 88.9)	88.3	88.7	84.7
Teresa Kenny		W	3.4	(3.0, 3.8)	3.7	4.3	3.6	3.6	(3.1, 3.9)	4.5	5.0	4.6
2019 November												
Secretary of State												
Gwen Collins-Greenup	D	B	96.0	(95.5, 96.4)	95.2	98.4	93.1	8.5	(8.0, 8.9)	8.8	7.2	12.0
Kyle Ardoin	R	W	4.0	(3.6, 4.5)	4.8	1.6	6.9	91.5	(91.1, 92.0)	91.2	92.8	88.0

Appendix E Enacted Plan District 4			Estimates for Black Voters					Estimates for White Voters				
			95% confidence interval		El RxC	ER	HP	95% confidence interval		El RxC	ER	HP
Party Race					El RxC	ER	HP			El RxC	ER	HP
<b>2018 November</b>												
<b>Secretary of State</b>												
Gwen Collins-Greenup	D	B	53.8	(53.1, 54.4)	55.5	54.3	51.5	2.9	(2.5, 3.3)	2.3	2.1	4.4
Renee Fontenot Free	D	W	35.5	(34.9, 36.1)	37.7	36.5	34.2	5.8	(5.5, 6.2)	4.5	4.4	6.5
Julie Stokes	R	W	1.2	(1.0, 1.4)	1.3	1.4	1.7	7.4	(7.2, 7.7)	7.3	7.6	7.8
Kyle Ardoin	R	W	2.2	(1.9, 2.6)	2.7	1.4	3.2	31.1	(30.8, 31.5)	30.6	33.6	31.1
Rick Edmonds	R	W	1.2	(1.0, 1.4)	1.1	1.0	1.9	23.8	(23.5, 24.1)	24.1	20.4	20.4
Thomas Kennedy III	R	W	2.2	(1.9, 2.5)	1.9	1.9	2.7	14.9	(14.5, 15.2)	15.2	15.8	14.7
Others			4.0	(3.7, 4.4)	3.2	3.3	4.8	14.0	(13.7, 14.3)	14.1	16.2	15.1
<b>2018 December</b>												
<b>Secretary of State</b>												
Gwen Collins-Greenup	D	B	96.2	(95.6, 96.8)	94.9	99.2	92.3	10.6	(10.0, 11.1)	11.9	8.0	13.8
Kyle Ardoin	R	W	3.8	(3.2, 4.4)	5.2	0.8	7.7	89.4	(88.9, 90.0)	88.0	92.0	86.2
<b>2017 October</b>												
<b>Treasurer</b>												
Derrick Edwards	D	B	90.7	(89.6, 91.7)	88.7	93.3	87.3	7.1	(6.6, 7.7)	7.6	6.2	9.5
Angele Davis	R	W	3.5	(2.8, 4.4)	3.2	1.7	5.2	29.4	(28.9, 30.0)	29.3	30.6	29.4
Neil Riser	R	W	2.4	(1.8, 3.1)	2.6	2.5	3.8	30.1	(29.6, 30.6)	29.7	29.4	29.5
John Schroder	R	W	1.8	(1.4, 2.3)	1.4	1.7	2.0	27.3	(26.8, 27.8)	28.1	27.4	25.2
Others			1.6	(1.3, 2.1)	0.7	0.9	1.7	6.0	(5.7, 6.3)	6.6	6.5	6.4
<b>2017 November</b>												
<b>Treasurer</b>												
Derrick Edwards	D	B	98.1	(97.6, 98.6)	94.4	101.9	96.6	11.2	(10.6, 11.8)	13.4	10.6	13.9
John Schroder	R	W	1.9	(1.4, 2.4)	5.7	-1.9	3.4	88.8	(88.2, 89.4)	86.6	89.4	86.1
<b>2015 October</b>												
<b>Lieutenant Governor</b>												
Kip Holden	D	B	83.2	(82.4, 83.9)	84.4	83.7	79.1	9.3	(8.8, 9.7)	7.7	9.2	12.1
Billy Nungesser	R	W	2.5	(2.2, 3.0)	2.3	2.6	3.3	34.3	(33.8, 34.7)	35.2	33.9	33.4
John Young	R	W	8.1	(7.4, 8.7)	8.2	7.0	12.1	41.6	(41.1, 42.1)	41.7	41.5	40.5
Elbert Guillory	R	B	6.2	(5.7, 6.8)	6.3	6.6	5.4	14.9	(14.5, 15.2)	15.1	15.4	14.1

Appendix E Enacted Plan District 4			Estimates for Black Voters					Estimates for White Voters					
			Party	Race	EI RxC	95% confidence interval	EI 2x2	ER	HP	EI RxC	95% confidence interval	EI 2x2	ER
Attorney General													
Ike Jackson	D	B	31.7	(31.0, 32.3)	31.2	32.3	30.1	2.2	(1.9, 2.5)	2.5	2.3	3.5	
Geri Broussard Baloney	D	B	45.3	(42.0, 46.3)	46.4	45.1	44.1	5.0	(4.6, 6.0)	4.4	4.9	6.4	
Buddy Caldwell	R	W	18.7	(17.8, 20.4)	18.2	19.0	20.5	44.5	(43.8, 45.0)	44.6	43.8	43.6	
Jeff Landry	R	W	3.0	(2.4, 4.9)	2.4	2.4	4.0	44.8	(44.1, 45.2)	45.5	44.7	42.7	
Marty Maley	R	W	1.4	(1.2, 1.6)	1.0	1.2	1.2	3.6	(3.4, 3.8)	4.0	4.3	3.8	
Secretary of State													
Chris Tyson	D	B	90.0	(89.2, 90.8)	90.7	90.0	87.2	14.1	(13.6, 14.6)	13.7	15.5	18.5	
Tom Schedler	R	W	10.0	(9.2, 10.8)	9.3	9.9	12.8	85.9	(85.4, 86.4)	86.4	84.5	81.5	
2015 November													
Lieutenant Governor													
Kip Holden	D	B	97.7	(97.3, 98.1)	97.5	99.1	95.3	16.9	(16.4, 17.4)	16.9	17.6	21.7	
Billy Nungesser	R	W	2.3	(1.9, 2.7)	2.5	0.9	4.7	83.2	(82.6, 83.6)	83.1	82.4	78.3	

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Appendix F Enacted Plan District 5			Estimates for Black Voters					Estimates for White Voters				
			95% confidence interval	El RxC	El 2x2	ER	HP	95% confidence interval	El RxC	El 2x2	ER	HP
Party	Race		El RxC		El 2x2	ER	HP	El RxC		El 2x2	ER	HP
2020 November												
U.S. President												
Biden/Harris	D	W/B	87.2	(70.0, 93.9)	95.3	99.7	94.2	12.3	(8.6, 21.2)	7.3	5.3	8.5
Trump/Pence	R	W/W	11.5	(4.9, 28.5)	4.2	-1.6	4.1	87.2	(78.2, 90.8)	91.1	93.6	90.4
Others			1.3	(1.2, 1.6)	1.8	1.9	1.7	0.6	(.5, .7)	1.3	1.1	1.1
U.S. Senator												
Adrian Perkins	D	B	42.4	(41.8, 42.9)	43.4	42.9	41.9	2.1	(1.9, 2.3)	1.9	1.3	3.0
Derrick Edwards	D	B	34.0	(33.4, 34.5)	35.1	34.8	32.5	1.4	(1.1, 1.6)	1.5	1.6	2.9
Bill Cassidy	R	W	6.5	(5.9, 7.0)	6.5	4.4	8.6	91.4	(90.9, 91.7)	90.9	91.3	88.3
Others			17.2	(16.6, 17.7)	18.8	18.0	17.0	5.2	(4.8, 5.5)	5.0	5.8	5.9
2019 October												
Lieutenant Governor												
Willie Jones	D	B	90.1	(89.5, 90.8)	90.2	91.7	87.8	4.9	(4.6, 5.3)	5.1	5.3	8.2
Billy Nungesser	R	W	9.9	(9.2, 10.5)	9.7	8.3	12.2	95.1	(94.7, 95.4)	94.9	94.7	91.8
Attorney General												
Ike Jackson	D	B	89.1	(88.4, 89.7)	89.0	90.9	85.8	5.1	(4.8, 5.5)	5.5	5.5	8.2
Jeff Landry	R	W	10.9	(10.3, 11.6)	11.0	9.1	14.2	94.9	(94.5, 95.2)	94.5	94.5	91.8
Secretary of State												
Gwen Collins-Greenup	D	B	91.0	(90.4, 91.5)	90.7	92.8	87.8	5.2	(4.9, 5.8)	5.4	5.2	7.9
Kyle Ardoin	R	W	2.2	(1.8, 2.6)	2.3	1.1	3.8	53.6	(53.0, 54.0)	53.7	52.6	51.5
Thomas Kennedy III	R	W	4.5	(4.0, 4.9)	4.1	3.9	5.5	31.6	(31.3, 31.9)	31.6	32.0	31.0
Amanda Smith	R	W	2.4	(2.1, 2.7)	2.1	2.1	2.9	9.5	(9.3, 9.8)	9.9	10.2	9.7
Treasurer												
Derrick Edwards	D	B	93.7	(93.2, 94.3)	93.3	95.7	91.2	7.1	(6.7, 7.7)	6.8	6.5	9.4
John Schroder	R	W	2.2	(1.8, 2.6)	3.8	-0.4	4.6	88.3	(88.0, 88.6)	87.9	88.1	85.7
Teresa Kenny		W	4.1	(3.7, 4.5)	4.1	4.8	4.2	4.6	(4.2, 4.9)	5.3	5.4	5.0
2019 November												
Secretary of State												
Gwen Collins-Greenup	D	B	96.0	(95.5, 96.5)	95.2	98.0	93.5	8.1	(7.8, 8.5)	8.5	8.1	11.0
Kyle Ardoin	R	W	4.0	(3.5, 4.5)	4.8	2.0	6.5	91.9	(91.5, 92.2)	91.4	91.9	89.0

Appendix F Enacted Plan District 5			Estimates for Black Voters					Estimates for White Voters					
			Party	Race	EI RxC	95% confidence interval	EI 2x2	ER	HP	EI RxC	95% confidence interval	EI 2x2	ER
2018 November Secretary of State													
Gwen Collins-Greenup	D	B	54.5	(53.9, 55.1)	57.0	55.6	52.0	2.1	(1.8, 2.5)	1.6	2.0	4.0	
Renee Fontenot Free	D	W	35.2	(34.6, 35.7)	36.7	36.3	34.4	5.3	(5.0, 5.5)	4.1	4.3	5.4	
Julie Stokes	R	W	1.0	(.8, 1.1)	0.8	1.2	1.2	10.3	(10.1, 10.5)	10.6	10.1	9.5	
Kyle Ardoin	R	W	2.2	(1.9, 2.5)	2.7	1.5	3.3	33.7	(33.4, 34.0)	33.4	34.3	32.9	
Rick Edmonds	R	W	1.2	(1.0, 1.5)	0.9	0.5	1.8	15.1	(14.8, 15.3)	15.2	14.9	15.2	
Thomas Kennedy III	R	W	2.3	(2.0, 2.6)	1.9	1.5	3.2	18.6	(18.3, 18.8)	18.7	19.6	18.6	
Others			3.7	(3.4, 4.1)	3.2	3.5	4.2	15.0	(14.7, 15.2)	15.3	14.8	14.4	
2018 December Secretary of State													
Gwen Collins-Greenup	D	B	96.1	(95.6, 96.6)	93.4	99.8	92.1	8.6	(8.1, 9.1)	10.6	7.5	9.7	
Kyle Ardoin	R	W	3.9	(3.4, 4.4)	6.6	0.2	7.9	91.4	(90.9, 91.9)	89.3	92.5	90.3	
2017 October Treasurer													
Derrick Edwards	D	B	86.7	(84.0, 88.0)	82.9	89.5	83.3	5.6	(5.1, 6.4)	6.4	4.0	7.7	
Angele Davis	R	W	4.5	(3.6, 5.6)	5.0	5.2	5.4	25.7	(25.2, 26.1)	25.6	25.7	22.7	
Neil Riser	R	W	4.6	(3.8, 5.6)	6.8	1.9	8.4	47.7	(47.2, 48.1)	46.6	51.9	50.0	
John Schroder	R	W	1.9	(1.4, 3.2)	0.5	1.2	1.1	17.1	(16.7, 17.5)	18.1	14.5	15.6	
Others			2.3	(1.8, 3.0)	1.0	2.1	1.7	3.9	(3.6, 4.2)	4.3	3.9	3.9	
2017 November Treasurer													
Derrick Edwards	D	B	98.1	(97.7, 98.6)	93.0	102.8	96.6	11.4	(11.0, 12.0)	14.0	9.8	13.1	
John Schroder	R	W	1.9	(1.5, 2.3)	7.0	-2.8	3.4	88.6	(88.0, 89.0)	86.0	90.2	86.9	
2015 October Lieutenant Governor													
Kip Holden	D	B	90.0	(89.3, 90.6)	90.1	91.2	86.9	8.9	(8.5, 9.3)	8.7	8.9	10.5	
Billy Nungesser	R	W	3.4	(2.9, 3.9)	3.2	3.0	4.6	40.2	(39.8, 40.6)	40.4	39.3	38.2	
John Young	R	W	4.1	(3.6, 4.6)	4.2	3.6	5.4	40.3	(39.9, 40.6)	40.1	40.5	40.1	
Elbert Guillory	R	B	2.5	(2.2, 2.9)	2.2	2.3	3.0	10.7	(10.4, 10.9)	10.9	11.5	11.2	

Appendix F Enacted Plan District 5			Estimates for Black Voters					Estimates for White Voters					
			Party	Race	EI RxC	95% confidence interval	EI 2x2	ER	HP	EI RxC	95% confidence interval	EI 2x2	ER
Attorney General													
Ike Jackson	D	B	34.4	(33.8, 35.0)	34.6	33.5	30.8	1.5	(1.3, 1.8)	1.7	1.8	2.7	
Geri Broussard Baloney	D	B	43.5	(42.2, 44.3)	44.9	45.1	43.1	4.0	(3.7, 4.5)	3.7	3.7	5.3	
Buddy Caldwell	R	W	17.6	(16.9, 18.5)	15.7	18.1	20.7	51.5	(51.1, 51.9)	52.0	51.9	49.8	
Jeff Landry	R	W	2.9	(2.5, 3.5)	2.2	1.8	3.7	39.2	(38.8, 39.5)	39.6	38.3	38.5	
Marty Maley	R	W	1.5	(1.3, 1.7)	1.5	1.5	1.7	3.8	(3.6, 3.9)	4.1	4.4	3.9	
Secretary of State													
Chris Tyson	D	B	93.2	(92.6, 93.9)	92.9	93.7	91.2	13.7	(13.3, 14.3)	13.7	14.4	16.5	
Tom Schedler	R	W	6.8	(6.1, 7.4)	7.2	6.3	8.8	85.3	(85.7, 86.7)	86.3	85.6	83.5	
2015 November													
Lieutenant Governor													
Kip Holden	D	B	97.6	(97.2, 98.0)	96.7	99.9	95.3	16.7	(16.3, 17.4)	17.1	17.0	17.8	
Billy Nungesser	R	W	2.4	(2.0, 2.8)	3.3	0.1	4.7	83.3	(82.6, 83.7)	82.9	83.0	82.2	

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Appendix G Enacted Plan District 6			Estimates for Black Voters					Estimates for White Voters					
			95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval	95% confidence interval		
Party	Race	El	RxC	El	2x2	ER	HP	El	RxC	El	2x2	ER	HP
2020 November													
U.S. President													
Biden/Harris	D	W/B	79.5	(57.8, 92.1)	96.6	102.3	92.3	19.0	(13.8, 26.5)	10.8	9.1	12.7	
Trump/Pence	R	W/W	19.1	(6.7, 40.4)	2.1	-4.0	6.4	80.4	(72.9, 85.6)	87.0	89.1	85.7	
Others			1.4	(1.0, 1.8)	1.3	1.6	1.3	0.6	(.5, .7)	2.0	1.8	1.6	
U.S. Senator													
Adrian Perkins	D	B	49.7	(48.4, 51.0)	53.0	51.4	55.9	5.7	(5.2, 6.2)	4.5	3.8	6.0	
Derrick Edwards	D	B	30.1	(29.0, 31.1)	33.3	32.9	23.6	1.5	(1.3, 1.9)	1.5	1.5	3.0	
Bill Cassidy	R	W	6.3	(5.3, 7.3)	3.5	0.2	8.0	88.7	(88.1, 89.0)	88.8	89.4	85.4	
Others			13.9	(12.8, 15.0)	15.4	15.5	12.5	4.1	(3.7, 4.6)	4.9	5.3	5.6	
2019 October													
Lieutenant Governor													
Willie Jones	D	B	84.6	(83.2, 86.0)	87.8	89.7	81.3	7.5	(7.0, 8.0)	7.3	7.1	11.3	
Billy Nungesser	R	W	15.4	(14.0, 16.8)	12.1	10.3	18.7	92.5	(92.0, 93.0)	92.7	92.9	88.7	
Attorney General													
Ike Jackson	D	B	90.8	(89.4, 92.0)	92.6	95.8	87.3	9.2	(8.8, 9.7)	9.2	8.3	12.5	
Jeff Landry	R	W	9.2	(8.0, 10.6)	7.4	4.2	12.7	90.8	(90.3, 91.2)	90.8	91.7	87.5	
Secretary of State													
Gwen Collins-Greenup	D	B	91.1	(88.0, 92.4)	93.6	95.9	89.0	9.8	(9.1, 11.4)	8.3	7.8	12.1	
Kyle Ardoin	R	W	4.5	(3.4, 7.4)	3.0	1.3	7.0	65.4	(63.8, 65.9)	65.4	64.5	61.5	
Thomas Kennedy III	R	W	2.9	(2.2, 3.9)	1.7	1.7	2.4	18.9	(18.5, 19.2)	19.6	20.4	19.4	
Amanda Smith	R	W	1.5	(1.0, 2.1)	2.4	1.1	1.5	6.0	(5.5, 6.4)	6.8	7.3	7.0	
Treasurer													
Derrick Edwards	D	B	92.3	(83.5, 93.8)	93.8	96.3	90.2	11.5	(10.8, 14.5)	8.6	8.6	13.3	
John Schroder	R	W	5.2	(3.7, 13.8)	2.3	-0.5	6.4	84.9	(82.3, 85.4)	85.5	85.3	81.2	
Teresa Kenny		W	2.5	(1.8, 3.3)	3.6	4.2	3.4	3.6	(3.2, 4.1)	5.7	6.0	5.5	
2019 November													
Secretary of State													
Gwen Collins-Greenup	D	B	95.0	(93.8, 96.0)	96.4	99.8	93.7	12.6	(12.1, 13.1)	12.5	11.3	16.5	
Kyle Ardoin	R	W	5.0	(4.0, 6.2)	3.6	0.3	6.3	87.4	(86.9, 87.9)	87.5	88.7	83.5	

Appendix G Enacted Plan District 6			Estimates for Black Voters					Estimates for White Voters					
			Party	Race	El RxC	95% confidence interval	El 2x2	ER	HP	El RxC	95% confidence interval	El 2x2	ER
2018 November													
Secretary of State													
Gwen Collins-Greenup	D	B	60.1	(58.8, 61.3)	64.8	62.9	60.3	2.6	(2.2, 3.1)	2.1	2.1	4.8	
Renee Fontenot Free	D	W	30.3	(29.0, 31.5)	33.4	32.6	26.2	8.5	(8.0, 9.0)	6.9	7.2	7.6	
Julie Stokes	R	W	1.9	(1.3, 2.7)	1.7	2.6	3.1	14.1	(13.6, 14.6)	14.4	13.8	12.6	
Kyle Ardoin	R	W	2.7	(2.0, 3.5)	1.9	0.5	4.8	33.0	(32.6, 33.4)	33.2	34.3	33.1	
Rick Edmonds	R	W	1.1	(.7, 1.7)	0.8	-2.4	1.7	22.4	(22.2, 22.7)	22.7	21.4	22.4	
Thomas Kennedy III	R	W	1.3	(.9, 1.8)	0.8	0.8	1.1	9.0	(8.8, 9.2)	9.3	10.2	9.4	
Others			2.6	(1.9, 3.3)	2.3	3.0	2.8	10.3	(9.8, 10.6)	10.5	11.0	10.1	
2018 December													
Secretary of State													
Gwen Collins-Greenup	D	B	97.0	(95.9, 97.8)	96.8	103.8	95.1	14.8	(14.2, 15.4)	15.6	11.0	17.9	
Kyle Ardoin	R	W	3.0	(2.2, 4.1)	3.1	-3.7	4.9	85.2	(84.6, 85.7)	84.4	89.0	82.1	
2017 October													
Treasurer													
Derrick Edwards	D	B	86.2	(84.2, 87.9)	89.2	91.9	82.5	10.4	(9.8, 11.0)	8.7	8.0	12.2	
Angele Davis	R	W	3.6	(2.4, 5.2)	3.6	2.8	4.9	41.9	(41.3, 42.4)	42.3	39.1	40.1	
Neil Riser	R	W	6.6	(5.2, 8.0)	2.3	5.8	7.6	11.8	(11.3, 12.3)	13.5	10.1	11.6	
John Schroder	R	W	2.1	(1.4, 3.0)	0.8	-1.9	2.0	30.5	(30.0, 31.0)	30.8	36.1	29.8	
Others			1.6	(1.1, 2.4)	1.4	1.3	3.0	5.4	(4.9, 5.8)	6.6	6.7	6.2	
2017 November													
Treasurer													
Derrick Edwards	D	B	96.8	(95.4, 97.9)	97.3	104.0	94.1	16.1	(15.5, 16.9)	16.5	13.4	19.1	
John Schroder	R	W	3.2	(2.1, 4.6)	2.8	-3.8	5.9	83.9	(83.1, 84.5)	83.5	86.6	80.9	
2015 October													
Lieutenant Governor													
Kip Holden	D	B	91.3	(89.2, 92.7)	93.6	95.5	91.9	24.7	(24.1, 25.4)	22.6	20.2	24.7	
Billy Nungesser	R	W	3.0	(2.1, 4.2)	1.2	5.4	3.1	37.9	(37.4, 38.3)	38.5	40.4	37.9	
John Young	R	W	3.9	(2.8, 5.2)	2.4	0.3	2.7	31.3	(30.8, 31.8)	32.1	31.6	30.0	
Elbert Guillory	R	B	1.9	(1.3, 2.6)	1.7	0.2	2.3	6.1	(5.7, 6.6)	7.7	7.8	7.5	

Appendix G Enacted Plan District 6			Estimates for Black Voters					Estimates for White Voters				
			95% confidence interval		EI 2x2	ER	HP	95% confidence interval		EI 2x2	ER	HP
Party Race			EI RxC					EI RxC				
<b>Attorney General</b>												
Ike Jackson	D	B	38.7	(37.6, 39.7)	40.5	40.8	34.5	1.6	(1.4, 2.0)	1.2	1.1	3.0
Geri Broussard Baloney	D	B	39.6	(38.0, 41.1)	41.4	41.9	37.0	5.4	(4.9, 6.0)	4.8	5.1	7.0
Buddy Caldwell	R	W	16.9	(15.4, 18.4)	15.8	14.6	22.8	50.0	(49.5, 50.5)	50.2	48.6	46.8
Jeff Landry	R	W	2.4	(1.6, 4.5)	1.3	0.3	3.5	38.3	(37.7, 38.7)	38.6	39.8	38.3
Marty Maley	R	W	2.3	(1.7, 3.0)	2.2	2.5	2.1	4.6	(4.2, 5.1)	5.6	5.3	4.9
<b>Secretary of State</b>												
Chris Tyson	D	B	92.1	(90.3, 93.7)	93.8	94.9	91.8	13.4	(12.8, 14.2)	12.7	13.9	18.2
Tom Schedler	R	W	7.9	(6.3, 9.7)	6.2	5.2	8.2	85.6	(85.8, 87.2)	87.2	86.0	81.8
<b>2015 November</b>												
<b>Lieutenant Governor</b>												
Kip Holden	D	B	95.7	(94.2, 96.9)	97.1	99.8	93.3	31.0	(30.4, 31.8)	29.8	27.9	32.7
Billy Nungesser	R	W	4.3	(3.1, 5.8)	2.9	0.2	6.7	69.0	(68.2, 69.6)	70.2	72.1	67.3

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# Exhibit 3

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**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.*

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

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-00214-SDD-RLB

**Preliminary Expert Report of Dr. R. Blakeslee Gilpin**



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## Credentials, Purpose

I am an Associate Professor of History and the Director of Graduate Studies at Tulane University in New Orleans, Louisiana. I earned my Ph.D. in 2009 from Yale University, my M.Phil from Cambridge University (2003) and a combined BA/MA from Yale University (2001). I study the history of the American South with a particular focus on the legacies of slavery and the Civil War. My first book, *John Brown Still Lives!: America's Long Reckoning with Violence, Equality, and Change*, was published by the University of North Carolina Press after winning the C. Vann Woodward Prize for the best dissertation by the Southern Historical Association in 2010.

I have worked extensively in the editorial realm as a historian. I co-edited *The Selected Letters of William Styron*, published in 2012, a *New York Times* Editor's Pick and nominated by Random House for the Pulitzer Prize. I have recently finished another editorial project as the historian paired with a literary scholar for the 2020 Norton Critical Edition of Frederick Douglass's *My Bondage My Freedom*. By far the most completely notated and thoroughly contextualized edition of this landmark text, this project is the most thorough historical treatment of Douglass's second autobiography.

My scholarship has been published and appreciated widely in academic and popular publications. My article on New Orleans' Hansen's Sno-Bliz was a finalist for the James Beard Award for best magazine writing of 2019. I have published chapters on the Reconstruction era in two prominent volumes: *Reconstruction* (Kent State University, 2016) and *Routledge History of Terrorism* (2016). My essays have appeared in the scholarly journals *Slavery & Abolition* and *Early American Literature*. My work has also appeared in *The Paris Review*, *The Boston Globe*, and *The New York Times* "Disunion." Other scholarship has appeared in *The American Scholar*, *The Journal of Mississippi History*, and *Biography: An Interdisciplinary Quarterly*. I have reviewed books for *The Journal of American History*, *Journal of Southern History*, *Slavery & Abolition*, *The New England Quarterly*, and *The Journal of American Studies*.

I include with this report a complete CV with my academic qualifications, academic positions, publications, fellowships and prizes, invited lectures, media appearances, and presentations. I am compensated at the rate of \$300 per hour for my work in preparing this the report. This compensation is not dependent upon my findings, and my opinions herein do not represent the sum total of my opinions in this matter, which are subject to change upon further research or revelations. I have not testified as an expert in any litigation in the past four years.

I have been asked by plaintiffs to examine any relevant historical evidence and determine if there are sociohistorical factors relevant to Louisiana's election laws that might affect the ability of Black voters in Louisiana to participate in the political process and elect candidates of their choice. My analysis adheres to the common standards of the historical profession, but I am also guided by the "totality of circumstances" test, as applied using the "Senate Factors," to evaluate whether the election laws in question do and will prevent Black voters in the state from equitably exercising their right to vote.

## I. Introduction

The state of Louisiana's long history of racial discrimination is without dispute. Since before Louisiana was admitted to the Union on April 30, 1812, the main consideration in determining a person's legal and political rights were the countless color gradations created by whites in power ("black," "creole," "quadroon," "octaroon," etc). Until Louisiana's Constitution of 1864 abolished slavery, the defining character of the state was the ownership and control of Black bodies. "Efforts to restrict black participation in the governmental process," explains the definitive history of voting rights in the south, "have been a permanent feature of Louisiana's political environment."<sup>1</sup> When Black Louisianans gained the right to vote following the ratification of the Fourteenth and Fifteenth Amendments in 1868 and 1870, the state's racial discrimination actually intensified even as opportunities to exercise the vote reached their historical peak. Overall, the story of Black suffrage in Louisiana is the story of "freedom-seeking former slaves and status-preserving masters."<sup>2</sup> Disenfranchising efforts after 1868 were now fueled by a special desire to exclude a burgeoning electorate likely hostile to white supremacist policies that had so long dominated the state. Hand in hand with foundational societal beliefs and customs built to reinforce white supremacy, Louisiana's laws and lifeways were explicitly designed to exclude non-whites from the political, social, educational, and economic rights enjoyed by white citizens. These discriminatory practices have been extensively documented by historians and plainly admitted to by Louisiana's lawmakers across its 210-year statehood. Even with so much evidence of and open hostility to Black political participation, contesting the tools of white supremacy has taken many forms across the past 150 plus years, including in state and federal courts. Louisiana overwhelmingly and consistently designed policies that could protect white voters while disenfranchising Black voters.

I summarize that history here for the Court, beginning with a brief account of antebellum racial attitudes, the laws and strategies deployed for racial control during that period, and the tools used for racial suppression before 1865. It is important to note that the strategies developed during slavery's legality were central to white Louisianans' conception of the "appropriate" level of white political control, a level they have consistently attempted to maintain since slavery was outlawed in 1865. From there, I look at efforts at disenfranchisement stretching from 1868 to the present day.

## II. The History of Racial Discrimination and Control in Louisiana

### *From the Code Noir to the End of Spanish Rule, 1724-1803*

In the context of 21<sup>st</sup> century voter disenfranchisement, early Louisiana laws and racial practices demonstrate the incredible depth and longevity of white anxieties about race and control.

<sup>1</sup> Richard L. Engstrom, Stanley A. Halpin, Jr., Jean A. Hill, and Victoria M. Caridas-Butterworth, "Louisiana," in Chandler Davidson and Bernard Grofman, eds., *Quiet Revolution in the South: The Impact of the Voting Rights Act, 1965-1990* (Princeton: Princeton University Press, 1994), 103.

<sup>2</sup> Marek D. Stedman, *Jim Crow Citizenship: Liberalism and the Southern Defense of Racial Hierarchy* (New York: Routledge, 2012), 53.

The story of Louisianan laws governing Black people is fundamentally a story of the area's fluid racial categories colliding with the encroaching realities of racial slavery and the official implementation of slave laws. That collision began with 1724's Code Noir, "borrowed with only slight modifications from Saint-Domingue's 1685 slave code." Louisiana made miscegenation illegal and introduced "restrictions against owners keeping slave concubines." All these measures were simply "a transparent attempt to widen racial divisions by fostering feelings of white superiority." Most notably in this regard, Louisiana's Code Noir strengthened the penalties for Black people guilty of the same crimes committed by whites. Indeed, most of the legal apparatus of the 18<sup>th</sup> century was dedicated to policing racial boundaries, particularly lines that were hard to visually discern. From attempts to control interracial socializing in "gambling dens and cabarets" and policing Black sartorial choices, "these boundary-fixing measures revealed...a nascent governing class still unsure of its grip on power, still uncertain of its identity and status."<sup>3</sup>

Indeed, the consolidation and maintenance of white supremacy was a constant act of improvisation. Planters worked on their own, collectively, and with the state to try to control enslaved people determined, whatever the cost, to practice agency, individuality, and basic humanity. Early laws in French Louisiana reveal the steady move to fortify and define white power. A 1744 regulation was introduced to stop slaves from carrying weapons without permits and a 1751 regulation requiring passes for slaves to travel both speak to white anxieties and white efforts to exercise control. Slave owners were urged to police their own slaves more vigilantly and there were suggestions of imposing lockdowns at night.

The revision of Spanish law in 1789 was perhaps more responsible than any other factor in securing New Orleans' and Louisiana's future, though not intentionally. Although the 1789 law controversially opened the slave trade, the new code also inserted the state in the "personal and moral lives of slaves," establishing guidelines for work, cohabitation, and leisure.<sup>4</sup> Slave owners were deeply unhappy with this new arrangement, bristling "at the crown's reassertion of authority over areas that masters considered their inviolable prerogative." Indeed elites' hostility to these revisions emphasized how slave owners hoped to preserve "the private-state sovereignty of their plantations."<sup>5</sup>

The preeminent historian of New Orleans captured this dynamic when he explained that "no matter how resolutely the city's masters cracked down on the slaves' customary rights and enjoyment privileges, they always found themselves backtracking, yielding to the necessity of allowing their bondpeople the creative scope to remake themselves after models not always of their owners' making."<sup>6</sup>

White elites were also living in the atmosphere of repression and fear that characterized American slavery. The Pointe Coupée region was particularly problematic in this regard and "insurrection panics and reports of maltreatment seemed to sprout like forest mushrooms after a hard rain."<sup>7</sup> At this moment, planters were not aligned with the Spanish crown, particularly the

<sup>3</sup> Larry Powell, *The Accidental City: Improvising New Orleans* (Cambridge: Harvard, 2013), 73, 117.

<sup>4</sup> Ibid., 274.

<sup>5</sup> Ibid., 275-6.

<sup>6</sup> Ibid., 276.

<sup>7</sup> Powell, 253.

laws they interpreted as “slave-friendly.” The 1795 discovery of a massive slave plot to revolt, the so-called Pointe Coupée conspiracy, proved to white elites that their fears of their slaves were justified.<sup>8</sup>

It was in this atmosphere of fear and repression, and of a deep desire by white elites to command “unfettered power over race policy,” that Louisiana would soon enter the United States.<sup>9</sup>

### ***American Louisiana, 1804-1861***

The Louisiana Purchase extended the frontiers of the United States and enabled the explosive expansion of the young republic’s slave-based sugar and cotton kingdoms and a new birth of unfreedom. Antebellum Louisiana consisted mainly of large plantations under the armed guard of mounted overseers, spaces whose explosive economic success and very survival depended upon uniting all sectors of white society under the banner of uncompromising white supremacy as a deterrent against slave insurrection. Understanding this deliberate cultivation of state power to control and marginalize Black people is essential to understanding later white strategies of disenfranchisement.

### **Slavery and Race**

Just as French and Spanish Louisiana did through its early laws, American Louisiana reinforced white anxieties over black control and the complexities of racial categories. Louisiana’s uniquely large population of free Black people prompted the first formal citizenship promises to Black people, but the profound growth of slavery reinforced the fraught power dynamic so fundamental to latter day Louisiana.

As one celebrated historian of antebellum Louisiana has explained, American Louisiana was, by every real measure, the exemplary center of North American slavery.<sup>10</sup> And yet, the Louisiana the United States purchased was more complex than any other slaveholding society in the United States. “Situated at a variety of indeterminate points between masters and slaves were Louisiana’s free people of color, numbering almost 19,000 in 1860,” writes Rebecca Scott.<sup>11</sup> The 1803 Treaty of Cession actually “recognized a formal claim to citizenship by this community, but President Thomas Jefferson quickly backed off on that promise.”<sup>12</sup> Jefferson’s sidestepping

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<sup>8</sup> Ibid., 253.

<sup>9</sup> Ibid., 309.

<sup>10</sup> As Walter Johnson explained, New Orleans “is, in no small measure, the story of antebellum slavery.” See Walter Johnson, *Soul by Soul: Life Inside the Antebellum Slave Market* (Cambridge: Harvard, 1999), 3. Johnson also explains that New Orleans, was “the commercial emporium of the Midwest, the principal channel through which Southern cotton flowed to the global economy and foreign capital came in to the United States, the largest slave market in North America, and the central artery of the continent’s white overseers’ flirtation with the perverse attractions of global racial domination.”

<sup>11</sup> Rebecca Scott, *Degrees of Freedom: Louisiana and Cuba After Slavery* (Cambridge: Harvard, 2005), 14. Scott explains that “Many of these families were descended from early French, Spanish, and African settlers, augmented by exiles and migrants from Haiti and Cuba, and by newly manumitted slaves.”

<sup>12</sup> Scott, 14.

this citizenship issue is not the earliest example of the state restricting non-white freedoms but does mark the earliest concrete instance of the state restricting non-white political rights.

Following the successful crystallization of American sugar in New Orleans, Louisiana and the entire Mississippi River Valley were rapidly consumed by a tightly managed, interlocking commercial enterprise of slave-grown cash crops, enormous slave-labored plantations, and the most thriving slave market in the history of the western hemisphere.<sup>13</sup>

For four decades, sugar was the unparalleled driver of New Orleans' exponential population growth and unremitting economic ascendance.<sup>14</sup> Between 1803 and 1810, New Orleans' population doubled and did so every decade until 1840, when the city became the third largest in the United States.<sup>15</sup> At that same moment, New Orleans reached its all-time historical peak as the fourth-largest port in the world. Slavery defined every aspect of antebellum Louisiana; "slavery was the pivot around which everything revolved."<sup>16</sup> Sugar created a massive capitalist engine and an insatiable demand for enslaved labor. Not only did American sugar fuel one final explosion of transatlantic slave trading before that avenue legally closed in 1808, Louisiana sugar was the point of origin for the devastating internal slave trade in the United States, the so-called Second Middle Passage, and the true eruption of the institution of American slavery itself.<sup>17</sup>

Connecticut-born Amos Stoddard (who would become the Commandant of the military district of Upper Louisiana after the Louisiana Purchase) attributed this financial boon to the massive increase in the importation of enslaved individuals, primarily the invigorated domestic slave trade originating in the Upper South. "The number of slaves has increased," Stoddard explained, so that "sugar estates are cultivated on a more extensive scale, and the number of them greatly multiplied."<sup>18</sup> Stoddard estimated "each good slave will annually earn his master from four hundred, to four hundred and fifty dollars" per year.<sup>19</sup>

Stoddard carefully tied this transformation to the developing Second Middle Passage. "Some considerable slave holders, who now find it difficult to subsist," Stoddard explained, "would soon with the same means accumulate fortunes on the Lower Mississippi. In no other part of the United States can each good slave yield his master from two hundred and fifty to three

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<sup>13</sup> Ibid., 3.

<sup>14</sup> It took more than a few decades for cotton production in Louisiana and Mississippi to start rivaling and outstripping the historically dominant growers in Georgia and South Carolina. Sven Beckert, *Empire of Cotton*, 103.

<sup>15</sup> Richard Campanella, *Bienville's Dilemma: A Historical Geography of New Orleans* (Lafayette, LA: Center for Louisiana Studies, University of Louisiana at Lafayette, 2008), 149.

<sup>16</sup> Scott, 15.

<sup>17</sup> This massive forced migration transported slaves from the upper South – particularly increasingly unprofitable tobacco plantations across the South to the bloody fields of sugar and cotton of the Deep South, destroying families and enslaved communities across America. See Ira Berlin, "Coming to Terms with Slavery in Twenty-First-Century America," 16.

<sup>18</sup> Major Amos Stoddard, *Sketches, Historical and Descriptive of Louisiana*. (Philadelphia, PA: Matthew Carey 1812), 161

<sup>19</sup> Ibid., 181.



hundred dollars annual profit; and the expense of removing families to that quarter by way of the rivers would be inconsiderable.”<sup>20</sup>

### **White Fear and Black Repression**

White fear of Black agency was the most important aspect of the antebellum Louisianan mind-set. Those fears were most deeply focused on perceived manifestations of Black freedom and the possibility of violent Black revenge.

It was through slavery that Louisiana began to change under American rule. “Most of the white constables in the streets of New Orleans” had been reared in St. Domingue, regulating Haitian slavery, before the 1789 Haitian Revolution on that island, which began as a slave revolt, forced them to take refuge in Louisiana. Experts from the brutal sugar plantations of Haiti poured into Louisiana for the same reason, helping to jumpstart the United States’ first successful sugar cultivation and fueling Louisiana’s commercial explosion. In turn, “a little Saint-Domingue” grew on the Mississippi River’s so-called “German Coast,” dominated by the Haitian-inspired plantations, many of them manned by slaves who had been carried across the Caribbean with their masters.

These refugees from Haiti also brought concrete reminders of the slave owner’s greatest fear: violent and bloody slave rebellion. Indeed, as Black bodies laid the cornerstones of a new nation’s physical edifice and Black labor built a world-conquering capitalist economy, a concomitant fear of blackness anchored the country’s imagination. The country’s rapid ascension to heretofore unseen achievements of democratic governance and economic success depended upon racial fears. The historian Alan Taylor’s brilliant research into fear in antebellum Virginia has explored the complex zero-sum game that early Americans thought governed the benefits and costs of freedom and slavery. “Slavery enslaved blacks,” Taylor explains, “but it also imprisoned whites in a web of distortions and deceptions of their own making.”<sup>21</sup>

Life under American slavery was, in the words of Taylor, an “ongoing cold war,” an arrangement always on the verge of “erupt[ing] into bloody retribution.” Events like the Haitian Revolution reaffirmed and encouraged both delusions: “powerful dread” at an “internal enemy” and a corresponding obsession with white “safety and prosperity.” The illusions of control – slave patrols, restrictive laws, physical punishment, even the idea of genetic superiority – were evidence of white America’s perpetual “war against the black enemy within.”<sup>22</sup>

Louisianans were particularly fearful of the explosive potential of the humans they subjected to bondage. Writing to Thomas Jefferson, Governor William Claiborne decried what he saw as “a general spirit of Insubordination” in the slaves of Louisiana. New Orleans’ mayor John Wilkins agreed that “the negroes are in a shameful state of Idleness, and want of

<sup>20</sup> Ibid, 266.

<sup>21</sup> Alan Taylor, *The Internal Enemy*, 81.

<sup>22</sup> Taylor, 86, 8.

subordination. They are suffered to wander about at night without passports, stealing, drinking and rioting.”<sup>23</sup>

Leading slaveholders became particularly concerned about maroonage, where enslaved people absconded with their own bodies. “The danger is growing more and more,” agreed New Orleans’ Conseil de Ville in 1805, noting, “the larger part of the population of the Colony appears to be alarmed over its symptoms.” Louisiana sought advice and examples from their Caribbean counterparts. When we consider the long march from racial fluidity of French Louisiana to the desperate disenfranchisement of the 20<sup>th</sup> century, the 1805 maroonage crisis was a signal moment in transferring “some coercive powers from slaveholder to state,” the legitimization of white supremacist discipline and control.<sup>24</sup> Borrowing legal inventions and tools of oppression from previous stops in the world school of slavery, from São Tomé to Barbados to Saint-Domingue, Louisianans established themselves as the world’s singular practitioner of racial slavery.

When the sugar boom consumed Louisiana, the plantations around New Orleans produced fortunes unimaginable to earlier generations. Gross exports in 1804 were nearly \$5 million, four times that figure in 1895. “Eager Americans flocked to the region,” explains the Louisiana historian John Bardes, “foreseeing the imminent accumulation of vast fortunes – all dependent on increasing the territory’s labor supply.”<sup>25</sup> The years 1800-1804 witnessed “an usually rapid and large influx of overwhelmingly male and overwhelmingly African-born slaves” as well as a “‘daily influx’ of refugees from Saint- Domingue, many of whom appeared tainted by the rebels’ ‘revolutionary principles.’”<sup>26</sup>

American slave owners had proven their commitment to innovative repression early on. Outflanking their own British laws by devising matrilineal slavery to sustain the enslaved population was the defining transformation of American slavery. From this legal creation, further concoctions covered every possible means of dehumanizing and controlling human property. Unfortunately, each innovation also stoked pervasive white fears ever hotter.

“One cannot pause but shudder,” the Crescent City’s Conseil de Ville warned, “at the thought that these men with their hands still reddened with the blood of our unfortunate fellow countrymen are arriving daily in great number in our midst and that perhaps tomorrow their smoking torches will be lighted again to set fire to our peaceful homes.” The Conseil recommended that the state help ameliorate white fears; the city simultaneously created a standardized penal system and replaced the city’s watch with one of the first professional police forces in the United States.<sup>27</sup>

These were viewed as necessary steps given the stakes. Louisianan slavery had become a specter of devastation for enslaved people elsewhere in the United States. For 100 miles upriver of New Orleans, slavery generated heretofore unseen economic rewards along with what one

<sup>23</sup> John Bardes, “Mass incarceration in the age of slavery and emancipation,” Unpublished Dissertation, Tulane University, 43.

<sup>24</sup> Bardes, 43.

<sup>25</sup> Ibid., 44.

<sup>26</sup> Ibid., 46.

<sup>27</sup> Ibid., 49.



contemporary observer called slavery's typical "scenes of misery and distress."<sup>28</sup> These qualities worsened year upon year as sugar masters demanded ever-increasing production and profit.

### **Slave Uprising**

The brutality of Louisiana's slave economy soon generated the 1811 slave revolt 25 miles upriver New Orleans, the largest slave uprising in the history of the United States, dwarfing the better-known and more-deadly revolt in Virginia in August 1831. The barbarity of the resulting suppression underscores the violent lengths otherwise civilized men would go to protect their investments and control over their property. Indeed, the slave uprising on the German Coast on January 5, 1811, was a defining moment for the future of Louisiana's race relations as well as its political identity. There is perhaps no event in early Louisiana more symbolic, not just because the enslaved rebels so specifically targeted sugar, but because the revolt confirmed planters' paranoid fantasies about the violent potential of their slaves. It was at these moments when the state's planter elite truly revealed the worldview that would be expanded upon for another 200 years.

As the definitive history of the Crescent City explains "it took no time at all for the full force of federal and slaveholder power to be brought to bear." The rebels were stopped near the present-day suburb of Kenner where a militia of planters led by one whose son had been killed by the rebels "routed them completely." Sixty-six slaves "were mutilated and beheaded on the spot" followed by an improvised "tribunal of planters [who] ordered the shooting and beheading of eighteen additional slaves." A further 21 slaves were decapitated by the New Orleans City Court, "hung upon the levee within the Parish of Orleans" and others "exposed at one of the lower gates of this city."<sup>29</sup> The decapitated heads of the enslaved were mounted on poles "to decorate our Levee, all the way up the coast." This was the kind of justice meted out by Louisiana's Slave Code of 1806 and Mississippi River air was dominated by the stench of rotting flesh for weeks.<sup>30</sup>

### **State Control of Black Louisianans**

Meanwhile, the racialized penal system and public executions of slaves show the increasing involvement of the state in policing and controlling Black Louisianans.

The violent terror, constant discipline, and elaborate mechanisms of control to keep Black majority populations at bay were defining characteristic of Louisianan slavery. Louisianans became pioneers in the emerging science of penology. In 1822, Edward Livingston, a Louisiana statesman and sugar planter, published his "plans for the total redesign of Louisiana's criminal laws, punishments, and penal institutions."<sup>31</sup> Livingston imagined an integrated system of

<sup>28</sup> Edward Baptist, *The Half Has Never Been Told: Slavery and the Making of American Capitalism* (New York: Basic, 2014), 51.

<sup>29</sup> *Ibid.*, Case No. 188.

<sup>30</sup> Powell, *The Accidental City*, 345.

<sup>31</sup> Livingston came from an illustrious background. His older brother had served in the Continental Congress and on the five-person drafting committee of the Declaration of Independence. After a term in Congress and mayor of New York City, Livingston was forced to resign in scandal and fled to New Orleans in 1804. Livingston quickly embedded himself in the planter elite, purchasing two sugar plantations and dozens of slaves. *See* Barden, 106.

“workhouses, penitentiaries, prisons, lock-ups, public school, and juvenile reformatories – a totalizing system, bent on reform rather than retribution, molding and upholding disciplined republican citizens from cradle to grave.”<sup>32</sup>

Livingston’s “cradle to grave” dream underscores Louisianans’ historic commitment to racial control. Livingston’s insistence that “each institution would scientifically classify offender” exposed Louisianans’ obsession with racial categories (among others). These were the cornerstones of a regime that would eventually embrace voter discrimination and disenfranchisement, the bedrock of the cultural and eventually legalized racism that would come to define Louisiana.

Perhaps the most crucial element of Livingston’s proposed innovations to Louisianan law and order was the author’s insistence that the state distinguish its laws and punishments by making “absolute distinctions” between the races. Livingston’s theories reveal much about white perceptions of laws and punishment, but particularly about policing the lines between enslaved and white Louisianans by using the state to create and enforce racial differences. “Efforts to reify racial difference were integral to this rapid transformation of Louisiana’s penal infrastructure. Whereas cells in the old state prison had often been integrated, the new facilities were either entirely restricted to one race or boasted separate wards for whites, slaves, and free people of color.”<sup>33</sup>

The enthusiastic use of the state to help police race and control the populace was a harbinger of postbellum Louisiana. Such practices would be essential to white supremacist interactions with Black citizens after 1865.

Hand in hand with white control over voting was a concomitant embrace of public displays of state violence like the spiked heads following the German Coast uprising. Public slave executions were a regular feature of antebellum Louisiana justice and culture. Indeed, historian John Bardes has called these brutal displays “carnavalesque affairs – ‘a sort of cheap amusement for the people,’ according to the *Daily Picayune*, ‘jovial and jocose.’”<sup>34</sup>

Like chain gangs, that most publicized public display of the state’s control of unruly slaves, “public slave executions were also intended as deterrents and tools of racial terrorism.” The terror-inducing aspect of slave executions, the central design of most slave “justice,” also involved the compulsory attendance of “an estimated two to three thousand slaves...in the *Place d’Armes* to view the mangled corpse of a prominent maroon and accused murder[er]” in 1837. In this case, authorities specifically explained that the gruesome scene was “for the sake of example,” designed to “have a salutary effect [upon the slaves] to let them gaze upon the outlaw and murderer as he lay bleeding and weltering in his gore.”<sup>35</sup>

One such spectacle execution in 1846, of an enslaved woman who had struck her mistress, drew nearly 5,000 onlookers. “Witnesses described streets ‘thronged’ with ‘men and boys, and women, too, with infants in arms... carriages filled with female spectators... all were

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<sup>32</sup> Bardes, 107.

<sup>33</sup> Ibid., 102.

<sup>34</sup> Ibid., 127.

<sup>35</sup> Ibid., 127.

stretching their necks, standing on tip-toe, pushing and jostling each other that they might get a good sight.” Interestingly, this massive public execution was likely New Orleans’ last public and officially sanctioned mutilation of an enslaved person’s corpse.<sup>36</sup>

But even as the state gave up the most extreme form of racial terrorism, the strength and intensity of its policing kept increasing in scale and frequency. Arrest rates in New Orleans during the 1850s were more than five times the next-highest city in the United States. Much of this was due to the Crescent City’s commercial engagement with the world and the constant exchange of sailors, international travelers, immigrants, and refugees. These populations, with their varying identifying markers, threw the color classifications so central to law and order in New Orleans and Louisiana into disarray. Indeed, authorities had great trouble trying to discern between free and enslaved. Papers and passes, so easily forged, were essentially meaningless. Free Black sailors were regularly arrested and imprisoned. In several instances, these free Black sailors were sold into slavery by the state of Louisiana.<sup>37</sup>

### Experiments with Voter Control

The 1840s and 1850s saw the state’s first experiments with voter disenfranchisement in the history of Louisiana, initially designed to deal with populations that white elites found undesirable. These practices, from taxpaying and residency requirements, would be sharpened as tools of disenfranchisement when Black Louisianans gained the right to vote.

While Black voting was being hammered into a logical and legal impossibility, the targets of antebellum voter disenfranchisement were immigrants. During the 1830s and 1840s, white Louisianans practiced their methods on these other groups. In 1845, leaders in the southern parishes of Orleans, St. Bernard, Jefferson, Lafourche, Saint Tammany, and Plaquemines, afraid that a perceived flood of immigrants would shift the political status quo, “succeeded in doubling the state residency requirement from one year to two, while demanding a full year’s residence in the parish. Residency also would be voided by an absence of ninety days or longer.”<sup>38</sup> These were the exact methods (refashioned for Black voters) Louisianan leaders would revisit and revive two decades later when the fearsome potential of Black voting power threatened white political control. White Louisianans practiced this two-front battle on perceived political threats by creating hurdles for undesirable voters while “eliminating taxpaying requirements” to expand desirable white votes, the “mortar solidifying the edifice of white supremacy.”<sup>39</sup>

White authorities were soon confronted with the regular seasonal arrival of immigrants – influxes that coincided with the cotton harvest. Ships arriving to carry cotton also represented “the period of peak international immigration because the same ships that arrived to collect cotton had little cargo to deposit and thus offered exceptionally inexpensive passenger fares,” explains historian John Bardes. Some of the ships made a second round-trip and carried a “second, smaller wave of immigrants in May.”<sup>40</sup>

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<sup>36</sup> Bardes, 160-70.

<sup>37</sup> Ibid., 160-170

<sup>38</sup> Ibid., 160-170

<sup>39</sup> Alexander Keyssar, *The Right to Vote*, 77.

<sup>40</sup> Bardes, 227.

Since the repressive and disciplinary tools against the enslaved and Black population had been so refined, this influx of immigrants was an additional population white elites were eager to control. “We are losing a valuable, manageable, and healthy population for one, in every sense the reverse,” cautioned the *Southern Quarterly Review* in 1853 – “the submissive, acclimated, non-voting negro pushed aside by the turbulent, feverish, naturalized foreigner.”<sup>41</sup> This writer’s specificity, particularly in the odd construction of “non-voting negro,” was both revealing and prescient – the paramount priority of the white elite.<sup>42</sup>

### **Eliminating Free People of Color**

Up until the 1840s, one of the defining characteristics of Louisiana, and particularly New Orleans, was the presence of a significant population of free people of color. To understand the recalcitrant and repressive state of postbellum Louisiana, it is crucial to understand how white Louisianans cracked down on the racial fluidity that had been so common in earlier times.

So while the state was attempting to exact greater control over enslaved people and reject any attempts by white immigrants to vote, the heaviest brunt of the racial backlash fell on the francophone free people of color, who were increasingly regarded as a fifth column threat to white supremacy and solidarity. Self-help societies were dissolved and free people of color were forbidden to hold meetings without the presence of a white person.<sup>43</sup> Louisiana quickly banned the possibility of slaveholders emancipating their slaves (manumission) and free people of color were invited by the state to find themselves masters.

“In the decades that preceded the Civil War, Louisiana’s legislators systematically tightened the constraints on people of African descent, slave and free, rural and urban” and this change became visible in the form of everyday harassment from the police and other white authorities. Creoles “chafed at the humiliations imposed on them,” but in every way this population was even more of an anomaly in the 1850s than they had been on the eve of American rule. “In 1860 Ascension Parish held 7376 slaves, but counted only 168 free people of color. In Lafourche Parish the figures were 6395 slaves, 149 free.”<sup>44</sup> There were fewer and fewer opportunities to be emancipated by one’s master, to “live in free union with a white man” or “own property in [one’s] own name.”<sup>45</sup>

“The free population of color in New Orleans fell in size between 1840 and 1850, and in 1857 the Louisiana legislature prohibited all future manumissions.”<sup>46</sup> This was part of a series of laws within Louisiana designed to further marginalize the civic existence of free Blacks in a slave state. “The squeezing out of free people of color translated into isolation and diminished hopes for those held as slaves...By 1860 Louisiana law was implacable in its hostility to the very existence of free persons of color, and fierce with regard to fugitives. Although individual

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<sup>41</sup> Ibid., 227.

<sup>42</sup> Ibid., 200.

<sup>43</sup> Scott, 15. Also note the similarity to white registrars in the 1950s and 1960s demanding potential black voters have a white person to prove their legitimacy.

<sup>44</sup> Ibid., 15.

<sup>45</sup> Ibid., 12.

<sup>46</sup> Ibid., 16.

masters still found ways to free occasional favored slaves, the freedom thus gained was hemmed about with dangers.”<sup>47</sup>

The “bedrock reliance on a coercive labor system marked by brutality” was matched by the extreme hostility to living alongside Black people with any legal status at all.<sup>48</sup> “Some slaves in rural Louisiana,” writes Rebecca Scott, “would live their whole lives without ever seeing a Black man or woman who was legally free.”<sup>49</sup>

From Baton Rouge in the 1850s came a steady stream of “further restraints on manumission and heightened control of slaves.” “In Louisiana, what legal rights had once been accorded to slaves had been aggressively rolled back in both city and country, and even the master’s own right to free his slave would be almost entirely blocked after 1857. A slave in Louisiana was not only a “person with a price” but a being whose very right to have rights had been squeezed almost to the vanishing point. A customary privilege to cultivate a garden, perhaps and sometimes. But rights, almost never.”<sup>50</sup>

### ***The Civil War, 1861-1865***

The American Civil War represented one principle moment when white fears of Black freedom began to materialize. Louisiana saw wartime emancipation advance faster and extend further than anywhere else in the Confederacy. On the very eve of Black political rights, white Louisianans demonstrated the dogged resistance that would take many forms in the years that followed.

The 1860 census recorded 331,726 slaves, a staggering 46.8% of the state’s population. Indeed, this interest, in Black people held as slaves, was the very reason Louisiana had ultimately tilted towards seceding from the Union. On December 10, 1860, Governor John Moore warned his state that “the election of Mr. Lincoln by the Northern people...shews[sic] that the Northern mind is poisoned against us, and that it no longer respects our rights...as a slaveholding State.”<sup>51</sup> Louisiana seceded from the Union on January 26, 1861. Shortly after, the St. Bernard sugar planter P.G.T. Beauregard ordered his artillery to fire upon federal troops stationed at Fort Sumter in Charleston, the shots that began America’s bloodiest conflict.

Louisiana was unique among the states that seceded from the Union in being largely defeated militarily and occupied by federal troops by 1862. The capture of New Orleans in April of that year (followed by the occupation of Baton Rouge on May 9) had Louisianan Confederates relocate their capital first to Opelousas and subsequently to Shreveport.

The early occupation of New Orleans signaled a real permissiveness with slave owners’ autonomy. Union troops participated in the policing and protection of slavery while rebellious soldiers risked discharge to aid fugitive Black people. “Local and Federal officials initially

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<sup>47</sup> Ibid., 16.

<sup>48</sup> Ibid., 27.

<sup>49</sup> Ibid., 27.

<sup>50</sup> Ibid., 27-28.

<sup>51</sup> Charles B. Dew, “Who Won the Secession Election in Louisiana?” *The Journal of Southern History* Vol. 36, No. 1 (Feb., 1970), 20.

worked together to maintain the city's preexisting infrastructure for capturing, disciplining, and returning fugitive slaves," writes John Bardes, but enslaved people refused to "to remain static [and] demolished slavery's foundation."<sup>52</sup> "As slavery collapsed, local and Federal officials transformed the city's antebellum infrastructure for policing and containing fugitive slaves into postbellum infrastructure for policing and containing" Black people.<sup>53</sup>

New Orleans witnessed the arrival of 30,000 Black Louisianans over the 1860s. Some of the fugitive slaves "sought *de facto* emancipation, safety from white violence, escape from white surveillance, and the possibly of reassembling divided family; later, the higher earning potential, and opportunity for cultural engagements, that urban life provided. Many had been expelled or abandoned by owners who had fled westward. They traveled by foot, horse, mule, plantation cart, and skiff. Some migrated with all of their belongings: clothing, food, 'boxes, bedding, and luggage of all sorts.' Others came in 'scarred, wounded, and some with iron collars round their necks,' as one officer later recalled – virtually naked, starving, and carrying nothing at all."<sup>54</sup>

Even before the Black population swelled, New Orleans was experiencing the consequences of the heady arrival of some kind of freedom. The "seemingly innocuous presence of unattended African Americans in New Orleans streets sowed frustration and fear" in both white Louisianans and Union soldiers. "The conduct of the negroes in New-Orleans is intolerable to their owners," wrote one Union soldier: "they laugh and talk and walk together up the streets in the most disgusting style, showing very little indications to make way on the banquette for ladies or gentlemen... a more idle, filthy, lazy, degraded looking set of wretches never were seen." "The Negroes will commit all kind of depredations... and [be] totally spoiled for the future whatever his condition may be," William Mithoff, President of the Jefferson Parish Police Jury, predicted: "free or slave... [the negro] must be controlled."<sup>55</sup>

In this sense, white Louisianans and Union troops agreed that the collective solution could not be to let Blacks determine their own fates. Some runaway slaves were declared contraband. Others were returned to owners who had "maintained loyalty" to the Union. But reports continued to flood the Union lines. "Darkies come flocking in here," Col. E.F. Jones, commander of Forts St. Philip and Jackson, reported in June.<sup>56</sup> "[T]hey have heard all sorts of stories... all tending to implant the notion that if they can only get to the forts they are free."<sup>57</sup>

"In July of 1862 Welman Pugh, the son of the owner of Woodlawn plantation, had reported 'a perfect stampede of the negroes' on several plantations," writes Rebecca Scott, "and

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<sup>52</sup> Bardes, 258-9.

<sup>53</sup> Ibid., 258-9. Bardes writes that "As the nation debated the meaning and future of Black freedom," "daily struggles in the streets of New Orleans – between police, jailors, local authorities, Federal officials, planters, free people of color, and fugitive enslaved people themselves – would have lasting repercussions on the reconstruction of Black punishment, the design of postbellum criminal justice, and white Southerners' theories of African American deviance and criminality."

<sup>54</sup> Ibid., 262.

<sup>55</sup> Ibid., 264.

<sup>56</sup> Ibid., 261.

<sup>57</sup> Ibid., 261.



Union officers near New Orleans reported the arrival of thousands of ‘contrabands,’ a term used by Butler for the slaves of disloyal southerners.”<sup>58</sup>

“The jails have become full, and I have no means of feeding them,” came a report from St. Bernard Parish.<sup>59</sup> As the Union army liberated more territory, the problem only grew. “What shall I do about the negroes?” complained General Godfrey Weitzel in Lafourche river region, “I have no rations to issue to them. I have a great many more negroes in my camp now than I have whites. These negroes are a perfect nuisance.”<sup>60</sup>

“Hoping to control” the massive influx of fugitive slaves to both Union lines and New Orleans, “Butler ordered that they be impressed as military laborers, turned over to Unionist slaveholders, or expelled from Union lines” “to save them,” Butler argued, “from idle and vicious habits.”<sup>61</sup>

By January of 1864 elites began to acknowledge that the laws and provisions of the state constitution pertaining to slavery were now “inoperative and void,” but those same elites continued to seize any opportunities to salvage elements of white supremacist rule.<sup>62</sup> Police in New Orleans began to ignore the antebellum distinctions between free Blacks and possibly fugitive slaves, efforts that simply radicalized the Afro-Creole population and allied them (tenuously at first) with the enslaved population.<sup>63</sup>

Efforts by white elites to control some now-generalized Black population backfired in this immediate context. Arrests of Afro-Creole people and the obliteration of those clearly honored antebellum color distinctions suggested to “the city’s freeborn people of color...that their security was now firmly bound to the security of the formerly enslaved.”<sup>64</sup>

“This transformation was to have profound consequence for local and national politics during Reconstruction,” writes John Barden, and “white Unionists’ pervasive racism during the 1864 Louisiana constitutional convention, the failure of all efforts to win suffrage rights, and the legislature’s rejection of the ‘Quadroon Bill’ which would have given the vote to free men of color possessing three-fourths white ancestry” all helped radicalize this population.<sup>65</sup> “Yet no single factor more forcibly demonstrated to New Orleans’ free people of color the new racial reality that they now faced than the repeated experience of having members of their community physically locked in cells with former slaves, and the realization that their traditional right to walk New Orleans’ streets unimpeded, without the law presuming their maroonage, was forever lost.”<sup>66</sup>

This interclass alliance of Black Louisianans would face formidable challenges before the war was over. Lincoln’s 10% plan allowed Louisiana to establish a new Constitution in 1864

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<sup>58</sup> Scott, 31.

<sup>59</sup> Barden, 261.

<sup>60</sup> Ibid., 261.

<sup>61</sup> Ibid., 264.

<sup>62</sup> Scott, 35.

<sup>63</sup> Barden, 328.

<sup>64</sup> Ibid., 287.

<sup>65</sup> Barden, 288.

<sup>66</sup> Ibid., 288.

using just 10% of the 1860 census taking a loyalty oath to the United States. That Constitution abolished slavery a year before the 13<sup>th</sup> Amendment but intentionally made no provision for the right of Black people to vote.

After the assassination of Abraham Lincoln in April of 1865, President Andrew Johnson met with Louisiana's new Governor Wells and it became clear that there was more than hope for white supremacy's fortunes in Louisiana. Johnson shared elite Louisianans' distaste for any increase of Black civil and political rights and had no problem with extending military occupation of the South. Johnson reassured white elites and "proclaimed the return of suffrage rights to virtually all former Confederate soldiers and officials. Louisiana, one contemporary noted, was now controlled by 'the disloyal and proslavery element.'"<sup>67</sup>

Planters simply refused to allow former slaves to rent or purchase land, which served a dual purpose of distancing them from political rights. There was the "immediate hardship" as well as a separation of the population which would make organizing against white supremacy even more difficult.<sup>68</sup> "Class position thus continued to map closely onto color categories," writes Rebecca Scott, "'sugar worker' was associated with black-ness and former slave status, 'farmer' with whiteness and a birthright to freedom."<sup>69</sup>

Scott explains further that the creation of a postbellum labor system was directly guided by white fears of and priorities for "the definition and prerogatives of citizenship."<sup>70</sup> Black political organizations even ran candidates "alongside the lily-white official elections" as a symbolic act, despite their candidates having no possibility of actually being elected to or holding office.<sup>71</sup>

### ***Louisiana Black Codes and the New Orleans Massacre***

Black Codes are the earliest example of white efforts to maintain the level of control they enjoyed during slavery. While these attempts at a legal failsafe ultimately failed, the Black Codes established the guidelines for white Louisianans' violence, beginning with racial massacres like the New Orleans Massacre of 1866.

Black Codes, designed explicitly to control Black citizens, began to be written and passed as soon as the Civil War ended and furthered these same ends. In late 1865, Mississippi and South Carolina led the charge, followed quickly by Louisiana's code on December 21, 1865.<sup>72</sup> Louisiana's Black Code was slightly modified by individual parishes but the template was nearly identical. All the codes sought to establish *de facto* slavery by restricting the right of Black Louisianans to travel within parishes "without special permits" or be fined and forced to work a chain gang.<sup>73</sup> Drunkenness in the parish also drew a fine or work on the chain gang. Blacks were not "permitted" to rent homes, preach, sell goods, "carry fire-arms, or any kind of

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<sup>67</sup> Bardes, 318.

<sup>68</sup> Scott, 39.

<sup>69</sup> Ibid., 39.

<sup>70</sup> Ibid., 39.

<sup>71</sup> Ibid., 39.

<sup>72</sup> See Appendix 2.

<sup>73</sup> Ibid.



weapons.”<sup>74</sup> “Every negro is required to be in the regular service of some white person” the Code delineated, and “no public meetings or congregations of negroes shall be allowed.”<sup>75</sup> “It shall be the duty of every” white Louisianan to “act as a police officer for the detection of offences and the apprehension of offenders.”<sup>76</sup>

The Louisiana Democratic party platform, authored by many of the same white elites responsible for the Black Code, explicitly set out that “we hold this to be a Government of white people, made and to be perpetuated for the exclusive benefit of the white race” and “people of African descent cannot be considered as citizens of the United States, and that there can, in no event, nor under any circumstances, be any equality between the white and other races.”<sup>77</sup> The fight by white Louisianans in the following 150 years to preserve this power dynamic would take many forms but the most persistent was the dogged effort to disenfranchise.<sup>78</sup>

The New Orleans Massacre of 1866 was a direct response to the Black Codes. Angered by the state legislature’s refusal to extend voting rights to Black men, a peaceful demonstration was being held by mostly Black freedmen outside the Republican Constitutional Convention. What followed was a harbinger of the extreme efforts white supremacists would make to control Black freedom. On July 30, 1866, a mob of ex-Confederate soldiers attacked the Black demonstrators.

“The whites stomped, kicked, and clubbed the black marchers mercilessly,” author Ron Chernow describes, while “policemen smashed the institute’s windows and fired into it indiscriminately until the floor grew slick with blood. They emptied their revolvers on the convention delegates, who desperately sought to escape. Some leaped from windows and were shot dead when they landed. Those lying wounded on the ground were stabbed repeatedly, their skulls bashed in with brickbats. The sadism was so wanton that men who kneeled and prayed for mercy were killed instantly, while dead bodies were stabbed and mutilated.”<sup>79</sup>

Federal troops were required to suppress the riot, jailing many of the white insurgents and New Orleans remained under martial law until August 3. Though the exact figure is unknown, nearly 200 people were killed, almost all Black Louisianans. On the national level, the New Orleans Massacre allowed radical Republicans to gain a supermajority and overturn vetoes by President Johnson, who opposed voting rights for Black people.

While most historians consider the major transition in Louisiana’s history to be from the antebellum period (up to 1865) to the postbellum period (after 1865), it was the transition to Black citizenship and Black suffrage that defines the primary shift in the state’s history. Until Black Louisianans gained the right to vote, the practice of white supremacy was based in racial slavery, driven by fear and focused on control and punishment. Indeed, the culminating act of pre-suffrage, the New Orleans Massacre, underscores the overall story of Louisiana before and after the Black vote. That story, developed until 1866 and doggedly followed since 1868, is one

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<sup>74</sup> Ibid.

<sup>75</sup> Ibid.

<sup>76</sup> Scott, 39.

<sup>77</sup> Walter Lynwood Fleming, ed., *Documentary History of Reconstruction*, 2 vols. (Cleveland: 1906-7), I, 229.

<sup>78</sup> Fleming, 229.

<sup>79</sup> Ron Chernow, *Grant* (New York: Penguin, 2017), 574-75.

of tightening control over Black Louisianans and the relentless efforts to preserve power relations established in the antebellum era.

### III. The History of Black Voting in Louisiana

#### *The Dawn of Black Voting and the Height of White Supremacist Violence, 1868-1877*

The century following the passage of the Fourteenth and Fifteenth amendments were defined by utter intransigence in voting equality. In broad strokes, that century was defined first by white terrorism designed to intimidate Black voters and eventually legislation intended to disenfranchise Black voters. The most outrageous terrorist violence in American history defined this 12-year period in Louisiana, a ferocious blowback to the legislative advancements in Black peoples' rights.

While the passage of the Fourteenth and Fifteenth Amendments to the Constitution guaranteed citizens the right to vote free of discrimination, the defining experience of the 150 plus years since their passage has been “a history of efforts to render the guarantee meaningless.”<sup>80</sup> Those efforts have taken many forms over the years but once power had been taken away from white Southern governments in the five military districts of Reconstruction, the white South's answer was overwhelmingly highly targeted violence designed to intimidate or physically prevent Black Louisianans from exercising their right to vote.

In the first such elections in the fall of 1868, U.S. Congressional testimony on Louisiana established that “over 2000 persons were killed, wounded and otherwise injured in Louisiana within a few weeks prior to the presidential election; that half the state was overrun by violence; midnight raids, secret murders, and open riot that kept the people in constant terror until the Republicans surrendered all claims, and the election was carried by the (white) democracy.”<sup>81</sup>

Political terrorism and violence in service of white supremacy became defining features of Reconstruction Louisiana, perpetrated by the Ku Klux Klan and its many imitators. It was the violent threat of the antebellum slave patrol that guided white supremacist violence in Louisiana, aimed specifically at voter intimidation and disenfranchisement. The Klan organized across many states and eventually similar groups were founded under many different names: the White Line, the White Caps, and others revived antebellum methods meant to keep first slaves, then freed Blacks in whatever whites defined as “order.” Louisiana's most popular white terror group, the Knights of the White Camelia, was organized in May 1867 and grew so famous that the organization crossed into “the western Alabama Black Belt by 1868, the year of its maximum growth.”<sup>82</sup> Each of these organizations functioned to derail Black civil rights, but most specifically Black suffrage – always considered by white Louisianans the most outrageous expression of racial equality. In Louisiana, the Knights of the White Camelia were “bands of postwar regulators and vigilantes” using violence to roll back postbellum Black advancements,

<sup>80</sup> Louisiana Advisory Committee for the United States Commission on Civil Rights, “Barriers to Voting in Louisiana” (June 2018).

<sup>81</sup> Report of the Joint Select Committee to Inquire into the Condition of Affairs in the Late Insurrectionary States, Rep. No. 41, 42nd Congress, 2nd Session, pt. 1, at 21-22 (1872).

<sup>82</sup> Allen W. Trelease, *White Terror: The Ku Klux Klan Conspiracy and Southern Reconstruction* (Baton Rouge, LA: LSU, 1995), 126.

particularly in the political sphere, white men trying to restore some semblance of the antebellum racial order.<sup>83</sup>

In 1868, one St. Martinville newspaper reported on white Louisianan regulators murdering a Republican judge and sheriff in a neighboring parish. The judge and sheriff, reasoned the paper, were pushing “advanced political ideas, and of progressive social reforms [and] we are compelled to own that they have met the fate they deserved.”<sup>84</sup> “We people of the South, who have suffered wrongs beyond endurance,” the writer maintained, “radicalism and negroism, which in the South are one and the same thing” have forced responsible Louisianans to “use such harsh means, but we have not the courage to blame them.”<sup>85</sup>

The open embrace of murder and violence to halt the advance of Black suffrage in the former Confederacy became the lever by which Southerners decided to reclaim their region. Outrages during election times got so terrible – murders, riots, and blatant political fraud – that the federal government was eventually forced, despite great reluctance, to get involved.<sup>86</sup> The result, in the words of the first historian to study white supremacist violence during Reconstruction, was “open white paramilitary organization and wholesale intimidation backed up on occasion by mob violence and more or less inspired rioting.”<sup>87</sup> Indeed, in his history of racial terrorism, the historian Allen Trelease established beyond any doubt that white supremacist organizations like the Klan served deliberately as the paramilitary wing of the Democratic Party.<sup>88</sup>

Federal response to white terrorist violence temporarily drove the Ku Klux Klan as an individual organization underground but its imitators fought on, especially at election time. One of the most notable ways that white Louisianans organized against Black suffrage were so called “Race riots,” interracial collisions organized and planned by white supremacist groups to antagonize and intimidate Black voters. “Many of the so-called riots came close to being massacres,” most notably the July 30, 1866, New Orleans Riot. This premeditated act of political intimidation injured more than 200 Blacks and killed 34 when “former Confederate soldiers and police officers shot unarmed Blacks attending Louisiana’s constitutional convention.” The riot killed four white Louisianans and injured 10, men who came to the convention to prevent Blacks from helping to shape Reconstruction policies and decide whether Black men would gain the right to vote.<sup>89</sup>

It was only the Republican Party’s overwhelming success in the midterm elections of 1866 which gave new hope to the suffrage issue. The Reconstruction Acts placed Louisiana in the Fifth Military District. Beginning in late spring of 1867, the fifth district commander was tasked with supervising voter registration to prepare for delegate elections to a state

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<sup>83</sup> Trelease, 126.

<sup>84</sup> *Courier of the Teche* (St. Martinville), Oct. 30, 1868, quoted in House Miscellaneous Documents, 41st Congress, 2d sess., No. 154, pt. 2, p. 320.

<sup>85</sup> Ibid.

<sup>86</sup> Trelease, 472.

<sup>87</sup> Ibid., 472.

<sup>88</sup> Ibid., 472.

<sup>89</sup> Trelease, xlv. Gloria J. Browne-Marshall, *The Voting Rights War: The NAACP and the Ongoing Struggle for Justice* (New York: Rowman & Littlefield, 2017), 138.

Constitutional Convention. Although a congressional order allowed registration without restriction to color, disloyalty to the Union was a disqualifying condition. As countless contemporaries and historians have commented, loyalty oaths were a ridiculously slippery notion. In the end, treasonous Confederates voted en masse, the central obstacle to racial equality in the democratic process. But enthusiasm was infectious for these first elections and Black Union veterans seized on suffrage as a validating and empowering measure. Republicans were elected in early every district to draw a new Constitution and “roughly half of the ninety-eight seats went to candidates of some African ancestry.”<sup>90</sup>

But this explosion of Black political participation came with real human cost. White Louisianans reacted with outrage at this new behavior by a population who just a few years earlier had been, in theory, an endless source of labor and obedience. Across 1866 and 1867, voter intimidation took the form of violent attacks and murders of freedmen. In February of 1867, “210 cases of whipping, beating, and stabbing” were reported in Louisiana, “almost all of them unpunished.”<sup>91</sup> Moreover, 70 Black Louisianans were murdered but “the actual total...might have been twice that number” if the victims were not so fearful of even reporting the violence.<sup>92</sup>

### Legislating Equal Rights

The foundation of Black voting rights were the Fourteenth and Fifteenth Amendments along with a new state Constitution. These early experiments with using the law to aid Black voting were met with tremendous violence and Black Louisianans were keenly aware of the precariousness of their newly gained rights.

Truly marking the beginning of an era, the draft Louisiana Constitution was both a fulfillment of the promises of the founding of the nation to Black Louisianans and a promise that would remain mostly unfulfilled for another century.

“Louisiana’s new Bill of Rights held that all citizens of the state should enjoy ‘the same civil, political and public rights and privileges, and be subject to the same pains and penalties,’” writes Rebecca Scott.<sup>93</sup> Along with “the bold claim of civil and political rights” the Louisiana Constitution “clarified an explicit prohibition of racial discrimination on public conveyances and in places of ‘public resort,’ or what we would now term public accommodations. This document became a touchstone of political commitment for activists, fusing their claim to political voice with an insistence on public respect.”<sup>94</sup>

Article 13 is powerfully important to the rest of Louisiana’s legal history and its deep patterns of voter disenfranchisement because it explicitly reclaimed the public space denied to the enslaved and free people of color before the Civil War. Article 13 also set the stage for the *Plessy v. Ferguson* case and the dire experiences of Jim Crow that followed. As Article 13 explained, “all persons shall enjoy equal rights and privileges upon any conveyance of a public

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<sup>90</sup> Scott, 40-1.

<sup>91</sup> Trelease, xliii.

<sup>92</sup> Ibid., xliii.

<sup>93</sup> Scott, 42.

<sup>94</sup> Ibid, 42.

character; and all places of business, or of public resort, or for which a license is required by either State, parish or municipal authority, shall be deemed places of a public character, and shall be opened to the accommodation and patronage of all persons, without distinction or discrimination on account of race or color.”<sup>95</sup>

As Rebecca Scott explains, the insistence of delegates on spelling out these rights about “public character” “had its roots in a keen recognition of the shaming intent of separate streetcars, alongside a memory of the multiple humiliations heaped on free people of color in the years prior to the Civil War.”<sup>96</sup>

But even further, the draft state constitution anticipated the eventual strategies of white supremacist disenfranchising legislation like 1898’s grandfather clause. The document “granted suffrage to all men who had been resident in the state for a year, and in the parish for ten days, except for those explicitly disenfranchised for crime or sedition by the constitution itself.” “Broad suffrage” was not just a bedrock priority of the postbellum Republic Party, it also spoke “to the need of former slaves in the countryside for political voice to counteract the reassertion of mastery by their former owners.”<sup>97</sup>

With a knowing prescience, “Representative P. F. Valfroit, a propertyless Black schoolteacher from Terrebonne, proposed unsuccessfully that the convention resolve that no legislative body be able to amend the constitution or call another convention for a period of seventy years.”<sup>98</sup> It was a strategy hedging against the white supremacists Blacks and Republicans saw whetting their blades. “Planters and other anxious defenders of racial hierarchy” reacted typically to the 1868 Constitution.<sup>99</sup> “The ratification elections of April 1868 were a wild, freewheeling battle that conservatives characterized as white versus black,” recounts Rebecca Scott, “Laborers left the fields to cast their votes, and in the end the constitution carried the day, 66,152 to 48,739. The constitution thus went into effect, functioning as the state’s fundamental document for the next eleven years.”<sup>100</sup>

Black Louisianans held the 1868 Constitution in almost holy regard, “a shining beacon of what was and could be again.”<sup>101</sup> For the first time in the state, the massive Black population had expressed their democratic voice, voting for universal suffrage, interracial marriage, civil and political rights of citizens without regard to color or previous condition. “In other words, they enlarged the scope of civil privileges of all races, instead of restricting it.” Despite their inability to maintain a political majority, the authors of the document had written a text whose vision of public rights would inform the initiatives of several generations of Louisiana activists.<sup>102</sup>

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<sup>95</sup> Ibid., 42.

<sup>96</sup> Ibid., 45.

<sup>97</sup> Ibid., 45.

<sup>98</sup> Ibid., 45.

<sup>99</sup> Ibid., 45.

<sup>100</sup> Ibid., 46.

<sup>101</sup> Ibid., 46.

<sup>102</sup> Ibid., 46.

That hope was counterbalanced by violence aimed squarely at undoing Black suffrage. One former slave, John J. Moore, “returned to St. Mary Parish after the war and took up work hoeing cane on George Cleveland’s plantation [and] organizing Republican clubs on various plantations.” Historian Rebecca Scott recounts that “it did not take long for a group of white men to come to the Cleveland plantation” to threaten violence and a concealed Moore “heard them try to coax information on his whereabouts from one of his fellow Republicans.” Moore later testified about the incident for a Congressional Committee, recalling that “the white gang told Moore’s friend that ‘there is but one way that you niggers can live here with us, and that is to let politics die. Leave them alone; you cannot live with us, and live and work and vote against our interests. All that you get and all that you have comes from us and by us; and now if you do not let politics alone you will get killed here. It is white peoples’ business; the business of negroes is to go into the fields and work, and we will pay you.’” Moore decided that even though this visit gave him only “‘a very poor chance’ he continued organizing: The ‘civil, political and public rights’ asserted in the new state constitution were costly to exercise, but activists like Moore responded with defiance rather than with deference.”<sup>103</sup>

### **The Belligerence of White Political Terror**

Violence aimed at intimidating Black voters was a plague on Reconstruction Louisiana. At no other time or place in American history has there been more sustained and varied acts of political terrorism designed to disenfranchise Black voters.

White Louisianans continued to respond with belligerence, violence, and a relentless determination to roll back Black suffrage. “We proclaim that we are opposed to negro suffrage under any circumstances, and stand ready to use all legitimate means to prevent its present and future exercise,” plainly explained one St. Martinville newspaper in 1868, speaking on behalf of “an overwhelming majority of the enlightened and liberal white people of the State.” “The Caucasian needs not to kneel to any other race,” the paper reasoned, and Black suffrage was “pregnant with future disaster and disgrace.”<sup>104</sup>

Even in this environment so hostile to Black suffrage, the power of the Black vote was immediately apparent. Plantation records in November of 1870 recorded “No work today. All hands gone to vote...Cutting cane today and hauling wood. The Rads carried the Parish by about 415 votes!” Despite electing many Black representatives, including the fearless John Moore, the overall story was one of increasing power of white supremacists. “Organization and voting by black fieldhands remained dangerous, and the physical security of those who undertook these projects depended to a considerable extent on Republican rule of the state, backed up by the presence of federal troops,” write Rebecca Scott, and the problem was the proliferation of “white-supremacist leagues, clubs, and ‘rifle companies.’” These groups portrayed “themselves as the legitimate representatives of the people” and violently antiblack groups like the Knights of the White Camelia” began to thrive. The White Line was eerily reminiscent of Louisiana’s policing in the 1850s, obsessed with “forbidding blacks to beat drums and cutting the drums up” at political rallies or election times. “This is a white man’s country, and we don’t allow that,” Black republicans were informed before they were beaten with sticks and pistols. “On election

<sup>103</sup> Scott, 47-48.

<sup>104</sup> *Courier of the Teche* (St. Martinville), Sept. 19, 1868.



day... White Liners dragged a [twenty-four-pound cannon] to the polling place and then began beating potential black voters.” The votes told the story of racial terrorism in the South: Republican votes plummeted from 1400 in 1873 to 90 in 1875.<sup>105</sup> The story was the same across the former Confederacy.

Those plummeting numbers were not accidental, it was the very design of white terrorism in Louisiana and elsewhere. That terrorism, intended to disenfranchise Black voters and their Republican allies, reached its apotheosis on Easter Sunday of 1873, striking the tone for nearly a century of white supremacist domination of the state of Louisiana, a period where Black political rights were under relentless attack. On April 13, 1873, white terrorists perpetrated what became best known as the Colfax Massacre, an event that would influence Louisiana far beyond the 1870s. An outgrowth of the disputed electoral results of 1872, dueling governments converged on a courthouse in Colfax, a town on the Red River 220 miles north of New Orleans. Tension between Democrats and Republicans had simmered and boiled over into violence several times before hundreds of local Blacks, including women, children, and armed men gathered at the Colfax courthouse to show their support for the Republican candidates they had voted for. At least 150 local whites, armed with a cannon and mounted riders forced the Black attendees into the courthouse and set fire to it. Shots were fired, and one of the white leaders, James Hadnot, a principle in the Knights of the White Camelia, was killed along with another white man. The white force began firing into the crowd and over the course of the day, somewhere between 60 and 250 of the Blacks strategizing to defend the election results were murdered.<sup>106</sup>

One day later, the Supreme Court handed down the decision in the Slaughterhouse Case. This case grew out of the Reconstruction government in Louisiana creating a single slaughterhouse downstream from New Orleans which replaced several operating within the city. The law required the entirely white population of butchers to bring cattle and hogs to this new facility. The case arose because Blacks were also allowed to use the new slaughterhouse, entering a closed white occupation without starting their own businesses. The reason this case would have such importance in Louisiana and elsewhere (one newspaper called it “one of the most significant decisions that has ever emanated” from the Supreme Court) because the white butchers sued claiming the Fourteenth Amendment should protect them. Their lead attorney, John A. Campbell, was a former Supreme Court justice who had served as the Confederate secretary of war who had voted affirmatively in the Dred Scott decision when the Supreme Court ruled in 1857 that no Black person could ever be a citizen of the United States. Campbell specifically sought “to undermine the legitimacy” of Black political participation.<sup>107</sup>

Campbell and his clients did not convince the Court of the unconstitutionality of the new slaughterhouse, but the Supreme Court effectively crippled the Fourteenth Amendment in the Slaughterhouse ruling. “To fetter and degrade the state governments by subjecting them to the control of Congress” was not the amendment’s intent, according to the majority opinion, and the Supreme Court would not serve as a “perpetual censor” of state laws. “The decision eviscerated

<sup>105</sup> Michael Fellman, *In the Name of God and Country: Reconsidering Terrorism in American History* (New Haven: Yale University Press, 2010).

<sup>106</sup> Eric Foner, *The Second Founding: How the Civil War and Reconstruction Remade the Constitution* (New York: Norton, 2019), 335. See also LeeAnna Keith, *The Colfax Massacre: The Untold Story of Black Power, White Terror, and the Death of Reconstruction* (New York: Oxford University Press, 2008).

<sup>107</sup> Foner, *The Second Founding*, 310.

the Privileges and Immunities Clause so effectively” explains the most revered historian of the period, that it “ceased to have constitutional meaning.” Thereafter, Black Louisianans “were deprived of a potential constitutional avenue for asserting claims for expanded rights.”<sup>108</sup>

To see the effect that the Slaughterhouse ruling would have on Black political rights in Louisiana is to observe the realpolitik that white violence would wreak when it operated hand in hand with a deferential federal government. August and September of 1874 witnessed two of the most significant acts of violence aimed at Black disenfranchisement in the history of the state. A small bit of geography helps explain the first of these outrages against Black voters. “The valleys of the Red River and the Mississippi River form a huge topographical Y that cuts through the heart of Louisiana. Radical Reconstruction was the program of the Republican Party, and Republican rule in the state rested on African American votes, which were concentrated in the alluvial bottomlands of the Y. The smaller and weaker arm of the Y was the Red River Valley, hence the importance of Red River Parish.”<sup>109</sup>

During Reconstruction, the upper Red River Valley had come under the purview of a Vermont carpetbagger named Marshall H. Twitchell, a former Captain of Black troops in the Union Army and a ready symbol to white Louisianans of the frightening future of Black suffrage and Republican rule. Although white supremacists had initially joined the KKK or the Knights of the White Camelia to disenfranchise Blacks and intimidate white Republicans, federal legislation had succeeded somewhat in driving those organizations underground. In their place, the White League came to dominate the Red River Valley. The White League was “less secret, better organized, and more explicitly political in its aims,” argues the writer Nicholas Lemann, and “its purpose was to use extralegal violence to remove the Republican party from power, and then to disenfranchise black people.”<sup>110</sup>

“We have been preserving the ascendancy of white people by revolutionary methods. In other words we have been stuffing ballot boxes, committing perjury, and here and there in the state carrying the elections by fraud and violence,” explained one verbose fellow traveler.<sup>111</sup> Quite simply, the White League “tried to drive the Republican officeholders out of power, to disrupt Republican campaign activities, and to prevent Negroes from voting – all aims that were to be accomplished by any means necessary.”<sup>112</sup>

### **Political Massacres and Coup D’Etats**

Beyond the intense political terrorism of the 1860s and 1870s, Louisiana witnessed two racial massacres – Coushatta and Colfax – where significant numbers of Black Louisianans were murdered to disenfranchise Black voters. Along with the crushing legal decisions in Slaughterhouse and Cruikshank, Louisiana proved to be on the cutting edge of schemes to eliminate Black voters from the body politic.

<sup>108</sup> Slaughterhouse Cases, 83 U.S. 36 (1872); Foner, 310-11. 312.

<sup>109</sup> <https://64parishes.org/entry/coushatta-massacre>.

<sup>110</sup> Nicholas Lemann, *Redemption: The Last Battle of the Civil War* (New York: FSG, 2006), 25.

<sup>111</sup> Judge Chrisman, quoted in James G. Hollandsworth, *Portrait of a Scientific Racist: Alfred Holt Stone of Mississippi* (Baton Rouge, LA: LSU, 2008), 57.

<sup>112</sup> Lemann, 25.



In Louisiana, where some of the most brutal terrorist violence in American history took place, white planters defended the violent tactics of white citizens. For B.W. Marston, white Republicans, particularly carpetbaggers, were simply trying “to organize the freedmen element against the interests of the white people.” With such “incendiary purposes” in mind, Marston explained to Congress that Blacks and whites who supported the Republican party would be dealt with “promptly.” Marston was referring, however obliquely, to the Coushatta Massacre, where the local White League assassinated six white Republicans and as many as 20 Blacks who witnessed the killings.<sup>113</sup> Coushatta was the most significant community in that Y described above and one where aggrieved whites were particularly outraged by the alliance of carpetbagging Yankees and local Blacks. The local White League decided a project of “extermination” was in order and these political vigilantes began by murdering a Black Republican in the Brownsville community. The next day several prominent white Republicans, including two of Twitchell’s family members, were arrested “on the pretext that they were plotting a murderous Negro rebellion.”<sup>114</sup>

The invocation, recalling the German Coast uprising so well known to white Louisianans, “drew heavily armed whites from neighboring parishes” who “thronged the streets” of Coushatta “swearing, drinking, and demanding blood.” Sham trials were conducted, all the accused white Republicans murdered before White Leaguers seized a black leader named Levin Allen, broke his arms and legs, and burned him alive. Two more Black voters were subsequently hanged by the White League. The so-called Coushatta Massacre was nothing more than a coup d’etat, indeed “the officialdom of an entire parish—and white men at that—had been virtually decapitated in a single murderous act.” The Massacre was a stunning revelation to Black and white Republicans alike about the future of Louisiana. White terrorists in service of the Democratic party had removed and executed the Republican leadership of the parish and murdered them “with impunity (none of the lynch mob would ever be brought to justice).” Republican safety, let alone government, was shown to be a hollow shell.<sup>115</sup>

The illusion of Republican political control and even control over public safety took place just two weeks later in New Orleans. There came a long-sought confrontation between white supremacists and the Metropolitan police force. Indeed, far from a spontaneous eruption of hostility between the Republican-run police force and the White League of New Orleans, the conflict that erupted had been in planning for quite some time, a concerted effort to intimidate Blacks and Republicans and regain control of New Orleans and the state.

The city’s White League had first called for volunteers on July 5, 1874, raising 1,500 men under Frederick Nash Ogden, a Confederate officer and prominent local Democrat and president of the Crescent City White League. Highly directed political violence was Ogden’s design (he had had led the failed Cabildo raid in March 1873) and the 1874 White League “represented political militarism on a scale that had never before been seen in the city nor has been seen since.” Throughout the summer, “dozens of companies of White League volunteers drilled in private club rooms and ward meeting halls across the city” while Ogden and other

<sup>113</sup> *Testimony of B.W. Marston Re: The Coushatta Affair*. House Reports, 44th Congress, 1st Session, No. 816, 645-727.

<sup>114</sup> *Ibid.*

<sup>115</sup> *Ibid.*

League leaders procured decommissioned Civil War weaponry cheaply available “from merchants in the North.”<sup>116</sup>

In addition to the secret military drills, the White League, deliberately invoking the slave patrols of the antebellum era, made torch-lit marches through the city throughout the summer of 1874. With an arms shipment arriving on September 14, an enormous rally of 5,000 white Democrats were whipped into an anti-Republic frenzy, barricades built, and battle lines set on Canal Street. Alongside the Metropolitan Police, Black troops were the only federal forces still in uniform, under the command of former Confederate General James Longstreet.

What followed was an intense military battle with the White League routing the Republican authorities and controlling the city of New Orleans within hours. The Black state militia was “forcibly disarmed and disbanded.” However, Ogden was careful not to commit murderous outrages because of the public opinion fiasco of the Colfax Massacre. Indeed, Colfax soon wheeled back into the center of Louisianan politics.

The bloodiest act of terrorism during Reconstruction produced one other rarity – a trial of nine white men, charged not with murder but with depriving murdered Black Louisianans of their civil rights. After a mistrial, four of the nine were convicted, including a participant in the massacre named William B. Cruikshank. Cruikshank’s conviction was appealed and the case ended up before the same Supreme Court that had crippled the Fourteenth and Fifteenth Amendments in the Slaughterhouse ruling. On March 27, 1876, Cruikshank and his three compatriots had their convictions overturned by the Supreme Court. Chief Justice Waite cited the Slaughterhouse Case in affirming state authority over its citizens and denied the Fourteenth Amendment’s ability to take such authority away from Louisiana. “Sovereignty, for the protection of the rights of life and personal liberty within the respective States,” Waite wrote, “rests alone with the States.” The Fourteenth Amendment “prohibits a State from depriving any person of life, liberty, or property without due process of law, and from denying to any person within its jurisdiction the equal protection of the laws, but it adds nothing to the rights of one citizen as against another... The duty of protecting all its citizens in the enjoyment of an equality of rights was originally assumed by the States, and it still remains there. The only obligation resting upon the United States is to see that the States do not deny the right. This the Amendment guarantees, but no more. The power of the National Government is limited to the enforcement of this guaranty.”<sup>117</sup>

James R. Beckwith, U.S Attorney for the District of the Circuit Court of Louisiana, wrote to the U.S. Attorney General that following the Cruikshank ruling, white terrorist organizations had actually proliferated, “sprung to life and grown influential precisely because of this decision.” As one historian explains, the state of Louisiana had, contrary to the Supreme Court’s ruling, “defaulted in their duty to protect citizens, so the federal government had to step in.” But the crucial distinction in the Court’s ruling in Cruikshank was that the federal government could only defend Black rights if the state itself was the violator. “The Cruikshank decision

<sup>116</sup> <https://64parishes.org/entry/the-battle-of-liberty-place>.

<sup>117</sup> *United States v. Cruikshank*, 92 U.S. 542 (1875).

therefore gave a green light to acts of terror wherever local officials either could not or would not enforce the law.”<sup>118</sup>

Endlessly trotted out as a relatively clear-headed observer of the horrors of Redemption, Adelbert Ames, the carpetbagger governor of Mississippi, captured the flavor of post Cruikshank Louisiana quite well. “Through the terror caused by murders and threats, the colored people are thoroughly intimidated,” Ames explained. They “are disenfranchised [and] are to be returned to a condition of serfdom – an era of second slavery.”<sup>119</sup>

And yet, even these concerted efforts to intimidate and disenfranchise went through almost two decades of sustained failure. By 1888, the voter rolls in Louisiana read like a nightmare to white elites: 128,150 Black voters and 125,407 white voters. Given the bald intimidation so common in Louisiana during this period, these numbers cannot be taken completely at face value since Black votes were routinely “stolen by Democratic election officials, as was the general practice in the black-majority districts.”<sup>120</sup> At the time, it was more important to steal Black (and immigrant) votes than to deny them because representation at the state level was based on parish totals.

### ***Legislating Resistance to Black Voting, 1877-1896***

This period witnessed a shift from white supremacist violence to the legislative voter disenfranchisement that would define 20<sup>th</sup> century Louisiana. The introduction of poll taxes, grandfather clauses, and literacy tests would combine with the *Plessy* ruling to introduce nearly seven decades of extreme voter disenfranchisement.

Despite waves of white supremacist violence specifically aimed at intimidating Black voters, the period from 1868-1896 represents the high-tide mark of Black voting in the state of Louisiana. In 1896, Black citizens made up 45% of the state’s registered voters, a number that has never been equaled since.

In other words, white Louisianans had tried terrorist violence and while it had succeeded in voter intimidation and in specific elections, Blacks were still voting and increasingly so. In the 1870s and 1880s, southern newspapers, as well as agricultural and political journals, were filled with discussions of how to get rid of Black voters. Indeed, by the late 1880s, efforts proceeded across the states in the former Confederacy to consolidate power in the white democratic minority. In 1889, Florida passed a poll tax law to prevent Blacks from voting. In 1890, Mississippi passed the Mississippi Plan, laws adding poll taxes and literacy tests to prevent Blacks and poor Whites from voting. South Carolina, Louisiana, North Carolina, Alabama, Virginia, Georgia, and Oklahoma passed laws adding poll taxes, grandfather clauses, and literacy tests to voting registration requirements, based on the Mississippi Plan.

In May of 1894, a constitutional commission in Louisiana drafted a suffrage amendment which established a series of qualifications designed to disenfranchise Black voters, including a

<sup>118</sup> <https://64parishes.org/entry/cruikshank-case>.

<sup>119</sup> Stephen Budiansky, *The Bloody Shirt: Terror After Appomattox* (New York: Viking, 2008), 207.

<sup>120</sup> Michael Perman, *Struggle for Mastery: Disfranchisement in the South, 1888-1908* (Chapel Hill: University of North Carolina Press, 2001), 127.

residency requirement, a poll tax, and either a literacy test or a high bar of property ownership. The state legislature was simultaneously considering a secret ballot proposal. Indeed, white supremacist Democrats in the state had not yet figured out the delicate construction of literacy tests and other tools that would allow them to retain the immigrant voters they needed while getting rid of the Black voters they feared.

The 1896 election witnessed voter fraud unprecedented in Louisiana history, where the white supremacist gubernatorial candidate, Murphy Foster, obliterated his opponents in the 25 black-majority parishes. As the formal protest to these results explained, the results were “so false [and] so infamous” it was going to require a complete audit of the ballot.<sup>121</sup> The premier historian of voter disenfranchisement across the South explains that “as the ink on the forged ballots was still drying, the *Picayune* announced the lesson to be derived from the recent scurrilous election: ‘The illiterate and shiftless population, chiefly, but not wholly, made up of the negro element, should be expunged from the political conditions.’”<sup>122</sup>

But it was the dire political crisis the grew out of the fraudulent 1896 election that caused Louisiana’s Democratic leadership to specifically get rid of the Black vote. J. C. Pugh, Ernest B. Kruttschnitt, and Robert S. Landry published “Address to the White Democracy” in which they described just three possibilities for Louisiana: “amalgamation, negro domination, or WHITE SUPREMACY.”<sup>123</sup>

“The Democracy is pledged to a limitation upon suffrage which will eliminate the Senegambian from politics as far as can be under the Constitution of the United States,” Louisiana’s Democratic Party leaders explained, “Mississippi and South Carolina have set us the example.”<sup>124</sup>

On the rippling effects of Louisiana’s streetcar segregation case *Plessy v. Ferguson*, the history of the fight over voting rights explains that after *Plessy*, “segregation took hold of American culture, then spread blood deep into every crevice. Terrorism followed, giving rise to murder with impunity by civilians as well as law enforcement officials. *Plessy v. Ferguson* heralded a disastrous period for all those who believed in American democracy.”<sup>125</sup>

Voting and civil rights activists were well aware of the laws white supremacists were passing and their ultimate design. Albion Tourgée, the crusading Reconstruction lawyer and activist, was particularly incensed by the aggressive shift against Civil Rights that characterized the 1890s. Tourgée had become particularly impassioned and outspoken by the time Louisiana passed its Separate Car Act in 1891. One column helped galvanize “a committee of prominent mixed-race Creoles and several black allies in New Orleans, which was already bent on mounting a legal challenge to the law.”<sup>126</sup> Homer Plessy identified as a Black man, but was classified as Creole by Louisiana custom and could pass for white. Accordingly, Homer Plessy

<sup>121</sup> *The New Orleans Daily Picayune* reported the revised official results on May 15, 1896.

<sup>122</sup> Perman, 133.

<sup>123</sup> Democratic Central Committee, “Address to the White Democracy,” May 4, 1896.

<sup>124</sup> Ibid.

<sup>125</sup> Browne-Marshall, 215.

<sup>126</sup> Steve Luxenberg, *Separate: The Story of Plessy V. Ferguson and America’s Journey from Slavery to Segregation* (New York: Norton, 2019), 14.

bought a first-class ticket on the East Louisiana Railway line on June 7, 1892, taking his seat in the railroad car designated for Whites.

Now the enforcement mechanism of these segregated trains is very informative about the ingenious penetrative power of white supremacist laws and the necessity of enlisting as many white accomplices as possible. Under the terms of the 1890 law, conductors on the trains (who were all white) were required to remove violators or risk jail and a fine themselves.

On June 7, Plessy was asked to move to the “Negro-only” car. Upon refusing to, Plessy was removed by police, arrested, and locked up in the Orleans Parish jail. As with test cases that would follow (*Brown v. Board* being the most prominent), Plessy intended to be arrested and also planned on appealing that charge as high up the judicial chain as he could go. The case was appealed to the Supreme Court, where the staunch segregationist Justice Henry Billings Brown wrote the majority opinion, denying Plessy’s claims of discrimination and dismissing the notion that “a badge of inferiority would be placed on Blacks segregated from the general population.”<sup>127</sup>

“If one race be inferior to the other socially,” Judge Brown wrote, “the Constitution of the United States cannot put them upon the same plane.” Brown’s reasoning was the bedrock of white supremacy before and after Black suffrage, affirming the invented differences of race and the inability of the law to promote actual equality. “A law which implies merely a legal distinction between the white and colored races—a distinction which is founded in the color of the two races and which must always exist so long as white men are distinguished from the other race by color—has no tendency to destroy the legal equality of the two races,” the decision explained, “The object of the [Fourteenth Amendment] was undoubtedly to enforce the absolute equality of the two races before the law, but in the nature of things it could not have been intended to abolish distinctions based upon color, or to enforce social, as distinguished from political equality, or a commingling of the two races upon terms unsatisfactory to either.”<sup>128</sup>

“Every aspect of American life was affected by this ruling,” writes Gloria Browne-Marshall in her history of the battle over voting rights, “the states were given the power to legislate social interaction between the races. The *Plessy v. Ferguson* opinion instituted the ‘separate but equal’ doctrine, which imposed on the country an Americanized version of apartheid.”<sup>129</sup> The dissenting opinion blasted both the logic of the majority and the effects the decision would certainly produce. Justice John Marshall Harlan wrote that “the judgment this day rendered will, in time, prove to be quite as pernicious as the decision made by this tribunal in the *Dred Scott* case.”<sup>130</sup>

Indeed, the high tide of Black voting in Louisiana was marked the same year as the *Plessy* decision: 1896, when Black voters made up nearly 45% of registered voters in the state of Louisiana.

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<sup>127</sup> Browne-Marshall, 211.

<sup>128</sup> 163 US 537 (1896).

<sup>129</sup> Browne-Marshall, 213.

<sup>130</sup> Browne-Marshall, 213, and 163 US 537 (1896).



### *Nadir of Black Voting, 1898-1954*

From Louisiana pioneering the grandfather clause to all manner of disenfranchising strategies, 1898-1954 witnessed the lowest numbers of Black voter registration and political participation since Blacks were enslaved.

Although the 30 years following Black enfranchisement in Louisiana were replete with violence and struggle, Black voter registration reached its highest point in 1896. The following 70 years would represent the effective creation of legislative white supremacy, a system of economic, social, and political discrimination that effectively removed Black voters from the body politic. Indeed, from 1898-1944, when the Supreme Court voided all-white primaries as unconstitutional, Louisiana's record on disenfranchising Black voters followed a standard pattern. "When one form of voting discrimination was identified and prohibited," one Congressional report explained, "another sprang up in its place."<sup>131</sup>

Black voting numbers plummeted after the *Plessy* ruling, from 130,334 to fewer than 5,320 just two years later. Researchers have been unsuccessful in locating a single Black Louisianan elected to office until the 1940s. The Louisiana legislature quickly amended its constitution to exclude Black voters. In 1898, when approximately 44% of all the registered voters in the state were Black, a policy was put in place denying them the right to vote based on race. The Black vote never reached more than 1%. From the grandfather clause to literacy tests to White-only primaries, for 80 years Louisiana schemed to exclude Black voters.<sup>132</sup>

It was not so much how the *Plessy* ruling applied to voting rights specifically, but how the case seemed to provide a broad mandate for states like Louisiana to develop sophisticated and persistent methods to disenfranchise Black voters. The next few decades showed Louisiana's "unremitting and ingenious" methods of ensuring that its African-American citizens would have no effect on the political process.<sup>133</sup> Just two years later, Louisiana pioneered the Grandfather Clause, imposing byzantine education and property requirements on any citizens whose fathers or grandfathers were not registered voters before January 1, 1867. As a direct result of the Grandfather Clause, Black voters plummeted from 45% to just 4% in two years.

Ernest B. Kruttschnitt, the President of the 1898 Constitutional Convention, explained this as the very design of the Grandfather Clause. "We know that this convention has been called together" Kruttschnitt explained, "to eliminate from the electorate the mass of corrupt and illiterate voters who have during the last quarter of a century degraded our politics." "Doesn't it let the white man vote," he continued, "and doesn't it stop the negro from voting, and isn't that what we came here for?"<sup>134</sup>

<sup>131</sup> Louisiana Advisory Committee for the United States Commission on Civil Rights, "Barriers to Voting in Louisiana," June 2018.

<sup>132</sup> Browne-Marshall, 390.

<sup>133</sup> Depo P. Adegbile, "Voting Rights in Louisiana, 1982-2006," *Review of Law and Social Justice* [Volume 17:2, 2008], 417.

<sup>134</sup> Ernest B. Kruttschnitt, "February 1898 speech," *New Orleans Daily Picayune*, February 9, 1898.

Indeed, contemporary observers understood that white politicians were attempting to “perpetrate one big steal” in Louisiana so there would be no need for “more fraudulent work to do hereafter.”<sup>135</sup>

In response to the baldness of the disenfranchising effort in Louisiana, the U.S. Supreme Court struck down the Grandfather Clause in 1915 in *Guinn v. United States*, but Louisiana was quite creative in searching out alternative means to follow Kruttschnitt’s statement of the obvious purpose: to “stop the negro from voting.” Laws were written “prohibiting elected officials from helping illiterates” and “potential voters were required to count the number of jelly beans in a large jar just by looking at it.”<sup>136</sup> Poll taxes, literacy tests, so-called “understanding” clauses were all deployed to prevent Black voting.<sup>137</sup> None of these methods were transparent to the potential Black voter, never graded in plain sight or in front of the applicant attempting to register, and nor were answers shared with the applicant.<sup>138</sup>

Louisiana’s 1921 constitutional convention was the first that had the potential of including Black women. The NAACP recognized that a permanent lobby was going to be necessary “to prevent...adverse legislation framed for the purchase of disfranchising the Negro.”<sup>139</sup>

The massive purging of Black voters was incredibly difficult to counteract. Very few Black voters could navigate the numerous “discriminatory hurdles” designed to keep them from exercising their democratic rights.<sup>140</sup> To complement these devices, Louisiana “authorized an all-white Democratic primary which functioned to deny blacks access to the determinative elections.” The all-white primary completely excluded African-Americans in Louisiana from the political process between its creation in 1923 and the Supreme Court’s condemnation of the practice in 1944.<sup>141</sup>

Understanding requirements, poll taxes, and registration purges gave way to even more sophisticated strategies to disenfranchise Black voters. Citizenship tests and bans on single-shot voting (which allowed Black voters to aggregate votes behind one candidate) were additional discriminatory techniques developed by Louisiana. As has been extensively quantified and documented, these methods were staggeringly effective “in achieving their discriminatory objectives.”

“From 1910 until 1948, less than 1% of Louisiana’s voting age African-American population was able to register to vote. In 1948, that proportion rose to 5%.” Even as the Federal government became more involved from 1952 until 1964, “the proportion rose only from 20% to 32%, reaching 32% only in October 1964.”

<sup>135</sup> *Southwestern Christian Advocate* (New Orleans), editorial, February 24, 1898.

<sup>136</sup> Browne-Marshall, 406.

<sup>137</sup> See Exhibit A.

<sup>138</sup> See Appendix 3 for a contemporary map of the Black population in the Louisiana Parishes.

<sup>139</sup> Lee Satain, *Invisible Activists: Women of the Louisiana NAACP and the Struggle for Civil Rights, 1915-1945* (Baton Rouge: LSU, 2007), 49.

<sup>140</sup> *Major v. Treen*, 574 F. Supp. 325, 340 (1983).

<sup>141</sup> Adegbile, 417.

White voting registrars had enormous power, which bolstered the discriminatory effect of the myriad laws meant to disenfranchise Black voters. The registrar's "complete discretion" allowed them to reject 64% of Black registrants (as opposed to 2% of white registrants) between 1956 and 1962. Indeed, "the consistency of Louisiana and other states' abilities to develop techniques and devices to maintain white supremacy in the political process, even as the Supreme Court condemned one disenfranchising practice after another" prompted the search for more effective legislation and Federal oversight of these sustained and innovative attacks on the democratic process.<sup>142</sup>

Civil rights groups began conducting voter education classes on the Constitution and freedom schools taught classes on the state and federal constitutions to try and outwit the tactics of disenfranchisement. The numbers tell how effective these efforts were. From 1910 until 1948, less than 1% of eligible Black voters were able to register. By 1948, the percentage had crept up only to 5%. Those fighting for civil rights and the Black vote came up with the ingenious strategy of turning the *Plessy* ruling on its head, demanding quantifiably equal treatment as they battled *Plessy* and other offenses in the courts. That legal crusade culminated in the *Brown v. Board* ruling of 1954, which found segregation in public schools unconstitutional but only ordered desegregation to take place "with all deliberate speed."<sup>143</sup>

### ***The Civil Rights Era, 1954-1965***

The intensification of legal efforts to fight for Black voting rights was met by a well-practiced and inventive white elite absolutely determined to prevent Black Louisianans from gaining political power. As legal decisions began to go against Louisianan practices, whites became increasingly concerned about how to continue a 200-year tradition of white supremacy.

The realities of Black voting in 1950s Louisiana were grim. After massive voter registration efforts by the NAACP and the YWCA in New Orleans, for instance, only 25% (25,524) of the Black population was registered. Suits were filed against the registrar of Rapide Parish in April of 1954 after efforts to register were denied several times. As in earlier eras, Black voters in Rapide were being denied because the registrar rejected applications on the grounds that the Black voters could not answer questions about the state and federal constitution to his satisfaction. The U.S. District Court for the Western District of Louisiana found no fault with the disenfranchising effects of these literacy tests.<sup>144</sup> The ruling explained that "we do not see how we could decide that the administration of the laws...penalized Negroes more than it did other citizens."<sup>145</sup>

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<sup>142</sup> Ibid., 417-18.

<sup>143</sup> 349 U.S. 294, 301 (1955).

<sup>144</sup> Some examples from the literacy tests used in the 1950s explained that Applicant must correctly answer any four of the following six questions so as to evidence an elemental knowledge of the Constitution and Government, an attachment thereto, and a simple understanding of the obligations of citizenship under a republican form of government. Questions include 1. The church that we attend is chosen, a. by the National Government; b. by ourselves; c. by the Congress. 2. The President must be at least, a. twenty-five years old; b. thirty years old; c. thirty-five years old. 3. It is important for every voter, a. to vote as others tell him to vote; b. to vote for the most popular candidates; c. to vote for the best qualified candidates.

<sup>145</sup> Shannon Frystak, *Our Minds on Freedom: Women and the Struggle for Black Equality in Louisiana, 1924-1967* (Baton Rouge: LSU, 2009), 72 and Adegbile, 419.



Efforts elsewhere in Louisiana met with similar obstinance from white authorities. Caddo Parish's white registrar refused to accept identification from a Black voter without a registered white voter to prove her identity. When the voter produced "a white store owner as well as a white notary" the "registrar rejected both as sufficient to establish identity."<sup>146</sup>

Therefore, the importance of the Brown ruling was not so much how it applied to Black suffrage but the overall treatment of Black people in Louisiana and more specifically that it reinvigorated efforts by white Louisianans to try and prevent Black suffrage through any means necessary. It was ultimately this intransigence that would prompt greater federal oversight, just as the violent outrages of the 1860s and 1870s against Black voters had done. The Southern Manifesto was crafted by Southern politicians in 1956 as a means of urging Southerners to use any "lawful means" to resist desegregation.<sup>147</sup> Indeed, the resistance on the ground in Louisiana was violent, venomous, and dramatic.

Piecemeal legislation to move desegregation forward, particularly in the political realm, proved inadequate to firmly entrenched white supremacist policies. The Civil Rights Act of 1957, which gave the attorney general power to prosecute those who obstructed voting in federal elections, could not change extra-legal practices. Indeed, Howard Smith, chairman of the House Rules committee and author of the southern Manifesto, remarked on that legislation that "the Southern people have never accepted the colored race as a race of people who had equal intelligence and education and social attainments as the whole people of the South."<sup>148</sup> Sharecroppers continued to be evicted from their land when they tried to register to vote.<sup>149</sup> In 1960, the Civil Rights Act of 1960 made the collection of state voter records mandatory and authorized the U.S. Justice Department to investigate and access voter data and history in all states so that Civil Rights legislation could be enforced. In 1962, just 150,000 Black voters, a mere 31% of eligible voters, were registered in Louisiana.<sup>150</sup> The year 1964 saw the ratification of the 24<sup>th</sup> Amendment which outlawed poll taxes nationwide. And finally, the penultimate legislation of this era, the Civil rights Act of 1964 made discrimination on the basis of race, national origin, gender, or religion in voting illegal.

Notwithstanding all this legislation, from 1956 to 1965, the high-tide mark of Civil Rights legislation in all of American history, Black voters in Louisiana rose just .1%, from 31.7% to 31.8% of eligible voters.<sup>151</sup> These stalled numbers spoke to the reality: every discriminatory and disenfranchising technique developed by Louisiana remained in practice, except for the few specifically condemned by the Supreme Court, until Congress banned them expressly or made them subject to meaningful legal review through the passage of the Voting Rights Act of 1965 ("VRA").

"Race was a factor in every aspect of voting" writes Gloria Marshall in her account of the path to the Voting Rights Act. This well-known discrimination was also the basis of a Louisiana

<sup>146</sup> Frystak, 73-4.

<sup>147</sup> <https://history.house.gov/Historical-Highlights/1951-2000/The-Southern-Manifesto-of-1956/>.

<sup>148</sup> *The Congressional Record: Proceedings and Debates of the 87<sup>th</sup> Congress*, Vol. 107, Part 2, 1498.

<sup>149</sup> Gary May, *Bending Toward Justice: The Voting Rights Act and the Transformation of American Democracy* (Durham, NC: Duke University Press, 2014), 28.

<sup>150</sup>

<sup>151</sup> Browne-Marshall, 461.

lawsuit handed down just before the VRA's passage, one that really captured the dire need for federal oversight to ensure Black suffrage. *Louisiana v. United States* was brought by the U.S. Attorney General's office against the state of Louisiana for "beginning with the adoption of the Louisiana Constitution of 1898" putting into "effect a successful policy of denying Negro citizens the right to vote because of their race."<sup>152</sup> The Supreme Court found that the Louisiana Legislature had formed a "Segregation Committee" which cooperated with white supremacist Citizens Councils to instruct registrars to purge Black voters from the voter rolls and promote white political control.<sup>153</sup>

Justice Hugo Black, a former member of the Ku Klux Klan himself, explained that "at least 21 parishes in the mid-1950s began applying the interpretation test, to which was added in 1960 a comprehension requirement, applicable to all persons, which the State Registration Board ordered rigidly enforced."<sup>154</sup> The Court found that "under the State's statutes and constitutional provisions" voter registrars, "without any objective standard to guide them," had full discretion to enforce interpretation tests and "the manner in which the interpretation [was]s to be given, whether it is to be oral or written, the length and complexity of the sections of the State or Federal Constitution to be understood and interpreted, and what interpretation is to be considered correct."<sup>155</sup> The Supreme Court "held that test, on its face and as applied, invalid under the Fourteenth and Fifteenth Amendments and 42 U.S.C. § 1971(a) and enjoined its future use in the State."<sup>156</sup>

In *Anderson v. Martin* (1964), Black residents of East Baton Rouge brought a lawsuit successfully challenging a Louisiana law that required ballots to specify the race of the candidates running for office. Louisiana defended its measure as necessary information for the electorate; moreover, "the labeling applie[d] equally to Negro and white."<sup>157</sup> A unanimous court recognized that this labeling was a violation of the Fourteenth Amendment and that it encourage[] its citizens to vote for a candidate solely on account of race."<sup>158</sup> The only reason to include race on a ballot was for discriminatory purposes, "so that people can react to it."<sup>159</sup>

As the VRA gained traction, Louisiana legislators spoke openly of their opposition to Black enfranchisement. Louisiana's Allen J. Ellender declared of the VRA that he would "talk against it as long as God gives me breath" and once bragged, "I have always voted for white supremacy."<sup>160</sup>

Louisiana's Joe D. Waggoner disagreed, arguing that there "were no problems in his home state [and] Blacks could vote just like anyone else." Waggoner's denials of the basic facts of Louisiana's discriminatory practices made compelled fellow Louisianan Congressman Hale Boggs to contradict this distorted account.

<sup>152</sup> *Louisiana v. United States*, 380 U.S. 145 (1965)

<sup>153</sup> *Id.* at 149-50.

<sup>154</sup> *Ibid.*

<sup>155</sup> *Ibid.*, 150.

<sup>156</sup> *Ibid.*, 150.

<sup>157</sup> *Anderson v. Martin*, 375 U.S. 399 (1964).

<sup>158</sup> *Id.* At 404.

<sup>159</sup> Browne-Marshall, 431.

<sup>160</sup> May, 406.

“I wish I could stand here as a man who loves his state, born and reared in the South...and say there has not been discrimination,” Boggs declared, “but unfortunately it is not so.”<sup>161</sup> In his own district, he said, there lived more than 3,000 Blacks, but less than 100 were registered. “Can we say there has been no discrimination? Can we honestly say that from our hearts? I shall support this bill because I believe the fundamental right to vote must be a part of this great experiment in human progress under freedom which America is.”<sup>162</sup>

On July 6, Congress nevertheless passed the Voting Rights Act, 333 to 85. The country’s need for racial justice, Johnson explained in the speech in the Capitol Rotunda on August 6, 1965, announcing the VRA’s passage, was necessary because racial equality had been intentionally obstructed at every turn.<sup>163</sup>

#### IV. The Battle Over the Voting Rights Act in Louisiana

##### *The Voting Rights Act Era Begins, 1965-1982*

While it is true that the Voting Rights Act transformed the century-long battle over Black voter participation, that transformation was not in changing the hearts and minds of Louisianans, who were just as dogged in their efforts to disenfranchise Black voters after 1965. Rather, the VRA’s supervision of state practices provided a permanent threat of action to combat the continued effort to mute Black Louisianans’ political power. The most crucial objections under Section 5 have allowed the federal government to prevent “the state from implementing racially discriminatory districting plans for the state legislature.”<sup>164</sup>

As the most comprehensive study of the effect of the Voting Rights Act has explained, “discriminatory election laws...continue to be a serious problem in Louisiana.”<sup>165</sup> From 1965-1989, the Attorney General had to issue 66 objection letters (11 to the state and 55 to local governments) nullifying over 200 changes. So while overall the VRA has changed the nature of voter discrimination in Louisiana, most commonly leaving white lawmakers to resort to vote dilution, it is only the “interference” of the VRA that has allowed to progress towards “a more open electoral process.”<sup>166</sup>

As one account explains, the “passage of the Voting Rights Act in 1965 eliminated literacy tests and other legal mechanisms that had been used to prevent black southerners from

<sup>161</sup> Robert A. Pratt, *Selma’s Bloody Sunday: Protest, Voting Rights, and the Struggle for Racial Equality* (Baltimore, Johns Hopkins, 2017), 108.

<sup>162</sup> Pratt, 108.

<sup>163</sup> Lyndon B. Johnson, “Remarks in the Capitol Rotunda at the Signing of the Voting Rights Act,” August 6, 1965. See <https://www.presidency.ucsb.edu/documents/remarks-the-capitol-rotunda-the-signing-the-voting-rights-act>. “The heart of the act is plain,” Johnson went on, “Wherever, by clear and objective standards, states and counties are using regulations, or laws, or tests to deny the right to vote, then they will be struck down. If it is clear that state officials still intend to discriminate, then federal examiners will be sent in to register all eligible voters . . . And under this act, if any county anywhere in this nation does not want federal intervention it need only open its polling places to all of its people.”

<sup>164</sup> Engstrom et al., “Louisiana,” 111.

<sup>165</sup> Ibid., 111.

<sup>166</sup> Engstrom et al., “Louisiana,” 103, 110-11.

registering.”<sup>167</sup> But it was the Section 5 supervision that precluded those in Louisiana from “simply substituting a new discriminatory trap for its invalidated literacy test.” Louisiana’s preclearance requirement was renewed in 1970, 1975, and again in 1982. “Across Louisiana, local blacks began to vote for the first time,” but the VRA’s strides were consistently compromised by those who “have remained steadfast in their efforts to minimize African-American voting power.”<sup>168</sup>

Indeed the VRA began in Louisiana mainly as a story of white resistance, particularly by the historic stopgap of disenfranchising whites, the registrar. When Orleans Parish Black voters swelled by 13,000 applicants, registrars used every tactic of delay, keeping thousands “waiting patiently under a blazing sun or in drizzling rain.”<sup>169</sup> Registrars in Shreveport rejected 337 Black applicants for inadequate identification in the first weeks following the VRA’s passage.<sup>170</sup> Five parishes in Louisiana had received more federal examiners and had particularly abysmal registration rates even compared to their counterparts. Morehouse and West Carroll actually saw declines in their Black voters. Across Louisiana, registrars refused Black ballots because of party affiliation or illiteracy; “good character” tests also began in the 1960s. After the threat of statewide federal intervention seemed imminent, Governor John McKeithen “prodded recalcitrant parish authorities to mend their ways.”<sup>171</sup>

And yet, instead of mending anything, white Louisianans simply seemed to abandon the registrar as their tool for Black disenfranchisement. In the first 17 years of its implementation, the Department of Justice made 50 formal objections to “attempts by state and local authorities to implement voting changes that would have diluted African-American voting strength.”<sup>172</sup> From 1982-2006, that number ballooned to 96 objections. In other words, white Louisianans efforts to lessen the impact of Black voters have only increased since the VRA was enacted.<sup>173</sup>

The patterns so entrenched in Louisianan history – of Black citizenship gains followed by white backlash – are as clearly visible in the battle over the Black vote as they were in the German Coast Uprising of 1811. Black Louisianans have been intentionally denied the most fundamental democratic act: voting, by the state of Louisiana. “The violations that affect various public offices, including judicial, aldermanic, councilmanic and school boards” are the defining experience of Black voters in the state.<sup>174</sup> This dynamic has been most pronounced in the Voting Rights Act era stretching from the passage of the VRA in 1965 to the gutting of the VRA’s core provisions in the 2013 Supreme Court case of *Shelby County v. Holder*.<sup>175</sup>

Louisianans outrage over gains by Black voters are clearly identified because those gains always precipitate “rejection of readily available non-discriminatory alternatives, inconsistent

<sup>167</sup> Michael S. Martin, *Louisiana Beyond Black and White: New Interpretations of Twentieth-Century Race and Race Relations* (Lafayette, LA: University of Louisiana at Lafayette Press, 2011), 148.

<sup>168</sup> Frystak, *Our Minds on Freedom*, 229 and Adegbile, 419.

<sup>169</sup> Adam Fairclough, *Race and Democracy: The Civil Rights Struggle in Louisiana, 1915-1972* (Athens: University of Georgia Press, 1995), 388.

<sup>170</sup> Fairclough, 388.

<sup>171</sup> *Ibid.*, 388.

<sup>172</sup> Adegbile, 419.

<sup>173</sup> *Ibid.*, 419.

<sup>174</sup> *Ibid.*, 460.

<sup>175</sup> *Ibid.*, 460.

application of standards [and] drastic voting changes” designed to minimize Black voting strength.<sup>176</sup> Thus, it is crucial to contextualize the very real successes of the VRA by understanding the intransigence of white efforts to roll back those advances in voting equality. The overall story of the VRA era is that legislation designed to break down prejudice has in some ways created a smaller but more greatly impassioned and resistant population in Louisiana, more deeply “committed to perpetrating voting discrimination” and dramatically “more sophisticated at concealing their objectives.”<sup>177</sup> As one report on this era has explained, “the consistent efforts to diminish African-American voting power in Louisiana are not inconsequential remnants of the distant past that can be ignored.”<sup>178</sup>

In Louisiana, more than 350,000 Black residents registered in 1969. But the test of Black voting power was not simply registration but also electing Black leaders. “In the first big test of black voting” after the passage of the VRA, “all twenty-four black candidates lost...the requirement to gain an outright majority...proved the bane of black candidates, who invariably led in the first primary only to lose in the runoff.”<sup>179</sup> As Adam Fairclough, the preeminent historian of the history of Black voting in Louisiana, has explained, “even a coherent black vote...could not guarantee the election of black candidates, for strenuous mobilization for blacks often led to equally vigorous countermobilization on the part of whites.”<sup>180</sup> Fairclough could have easily been describing Leander Perez, “the racist boss of Louisiana’s Plaquemine Parish,” who did not simply capitulate to what he and many Louisianan leaders saw as an unlawful and unconstitutional attempt to bring them to heel.<sup>181</sup> When officials visited Clinton, Louisiana, local businessmen complained about a second Reconstruction. “The Feds are fixing it so the Negroes can take over,” the district attorney complained to *The Wall Street Journal*. Indeed, the 57 years since the passage of the VRA of 1965 have been plagued by the same racism and resistance that so characterized the Jim Crow era.

Indeed this new legislation met a seemingly intractable force: resistance by those who had fought for centuries against any measurable power for Black Louisianans. President Johnson had mentioned this possibility in the speech celebrating the VRA’s passage, explaining that “there is always room for understanding toward those who see the old ways crumbling. And to them I say simply this: it must come. It is right that it should come. And when it has, you will find that a burden has been lifted from your shoulders, too.”<sup>182</sup>

But Louisiana’s experience of the VRA showed that Johnson’s rhetoric was no match for efforts to disenfranchise Black voters. In the first five years that followed the legislation, Black Louisianans made up an absolutely “miniscule proportion of the state’s elected officials, fewer than 1 percent.”<sup>183</sup>

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<sup>176</sup> Ibid., 434.

<sup>177</sup> Ibid., 434.

<sup>178</sup> Ibid., 435.

<sup>179</sup> Fairclough, 394.

<sup>180</sup> Ibid., 394.

<sup>181</sup> May, 464.

<sup>182</sup> Lyndon B. Johnson, “Remarks,” August 6, 1965.

<sup>183</sup> Fairclough, 394.



Tensas Parish in Northeastern Louisiana was the last parish in the state to allow Black Louisianans to register to vote. Before the VRA, in 1964, only 15 Black voters were on the rolls when at least 6,000 Black people called Tensas home. By 1967, 34% of the Black population had been registered, a huge leap forward, “but not a single black ran for office.”<sup>184</sup> In other words, progress in involving Black voters was never instantaneous. The Voter Education Project (“VEP”) worked doggedly to register more of Tensas’ black population, adding 310 Black voters in just 10 days that year.<sup>185</sup> It was only through these efforts and the legal oversight of the VRA that produced astonishing voting and electoral results. In the next election cycle, all five city council seats were contested by black candidates for the first time. Still, fewer than half the eligible black voters actually cast votes.

Tensas’ early post VRA elections highlighted the myriad subaltern strategies to preserve white supremacy in Louisiana. “Whites told their black employees, most of them maids or farmworkers, that ‘there is no use wasting time voting,’ and they would lose their food stamps if they did.” In Waterproof, a Tensas community near the Mississippi, the town’s only doctor, a white man, warned “his black patients that he would leave” the town if blacks succeeded in town elections.<sup>186</sup>

By 1971, when the population of the Parish dipped to 9,400, with a Black population of roughly 5,600 (60% of the population), Black people still represented just 46% of registered voters.<sup>187</sup> Despite the slow progress, by 1975, Black voters had at least shown success in the town of Waterproof, which now had a Black mayor, five councilmen, and a Black chief of police.<sup>188</sup>

After Louisiana’s Section 5 renewal in 1970, both the House and Senate plans adopted by the legislature contained a mixture of single and multimember districts that clearly disadvantaged Black voters. These plans utilized both of the most common strategies used to limit Black voters’ political strength in Louisiana: over-concentrating Blacks into fewer districts (“packing”) or breaking up the Black population and spreading them out across white majority districts (“cracking”). “The dilutive consequences of the legislature’s schemes were so blatant that a federal district judge stated in 1971 that if the Attorney General had not objected to their implementation, he would have found them to be unconstitutional for, among other reason[s], ‘employing gerrymandering their grossest form.’”<sup>189</sup>

New Orleans’ second effort at councilmanic redistricting in the 1970s became the basis of a significant Supreme Court decision involving Section 5 preclearance criteria. A unanimous three-judge panel found that the city’s councilmanic districts had a discriminatory effect, specifically by cracking and diluting Black voting power. But when the city council did not accept the Attorney General’s decision, it sought preclearance from the federal judiciary which

<sup>184</sup> Ari Berman, *Give Us The Ballot: The Modern Struggle for Voting Rights in America* (New York: FSG, 2015).

<sup>185</sup> Eight hundred Voters were registered as a result of the VEP efforts, so many “that the white registrar closed his office to process the ‘paper work.’” *See* Berman, 103.

<sup>186</sup> Berman, 103.

<sup>187</sup> Berman, 102; <https://fred.stlouisfed.org/series/LATENS7POP>.

<sup>188</sup> Berman, 103.

<sup>189</sup> Engstrom et al., “Louisiana,” 111.

eventually found that the districts were not retrogressive.<sup>190</sup> *Beer v. United States* (1976) was the first decision restricting the ground upon which the Attorney General could deny preclearance and a frightening sign of the limitations of federal oversight when white intransigence was sufficiently dogged. The Supreme Court's ruling in *Beers* established, before it was superseded by statute, that Section 5 preclearance applies only to change in election procedures not to dilutive structures like at-large elections, in place before November 1, 1964.

Fortunately, the extension and amendment of the VRA in 1982 made the retrogression standard slightly less impactful. Indeed, the 1982 amendments to Section 2 were even more vital as white resistance to Black voting power in Louisiana was just as stubborn after 1982 as it had been before. During the debates over the VRA's renewal, Louisiana Republican W. Henson Moore chafed at the continuing oversight under Section 5. Moore denounced his "sanctimonious brethren" in Congress for promoting laws that, he claimed, only hurt his constituents. "We want to be treated like everybody else," Moore argued.<sup>191</sup>

And yet, just months later, when new Congressional maps were proposed in Louisiana, Moore's position was revealed to be yet another strategy to preserve white power. In these maps, a new Black majority congressional district had been created in New Orleans, not unthinkable for a Black-majority city in a state where Black people made up 29% of the population but held exactly zero statewide elected positions.<sup>192</sup> White political leaders reacted to the potential of a Black Louisiana congressperson with barely suppressed outrage. Louisiana's governor, David Treen, explained simply that "any bill in that form is unacceptable and without question will be vetoed."<sup>193</sup> Treen's passion on this front was not unexpected; he had begun his political career in the extreme segregationist States' Rights Party of Louisiana and had run several unsuccessful campaigns opposing civil rights in voting, education, and housing. Once elected, Treen voted "against nearly every piece of civil rights legislation, including the VRA extension of 1975."<sup>194</sup>

Treen's commitment to vetoing any such map led a "small group of legislators and state officials" to convene "in the subbasement of the state capitol to draft a new congressional map without a majority black district."<sup>195</sup> Needless to say, no Black officials participated in this secret meeting. Representative Peppi Bruneau, the chairman of the redistricting subcommittee, told Lawrence Chehardy, the Jefferson Parish tax assessor, that "we already have a nigger mayor, and we don't need another nigger bigshot."<sup>196</sup>

The men concocted absurd maps that distributed Black New Orleanians into absurdly drawn districts in order to dilute the power of potential Black voters. Not only was Governor Treen "aware of the racial consequences" of the deliberate effort to mute Black wards, "racial considerations formed the basis" of the Governor's logic. In the litigation over Treen's attempts, "the court accepted the plaintiffs' expert's testimony, showing racially polarized voting and that

<sup>190</sup> *Beer v. United States*, 425 U.S. 130 (1976).

<sup>191</sup> May, *Bending Towards Justice*, 577.

<sup>192</sup> Berman, 162.

<sup>193</sup> May, 577.

<sup>194</sup> *Ibid.*, 577.

<sup>195</sup> *Ibid.*, 577.

<sup>196</sup> *Ibid.*, 577.

such voting played a significant role in the electoral process. It also found that ‘Louisiana’s history of racial discrimination, both *de jure* and *de facto*, continue[d] to have an adverse effect on the ability of its black residents to participate fully in the electoral process.’”<sup>197</sup>

The result of rejecting Treen’s racist redistricting of Orleans Parish was the election of Louisiana’s first Black Congressman since the 1870s. The most notable aspect of the Treen case is not just the bald racism nor staggering absence of Black representatives up until that point, but the fact that none of these facts would likely have been known without the oversight of Section 5 of the VRA.

“By any measure, attempts to dilute African-American voting strength in Louisiana have been widespread,” wrote one expert on voting in the state, “thirty-three—more than half—of Louisiana’s sixty-four parishes and thirteen of its cities and towns have proposed discriminatory voting changes since 1982, many more than once.”<sup>198</sup> These efforts were so persistent and diverse that collectively Louisianan attempts to disenfranchise Black voters highlight a state utterly determined to not simply resist the laws of the nation but to reinforce the control over Black people that have defined the state since the 1800s.

### ***Voting Rights in Louisiana, 1982-2013***

Much like the immediate post-VRA period, 1982-2013 experienced a similar flood of attempts by Louisiana to dilute Black voting strength. If the long history of Black disenfranchisement has shown anything, Louisianans will continue to attempt any combination of strategies to deny equal voting rights to Black residents of the state. This section explores both Section 5 and Section 2 responses to voter disenfranchisement to show how persistent resistance to voting equality has been since the 1982 renewal of the VRA. The time between the 1982 amendments to the VRA and the Supreme Court ruling in *Shelby County v. Holder* are considered below in two separate but interrelated sections. First, the various cases and violations under Section 2 of the VRA will be discussed, and following, the cases and violations under Section 5.

### **Section 2**

Discussed at the end of the previous section when the case began in 1980, in *Major v. Treen* (1983), a federal court found that the state’s Congressional redistricting plans cracked Black voters in a “racially selective manner.” “If the maps had been allowed to stand, the power of Black voters would be unfairly and illegally minimized.”<sup>199</sup>

The Supreme Court’s ruling in *Thornburg v. Gingles* (1986), a case on multimember legislative districts in North Carolina, had a deep impact on efforts to invalidate electoral “systems that dilute through submergence.” Indeed, the first post-*Gingles* decision by the Fifth Circuit Court of Appeals involved the West Bank of New Orleans municipality of Gretna.

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<sup>197</sup> Adegbile, 430.

<sup>198</sup> *Ibid.*, 430.

<sup>199</sup> *Ibid.*, 118.



There, aldermanic elections – for mayor and aldermanic board – were the root of almost all political power in the town. No Black candidate had managed to be elected to any municipal office in the town since its incorporation in 1913 despite representing 30% of the population. In Gretna’s case, an informal slating process drawn from the reigning mayor and the father-and-son Chiefs of Police excluded Black voters from “meaningful participation in the political process.” Despite white defendants claiming that if any Blacks supported winning white candidates, then Blacks voters’ inability to elect Black candidates was “legally inconsequential,” the court found that the at-large electoral system “effectively barred African-American citizens from any meaningful role in the city’s government.”<sup>200</sup>

In *Citizens for a Better Gretna*, the court observed the “history of black citizens’ attempts, in Louisiana since Reconstruction, to participate effectively in the political process and the white majority’s resistance to those efforts is one characterized by both *de jure* and *de facto* discrimination. Indeed, it would take a multi-volumed treatise to properly describe the persistent, and often violent, intimidation visited by white citizens upon black efforts to participate in Louisiana’s political process.”<sup>201</sup>

The combined precedents of *Gingles* and *Gretna* represented an important development in the fight against voter disenfranchisement in Louisiana. The Supreme Court ruling in *Gingles* that “plaintiffs need show only the existence of [racial] divisions” in voting, “not the reasons for them.” The consistent arguments by disenfranchising entities was “that as long as blacks were often on the winning side in white-on-white elections, they had no valid claim of dilution.”<sup>202</sup> As one analysis explains, “this argument was especially pernicious in light of the chilling effects that dilutive arrangements often have on black candidacies.”<sup>203</sup>

Fortunately, the Fifth Circuit’s decision in *Gretna* essentially eliminated this rationale in Louisiana. Demonstrating the widespread attempts to persist in disenfranchising and diluting schemes, Jefferson Parish authorities attempted to use this invalidated defense in *East Jefferson Coalition for Leadership and Development v. Parish of Jefferson* (1988).<sup>204</sup> A federal district court later found that the parish council plan had a dilutive result and therefore violated Section 2.<sup>205</sup>

These rulings did not stop efforts to use “multimember districts to elect judges” which also served to dilute Black voting strength.<sup>206</sup> Accordingly, the Louisiana judiciary was particularly ripe for legal intervention. In a series of cases under the *Clark v. Roemer* label, plaintiffs tried to stop these multimember elections. Research for the case showed that “of 156 district court judgeships in Louisiana outside of Orleans Parish, only two African-Americans had ever been elected in the state’s history.”<sup>207</sup> Perhaps even more shocking was that across the 20<sup>th</sup> century in Orleans Parish where there had been periods of Black majorities as high as 65%, only

<sup>200</sup> *Citizens for a Better Gretna v. City of Gretna*, 834 F.2d 496 (5th Cir. 1987).

<sup>201</sup> *Citizens for a Better Gretna*, 636 F. Supp. 1113, at 1116 (E.D. La 1986).

<sup>202</sup> *Ibid.*

<sup>203</sup> Engstrom et al., “Louisiana,” 121.

<sup>204</sup> *East Jefferson Coal. For Leadership & Dev. v. Parish of Jefferson*, 703 F.Supp. 28 (1989).

<sup>205</sup> *East Jefferson Coal. For Leadership & Dev. v. Parish of Jefferson*, 926 F.2d 487 (1991).

<sup>206</sup> Adegbile, 461.

<sup>207</sup> *Ibid.*, 461.

one Black attorney “had ever served on the criminal district court and only three had been elected to serve on the civil district court. Of the forty-eight court of appeal judgeships in the state, only one judge was African-American. No African-American citizen had ever been elected to any statewide office, to the U.S. Congress or to the Louisiana Supreme Court.”<sup>208</sup>

Similar appeals formed the basis of the *Chisom v. Roemer* cases, where five Black voters in Orleans Parish filed a class action suit on behalf of all Black voters registered in the parish. The case revolved around the system of electing two at-large supreme court justices from Orleans, St. Bernard, Plaquemines, and Jefferson parishes. The plaintiffs argued that this design violated the “VRA, the Fourteenth and Fifteenth Amendments to the U.S. Constitution and 42 U.S.C. § 1983 by impermissibly diluting, minimizing and canceling the voting strength” of Black voters.<sup>209</sup>

*Chisom v. Roemer* sat on a fault-line between Louisiana’s two most prominent disenfranchising strategies: at-large voting and redistricting. Louisiana’s First Supreme court district had 1,102,253 residents, 63.4% white, 34.4% Black and 515,103 registered voters, 68% white, 31.6% Black. The First Supreme Court District, “encompassing only Orleans Parish, would then have an African-American population and voter registration comprising another district, comprised of Jefferson, Plaquemines and St. Bernard Parishes, would be majority white.” The *Chisom* case, settled in 1992, had a profound effect on future efforts to dilute Black voting strength and spurred efforts to legislate against the gains made in the settlement.

## Section 5

Section 5 violations continued to occur after the VRA was renewed in 1982 and the DOJ was forced to respond to “thirty-three parish school board redistricting and expansion plans proposed by twenty-three parishes and one city, thirty-one parish police jury redistricting and reduction plans proposed by twenty parishes, seven parish council redistricting and reduction plans proposed by six parishes, eleven city and town council redistricting plans proposed by ten cities and towns, two board of alderman redistricting plans proposed by two cities and six annexations proposed by the city of Shreveport alone.”<sup>210</sup>

“In a stark illustration of the persistence of the hostility to equal African-American participation in Louisiana’s political process with statewide consequences, in *every* decade since the VRA was passed in 1965, the proposed Louisiana State House of Representatives redistricting plan was met with a DOJ objection.”<sup>211</sup>

Packing and cracking black voters remained common strategies for the dilution of black voting power. These efforts are particularly common after Black voters make significant

<sup>208</sup> Adegbile, 461. See *Clark v. Roemer* series of cases (*Clark v. Roemer (Clark-2 III)*, 750 F. Supp. 200 (M.D. La. 1990); *Clark v. Roemer (Clark-2 II)*, 777 F. Supp. 445 (M.D. La. 1990); *Clark v. Edwards (Clark-2 I)*, 725 F. Supp. 285 (M.D. La. 1988).

<sup>209</sup> *Ibid.*, 463. See *Chisom v. Roemer* series of cases (*Chisom V*), 501 U.S. 380 (1991); *Chisom v. Roemer (Chisom IV)*, No. 86-4057, 1989 WL 106485 (E.D. La. 1989); *Chisom v. Edwards (Chisom III)*, 839 F.2d 1056 (5th Cir. 1988); *Chisom v. Edwards (Chisom II)*, 690 F. Supp. 1524 (E.D. La. 1988); *Chisom v. Edwards (Chisom I)*, 659 F. Supp. 183 (E.D. La. 1987).

<sup>210</sup> *Ibid.*, 434.

<sup>211</sup> *Ibid.*, 434.

showings in an election cycle. “In 1988, Louisiana attempted to adopt anti-single-shot devices in circuit court elections and add more at-large judges to the circuit courts. Both efforts drew Section 5 objections but exposed the myriad strategies being used in concert to disenfranchise Black voters in the state. Information requests about these changes were ignored by the State and Louisiana attempted to add at-large or multimember judicial seats again in 1989, twice in 1990, 1991, and 1994, and again adopted anti-single-shot devices in 1990. In its 1991 objection letter, the DOJ noted blatant noncompliance with Section 5. As the objection letter noted, the state had gone ahead and held at-large elections for un-precleared judgeships from its last two submissions, and that white judges were now sitting in these seats. These facts manifest a willful disregard for the VRA mandates.”<sup>212</sup> Annexing white suburbs was another common strategy used to dilute Black voting power. The city of Monroe attempted to annex their white suburbs in 1990, and Shreveport tried six times to shift the balance of power from 54% Black to 45% Black. Numerous efforts, in Washington Parish, Franklin Parish, and Concordia Parish, among others, continued these attempts to dilute or eliminate majority Black districts. Local officials were remarkably consistent and persistent in their efforts to eliminate or minimize the influence of majority African-American districts and, at times, remove African-American elected officials from office, without resort to the familiar “packing” or “cracking” associated with discriminatory redistricting techniques.

The year 1994 presented the beginning of another era of disenfranchisement strategy, very much in the century-long tradition of grandfather clause, poll taxes, and the like. Louisiana attempted to require photo identification “as a prerequisite for first-time voters who register by mail,” a requirement the DOJ concluded had both discriminatory purpose and discriminatory effect. Louisiana distinguished itself with voter identification laws, even among recalcitrant states trying to undo the VRA’s influence. Indeed, Louisiana consistently demonstrated a real dedication to what one scholar has deftly termed “adaptive discriminatory voting changes.”<sup>213</sup>

At-large voting, which the DOJ objected to for the first time on June 26, 1969, has been the most consistently deployed strategy for disenfranchisement in Louisiana. Attempted time and time again, particularly in voting for boards of aldermen, judges, and school boards, at-large voting has been clearly established to dilute minority votes. School boards have been a particularly rich arena for Louisianan voter disenfranchisement through at-large voting schemes. St. Bernard Parish, as one example, altered their school board structure in 2001 with this goal in mind.

Between 1982 and 2003, many parishes (DeSoto, Morehouse, East Carroll, Madison, East Baton Rouge, West Feliciana, St. Landry, Webster, Richland, Lafayette, and Washington) were “repeat offenders” in submitting discriminatory redistricting plan and 13 times the DOJ noted that local authorities were merely resubmitting objected-to proposals with cosmetic or no changes. Municipalities played the same game (Shreveport, Monroe, St. Martinsville, Ville Platte, and Minden) leading one expert to comment on the remarkable “tenacity of local resistance to compliance.”<sup>214</sup>

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<sup>212</sup> Adegbile, 441.

<sup>213</sup> Ibid., 440.

<sup>214</sup> Ibid., 463-5

Pointe Coupée Parish attempted to alter school board and police jury districts in 1983, 1992, and 2002 – all efforts to dilute Black voting by packing as much of the Black population into single districts. Jefferson Parish used a novel (at that point) strategy of actually resisting redistricting plans that would increase Black voting power. In other words, whatever position or strategy would best provide the outcome of diluting Black voting, whether that was claiming redistricting was necessary or that redistricting was an affront to logic, would be utilized. The state of Louisiana demonstrated the same hypocrisy and naked desire to disenfranchise Black voters in Orleans Parish in 2002, arguing that white voters in the state were entitled to proportional representation in the Parish despite never arguing that Black voters were entitled to the same across the state.

Two points on these efforts in Orleans Parish are very instructive about the character of voter discrimination in the state. The only reason voters in Louisiana learned about these subversions of the law was because of Section 5 Reviews under the VRA. Throughout the 1990s, St Landry Parish, East Carroll Parish, Morehouse Parish, and DeSoto Parish all tried to dilute the Black vote until the DOJ stepped in. Furthermore, Louisianan officials pathologically resisted DOJ requests for any information about changes to voting laws in the state. “In 1993, when Morehouse Parish attempted to reduce the number of its elected justices of the peace, the DOJ noted that the parish’s initial submission ‘contained virtually none of the information required’; that the parish ignored a request for more information for over a year; and that the response, when finally received, still contained no population data by race and included maps of such poor quality” they were illegible.<sup>215</sup> “The DOJ noted similar efforts by Louisiana officials to withhold information in the city of Cottonport in 1987, Jackson Parish in 1991, Evangeline Parish in 1993 and Richland Parish in 2003.”<sup>216</sup>

Secondly, Louisianan legislators were engaged in a constant effort to rewrite laws even before Congress had any opportunity to reevaluate renewing Section 5 of the VRA. In other words, the desire to disenfranchise Black voters was so intense that the state constantly had plans prepared in advance, ready to try and roll back advances in Black voting power made since 1965.

All of these efforts reflect a deep hostility to the intent of the VRA – the pursuit of voting equality for Black Americans. Louisiana’s record since 1965 showed local elections have been even more prejudicial than state elections. Analysis has definitively shown that “for 27.5% of the districts created for district court judges and 40% of the districts for circuit court judges the State ignored its preclearance obligations. Given Louisiana’s African-American population of about 1,299,281 following the 1990 Census, the failure to obtain preclearance as required for district court election districts potentially affected the voting rights of hundreds of thousands of African-Americans, while the failure to obtain preclearance for circuit court election districts potentially adversely affected several hundred thousand African-American citizens of the state.”<sup>217</sup>

Voting discrimination in the state persists and attempts to dilute Black votes remain commonplace while “many white officials remain intransigent, refusing to provide basic information required under Section 5.” From 1982-2005, “African-Americans have been

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<sup>215</sup> Adegbile, 450.

<sup>216</sup> Ibid., 450.

<sup>217</sup> Ibid., 452-53.

excluded from local decision-making processes, and African-American officials who advocate for non-discriminatory voting changes have confronted retaliation...[a] record [that] includes examples of discriminatory effects and intentionally discriminatory acts.”<sup>218</sup>

The 1990 census came wheeling back into voter litigation because of efforts in Bossier Parish to create 12 single-member districts without any Black-majority districts. This case prompted the *Reno v. Bossier* Parish School Board lawsuit and two separate Supreme Court decisions. The DOJ found that the school board’s plan violated the Section 2 results test as well as Section 5. This case was significant because it showed that retrogression did not provide a high enough standard when Black political power remained at zero between redistricting plans. Bossier II (2000) clarified the deep power of the VRA’s Section 5 in states like Louisiana that continued to fight so doggedly to disenfranchise Black voters. The Justice Department’s power “to stop a state or locality from even provisionally implementing districting and other decisions...shifts the burden of proof, normally on plaintiffs to the defendant jurisdictions.” Those jurisdictions must convince the attorney general that any proposed changes are not discriminatory.<sup>219</sup>

In Louisiana since 1965, that stop-gap against Black disenfranchisement has been utterly necessary. And yet, Justice Scalia, in trying to weaken the protections of the heavily relied-upon Section 5 emphasized that Section 2 and the Fourteenth Amendment do provide legal recourse, but shift the burden to plaintiffs “for proving their charge of purposeful discrimination in a federal court” because “they could not prevail on the basis of suspected illegality alone.” In Louisiana, much like earlier moments where the doggedness of whites to disenfranchise Blacks had worn down federal mechanisms to insure voting equality, Bossier was an encouraging sign to opponents of Black political power.<sup>220</sup>

Barack Obama’s first presidential campaign revealed how divisive race still was for Louisianan voters and how unfamiliar it was to vote for a Black man even in 2008. Had the VRA produced lasting effects, especially in terms of transforming racist attitudes, Obama should have done much better across many different metrics. Among the states singled out by the original VRA, Louisiana was third from the bottom and only 14% of white Louisianans voted for Obama. The gulf separating southern white and minority voters was greater than ever before. A similar gulf existed between white voters in the covered and noncovered states. In the latter Obama received 47% of the white vote, a bit better than Kerry had in 2004, but more than 20% greater than in the covered states of the South. Although Obama’s showing among white voters outside the South is encouraging, he won a majority of their vote only in 18 states and the District of Columbia.<sup>221</sup> Without an increase in minority turnout and decline in white participation (both of which characterized the 2008 election), Obama probably would have lost even though the conditions – an unpopular incumbent, a sinking economy, high unemployment, and two wars – favored his candidacy.

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<sup>218</sup> Ibid., 405.

<sup>219</sup> Abigail Thernstrom, *Voting Rights – And Wrongs: The Elusive Quest for Racially Fair Elections* (Washington, D.C.: AEI Press, 2009), 64-65.

<sup>220</sup> Ibid., 66.

<sup>221</sup> May, 622.



### *Voting Rights in Louisiana after Shelby County, 2013-2022*

Given the 50-year history of relentless resistance to Black voting equality under the VRA, the last nine years have been an experiment in how difficult the post-preclearance period would be for Black voters seeking fair treatment. Indeed, the loss of preclearance oversight has meant that white efforts to disenfranchisement are allowed to proceed until plaintiffs can gather evidence and file suit.

In *Shelby County v. Holder*, the Supreme Court declared that the preclearance formula used to protect Black voters in Louisiana was outdated. Curiously, Chief Justice Roberts wrote in his majority opinion that “voting discrimination still exists; no one doubts that.”<sup>222</sup> Of course, the practical effect of this ruling was crippling Section 5 of the VRA, in particular the preclearance protections that have so clearly been the last line of defense against Louisianan efforts to disenfranchise Black voters were defeated. “Without the protections of Section 5, Louisiana voters must wait until they are aggrieved before seeking judicial intervention,” reported one Congressional subcommittee, “Lawsuits prompted by voting restrictions, once handled administratively by the Justice Department, must now be addressed through more expensive and less efficient litigation.” That report cited a recent case in Terrebonne Parrish, Louisiana, protesting the most frequent Louisianan violation of the VRA: at-large voting. On August 17, 2017, a federal court ruled that Louisiana’s use of at-large voting for electing five members to the 32<sup>nd</sup> Judicial District Court violated the Voting Rights Act of 1965 and the U.S. Constitution. Despite comprising 20% of the parish electorate, no Black candidate had ever been elected in the face of opposition in the district under the at-large system. The District Court held the at-large voting system had discriminatory or dilutive effect, in violation of the VRA.

Across states formerly under Section 5 preclearance supervision, there has been a pronounced shift to 21<sup>st</sup> century versions of the jelly-bean counting, poll taxes, and literacy tests of the 1910s and 1920s. Voter suppression laws now focused on identification requirements and registration-drive bans, but have expanded to other strategies to disenfranchise black voters. In Louisiana, restricting access to polling places, early voting, and electoral information have all emerged in the 2010s as strategies for those seeking to disenfranchise Black voters.

The hotly contested election of 2016 was seen as the first major test of the new iteration of the VRA. The state legislature had already used the opening provided by *Shelby County* to push voter restrictions tied to concerns about supposed voter fraud. As *The Times Picayune* explained “the federal courts have agreed with increasing frequency that those new laws were improperly based on race.” The changes to the VRA in the wake of *Shelby County* meant that states were no longer under the burden of proving their laws to be nondiscriminatory. Voters were now responsible for proving discrimination under Section 2 of the VRA.<sup>223</sup>

Angie Rogers, the Commissioner of Elections for the state of Louisiana, testified on December 6, 2017, that state “law requires that every precinct is assigned a polling place” but with 3,904 precincts, Louisiana only had 2,068 polling locations or about one polling place for every two precincts. The Louisiana Parish Board of Supervisors had eliminated 103 polling

<sup>222</sup> *Shelby County v. Holder*, 570 U.S. 2 (2013).

<sup>223</sup> Richard Rainey, “As New Voter Restrictions Crash and Burn,” *The New Orleans Time-Picayune*, August 11, 2016.

places since 2012, requiring greater travel which overwhelmingly impacts Black voters. Furthermore, the consistent patterns of subterfuge and intransigence and even willful ignorance were evident in testimony by Kyle Ardoin (then-First Assistant to Secretary of State Tom Schedler) on behalf of Louisiana. Ardoin either intentionally misled or betrayed a total misunderstanding of what authorities could close or move polling locations when he attributed any such changes to local Orleans Parish elected officials. Schedler explained that “information was provided to the Commission that Louisiana’s polling locations were distributed disproportionately using race and/or income as the determining factor.” Indeed, contrary to Ardoin’s testimony that Orleans Parish elected officials voluntarily shut down polling places, “the number of polling locations per 1,000 registered voters in a census tract is negatively related to the number of black residents in that census tract.”<sup>224</sup> Budgetary shortfalls were the proximate explanation of the real dearth of early voting locations and opportunities but widening access to voting, particularly for Black voters, is not only something the state does not prioritize but something the state actively works against.

These priorities can be seen in Louisiana’s ongoing resistance to compliance with the National Voter Registration Act because citizens were not given information about registration when applying for public benefits. “[T]housands and thousands of African American voters were not being provided with access to this information [which is] a barrier to access to voting.”<sup>225</sup>

Testimony before the June 2018 Louisiana Advisory Committee identified several ways in which Louisiana’s voter identification requirements create barriers to voting. First, Carol DeVillie of the League of Women Voters of Lafayette, noted that her organization received a number of complaints that voters were being turned away when they did not present a photo identification and were never offered the affidavit as an alternative method of identification. The disenfranchisement of Black voters is complex, but the authority given to election officials and poll workers has the ultimate effect of reinforcing patterns from the 20<sup>th</sup> century where registrars could deny Black voters for essentially infinite reasons. Even in 2018, testimony established that poll workers continue to believe (to the explicit consequence of disenfranchising Black voters) that contrary to state law they have discretion to deny the vote to people without identification. Voter identification requirements “present unique barriers to certain groups of people” and “dissuades many people, particularly the poor and African Americans, from even attempting to vote.” Low participation rate of voters in poor and African American communities has been strongly tied to the increase and intensity of voter identification requirements.<sup>226</sup>

Finally, an issue facing many states, especially those in the former Confederacy and under Section 5 preclearance, is that of felons. Dr. Joshua Stockley of the University of Louisiana at Monroe testified “that approximately 80% of the parolees/probationers currently ineligible to vote are African American, compared with about 32% of the population of the state.”<sup>227</sup> Indeed, Stockley helped explain how the racial impact of incarceration in the state is so radically disproportionate and had a disenfranchising consequence, influencing even the “concept of proportional representation. If many members of a community are unable to vote,

<sup>224</sup> “Barriers to Voting in Louisiana,” 11, 12.

<sup>225</sup> *Ibid.*, 14.

<sup>226</sup> *Ibid.*, 14.

<sup>227</sup> *Ibid.*, 24.

they are denied the opportunity to be governed by people who might best serve their interests.”<sup>228</sup>

Act 636 was passed in 2018 to address the more-than 40,000 voters disenfranchised because of felony convictions, again overwhelmingly Black voters in Louisiana. Mack Terrance, a formerly incarcerated New Orleanian has spoken extensively on the importance of voting but that state had made registration burdensome and difficult for former felons. Allegations continue to crop up about inappropriate voter purges and state officials “imposing unnecessary and onerous requirements on former incarcerated people attempting to register to vote.”<sup>229</sup>

### ***Louisiana’s Recent History of Discriminatory Voting Changes, 2021-2022***

April of 2021 saw a settlement between the Justice Department and the City of West Monroe over VRA violations. Not entirely surprisingly, West Monroe’s Board of Alderman was resorting to the at-large system proven again and again to disenfranchise Black voters. As the consent decree explained, “Black residents comprise nearly 30% of the electorate” and yet “no Black candidate has ever been elected to the West Monroe Board of Aldermen.” West Monroe agreed in the settlement to “discontinue use of its current at-large method of electing the five members of its Board of Aldermen.”<sup>230</sup>

Most recently, the 2022 case of *Harding v. Edwards* demonstrated the recalcitrance of the state of Louisiana to expand the franchise even in the midst of a worldwide pandemic that fell most acutely on the state’s Black residents. Although *Harding v. Edwards* is a case involving restrictions on absentee voting during the COVID-19 pandemic, the case is highly to the state of Louisiana’s sustained efforts to disenfranchise Black voters. In that case, a federal court found evidence of the undue burdens regularly placed on voters, but particularly those disproportionate burdens facing Black Louisianans, exacerbated by the pandemic. The court in *Harding v. Edwards* provided limited injunctive relief for early voting.<sup>231</sup>

Taken as a whole, the two halves of the history of Louisiana underscore a profound and sustained hostility to the freedoms of Black people. In the pre-suffrage era, most of which involved legalized slavery, controlling Black freedoms was the primary cog in the economy, society, and function of the state. After suffrage, these efforts to restrict Black freedom focused mainly on restricting Black voting. As previous studies of voter disenfranchisement in Louisiana have noted, “any careful study of the experience of minority voters in Louisiana reveals that much of the progress that has been achieved in the state is a direct result of the protections of the VRA generally...the role of the VRA both as a remedy for, and as a deterrent to, voting discrimination is unmistakable.”<sup>232</sup> Since the *Shelby County* ruling in 2013, Louisiana has continued in the path established after 1898, “having one of the most severe, adaptive, and

<sup>228</sup> Ibid., 24.

<sup>229</sup> <https://www.prnewswire.com/news-releases/civil-rights-group-demands-action-by-state-of-louisiana-to-remedy-violations-of-federal-voting-rights-law-301158988.html>.

<sup>230</sup> <https://www.justice.gov/opa/pr/justice-department-reaches-agreement-city-west-monroe-louisiana-under-voting-rights-act-0>.

<sup>231</sup> 487 F. Supp. 3d 498 (M.D. La. 2020).

<sup>232</sup> Adegbile, 472-3.



violent histories of discrimination in voting.”<sup>233</sup> As this report should make clear, that history stretches back even before Black suffrage, when white Louisianans sought to control Black bodies and actions. Because of this deep history and sustained practice of Black disenfranchisement, Louisianans’ efforts to continue in this manner must be recognized and in whatever cases it is possible, stopped.

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<sup>233</sup> Ibid., 472-3.

## **Appendices**

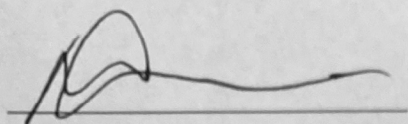
Appendix 1 is my curriculum vita.

Appendix 2 is an excerpt of Louisiana Code from December 21, 1865.

Appendix 3 is a contemporary map of the Black population in the Louisiana Parishes.

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Per 28 U.S. Code 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 14, 2022.

A handwritten signature in black ink, consisting of a large, stylized 'R' followed by a series of loops and a long horizontal stroke, positioned above a solid horizontal line.

R. Blakeslee Gilpin, Ph.D.

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## APPENDIX 1

### **R. Blakeslee Gilpin**

Tulane University - Department of History  
Hebert Hall, Room 207  
New Orleans, LA 70118  
[rgilpin@tulane.edu](mailto:rgilpin@tulane.edu)  
504-654-9376

#### EDUCATION

- Ph.D. in History (with distinction), Yale University, May, 2009
  - *John Brown Still Lives!: America's Long Reckoning with Violence, Equality, and Change*
  - Winner, 2010 C. Vann Woodward Dissertation Prize, Southern Historical Association
  - David W. Blight, Director. Glenda Gilmore and John Mack Faragher, Dissertation Committee.
- M.Phil in History, Yale University, 2005.
- M.Phil in British History, Cambridge University, 2002.
- B.A., M.A. in History (with distinction), *Magna Cum Laude*, Phi Beta Kappa, Yale University, 2001.

#### ACADEMIC POSITIONS

- Director of Graduate Studies, 2017-18, 2020-present; Associate Professor, 2018-present; Assistant Professor, 2013-present, Tulane University.
  - Courses: American Race War; US History and the Law; Stars and Bars; Slavery, Banjos and Moonshine; The Southern Imagination; Memory and History; Civil War and Reconstruction; Utopia-Dystopia.
- Gilder Lehrman Institute of American History, Summer Teacher Institute, "Southern Fictions," 2014.
- Assistant Professor, University of South Carolina, 2011-2013.
  - Courses: Southern Intellectual and Cultural History; Readings in Nineteenth-Century U.S. History; Southern Memory and the Civil War; Civil War and Reconstruction; America to 1877.
- Postdoctoral Fellow, United States Studies Centre, University of Sydney, 2010.
- Postdoctoral Fellow, Center for the Study of the American South, University of North Carolina, 2009.

#### PUBLICATIONS & BOOK PROJECTS

- Editor, with Nicholas Bromell, Frederick Douglass, *My Bondage My Freedom. A Norton Critical Edition* (W.W. Norton, October 2020).
- Editor, with Rose Styron, *The Selected Letters of William Styron* (Random House, 2012).
- 2013 Pulitzer Prize Nominee in Non-Fiction; *The New York Times* Editor's Choice.
- *John Brown Still Lives!: America's Long Reckoning with Violence, Equality, and Change* (University of North Carolina Press, 2011).

- Finalist, 2012 Frederick Douglass Prize, Gilder Lehrman Center, Yale University.

#### ARTICLES & BOOK CHAPTERS

- “The Family Dynasty,” *Gastro Obscura*, August 2019. Finalist for James Beard Award.
- “The Other Side of the World: Battling the Exceptional South,” *Early American Literature*, June 2017.
- “Essential and Pure: Imagining Old-Time North Carolina,” *Scalawag Magazine*, Spring 2015.
- “Reconstruction: Emancipation and Race,” in Smith, ed., *Reconstruction* (Kent State University, 2016).
- “Crimes of a Guilty Land: Racial Terrorism,” in *Routledge History of Terrorism* (Routledge, 2016).
- “Love Letters to Black America: Charles White’s Art for the People,” *Slavery and Abolition*, Sept 2013.
- “John Brown, Religion, and Violent Abolition,” *The Huffington Post*, January 22, 2013.
- “Book Bag: The Best Letter Collections,” *The Daily Beast*, December 18, 2012.
- “William Styron Letters,” *The Paris Review*, December 2012.
- “William Styron to Norman Mailer: Two Letters,” *The New York Review of Books*, October 25, 2012.
- “To the Last Pike,” *The New York Times*, Disunion, March 2, 2012.
- “Birthday of a Nation,” *The New York Times*, Disunion, December 19, 2011.
- “The Battle Hymn of John Brown,” *The New York Times*, Disunion, November 25, 2011.
- “The War Not For Abolition,” *The New York Times*, Disunion, October 20, 2011.
- “Why they sang about John Brown,” *The Boston Globe*, August 14, 2011.
- “*The Afterlife of John Brown*,” *Biography: An Interdisciplinary Quarterly*, Winter, 2007.
- “The Fugitive Imagination: Robert Penn Warren’s *John Brown*,” chapter in *Memory and Myth: The Civil War in Fiction and Film* (Purdue University Press), 2007.
- “Hopping Freights,” *The American Scholar*, July 2003.
- “The Way It Ought To Sound: Mississippi John Hurt and The Blues Of The Mississippi Delta,” *Journal of Mississippi History*, July 2000.

#### BOOK REVIEWS

- Aston Gonzalez, *Visualizing Equality*, *Journal of American History*, December 2021.
- Scott Matthews, *Capturing The South*, *Journal of American History*, December 2019.
- Stephen Lubet, *The “Colored Hero,” American Historical Review*, December 2016.
- Jeff Forret, *Slave Against Slave*, Civil War Book Review, Fall 2016.
- W. Brent Morris, *Oberlin: Hotbed of Abolitionism*, *Journal of American Studies*, Fall 2015.
- C. Friend and L. Glover, eds., *Death and the American South*, *Journal of American History*, Fall 2015.
- Minrose Gwin, *Remembering Medgar Evers*, *Journal of Southern History*, August 2014.
- Gregory Smithers, *Slave Breeding*, *Journal of American History*, December 2013.
- Jonathan Kahrl, *The Land Was Ours*, *Florida Historical Quarterly*, Spring 2013.
- Stephen Lubet, *John Brown’s Spy*, *Civil War History*, Spring 2013.



- Anne Valk and Leslie Brown, eds., *Living With Jim Crow*, *Journal of Southern History*, Spring 2011.
- John McGlone, *John Brown's War Against Slavery*, *Slavery and Abolition*, Winter 2010.
- Bruce Ronda, *Reading the Old Man*, *New England Quarterly*, Summer 2010.
- Elizabeth Varon, *Disunion!*, *Journal of American Studies*, 2009.

#### FELLOWSHIPS & HONORS

- Inaugural Rosenthal Fellow, New Orleans Center for the Gulf South Food Studies Program, 2019-20.
- Lurcy Fellowship, Tulane University, 2016.
- Heyburn Lecturer, Milton Academy, 2014.
- Monroe Fellowship, New Orleans Center for the Gulf South, 2014.
- Finalist, Frederick Douglass Prize, Gilder Lehrman Center, Yale University, 2012.
- C. Vann Woodward Dissertation Prize, Southern Historical Association, 2010.
- Hutchins Lecturer, University of North Carolina - Chapel Hill, 2010.
- Gilder Lehrman Research Fellowship, Gilder Lehrman Center, 2008.
- Beinecke Rare Book Library Research Fellowship, 2007.
- John Hope Franklin Grant, Duke University, 2007.
- Lamar Scholar, Howard R. Lamar Center for the Study of Frontiers and Borders, Yale University, 2007.
- Gilder Lehrman Fellow, Gilder Lehrman Institute of American History, 2006.
- Joan Nordell Fellow, Houghton Library, Harvard University, 2006.
- W.M. Keck Foundation Fellow, Huntington Library, 2006.
- John F. Enders Grant, Yale University, 2006.
- Paul Francis Speaker Series, Yale University, Spring 2005.
- Beinecke Rare Book Library Graduate Pre-Prospectus Fellowship, 2004.
- Graduate Fellow, Calhoun College, Yale University, 2004-2006.
- Paul Mellon Fellow, Clare College, Cambridge, 2001-2003.
- Class of 1955 Fellowship, 2000.
- Alanne Linck Fellowship, 2000.

#### INVITED LECTURES

- "Horace Pippin and John Brown," The Artist's Institute, Hunter College, November 9, 2021.
- "Imagining History and Finding John Brown," Milton Academy, Milton, MA, December 3, 2014.
- "John Brown in Antebellum Life," Peninsula Foundation, Peninsula, OH, September 21, 2013.
- "Letters and Life of William Styron," Martha's Vineyard Book Festival, Chilmark, MA, August 2, 2013.
- "William Styron: Tell About the South," University of North Carolina, February 14, 2013.
- "William Styron: A Discussion," Perkins Library, Duke University, February 13, 2013.
- "William Styron: Life and Letters," Jimmy Carter Presidential Library and Museum, January 14, 2013.

- “Meteor of War: John Brown, Slavery, and the Civil War,” Northwestern University, January 9, 2012.
- “The Chains of Slavery: The Literature of John Brown,” Brown University, April 18, 2011.

#### MEDIA APPEARANCES

- Greater Boston, WGBH, July 6, 2015.
- [\*American Experience: Abolitionists\*](#), PBS, January 2013.
- National Book Tour, *Letters of William Styron*, December 2012-February 2013.
- [\*Walter Edgar’s Journal\*](#), South Carolina Public Radio, April 10, 2012, April 8, 2013, April 12, 2013
- [\*Southern Belle\*](#), 2011.
- “The Letters of William Styron,” *Book World*, ABC Radio National, January 28, 2011.
- “The Long Legacy of American Slavery,” *Saturday Extra*, ABC Radio National, November 27, 2010

#### PRESENTATIONS & CONFERENCE PAPERS, SELECTED

- Organizer and Speaker, “Making History Come Alive,” Organization of American Historians Annual Meeting, April 8, 2017.
- Organizer and Speaker, “Trailblazing Abolition,” Organization of American Historians Annual Meeting, April 8, 2016.
- “From Dissertation to Book: Testimonials from Three Woodward Prize Winners,” Southern Historical Association, November 2, 2012.
- “A Kiss for the Negro’s Child: Painting an Abolitionist Martyr,” University of Melbourne, November, 2010.
- “The Slave Rebel and Black Power: Nat Turner and the 1960s,” University of Sydney, October 2010.
- “John Brown’s Place in American Art: 1860-2010,” Ackland Art Museum, May 5, 2010.
- “John Brown: Old Testament Avenger or Peaceful Patriarch?,” University United Methodist Church, Chapel Hill, NC, May 2, 2010.
- “Legend, Myth, and Jacob Lawrence’s Harlem,” Gallery Talk, Ackland Art Museum, April 14, 2010.
- “The Mad Hero: John Brown Through the Prism of Paint,” Organization of American Historians Annual Meeting, April 10, 2010.
- “The Dogged Pursuit of Destiny: W.E.B. Du Bois and John Brown,” University of North Carolina – Chapel Hill, February 9, 2009.
- Organizer and Speaker, “John Brown, Slavery, and the Legacies of Revolutionary Violence,” Gilder Lehrman Center 11<sup>th</sup> Annual International Conference, October 29-31, 2009.
- “John Brown Remembered: 150th Anniversary of the Raid on Harpers Ferry,” Harpers Ferry
- National Historical Park in Harpers Ferry, West Virginia, October 14-17, 2009.
- “The Fugitive Imagination,” University of North Carolina – Chapel Hill, October 8, 2009.
- “Words and Action: Franklin Sanborn and a John Brown for the Gilded Age,” American Historical Association Annual Meeting, Atlanta, GA, January 6, 2007.
- Panelist, “Race and the Americas,” Gilder-Lehrman Center for the Study of Slavery and Abolition, November 5, 2005.

## APPENDIX 2

AN ORDINANCE relative to the police of negroes recently emancipated within the parish of St. Landry.

Whereas it was formerly made the duty of the police jury to make suitable regulations for the police of slaves within the limits of the parish; and whereas slaves have become emancipated by the action of the ruling powers; and whereas it is necessary for public order, as well as for the comfort and correct deportment of said freedmen, that suitable regulations should be established for their government in their changed condition, the following ordinances are adopted, with the approval of the United States military authorities commanding in said parish, viz:

**SECTION 1.** *Be it ordained by the police jury of the parish of St. Landry,* That no negro shall be allowed to pass within the limits of said parish without a special permit in writing from his employer. Whoever shall violate this provision shall pay a fine of two dollars and fifty cents, or in default thereof shall be forced to work four days on the public road, or suffer corporeal punishment as provided hereinafter.

**SECTION 2.** *Be it further ordained,* That every negro who shall be found absent from the residence of his employer after 10 o'clock at night, without a written permit from his employer, shall pay a fine of five dollars, or in default thereof, shall be compelled to work five days on the public road, or suffer corporeal punishment as hereinafter provided.

**SECTION 3.** *Be it further ordained,* That no negro shall be permitted to rent or keep a house within said parish. Any negro violating this provision shall be immediately ejected and compelled to find an employer; and any person who shall rent, or give the use of any house to any negro, in violation of this section, shall pay a fine of five dollars for each offence.

**SECTION 4.** *Be it further ordained,* That every negro is required to be in the regular service of some white person, or former owner, who shall be held responsible for the conduct of said negro. But said employer or former owner may permit said negro to hire his own

time by special permission in writing, which permission shall not extend over seven days at any one time. Any negro violating the provisions of this section shall be fined five dollars for each offence, or in default of the payment thereof shall be forced to work five days on the public road, or suffer corporeal punishment as hereinafter provided.

**SECTION 5.** *Be it further ordained,* That no public meetings or congregations of negroes shall be allowed within said parish after sunset; but such public meetings and congregations may be held between the hours of sunrise and sunset, by the special permission in writing of the captain of patrol, within whose beat such meetings shall take place. This prohibition, however, is not intended to prevent negroes from attending the usual church services, conducted by white ministers and priests. Every negro violating the provisions of this section shall pay a fine of five dollars, or in default thereof shall be compelled to work five days on the public road, or suffer corporeal punishment as hereinafter provided.

**SECTION 6.** *Be it further ordained,* That no negro shall be permitted to preach, exhort, or otherwise declaim to congregations of colored people, without a special permission in writing from the president of the police jury. Any negro violating the provisions of this section shall pay a fine of ten dollars, or in default thereof shall be forced to work ten days on the public road, or suffer corporeal punishment as hereinafter provided.

**SECTION 7.** *Be it further ordained,* That no negro who is not in the military service shall be allowed to carry fire-arms, or any kind of weapons, within the parish, without the special written permission of his employers, approved and indorsed by the nearest or most convenient chief of patrol. Any one violating the provisions of this section shall forfeit his weapons and pay a fine of five dollars, or in default of the payment of said fine, shall be forced to work five days on the public road, or suffer corporeal punishment as hereinafter provided.

**SECTION 8.** *Be it further ordained,* That no negro shall sell, barter, or exchange any articles of merchandise or traffic within said parish without the special written permission of his employer, specifying the articles of sale, barter or traffic. Any one thus offending shall pay a fine of one dollar for each offence, and suffer the forfeiture of said articles, or in default of the payment of said fine shall work one day on the public road, or suffer corporeal punishment as hereinafter provided.

**SECTION 9.** *Be it further ordained,* That any negro found drunk within the said parish shall pay a fine of five dollars, or in default thereof shall work five days on the public road, or suffer corporeal punishment as hereinafter provided.

**SECTION 10.** *Be it further ordained,* That all the foregoing provisions shall apply to negroes of both sexes.

**SECTION 11.** *Be it further ordained,* That it shall be the duty of every citizen to act as a police officer for the detection of offences and the apprehension of offenders, who shall be immediately handed over to the proper captain or chief of patrol.

**SECTION 12.** *Be it further ordained,* That the aforesaid penalties shall be summarily enforced, and that it shall be the duty of the captains and chiefs of patrol to see that the aforesaid ordinances are promptly executed.

**SECTION 13.** *Be it further ordained,* That all sums collected from the aforesaid fines shall be immediately handed over to the parish treasurer.

**SECTION 14.** *Be it further ordained,* That the corporeal punishment provided for in the foregoing sections shall consist in confining the body of the offender within a barrel placed over his or her shoulders, in the manner practiced in the army, such confinement not to continue longer than twelve hours, and for such time within the aforesaid limit as shall be fixed by the captain or chief of patrol who inflicts the penalty.

**SECTION 15.** *Be it further ordained,* That these ordinances shall not interfere with any municipal or military regulations inconsistent with them within the limits of said parish.

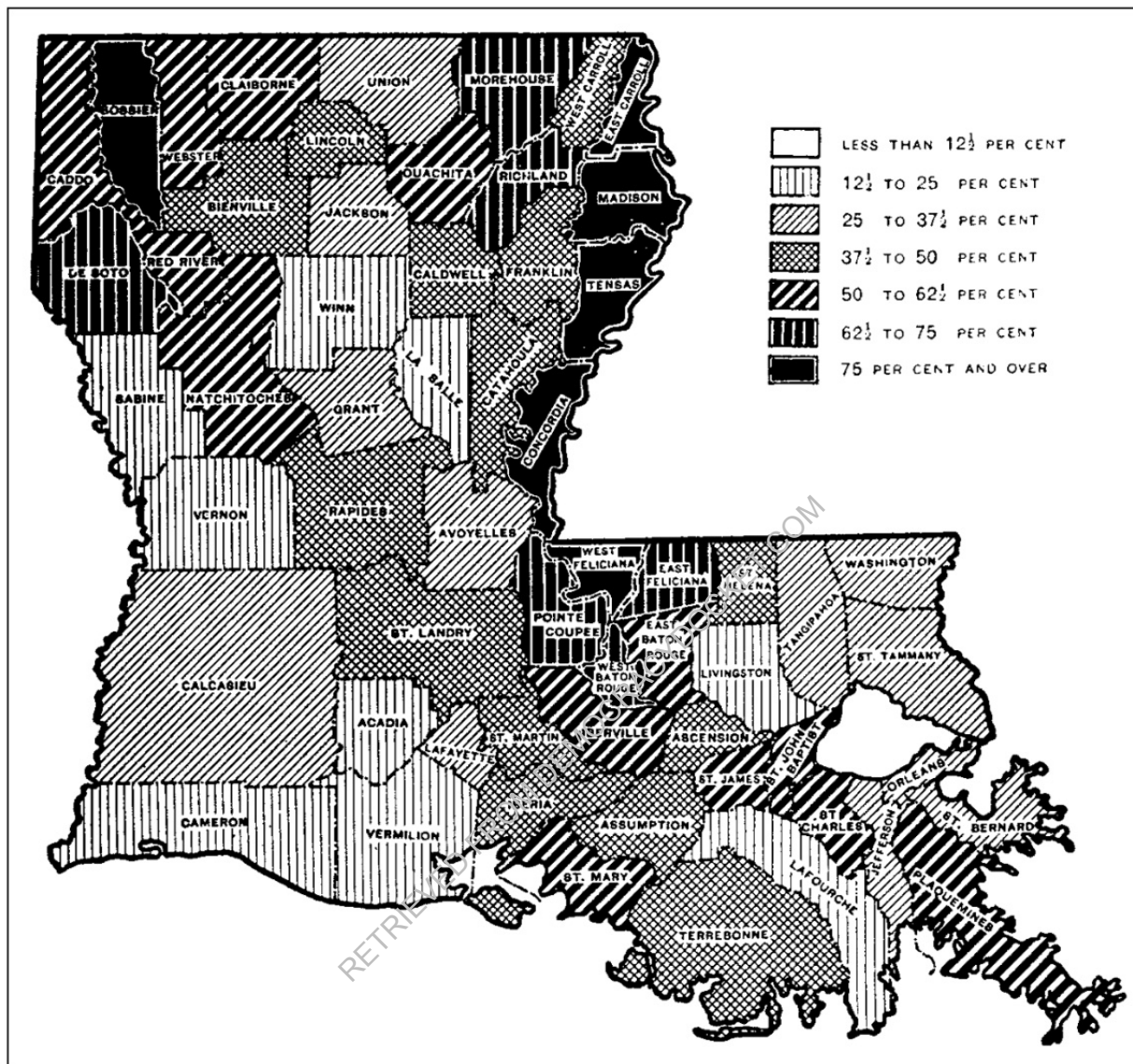
**SECTION 16.** *Be it further ordained,* That these ordinances shall take effect five days after their publication in the Opelousas Courier.

Official copy:

J. LOVELL,  
Captain and Assistant Adjutant General.



### APPENDIX 3



Map 5. Percentage of African Americans in Total Population of Louisiana, by Parishes, 1910

# Exhibit 4

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**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.*

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

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-00214-SDD-RLB

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### Qualifications and Background

My name is Dr. Traci Burch. I am Associate Professor of Political Science at Northwestern University and Research Professor at the American Bar Foundation. I received my Ph.D. in Government and Social Policy from Harvard University in 2007.

Over the past 15 years, I have led several large, long-term quantitative and qualitative research projects on political participation in the United States. I have participated in and coauthored several book chapters and articles that examine race, political participation, and inequality. For instance, I have worked with Professors Kay Schlozman, Sidney Verba, and Henry Brady on book chapters and articles related to the causes and consequences of inequality in political participation. I also collected data on congressional hearings and interest group activities for that book. For my coauthored article with Jennifer Hochschild and our book with Vesla Weaver, I analyzed the legislative history of several racial policies, including the 1965 Hart-Cellar Act. We also explore political participation and attitudes in our book *Creating a New Racial Order*.

I am widely regarded as an expert on political behavior, barriers to voting, and political participation. My work has been widely cited and replicated and has won several awards. My dissertation on the effects of felony disenfranchisement on voting in North Carolina, Georgia, and other states, "Punishment and Participation: How Criminal Convictions Threaten American Democracy" won the Robert Noxon Toppan Prize for the Best Dissertation on a Subject of Political Science at Harvard in 2007. I also achieved national recognition for this work; the dissertation was awarded the E.E. Schattschneider Award from the American Political Science Association for the best dissertation in American Government, and the William Anderson Award for the best dissertation in federalism, intergovernmental relations, and state and local politics. Several articles from this dissertation, including work evaluating voting patterns among people with felony convictions in North Carolina, Georgia, Florida, Missouri, and Michigan, have been published in leading peer-reviewed journals. In particular, my articles "Did Disfranchisement Laws Help Elect President Bush? New Evidence on the Turnout and Party Registration of Florida's Ex-Felons" and "Turnout and Party Registration among Criminal Offenders in the 2008 General Election," which appeared in the peer-reviewed journals *Law and Society Review* and *Political Behavior*, respectively, included my calculations of felony disenfranchisement.

My academic book on the community-level effects of criminal convictions on political participation, *Trading Democracy for Justice*, was published by the University of Chicago Press and also won multiple national awards from the American Political Science Association and its sections, including the Ralph J. Bunche Award for the best scholarly work that explores the phenomenon of ethnic and cultural pluralism and best book awards from the law and politics and urban politics sections. *Trading Democracy for Justice*, as well as the articles "The Effects of Imprisonment and Community Supervision on Political Participation," "Did Disenfranchisement Laws Help Elect President Bush?," "Skin Color and the Criminal Justice System," and "Turnout and Party Registration among Criminal Offenders in the 2008 General Election" rely on the analysis of data from Georgia. My most recent articles measure the effects of officer-involved killings on political interest, voter turnout, and protest among community members.

I have had the opportunity to engage in important professional service. Currently, I am a member of the Executive Council of the Elections, Public Opinion, and Voting Behavior Section of the American Political Science Association. I also serve on the Scientific Advisory Board for the General Social Survey, a longstanding national public opinion survey run by the National Opinion Research Center at the University of Chicago. I have served on the editorial boards of leading journals including *Political Behavior* and *Law and Social Inquiry*. I routinely review the work of my peers for tenure, scholarly journals, university presses, and grants and have served as a reviewer for the *American Political Science Review*, *The American Journal of Political Science*, *The Journal of Politics*, *Political Behavior*, the National Science Foundation, Cambridge University Press, Princeton University Press, the University of Chicago Press, Oxford University Press, and many other entities. I have received several grants for my work, including a grant from the Stanford University Center on Poverty and Inequality. I also serve as co-Principal Investigator on a National Science Foundation grant that supports graduate and postdoctoral fellowships at the American Bar Foundation.

My curriculum vitae is provided in the Appendix. I am being compensated \$300 per hour for work in this case, plus expenses. My compensation is not contingent on the analysis and opinions offered or on the outcome of this litigation. This is my seventh engagement as an expert witness. I previously testified at trial and in a deposition in a case in federal district court in Florida, (*Jones v. DeSantis*, Consolidated Case No. 4:19-cv-300), at trial and in a deposition in a case in Wake County Superior Court in North Carolina (*Community Success Initiative, et al. v. Moore*, No. 19-CVS-15941), at trial and in a deposition in federal district court in Alabama (*People First of Alabama, v. Merrill*, No. 2:20-cv-00619-AKK), and at trial and in a deposition in federal district court in Florida (*Florida State Conference of the NAACP v. Lee*, No. 4:21-cv-00187-MW-MAF). The trial courts relied on my expert testimony and I was cited in the courts' opinions in *Jones v. DeSantis*, *People First of Alabama v. Merrill*, *Florida State Conference of the NAACP v. Lee*, and in *Community Success Initiative v. Moore*. Recently, I was deposed in a case in a consolidated case in federal district court in the Western District of Wisconsin (*One Wisconsin Institute Inc. v. Jacobs* and, No. 15-CV-324-JDP and *Luft v. Evers*, No. 20-CV-768-JDP). I also have testified before the U.S. Commission on Civil Rights about the collateral consequences of felony convictions with respect to voting and other issues.

### Scope of the Report

For this case, I was asked by the attorneys for the plaintiffs to examine the Louisiana Legislature's passage of HB1 and SB5 with respect to information relevant for evaluating the totality of the circumstances as it relates to Section 2 of the Voting Rights Act, which I understand to refer to discrimination or practices in the social, political, and economic environment that might make it harder for minority groups to cast ballots. I was asked to discuss information pertaining to Senate Factor 5, or "the extent to which minority group members bear the effects of discrimination in areas such as education, employment, and health, which hinder their ability to participate effectively in the political process," particularly with respect to Black Louisianans. I also was asked to discuss information that would be relevant for evaluating Senate Factor 6, or "the use of overt or subtle racial appeals in political campaigns;" Senate Factor 7, or "the extent to which members of the minority group have been elected to public office in the jurisdiction;" Senate Factor 8, or "whether there is a lack of responsiveness on the



part of elected officials to the particularized needs of minority group members;” and Senate Factor 9, or whether the policy underlying the challenged standard or practice is tenuous.

In formulating my opinions, I relied on my analysis of standard sources for political scientists such as the reviews of scholarly literature and the analysis of demographic data, census data, historical records, government reports and data, and public opinion surveys where noted.

### Summary of Opinions

Based on my analyses and review of the scholarly literature, I offer the following opinions:

1. Senate Factor 5: There are large gaps in educational attainment, unemployment, and other socioeconomic indicators between Black and White Louisianans. Research shows that these disparities are the result of contemporary and historical discrimination by government and market institutions and actors. Educational attainment and other socioeconomic indicators are important predictors of voting behavior.
2. Senate Factor 5: Several cities in Louisiana are marked by racial residential segregation, which has been shown to affect voting. These patterns of residential segregation are the result of contemporary and historical racial discrimination by government and market actors.
3. Senate Factor 5: Health outcomes vary by race in Louisiana; health is also an important predictor of voter turnout. Health disparities in Louisiana are shaped by government and market policies that affect the sites of environmental hazards as well as access to health care.
4. Senate Factor 5: Criminal justice involvement also affects voting, and criminal justice outcomes vary by race in Louisiana. Black people are overrepresented in Louisiana’s correctional populations. Research has shown that racial discrimination played a role in racial disparities in criminal justice in Louisiana in the past and continues to do so today. Patterns of criminal justice outcomes cannot be explained fully by the differential commission of crimes by race.
5. Senate Factor 6: Political campaigns in Louisiana have historically been and remain marked by implicit and explicit racial appeals.
6. Senate Factor 7: Black people are one third of Louisiana’s overall population, yet are underrepresented among elected officials at all levels of government, including among executives (such as Governor, Lieutenant Governor, and Mayors), federal and state legislators, and judges.
7. Senate Factor 8: Policy outcomes, such as with respect to infrastructure, do not track the specific needs of the minority community in several ways. Moreover, Black Louisianans often express the belief that they are not valued equally by elected representatives in both public comments and surveys.



8. Senate Factor 9: Although supporters of SB5 and HB1 offered several justifications for passing SB5 and HB1, including respect for traditional redistricting principles such as minimizing deviations from the ideal district population, compactness, keeping precincts and parishes whole, keeping traditional district boundaries, and maintaining communities of interest, the Legislature ultimately elected not to pass legislation proposing maps with two majority-minority districts that more closely conformed to these traditional redistricting principles than SB5 and HB1.
9. Senate Factor 9: Sponsors of SB5 and HB1 provided no evidence that they tried to draw an additional majority-minority district, nor did they provide evidence that adding a second majority-minority district would fail to allow Black Louisianans an opportunity to elect a candidate of their choice.

#### Senate Factor 5: Historical Discrimination in Education, Employment, Health, and Other Areas

##### *Education and Political Participation in Louisiana*

Educational attainment is one of the most fundamental explanatory variables with respect to political participation (Almond and Verba 1963, Brady, Verba, and Schlozman 1995, Burden 2009, Campbell et al. 1980, Verba, Schlozman, and Brady 1995). Voters with higher educational attainment are more likely to vote. Verba, Schlozman, and Brady argue that the relationship between socioeconomic status and voting exists because people with greater income and education also tend to have more of the resources such as time, money, and civic skills that affect the calculus of participation (1995: 282). Education makes it easier for individuals to navigate the costs of voting such as acquiring information about the candidates and issues or learning how to register and vote (Verba, Schlozman, and Brady 1995).

Black Louisianans have faced educational discrimination throughout Louisiana's history. Although the U. S. Supreme Court ruled segregation in public schools unconstitutional in *Brown v. Board of Education* in 1954, and Congress outlawed segregation in public accommodations in the Civil Rights Act of 1964, Louisiana's state and local governments continued to enforce and support segregation in educational institutions well into the 1970s. Despite the court's ruling in *Brown*, the education provided by the state to Black and White students remained separate and unequal. In 1959, the average district in Louisiana spent only 72 cents on Black instruction for every dollar spent on White students (Reber 2011: 406). By May of 1961, the Southern Educational Reporting Service found that only .0004% of Louisiana Black students attended school with White students (1961). Even as late as 1968, Reber writes, "11 of 64 counties [*sic*] in Louisiana still were completely segregated, but the average black was still in a school that was about 8 percent white, while whites comprised over 60 percent of enrollment" (Reber 2004: 5). In 1961, only five of 13 publicly supported colleges and universities in Louisiana enrolled both Black and White students, and even this limited integration occurred only as a result of a court order (1961).

The lack of progress on desegregating public schools was due to Louisiana's state and local governments' policies of consistent resistance. Federal courts issued orders to desegregate the schools in Orleans Parish in 1956 (Douglas and Center 2005), but the Louisiana legislature adopted several laws in special sessions that were designed to maintain segregated schools

(1961, Douglas and Center 2005). According to the district court ruling in *Bush v. Orleans Parish School District* (1960), the Legislature:

promptly enacted 25 measures designed to halt, or at least forestall, the implementation of the Orleans Parish School Board's announced proposal to admit five Negro girls of first grade age to formerly all-white schools. The first of these, Act 2 of the First Extraordinary Session of 1960, LSA-R.S. 49:801 et seq., is the so-called "interposition" statute by which Louisiana declares that it will not recognize the Supreme Court's decision in *Brown v. Board of Education*, supra, or the orders of this court issued pursuant to the mandate of that case."

The Louisiana Legislature attempted to abolish the Orleans Parish School Board and passed Act 555, which required separate schools for Black and White children (1961). However, with federal intervention, the first seven Black students integrated New Orleans public schools in November, 1960 (1961). Ultimately, the story of one of those children, Ruby Bridges, inspired the Normal Rockwell painting, *The Problem We All Live With* (Douglas and Center 2005: 1)

Although integration and funding equalization accelerated throughout the late 1960s and early 1970s due to the continued oversight of federal courts (Douglas and Center 2005, Reber 2004, 2011), the State of Louisiana continued to support school segregation. In 1975, federal courts prevented the state from continuing its practice of providing "substantial state assistance to racially segregated private schools" such as "furnishing school textbooks, school supplies and educational materials, library books, and by providing school bus transportation to students attending private, racially segregated schools which serve as a haven to those leaving racially integrated public schools" *Brumfield v. Dodd*, 405 F. Supp. 338 (E.D. La. 1975).

This long history of persistent racial discrimination in education affects outcomes in educational attainment for Louisianans to this day. Although there have been gains in educational attainment in Louisiana over time, racial gaps persist. Figure 1 shows data from the 2019 1-Year Estimates from the American Community Survey on the percentage of Louisianans over the age of 25 who have earned a bachelor's degree or higher, by race. The data show that White and Asian Louisiana adults are far more likely than Black and Latino adults to have earned a bachelor's or postgraduate degree. Louisiana's history of educational segregation contributes to these disparities, because the youngest school-age children in the 1970s are only in their mid-50s today; in Louisiana, people age 55 and older make up 41.6 percent of registered voters (2022h). Put another way: 41.6 percent of Louisiana voters were school age when Louisiana's state and local governments still funded segregated and unequal schools by law.<sup>1</sup> As of the date of this report, Ruby Bridges, one of the young students who integrated New Orleans public schools, is only 67 years old.<sup>2</sup>

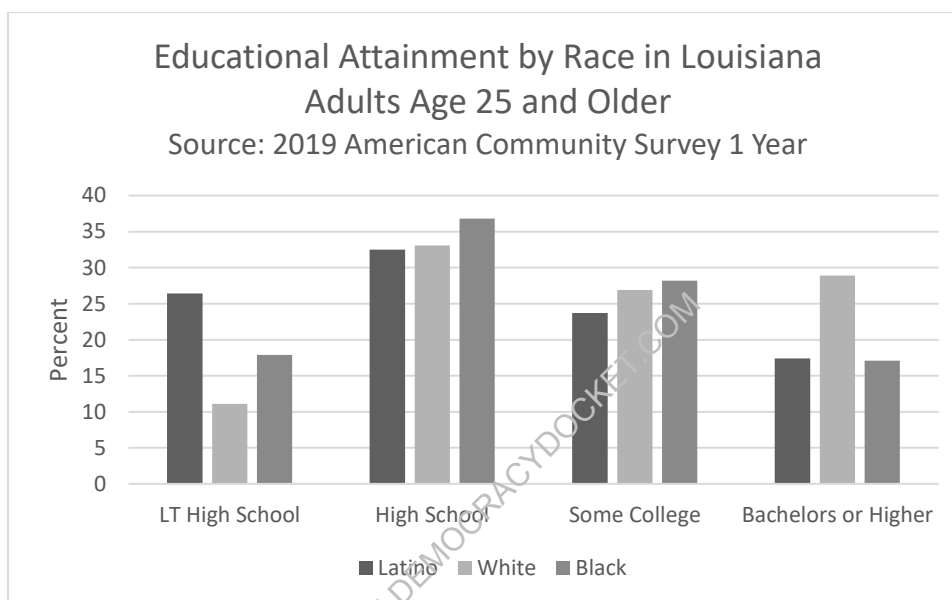
Differences in educational attainment can explain some of the racial gap in voter turnout in Louisiana. Based on my calculations of data from the 2020 Current Population Survey Voting and Registration Supplement, 64% of White Louisianans said that they voted in the 2020 general

<sup>1</sup> For reference, 77.6 percent of Louisiana residents were born in Louisiana (2020b).

<sup>2</sup> People age 65 and older make up 23.9 percent of Louisiana's registered voters (2022h).

election, compared with 58% of Black Louisianans.<sup>3</sup> However, as Table 1 shows, voter turnout among Louisianans increases with educational attainment across racial groups. Within educational levels, Black voting may reach parity or, in the case of people without high school diplomas, outperform White voting. But as Figure 1 shows, Black Louisianans have lower educational attainment overall due to the factors discussed here, which results in lower voter turnout overall compared with White Louisianans.

*Figure 1: Educational Attainment by Race among Louisiana Adults Age 25 and Older*



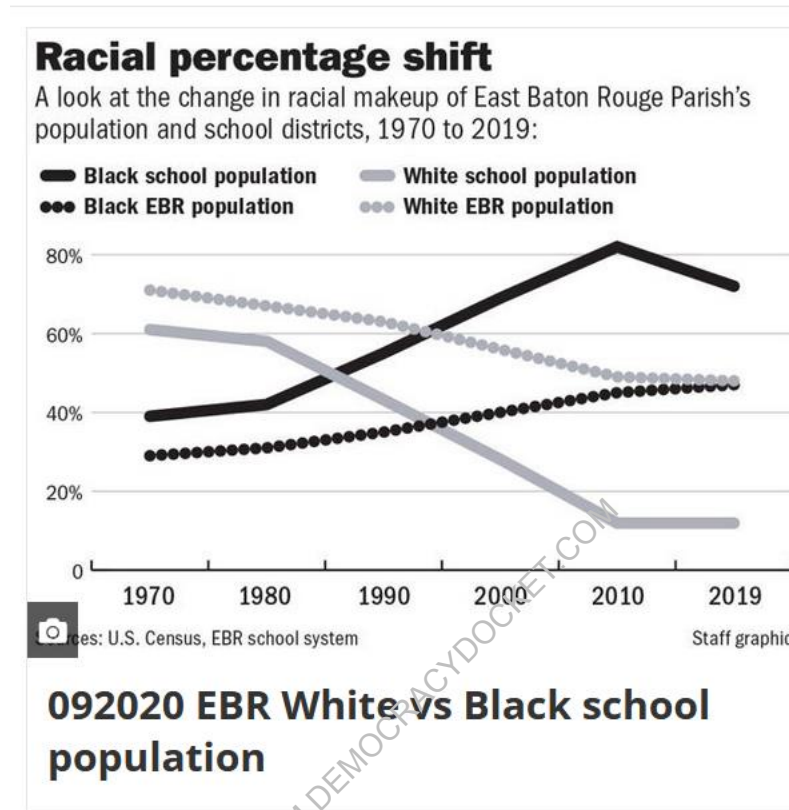
<sup>3</sup> These figures may differ from those calculated using other methods, such as the census voting age population, for several reasons: First, I calculated these figures for non-Hispanic Black alone and White alone citizens aged 18 and older (McDonald and Popkin 2001). Moreover, because the CPS is a household survey, it excludes people in group quarters, which may inflate turnout, especially when certain racial groups are more likely to be in group quarters populations such as prisons (Pettit 2012). Finally, people in surveys sometimes overreport voting (Silver, Anderson, and Abramson 1986).

*Table 1: 2020 Voter Turnout by Educational Attainment and Race among Louisianans. Source 2020 Current Population Survey Voting and Registration Supplement. Cells contain estimated number who voted, with turnout rate in parentheses.*

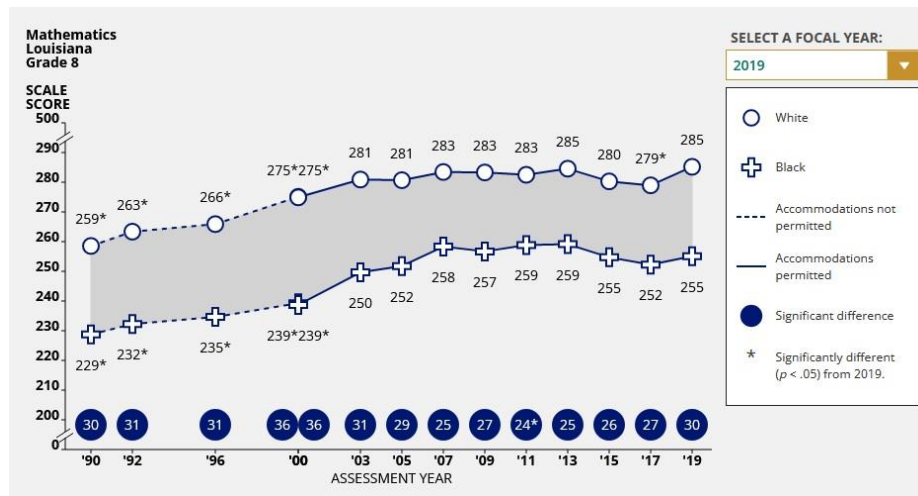
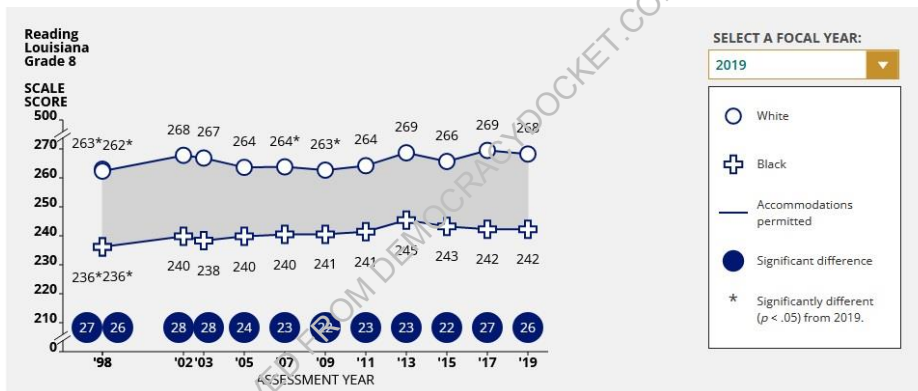
<b>Educational Level</b>	<b>White Turnout</b>	<b>Black Turnout</b>
No High School Diploma	52,269 (30%)	71,105 (46%)
High School Diploma	432,887 (61%)	258,376 (56%)
Some College or Associates Degree	374,984 (67%)	162,680 (60%)
Bachelor's Degree	293,618 (74%)	62,456 (76%)
Graduate School	152,234 (86%)	39,603 (70%)

Moreover, school segregation and educational inequality still are the reality for current Louisiana students today. School segregation has been shown to detrimentally affect the academic performance of minority students: Black and Latino students who grew up under conditions of segregation were less academically prepared for college and had been exposed to more violence and social disorder than those coming from “majority-dominant settings.” (Massey and Fischer 2006). According to ProPublica’s *Miseducation* project, as recent as 2017, 50 percent of traditional school districts for which data were available demonstrated high levels of racial segregation within the district (2017). Nine of the 68 traditional school districts in Louisiana were more than 87% non-White (2021c). Partly, this persistent educational racial segregation is the result of racial residential segregation and of White parents opting out of integrated schools, and out of public schools in general (Reber 2011). For instance, as Figure 2 shows, White people are about half of the population in East Baton Rouge Parish, but only 11 percent of that district’s students (Lussier 2020). Secession movements driven by flight from East Baton Rouge schools (2022a) have further contributed to the high concentration of minority students in that district (Harris 2019).

Figure 2: *Racial Makeup of East Baton Rouge Parish's Population and School Districts.* (Lussier 2020)



Educational outcomes vary among current students by race. As shown in Figures 3 and 4, among current students, there is a gap in scores on assessment tests in Louisiana; for example, Black eighth graders score 30 points lower in Math (on average) and 26 points lower in Reading (on average) than White eighth graders (2019b). In the 2017-2018 school year (the latest data available from the federal government), Black students were 43.5 percent and White students were 44.7 percent of Louisiana public school students (2019b). However, that year, Black students were only 22.9 percent of students in gifted and talented programs and 35.5 percent of students taking Advanced Placement courses (2018). Two out of every three students who had received one or more out of school suspensions that year were Black, while 26.5 percent of students who had received a suspension were White (2018). School suspensions have been shown to increase subsequent arrests and other anti-social behavior in youth (Mowen and Brent 2016, Hemphill et al. 2006).

Figure 3: Scores on 8<sup>th</sup> Grade Math Assessments in Louisiana, by Race (2019b)Figure 4: Scores on 8<sup>th</sup> Grade Reading Assessments in Louisiana, by Race (2019b)

### Employment, Socioeconomic Status, and Voting in Louisiana

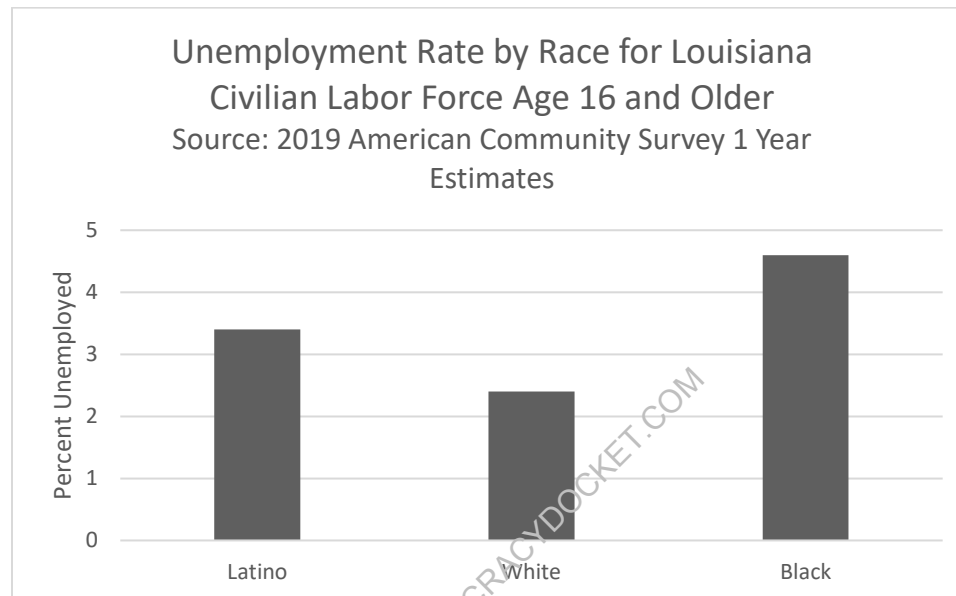
Employment also may affect voter turnout through several pathways. First, white collar occupations may provide employees with a greater opportunity to develop civic skills that can be useful in navigating electoral bureaucracies (Almond and Verba 1963, Verba, Schlozman, and Brady 1995). Second, salaried workers may have greater freedom to take time off work without risking their pay. Finally, Rosenstone and Hansen argue that work is an important site for recruitment into politics, which also increases voter turnout (Rosenstone and Hansen 1993).

As depicted in Figure 5, data from the 2019 American Community Survey show there are racial gaps in unemployment, with Black Louisianans nearly twice as likely to be unemployed than White Louisianans. There is evidence that people of color in Louisiana face racial discrimination in employment. In 2021, 74 percent of Black respondents to the Louisiana Survey agreed that “. . . Black people are treated less fairly than White people . . . in hiring, pay, and promotions at work” (2021a). Research supports these claims: audit studies, which hold constant potentially confounding factors in order to isolate the causal effect of race, have consistently found that employers discriminate against racial minorities in hiring (Bertrand and Mullainathan 2004, Pager and Quillian 2005, Quillian et al. 2017). This racial discrimination is



magnified when job applicants have a criminal background (Pager and Quillian 2005). Data on discrimination filings with the Equal Employment Opportunity Commission show that 8,698 charges of race- or color-based employment discrimination were filed in Louisiana between 2011 and 2021 (2022f).

*Figure 5: Unemployment by Race in Louisiana for Civilian Labor Force Age 16 and Older*



There are persistent racial gaps in income and poverty among Louisianans as well. The American Community Survey shows that racial gaps in poverty rates, shown in Figure 6, also are large and persist over time: the Black and Latino poverty rates are more than 2.8 times as high as the White poverty rate in Louisiana. The median income for Black Louisiana households is about \$29,000 less than that of White Louisiana households (Figure 7). More than three times as many Black households lack access to a vehicle than White households (Figure 8).

Educational discrimination (Long 2010), as well as discrimination in access to capital, can produce such economic disparities. According to JP Morgan Chase, Black Louisianans are underrepresented among small business owners relative to Whites (Farrell, Wheat, and Mac 2020). Black Louisianans also face more difficulty in securing relief to rebuild homes and businesses after natural disasters such as hurricanes (Fussell, Sastry, and VanLandingham 2010). Among Black respondents to the Louisiana Survey, 72 percent believe that Black people are treated less fairly when applying for a loan or mortgage (2021a).

Figure 6: Median Household Income in Louisiana by Race

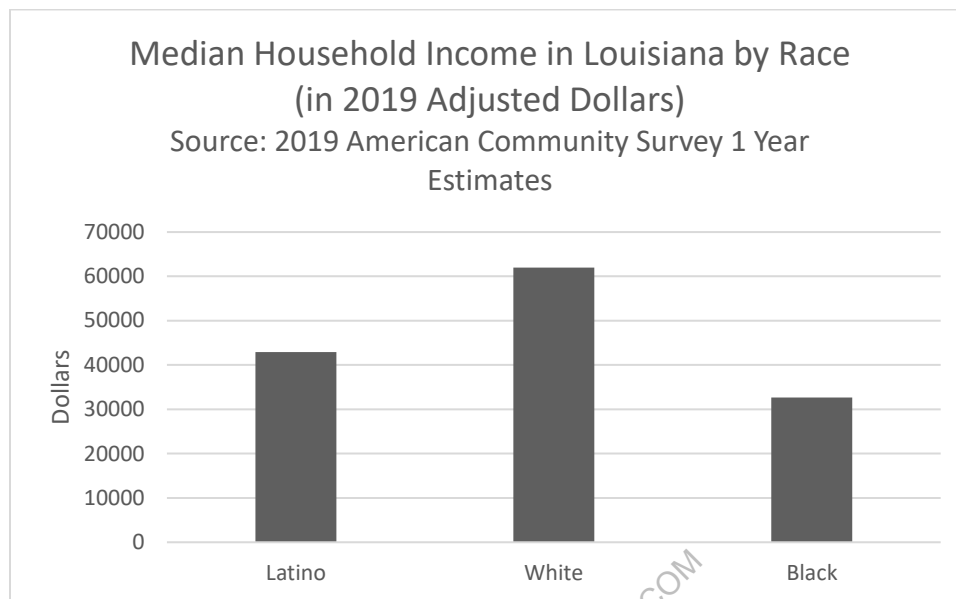


Figure 7: Family Poverty in Louisiana, by Race.

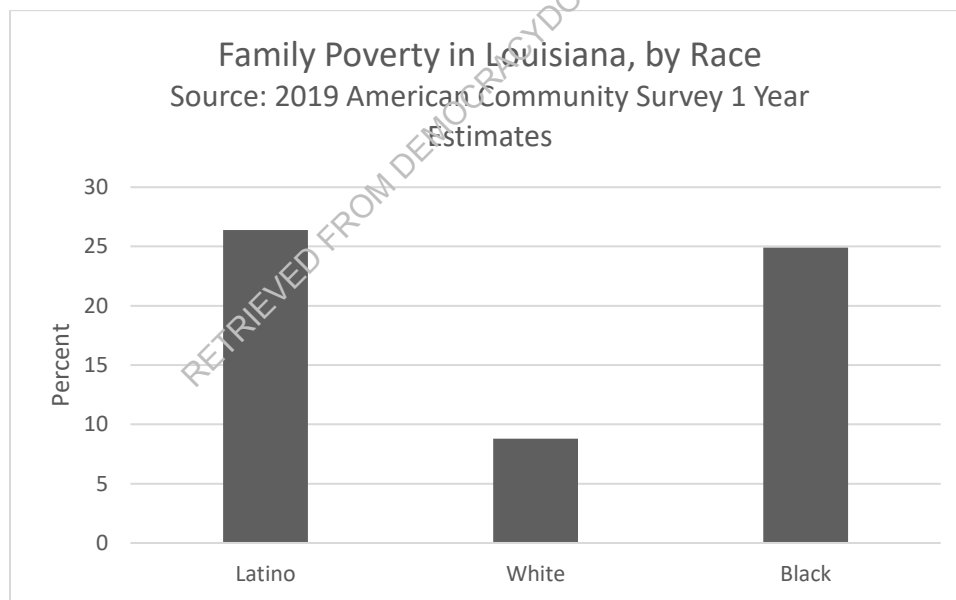
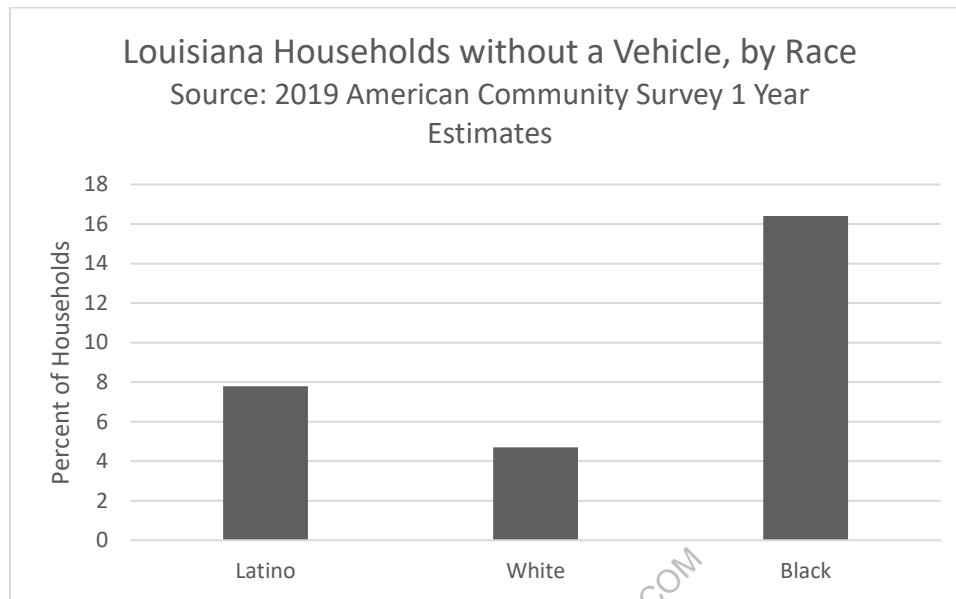




Figure 8: Louisiana Households without Access to a Vehicle, by Race.



In sum, education, employment, and other elements of socioeconomic status are leading predictors of voting. From this discussion, it is clear that Black Louisianans are at a disadvantage relative to White Louisianans along many of the socioeconomic indicators that have been shown to affect voting. These contemporary disparities are the result of historical and present-day discrimination by government policies and market actors.

#### *Racial Residential Segregation and Voting in Louisiana*

Neighborhood context matters for political mobilization and political outcomes (Burbank 1997, Burch 2013, Cohen and Dawson 1993, Huckfeldt, Plutzer, and Sprague 1993, Huckfeldt 1979, Tam Cho and Rudolph 2008). In particular, racial residential segregation has been shown to decrease Black voter turnout. Researchers argue that segregated Black areas have less access to public goods, such as polling places or transportation, that might matter for voting (Zingher and Moore 2019). Racial residential segregation also affects politics indirectly because it is an important determinant of economic and health outcomes. Racial residential segregation increases Black poverty rates, lowers Black educational attainment, and increases income inequality between Black and White residents (Ananat 2011). Research attributes these effects to isolation from quality schools and jobs (Kruse 2013, Massey and Fischer 2006, Wilson 1996). Racial residential segregation also contributes to the test score gap between Black and White students (Reardon, Kalogrides, and Shores 2019), to inequalities in the provision of public goods, to lower public goods expenditures (Trounstein 2016), and to worse health outcomes and greater exposure to environmental toxins (Ard 2016, Kramer and Hogue 2009).

Like many southern states, Louisiana operated under a strict regime of *de jure* racial segregation that affected nearly all aspects of public life and even intimate relationships for much of the 20<sup>th</sup> century. Residential patterns in Louisiana also were affected by local laws and policies that facilitated White suburbanization and Black segregation, such as segregation in public housing (Spain 1979). Federal housing policy also was a major driver of racial residential segregation in many cities. The Federal Housing Administration (FHA) was created in 1934 in

order to “insure lenders against any loss on loans made for purchasing homes” (Kimble 2007: 402). The FHA, in this role, “could dictate the range of acceptable, insurable terms and conditions of home lending” (Kimble 2007: 403). Race was the most important criterion that the FHA used to evaluate “the trajectory of a city and its neighborhoods” (Kimble 2007: 403). Black and racially mixed areas were deemed hazardous for lending; the FHA “instructed financial institutions not to lend to households in integrated or predominantly African American areas” (Kimble 2007: 405). The FHA also encouraged the use of racially restrictive covenants and racial zoning to uphold racial residential segregation (Kimble 2007). The FHA did not officially abandon this policy until 1949 (Kimble 2007).

In order to prevent lending to places where Black people lived, the FHA relied on Residential Security Maps that were produced by the Home Owners Loan Corporation (“HOLC”) (2021h). These maps “color-coded neighborhoods using racial composition as a primary indicator of their acceptability as candidates for mortgage investment” (Kimble 2007: 405). The maps assigned grades to neighborhoods based on racial composition, “with “A” being most desirable and a “D” grade ensuring rejection” (Kimble 2007: 405). For example, the HOLC maps for New Orleans and Shreveport are shown in Figures 9 and 10, respectively. In the maps, hazardous areas are shown in red. In the New Orleans map, flooding and elevation may have played a role in the neighborhood grades. However, the HOLC descriptions of the red zone areas contain several references to race as well: part of Area 34 is described as “composed of 2 story singles and doubles, some camel backs, some negro tenements, a conglomeration of everything. It is the largest area of concentrated negro population in the City;” Area 3 is described as “[a]n area predominantly of cheaply constructed cottages occupied by Negroes. Large Negro school in area;” Area 35 is described as “composed of 2 story doubles, negro row houses, raised singles. This area includes what is often referred to as the “Irish Channel” and it is one of the toughest sections in the entire City. It has a mixed population, some blocks are mixed white and colored, some solid white, some solid colored, and properties are in a varying condition, fair, bad and indifferent. It is a regular conglomeration of the worst features found in the city” (2021h). In Shreveport, all the areas graded A or B were 100 percent White, while all the areas marked D had some proportion of Black residents (2021h).



Figure 9: Homeowners Loan Corporation Underwriting Map for New Orleans.

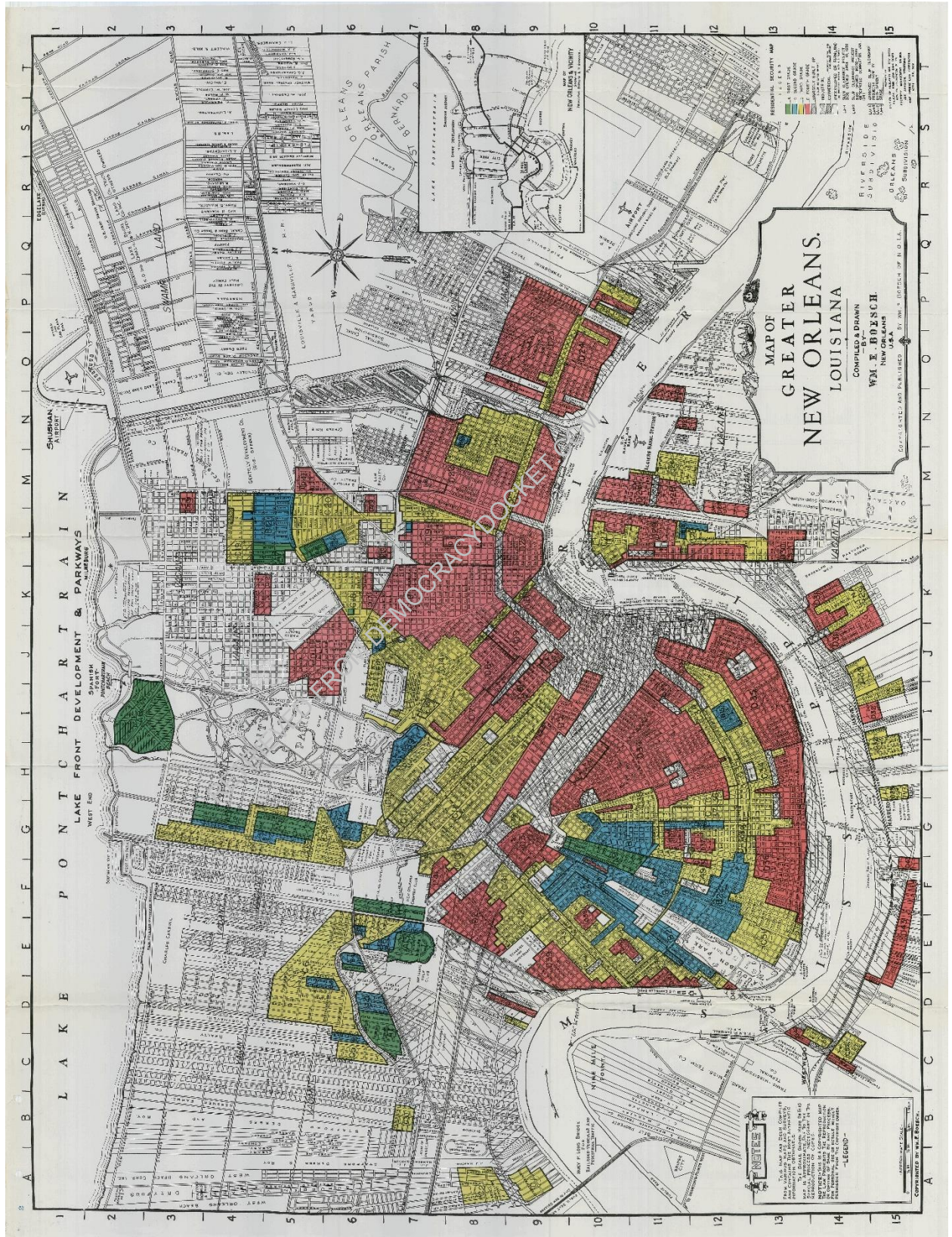
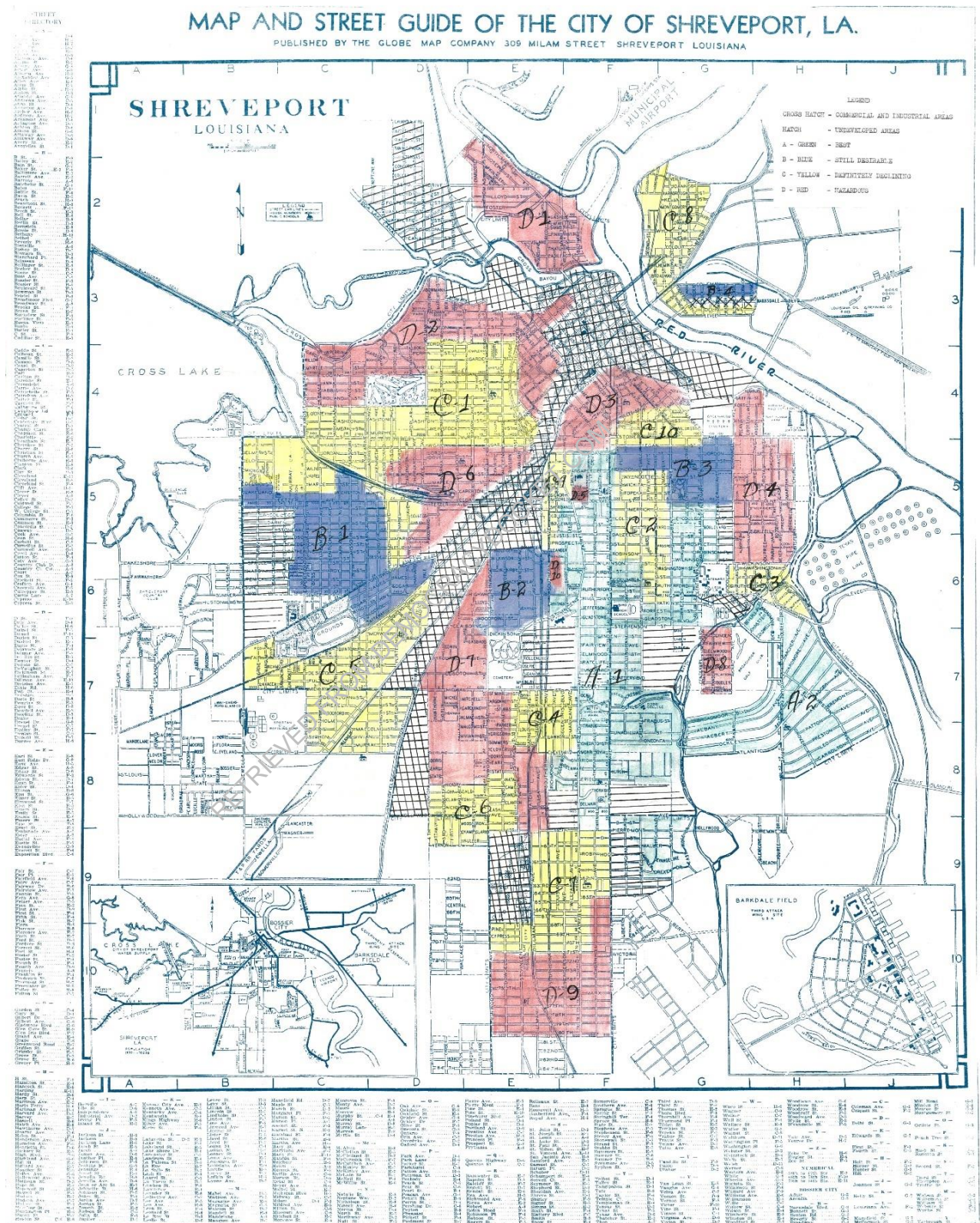




Figure 10: Homeowners Loan Corporation Underwriting Map of Shreveport, Louisiana.



Both 2020 census data and the geographic analysis of cell phone data demonstrate that many of the most populous cities and metropolitan areas in Louisiana still are highly segregated by race. The Othering and Belonging Institute characterized the metropolitan areas of New Orleans-Metairie-Kenner, Baton Rouge, Shreveport-Bossier City, and Lake Charles as high segregation (2021i). Baton Rouge, New Orleans, Monroe, Alexandria, Shreveport, and Lake Charles cities are highly segregated as well (Athey et al. 2021).

Contemporary government policies continue to shape patterns of racialized displacement and resettlement. For instance, neighborhoods damaged by Hurricane Katrina in 2005 were 45.8 percent Black, on average, compared with undamaged neighborhoods, which were 26.4 percent Black (Logan 2006). In the aftermath of Hurricane Katrina, preexisting inequalities by race and socioeconomic status made Black New Orleans residents more likely to be displaced, and for longer periods, than White New Orleans residents (Fussell, Sastry, and VanLandingham 2010, Fussell 2015). Black New Orleans residents also had a more difficult time returning to their old neighborhoods due to disparities in the delayed timing of disaster relief and rebuilding efforts (Gotham 2014, Fussell 2015). As a result, New Orleans's Black population still has not recovered to its pre-Katrina levels: in 2000, New Orleans was 67.5 percent Black, while in 2020, it was only 59.5 percent Black.

To conclude, where a person lives affects their ability to vote. Black Louisianans have been subjected to racial residential segregation for generations. The existing literature shows that such racial residential segregation detrimentally affects voting.

#### *Race and Health in Louisiana*

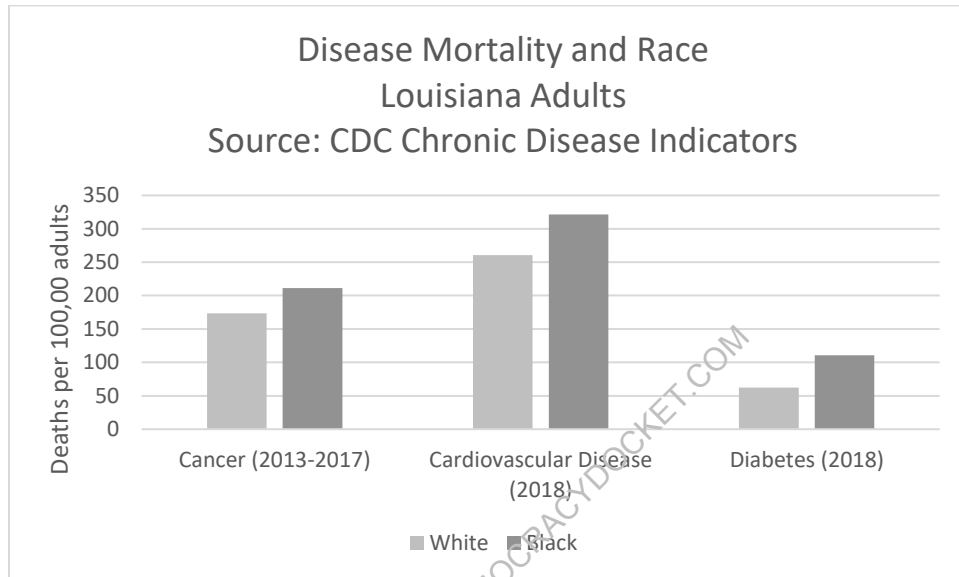
Health status also may affect voting. Several studies have associated poor health with lower voter turnout (Blakely, Kennedy, and Kawachi 2001, Lyon 2021, Pacheco and Fletcher 2015). The effects of health on voting may take many pathways, such as reducing the availability of free time and money that could otherwise be devoted to politics (Pacheco and Fletcher 2015). Impaired cognitive functioning or physical disability also may make voting more difficult (Pacheco and Fletcher 2015). Poor health is likely the reason that voter turnout declines in old age (Pacheco and Fletcher 2015). People with disabilities also are less likely to vote; problems with polling place accessibility only partially explain this gap (Schur, Ameri, and Adya 2017, Schur et al. 2002).

Black Louisianans have worse health outcomes than White Louisianans on several metrics. For instance, although rates of invasive cancer are similar across Black and White Louisianans (487.9 per 100,000 adults vs. 478.7 per 100,000 adults, respectively), as shown in Figure 11, there is a large disparity in the mortality rate from invasive cancers (211.2 deaths per 100,000 adults for Black Louisianans vs. 173.6 deaths per 100,000 adults for White Louisianans) (CDC). Similarly, Figure 11 also shows large racial differences in the mortality rates for cardiovascular disease and diabetes (for cardiovascular disease: 260.5 per 100,000 White adults vs. 321.5 per 100,000 Black adults; for diabetes: 62.2 per 100,000 White adults vs. 110.8 per 100,000 Black adults) (CDC). Disease prevalence rates also vary by race: 17.7 percent of Black Louisiana adults have been diagnosed with diabetes, compared with 10.8 percent of White adults (CDC). Obesity disparities also are large: 42.9 percent of Black Louisiana adults are obese, compared with 32.4 percent of White Louisiana adults (CDC). These disparities in health

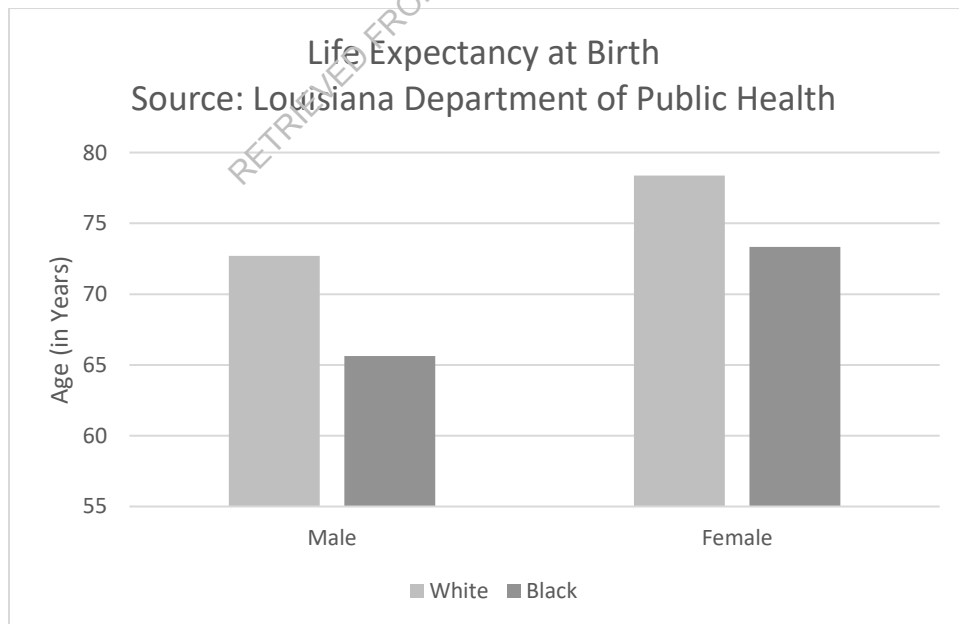


translate into disparities in life expectancy as shown in Figure 12: in Louisiana, White men are expected to live over seven years longer than Black men (72.71 vs. 65.62, respectively), while White women are expected to live over five years longer than Black women (78.37 vs. 73.34, respectively) (2022g). Infant and child mortality rates among Black children are about twice as high as those for White children (Benno and Lake).

*Figure 11: Disease Mortality Rates by Race among Louisiana Adults.*



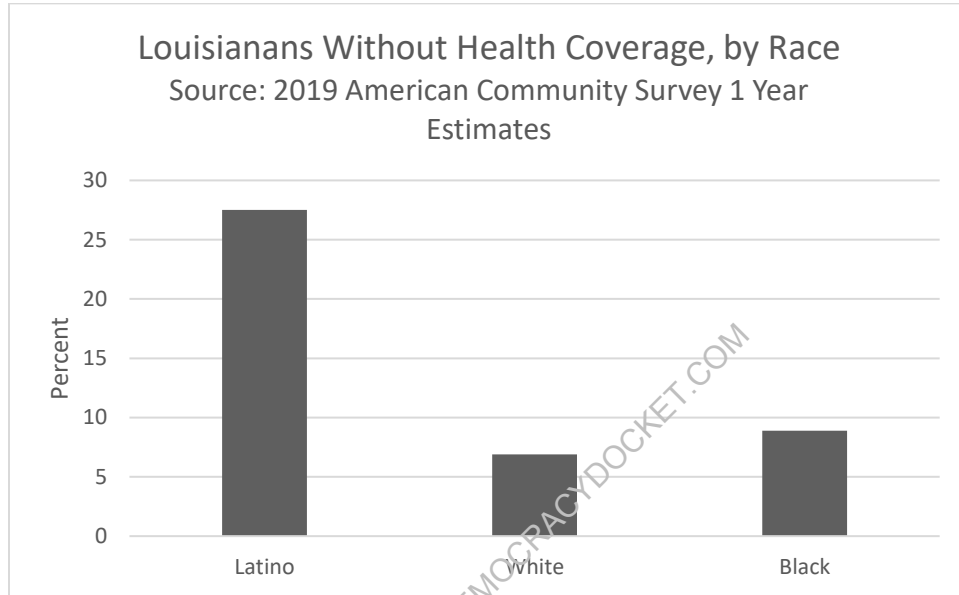
*Figure 12: Life Expectancy at Birth, by Race and Gender (2022g).*



These racial gaps in health outcomes are partly explained by racial disparities in access to care. According to a 2020 Kaiser Family Foundation survey, Black Louisianans are more likely than White Louisianans to say that there was a time in the past 12 months that they needed to see

a doctor but could not because of cost (12.8 percent of Black respondents vs. 8.2 percent of White respondents) (2020a). Moreover, as shown in Figure 13, data from the 2019 American Community Survey 1-Year Estimates shows that White Louisianans also are more likely to have health insurance than Black Louisianans. More than 60 percent of Black Louisianans also think that Black people are treated less fairly than White people when seeking medical care (2021a).

*Figure 13: Health Coverage in Louisiana by Race*



Discrimination in other arenas of life also contributes to racial health disparities. Racial residential segregation, which, as discussed above, affects many Louisiana cities, has been shown to lead to worse health outcomes for Black Americans. Several studies have demonstrated that racial residential segregation contributes to racial gaps in cancer outcomes (Landrine et al. 2017, Blanco et al. 2021, Poulson et al. 2021). Racial residential segregation also may make it more difficult for Black Americans to access primary care physicians and other doctors (Gaskin et al. 2012, Anderson 2018). Similar problems have been reported with respect to racial disparities in access to COVID-19 vaccination sites in Louisiana (Berenbrok et al. 2021, McMinn et al. 2021). Such factors, by contributing to racial disparities in health, ultimately may affect voting because of the link between poor health and lower voter turnout.

In Louisiana, environmental factors contribute to racial health disparities. Natural disasters are one such avenue: Black mortality rates during Hurricane Katrina were significantly higher in Orleans Parish across all age group categories 30 years and older (Brunkard, Namulanda, and Ratard 2008:3). The siting of chemical plants and other hazards near heavily Black residential areas exposes residents to high levels of air pollution and other dangers (2021d, Baurick, Younes, and Meiners 2019). In Cancer Alley, an area of Louisiana that stretches between New Orleans and Baton Rouge, studies have linked high levels of air pollution to increased risk of cancer, COVID-19, and asthma (Bakshi et al. 2022, Terrell and James 2020). Cancer Alley includes several unincorporated, mostly Black land areas that have little say in the decisions to locate factories and refineries near their homes (2021d, Baurick, Younes, and Meiners 2019, Terrell and James 2020). Such policies of siting environmental hazards in ways

that detrimentally affect the health of Black communities can shape voting, because health affects voting as shown above.

To reiterate, poor health can decrease voter turnout. In Louisiana, Black people are more likely to be in poor health than White people by several measures, including mortality rates, disease prevalence, and life expectancy. These health disparities partly are the result of racial discrimination: disparities in access to care, exposure to environmental hazards, and racial residential segregation all detrimentally affect the health of Black Louisianans.

#### *Race, Criminal Justice, and Voting in Louisiana*

A growing body of research shows that criminal justice interactions affect political behavior. Several studies (including my own work) have shown that, for individuals, contact with the criminal justice system, from police stops, to arrest, to incarceration, directly decreases voter turnout (Burch 2011, Lerman and Weaver 2014, Weaver and Lerman 2010). Primarily, criminal justice contact decreases turnout through “the combined forces of stigma, punishment and exclusion” which impose “barriers to most avenues of influence” and diminish “factors such as civic capacity, governmental trust, individual efficacy, and social connectedness that encourage activity” (Burch 2007: 12).

As in other aspects of life, criminal justice outcomes in Louisiana have been shaped by race for more than a century. For instance, like many other southern states, Louisiana enacted Black codes at the end of the Civil War, which were designed to penalize newly freed slaves and control their labor through enticement laws, vagrancy laws, and other schemes (Vandal 2001, Roback 1984, Cohen 1976). Louisiana’s prison was destroyed during the War, so the state turned to a system of convict leasing (2019a, Cardon 2017, Muller 2018, Mancini 1978). Louisiana’s Black Codes were used to force newly freed Blacks into labor contracts, and many people who refused to sign contracts were arrested and “subleased to landowners to replace slaves” (2019a). As a result of the legal changes brought about by the Black Codes, the racial makeup of Louisiana’s convict labor population shifted from mostly White in the antebellum period to mostly Black after the Civil War (Cardon 2017, Vandal 2001).

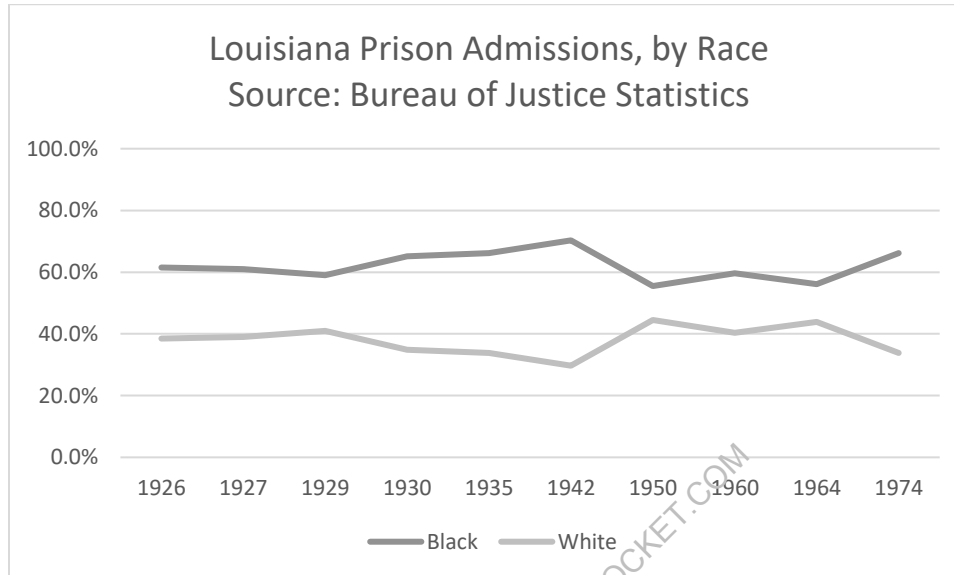
Louisiana’s contracts were awarded to S. L. James, a civil engineer and planter who bought up several plantations in Louisiana, including Angola Cotton Plantation (2019a, Cardon 2017). The prisoners’ labor also was used for post-war rebuilding and modernization, particularly for the construction of levees and railroads (Cardon 2017). Angola Plantation was known as the James Prison Camp beginning in 1880, and in 1900 the state purchased the site from the James Family (2019a). Currently, Angola is the largest maximum security prison in the world (2019a); its lands have been worked continuously by an unfree, majority Black labor force since before the Civil War.

The pattern of disproportionate racial impact has continued unabated in Louisiana since reconstruction. Between 1925 and 1940, for instance, Adler finds that the Louisiana prison population increased in a racially disproportionate manner: White incarceration rose by 39 percent during the period, while Black incarceration rose by 143 percent, despite lower overall crime rates in 1940 (Adler 2015: 44). Data from the Bureau of Justice Statistics in Figure 14



shows that Black people constituted around 60 percent of Louisiana's prison admissions in each year between 1926 and 1974 (Langan 1991).

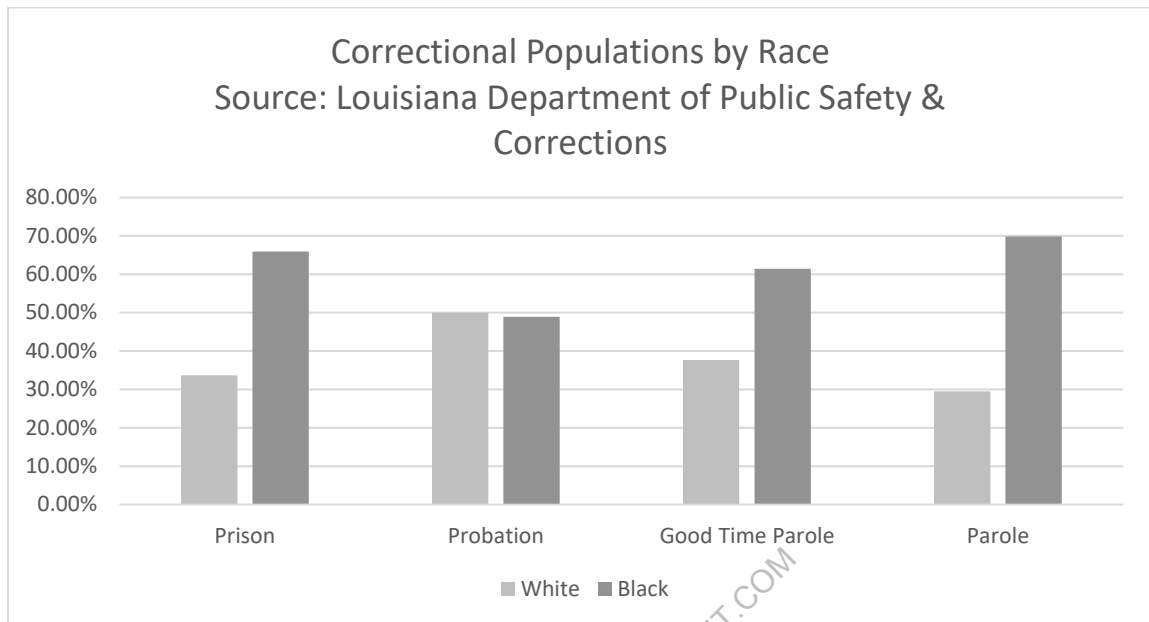
*Figure 14: Louisiana Prison Admissions, by Race (Langan 1991).*



Today, Louisiana's incarceration rate is the highest in the country (Minton, Beatty, and Zeng 2021: 11). Black prisoners still constitute about two-thirds of Louisiana's prisoners and are imprisoned at a rate double their presence in the population. Black Louisianans also are disproportionately on probation and parole in Louisiana. Although approximately one-third of Louisiana's population identifies as Black, Black people are a majority of people in prison or on community supervision in the state (2022d). As Figure 15 shows, 65.92 percent of prisoners, 48.90 percent of probationers, 61.46 percent of good-time parolees, and 69.89 percent of parolees are Black (2022d). Overall, in 2019, the Black incarceration rate in Louisiana was 1,411 per 100,000 adults, which is 3.7 times that of White Louisiana adults (381 per 100,000).

Disparities punishment may not be explained solely by disparities in crime rates (Mitchell and Caudy 2017). For instance, there is a racial disparity in imprisonment for drugs: about 61.5 percent of people in prison in Louisiana for drugs as their most serious offense are Black, while 38.3 percent are White (2022d). However, among Black Louisianans arrested for drug offenses in 2019, 62.5 percent were arrested for marijuana possession only, while only 42 percent of White Louisianans arrested for drug offenses were arrested for marijuana possession (2021e). Once marijuana possession is excluded, White people constitute a majority of people arrested for more serious drug offenses (e.g., possession of hard drugs, or the sale or trafficking of any drug) in Louisiana (2021e). The racial disparity in imprisonment, where Black Louisianans make up two-thirds of the incarcerated population, does not reflect the fact that the majority of people arrested for serious drug offenses in Louisiana are White.

Figure 15: Correctional Populations by Race, 2021 (2022d).



Racial discrimination still is an important contributor to the disproportionate representation of Black people in the criminal justice system today. For instance, racial disparities in arrests are caused partially by factors that make it more likely that police will stop or search Black people, such as spatially differentiated policing, racial residential segregation, and discrimination (Beckett, Nyrop, and Pfingst 2006, Gelman, Fagan, and Kiss 2007, Ousey and Lee 2008, Pierson et al. 2020). Racial disparities also exist in bail decisions (Arnold, Dobbie, and Yang 2018) and in sentencing (Bushway and Piehl 2001, Mitchell 2005, Steffensmeier and Demuth 2000, Steffensmeier, Ulmer, and Kramer 1998).

With respect to Louisiana in particular, research shows that racial discrimination affects criminal justice outcomes. For instance, a high proportion of Black Louisianans (86 percent) believe that Black people are treated less fairly when dealing with police (2021a). Studies have shown that racial disparities are associated with capital sentencing in Louisiana: people who kill Black victims are less likely to receive the death penalty than people who kill White victims (Baumgartner and Lyman 2015). As of 2015, no White person had been executed in Louisiana for killing a Black person since 1752 (Baumgartner and Lyman 2015). A study of prosecutorial case files in Caddo Parish shows that prosecutors extend greater effort in cases with White female victims than Black victims (Pierce et al. 2014).

Another important pathway by which criminal justice contact can decrease voter turnout, at least for people with felony convictions, is through felony disenfranchisement laws (Burch 2007). Louisianans who are serving an active sentence in prison or on parole or probation for a felony conviction cannot vote (Uggen et al. 2020). An estimated 4.41 percent of the Black voting age population in Louisiana cannot vote due to a felony conviction compared with 2.23 percent of the state's population as a whole (Uggen et al. 2020). Uggen et al. estimates that 47,951 Black Louisianans were unable to vote in 2020 due to their felony convictions (Uggen et al. 2020).

To summarize, criminal justice involvement has been shown to affect voter turnout through several pathways. In Louisiana, Black people are disproportionately arrested, convicted, and punished for crimes. Research suggests that racial discrimination has played a role in these disparities historically and continues to do so because of discriminatory arrest, conviction, and sentencing practices.

#### Senate Factor 6: Racial Appeals in Campaigns

Whether politics is marked by “the use of overt or subtle racial appeals in political campaigns” is another consideration of section 2 of the Voting Rights Act. A deep and robust literature on racial appeals in campaigns exists in political science (Hutchings and Valentino 2004, Stephens-Dougan 2021). Writing in 2001, Mendelberg argued that a “norm of racial equality,” which held that “southern segregation and the ideology of white supremacy were illegitimate” gained ascendance in the U. S. (Mendelberg 2001: 70). The norm of racial equality meant that using explicitly racist rhetoric or espousing explicitly racist policy positions would not help, and may even hurt, politicians (Mendelberg 2001). However, because “racial attitudes are still a potent force in American politics,” candidates still have an incentive to appeal to White racial fears (Valentino, Hutchings, and White 2002: 76). These two phenomena, the need to appear racially egalitarian while activating racial attitudes, means that campaigns would work to activate White voters’ negative racial attitudes through covert or implicit means such as images or coded language (Valentino, Hutchings, and White 2002, Mendelberg 2001).

Implicit racial appeals make racial attitudes and concerns more salient in the minds of voters, even without explicitly mentioning or referring to a particular race or group (Valentino, Hutchings, and White 2002, Mendelberg 2001). Implicit racial appeals may rely on certain code words or issues, use images of Black exemplars, or a combination of both, to make race more salient to voters (Valentino, Hutchings, and White 2002). In particular, Caliendo and McIlwain highlight racist appeals, which “prime antiminority racial fear, resentment, and bias . . . through a variety of audiovisual and textual cues that associate persons of color with long-standing, negative, racial stereotypes” (McIlwain and Caliendo 2014: 1159). These implicit racial appeals can rely on code words such as “inner-city” or “sanctuary city” or reference crime, welfare, and illegal immigration (Brader, Valentino, and Suhay 2008, Collingwood and O’Brien 2019, Hurwitz and Peffley 2005, Valentino, Hutchings, and White 2002). More broadly, McIlwain and Caliendo argue that racial appeals in television ads typically include elements such as, “a salient stereotype, most often those of criminality, laziness, taking undeserved advantage, and the charge of liberalism (read, “extreme” liberal, “dangerously” liberal, “radical,” etc.); a minority opponent’s image; all-White, noncandidate images; and an exposed audience that includes a high percentage of White potential voters” (McIlwain and Caliendo 2014: 1159).

The 1988 Willie Horton ad targeting Michael Dukakis is probably the most famous example of an implicit racial appeal (Hurwitz and Peffley 2005, Valentino, Hutchings, and White 2002, Mendelberg 2001). In this ad, “the narrator of the spot states that Willie Horton, a convicted murderer, received multiple weekend furlough passes from prison,” during the last of which, the narrator informs us, he “fled, kidnapping a young couple, stabbing the man and

repeatedly raping his girlfriend.” While the ad could have conveyed exactly the same information without graphics, NSPAC elected to superimpose the most menacing possible picture of Horton, a Black man, over the narrative. (Hurwitz and Peffley 2005: 100). The ad never explicitly mentions Horton’s race, but the ad does incorporate many of the elements common to implicit racial appeals as expressed in the literature: evoking the salient stereotype of criminality and the charge of liberalism by using images of a Black exemplar, in this case, Horton’s mugshot.

There are prominent examples of racial appeals in Louisiana politics. Most notably, David Duke, a former Grand Wizard of the Ku Klux Klan, “won a strong majority of Louisiana’s white vote in three recent statewide elections: a 1990 U.S. Senate race, a 1991 gubernatorial open primary, and a 1991 gubernatorial runoff” (Voss 1996: 1156). Duke’s base of support included White suburbanites as well as White college graduates (Voss 1996). Duke, the founder of the National Association for the Advancement of White People, ran on a platform that openly appealed to white racial fears (Harrison 1989). Duke also endorsed other Louisiana political candidates, such as Governor Mike Foster, who received eighty-four percent of the White vote and only four percent of the Black vote (Sack 1995).

Louisiana politicians still resort to implicit racial appeals to mobilize White voters. In the 2019 Gubernatorial race, Eddie Rispone, the Republican candidate, produced an ad that echoed the same themes as the Horton ad (2019c). Like the Horton ad, Rispone blames Governor Jon Bel Edwards for crimes committed by people after their early release from prison (2019c, Governor 2019). The ad never explicitly mentions race, but does discuss crime and sanctuary cities (2019c, Governor 2019). Similar to the Horton ad, Rispone’s ad begins with mugshots of Black men prominently displayed, alongside additional mugshots of two other men who could be Latino.<sup>4</sup> The imagery of the ad also contains the all-White, non-candidate images of Rispone with his constituents that McIlwain and Caliendo mark as common in implicit racial appeals. The mugshots, words such as murder, robbery, New Orleans, and sanctuary city, and Rispone and his White constituents flash as ominous music plays and a narrator says the following:

Dangerous, sick, violent. John Bel Edwards put them back on our streets where they robbed, attacked, murdered. Under Edwards murder is up 20 percent. Thousands of dangerous criminals released and New Orleans a sanctuary city mecca for lawlessness. Eddie Rispone will ban sanctuary cities and leave forgiveness to God, not government. Commit the crime, do the time. Eddie Rispone for governor.” (Hilburn 2019).

In an ad placed in a prominent newspaper, Rispone further embraced implicit racial appeals, again relying on “the charge of liberalism” and code words such as sanctuary city, illegal immigration, terrorist, gang, and radical leftists protesting that research has shown to prime racial resentment in White voters (Brader, Valentino, and Suhay 2008, Christiani 2021, Clapp 2019, Collingwood and O’Brien 2019, Hurwitz and Peffley 2005, Major, Blodorn, and Major

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<sup>4</sup> After searching the citations provided in the ad, I was unable to find the news stories that identified all of the people in the mugshots.

Blascovich 2018, Mendelberg 2001, Reny, Valenzuela, and Collingwood 2020, Valentino, Hutchings, and White 2002).

The conventional wisdom based on studies conducted primarily before the elections of Presidents Obama and Trump argued that these kinds of implicit racial appeals were more effective than explicit racial appeals, which could backfire (Stephens-Dougan 2021, White 2007, Valentino, Hutchings, and White 2002, Mendelberg 2001). However, recent studies suggest that candidates can increase their vote share by making explicit racial appeals (Reny, Valenzuela, and Collingwood 2020, Valentino, Neuner, and Vandenbroek 2018, Stephens-Dougan 2021, Christiani 2021, Major, Blodorn, and Major Blascovich 2018). The implicit-explicit distinction appears to work only for certain subsets of White voters, meaning that racial appeals need not be subtle in order to activate negative racial attitudes (Wetts and Willer 2019, Huber and Lapinski 2006).

Explicit racial appeals may target Black voters as well. For Black voters, racial appeals operate differently; White argues that racial appeals often activate in-group attachments rather than out-group antagonism among Black voters (White 2007). However, certain kinds of racial campaign rhetoric, specifically messages designed to portray the chosen candidate or party of Black voters as racist or indifferent to Black concerns, can demobilize Black voters (Stout and Baker 2021). Such messages may include assertions “that the Democratic Party and its presidential candidates, Hillary Clinton in 2016 and Joe Biden in 2020, were using African Americans for their votes without providing any solutions for systematic racial inequality” (Stout and Baker 2021: 1).

In a particularly ugly exchange, again during the 2019 Gubernatorial Race, Rispone and Edwards began trading accusations that the other was racist. Supporters of Edwards ran ads targeting Black voters, arguing that Rispone supported Donald Trump and calling Trump a racist. Studies have shown that this type of explicit racial appeal can serve as a counterstrategy to neutralize racial appeals in ways that galvanize White liberals and Black voters (Banks and Hicks 2019, White 2007). In response, Rispone and the Louisiana GOP said that Edwards, who did not run the ad himself, was a racist taking part in the family tradition of taking advantage of Black people:

It is absurd for John Bel Edwards to attempt to link Eddie Rispone to a Ku Klux Klan member when historical records make it clear that the Edwards family has been racist for generations. From slavery, through segregation the Edwards clan has been taking advantage of black people in Louisiana for their personal benefit since Louisiana was born.

John Bel is just the latest Edwards to follow in this “family tradition”(2019d).

As noted above, studies have shown that messages like these are designed to demobilize Black voters by portraying their chosen candidate or party as insensitive to the group’s needs (Stout and Baker 2021). Other candidates in Louisiana have embraced this tactic as well. For instance,

Republican State Sen. Conrad Appel argued in a Facebook post that African Americans should not support Democrats because the party's policies will lead to racial replacement:

And this is the great irony of blind support of Democrats by African Americans. The Democrat Party has assumed the position that open borders and unlimited illegal immigration is their cause célèbre. Their logic appears to be that inviting millions of illegal immigrants into the nation will lead to pressure in the future for blanket amnesty and eventual citizenship. That, in their plan, will create an unbeatable mass of Democrat voters for the future.

But that inflow of non-white immigrants will swamp the native black population and accelerate the demand by these new immigrant populations to assume the roles that African Americans enjoy today.

So as this year's Essence Festival ends I am left to wonder why any black American would want to see an acceleration to the inevitable time when other non-white citizens have the voting power to overwhelm and displace African Americans.

But, as in the past, by block voting for Democrats and by ignoring the logic of border and immigration control offered by Republicans that is exactly what they are doing (Rasso 2019).

Comments such as these make it clear that politicians think that explicit racial appeals still resonate in Louisiana politics. As a result, explicit racial appeals such as these appear even in recent political campaigns.

#### Senate Factor 7: Black Elected Officials

Black Louisianans are underrepresented relative to their share of the population with respect to Senate Factor 7, or "the extent to which members of the minority group have been elected to public office in the jurisdiction." There have been no Black people elected as Governor of Louisiana since Reconstruction, when P. B. S. Pinchback was elected governor. Similarly, three Black men served as Lieutenant Governor of Louisiana (Pinchback, Oscar Dunn, and Caesar Antoine) during Reconstruction; however, none have been elected since. No Black senators have been elected to the U. S. Congress from Louisiana.

Louisiana has sent five Black people to Congress. Charles Nash served during Reconstruction (2022b). Cleo Fields, William Jennings Jefferson, Cedric Richmond, and Troy Carter have been elected since (2022b). Troy Carter is currently the member from the majority-minority 2<sup>nd</sup> district, which Richmond and Jefferson also represented (2022b).

Black people are underrepresented in other elected offices as well. As noted previously, about one-third of Louisianans are Black. However, Black legislators hold only 25 percent of state legislative seats, or 36 of 144 total seats (2021g). There are 10 Black Louisiana State Senators out of 39 total seats (2021g). Twenty-six Black legislators serve in the state House of Representatives out of 105 total members (2021g). Less than one-quarter of Louisiana mayors are Black (71/304) and 26.1 percent of Louisiana's state court judges are Black (2022e). Two of



the eight elected Board of Elementary and Secondary Education members are Black (2022e). One Associate Justice on the Louisiana Supreme Court, Piper Griffin, is Black (2022e).

#### Senate Factor 8: Lack of Responsiveness

When reauthorizing Section 2 of the Voting Rights Act in 1982, the Senate also suggested the consideration of “whether there is a lack of responsiveness on the part of elected officials to the particularized needs of minority group members.” Louisiana ranks among the worst states in the nation on many indicators of well-being. For instance, Louisiana ranks 48<sup>th</sup> out of 50 states in math achievement scores (2019b), 46<sup>th</sup> for cancer death rates (2022c), and 44<sup>th</sup> for overall life expectancy (2021f). As the previous discussion shows, Black Louisianans are even worse off along all of these dimensions, which, in my opinion, indicates a lack of responsiveness of public officials to these problems. Racial disparities in education, segregation, employment, housing, health, and criminal justice have been evident in Louisiana for generations.

Louisiana public officials often are opposed to specific policies that might ameliorate problems experienced by Black communities. For instance, in 2021, when President Biden announced several climate-related executive orders designed to promote environmental justice and mentioned Louisiana’s “Cancer Alley” specifically, Louisiana Senator Bill Cassidy called the remarks “a slam upon our state” and denied that pollution was a factor in elevating cancer rates (Boyle 2021). Instead, Cassidy blamed behavioral factors for the elevated cancer rates:

We have a higher incidence of cigarette smoking, of obesity, of certain viral infections, and other things which increase the incidence of cancer in our state, (Boyle 2021).

An advocate for the affected areas called Cassidy’s comments victim blaming: “It’s always ‘blame the folks’ -the poor, Black folks -for their own demise” (Boyle 2021). Also, as noted previously, peer-reviewed studies (Terrell and St Julien 2022, Terrell and James 2020) do find a statistically significant relationship between pollution and both cancer and COVID-19 in Louisiana.

Similarly, Black Louisianans noted the opposition of their congressional delegation to the passage of the Build Back Better Act, which the White House claimed would, among other benefits, support early childhood education, childcare, Pell Grants, and rental assistance for thousands of Louisiana families (2021b), including the families of Black Louisianans. Five of Louisiana’s six members of congress voted against the bill. During the redistricting road show, Herbert Dixon, of Alexandria, said of Build Back Better:

In my community of similar interests, there should be a Congress person that understand[s] the importance of a \$1.2 trillion infrastructure bill that would create vast opportunities for central Louisiana and our state. According to Republican U.S. Senator Bill Cassidy, one of the chief architects of the bill, the \$1.2 trillion infrastructure Bill signed by President Biden would do the following: One, \$6 billion would be allocated to Louisiana for roads and bridges for the first five years of the rollout. Think what this would mean for Gilchrist Construction Company, Diamond B Construction Company,

TL Construction, Madden Construction Company and all other local contractors in our area. . . . In the Alexandria region we should have a U.S. Congress person that represent our community interest. Every Louisiana U.S. House Congressional member voted against the \$1.2 trillion infrastructure bill, except one. That one House Congressperson represented the community interest of South Louisiana and represented a majority-minority congressional district.<sup>5</sup>

Several other members of the public noted the opposition as well.<sup>6</sup>

The evidence suggests that Black Louisianans do not feel adequately represented and believe that many public officials are not responsive to their needs. For instance, during the redistricting road show, where members of the Louisiana Legislature traveled to public meetings throughout the state, several Black Louisianans from across the state offered opinions on the redistricting process and criticized current officials for being unresponsive to their needs. The speakers often explicitly linked officials' lack of responsiveness to race. For instance, at a meeting in Lake Charles, Louisiana, Lydia Larse, a Black citizen of Lake Charles, said:

“the Constitution starts with we the people. I don’t feel that. None of you guys up here represent me, but a few. . . We’re one-third of the state, and I’m not being represented. . . Our voices are not being heard. At all.” . . . I feel as though my voice is not being heard because y’all don’t need us. We’re not needed. You don’t care.”<sup>7</sup>

As an example of how disregarded she felt by public officials, Ms. Larse further noted, “I’ve been watching Representative Tarver, he’s been sleeping back there. I guess he’s not interested, but I understand. We don’t matter to you. I just want to matter. I just want to matter.”<sup>8</sup> Another Black Lake Charles resident, Adam Moore, expressed similar sentiments when he said, “Do we care about gerrymandering? Hey, let’s isolate these people over here! Do you care? . . . Help us! . . . Do anyone care? Hey, its not my fault I’m Black! I was born this way!”<sup>9</sup> Jacqueline Germany said, “I’m sick and tired of being sick and tired. I’m sick and tired of being not fairly

<sup>5</sup> 2:03:00. “Louisiana Redistricting Video, Alexandria, Louisiana 11/9/21.”

[https://redist.legis.la.gov/default\\_video?v=house/2021/nov/1109\\_21\\_Alexandria\\_Redist](https://redist.legis.la.gov/default_video?v=house/2021/nov/1109_21_Alexandria_Redist). Accessed 11 Mar 2022.

<sup>6</sup> For an additional example, see public testimony of Albert Samuels, Baton Rouge, at 1:19:40.

“Louisiana Redistricting Video, Baton Rouge, Louisiana 11/16/21.”

[https://redist.legis.la.gov/default\\_video?v=house/2021/nov/1116\\_21\\_BatonRouge\\_RedistSU](https://redist.legis.la.gov/default_video?v=house/2021/nov/1116_21_BatonRouge_RedistSU). Accessed 7 Mar 2022.

<sup>7</sup> 1:35:40. “Louisiana Redistricting Video, Lake Charles, Louisiana 12/15/21.”

[https://redist.legis.la.gov/default\\_video?v=house/2021/dec/1215\\_21\\_Southwest\\_Redist](https://redist.legis.la.gov/default_video?v=house/2021/dec/1215_21_Southwest_Redist). Accessed 7 Mar 2022.

<sup>8</sup> 1:39:20. Louisiana Redistricting Video, Lake Charles, Louisiana 12/15/21.”

[https://redist.legis.la.gov/default\\_video?v=house/2021/dec/1215\\_21\\_Southwest\\_Redist](https://redist.legis.la.gov/default_video?v=house/2021/dec/1215_21_Southwest_Redist). Accessed 7 Mar 2022.

<sup>9</sup> 1:17:20. “Louisiana Redistricting Video, Lake Charles, Louisiana 12/15/21.”

[https://redist.legis.la.gov/default\\_video?v=house/2021/dec/1215\\_21\\_Southwest\\_Redist](https://redist.legis.la.gov/default_video?v=house/2021/dec/1215_21_Southwest_Redist). Accessed 7 Mar 2022.



represented in Congress. I'm sick and tired of a congressman overlooking my district.”<sup>10</sup> Even non-Black Louisianans noted that Black people did not receive proper consideration from their representatives. Melissa Flournoy of Louisiana said in Baton Rouge:

We have five hardcore Republican Congressmen, and we have one African-American Congressman who for all intents and purposes, is expect [*sic*] to represent the voices of African-American voters in Caddo Parish, in East Baton Rouge Parish, in Tallulah, Richland, Tensas, Concordia Parish. Because he's the only congressman that will return the calls, okay? He's the only congressman that really will be engaged in the issues that are important to people. So, Mr. Jenkins can say race doesn't matter. I'm here today to say race does matter.<sup>11</sup>

The lack of responsiveness of public officials to the interests of Black Louisianans was a persistent theme in the public comments.

In every redistricting road show, the members of the public who commented on the issue of a second majority-minority district favored drawing a second majority-minority congressional district outnumbered those who opposed the idea. For instance, among the speakers in New Orleans, the topic of a second majority-minority district was addressed by a majority of speakers, with 19 of the 25 speakers who expressed a clear opinion in favor of adding the second majority-minority congressional district. In Covington, all six speakers who referenced the topic supported a second majority-minority district; in Thibodeaux, there were only a handful of speakers, but the four who mentioned a second majority-minority congressional district were in favor. In Lafayette, of the seven speakers who expressed an opinion about adding a second majority-minority district, only one expressed opposition. Across the road shows, nearly two-thirds of the written comments that expressed a clear opinion on the topic supported drawing a second majority-minority congressional district.

The Louisiana Senate failed to pass a map with a second majority-minority congressional district. Senator Hewitt did acknowledge the clear and passionate arguments against racial gerrymandering that packed Black voters into the second congressional district:

I want you to know I've been moved by much of what I've heard. Several members of the public in their comments yesterday and others on the road have helped me to better understand the passion around the right to vote and the importance of the Voting Right Act. Senator Price, and you know, I was especially moved yesterday when one of the ladies came and testified and she said, “I just felt like I had to be here. I had to come and speak. I wanted to be heard.” We've heard that Senator Price along on the road show

<sup>10</sup> 2:21:00. “Louisiana Redistricting Video, Baton Rouge, Louisiana 11/16/21.” [https://redist.legis.la.gov/default\\_video?v=house/2021/nov/1116\\_21\\_BatonRouge\\_RedistSU](https://redist.legis.la.gov/default_video?v=house/2021/nov/1116_21_BatonRouge_RedistSU). Accessed 7 Mar 2022.

<sup>11</sup> 1:37:42. “Louisiana Redistricting Video, Baton Rouge, Louisiana 11/16/21.” [https://redist.legis.la.gov/default\\_video?v=house/2021/nov/1116\\_21\\_BatonRouge\\_RedistSU](https://redist.legis.la.gov/default_video?v=house/2021/nov/1116_21_BatonRouge_RedistSU). Accessed 29 Mar 2022.

from other people that were just as passionate about that, and I really appreciate that. And, some people have traveled around the state, right? So, we had people here from North Louisiana who traveled here yesterday to speak and it really has helped me to understand more about how people feel. It's a blessing and I appreciate that people took the time to say that and to help us understand better. And so, I just want to acknowledge that because that's been a very important part of the process and an important part of the journey to me. It's not just about maps and numbers. It is about people and I appreciate that.<sup>12</sup>

However, Senator Hewitt went on argue against creating a second majority-minority district anyway, saying, without presenting any evidence, that “[b]y taking minority voters out of a district that is 56 percent Black VAP today and creating two underperforming districts as proposed in several other bills, we would jeopardize the current majority-minority district and this Legislature would be remiss in our obligations to comply with the Voting Rights Act.”<sup>13</sup> In other words, in the face of a clearly articulated policy preference expressed by members of the minority community, Senator Hewitt and the members of the Senate chose do the opposite of what was responsive to the particularized needs of the group.

#### Senate Factor 9: Tenuousness

The sponsors and advocates of SB5 and HB1 provided several justifications for supporting these plans over plans that provided for two majority-minority districts in Louisiana. However, as I will show, many of the proffered justifications lacked empirical support, were vague or contradictory, or were based on misunderstandings. In some instances, the final plan adopted by the Louisiana legislature fails to live up to the very principles that bill sponsors said were important.

#### *Adherence to Traditional Redistricting Principles*

The most important criterion, according to Speaker Schexnayder, who sponsored HB1, was adherence to the principle of one person, one vote. Speaker Schexnayder took pride in the fact that his map had low relative and absolute deviations between districts:

This Bill is my best efforts to achieve population equality among the districts. In fact, HB1 has a relative deviation of 0.00 percent, which is the percentage of which all district populations differ from the ideal population of 776,292. And then, the overall range of 46 which means that between the highest populated district in my Bill, which is District 4

<sup>12</sup> 26:30. “Louisiana Senate and Governmental Affairs Committee, 2/4/2022.”

[https://redist.legis.la.gov/default\\_video?v=senate/2022/02/020422SG](https://redist.legis.la.gov/default_video?v=senate/2022/02/020422SG). Accessed 14 Mar 2022.

<sup>13</sup> 29:11. “Louisiana Senate and Governmental Affairs Committee, 2/4/2022.”

[https://redist.legis.la.gov/default\\_video?v=senate/2022/02/020422SG](https://redist.legis.la.gov/default_video?v=senate/2022/02/020422SG). Accessed 14 Mar 2022.

and the lowest populated district in my Bill which is Senate District 3, there's a difference of only 46 people.<sup>14</sup>

Chairman Stefanski agreed:

Our duty to make sure that these populations are equal is an overriding duty. Specially, on this map. We have to try to get down to as close to the nearest person and I think the numbers speak for themselves on that.<sup>15</sup>

Representative McGee also stressed the importance of equalizing the population across the six districts as the paramount goal:

The reason why you come into redistricting is because the census data has changed and you have to do it because you have to make the districts equal and Mr. Speaker's map is the best map as far as making them equal in population.<sup>16</sup>

However, maps with two majority-minority districts, such as Senator Gaines's Amendment 88, had lower absolute and relative deviation.<sup>17</sup> When it was pointed out that Senator Fields had presented an amendment with a lower absolute deviation than SB5 and also managed to create a second majority-minority district, Senator Hewitt said that getting to the lowest deviation was not that important after all:

The things that I see different in this map and the map in the Amendment that Senator Fields has proposed and the map that I have presented . . . this is very similar to Senate Bill 2 with a few tweaks which the committee did already consider and did hear. The senator talks about the deviation from zero, you know what the courts have ruled is that passed when we were working under preclearance ten years ago was to anything less than a hundred was kind of the objective, and so Senate Bill 5 definitely meets that objective; it ranges from minus 92 to 35. The amendment from minus 12 to 32, although it is better, I don't know that it is significant in terms of the law.<sup>18</sup>

<sup>14</sup> 3:47. "Louisiana House and Governmental Affairs Committee, 2/4/2022."  
[https://redist.legis.la.gov/default\\_video?v=house/2022/feb/0204\\_22\\_HG](https://redist.legis.la.gov/default_video?v=house/2022/feb/0204_22_HG). Accessed 11 Mar 2022.

<sup>15</sup> 12:40. "Louisiana House and Governmental Affairs Committee, 2/4/2022."  
[https://redist.legis.la.gov/default\\_video?v=house/2022/feb/0204\\_22\\_HG](https://redist.legis.la.gov/default_video?v=house/2022/feb/0204_22_HG). Accessed 11 Mar 2022.

<sup>16</sup> 32:50. "Louisiana House and Governmental Affairs Committee, 2/4/2022."  
[https://redist.legis.la.gov/default\\_video?v=house/2022/feb/0204\\_22\\_HG](https://redist.legis.la.gov/default_video?v=house/2022/feb/0204_22_HG). Accessed 11 Mar 2022.

<sup>17</sup> "House Floor Amendments." <http://www.legis.la.gov/Legis/ViewDocument.aspx?d=1246825>  
Accessed 28 Mar 2022.

<sup>18</sup> 2:31:25. "Louisiana Senate Chamber Day 6, 2022 ES1."  
[https://senate.la.gov/s\\_video/videoarchive.asp?v=senate/2022/02/020822SCHAMB](https://senate.la.gov/s_video/videoarchive.asp?v=senate/2022/02/020822SCHAMB). Accessed 17 Mar 2022.

The sponsors of HB1 and SB5 stressed the importance of keeping precincts whole. This claim came up multiple times throughout the process. For instance, Senator Hewitt said:

Another principle: respect the established boundaries of political subdivisions and the natural geography of the state and contain whole precincts to the extent practicable. We've done that in this map. We've kept 49 of 64 parishes whole, which is more than the current map, we minimized the split precincts and they are actually zero.<sup>19</sup>

Representative Stefanski also said publicly, "I'll tell you from my House perspective though, I don't want to split precincts, and I want to try to stick as much to the natural geography as possible."<sup>20</sup> Likewise, Representative Farnum said during committee:

You get into splitting of precincts and things of that nature that to me is a very disenfranchising method of splitting absolutely an area of interest. When you take an individual precinct and cut it in half, much less a parish or any other thing. So, I guess the method of how you got here is disturbing.<sup>21</sup>

It is important to note that the legislature voted not to proceed with plans, such as the maps presented in HB4, for instance, that managed to draw two majority-minority districts also without splitting precincts.

At various points, supporters of HB1 and SB5 also stressed the importance of compactness. Supporters of HB1 and SB5 were particularly concerned with what they referred to as the "Z map" or the "7 map." They argued that this map was not compact and was similar to a district that was struck down by courts in *Hays v. State of Louisiana*, 862 F. Supp. 119 (W.D. La. 1994). Legislators raised this point in particular with reference to SB16, which drew a second majority-minority district through Shreveport. As Senator Hewitt said:

This is sort of the famous Z-Map that we had back in the day that, you know, gets used in a lot of classes, political science classes as maybe not such a great example, but nevertheless I want to just try to talk to you a few minutes about it. It looks to me like a lot of metropolitan areas, you know, seems to get split up in this map. Not Alexandria so much, because it misses the Z, but the Z catches a lot of other things, you know, you've got Lafayette in a district with New Orleans. You've got neighborhoods in Baton Rouge, would share a member of Congress with Shreveport and Lake Charles is joined with parts of Monroe, it divides up some of the Barksdale Community. I guess tell me your thoughts on that because, you know, one of our redistricting principles is trying to as you said, keep the parishes together, but also the communities of interest in some of those

<sup>19</sup> 2:02:42. "Louisiana Senate Chamber Day 6, 2022 ES1."

[https://senate.la.gov/s\\_video/videoarchive.asp?v=senate/2022/02/020822SCHAMB](https://senate.la.gov/s_video/videoarchive.asp?v=senate/2022/02/020822SCHAMB). Accessed 17 Mar 2022.

<sup>20</sup> 21:09. "State Rep. John Stefanski Press Club 11/22/2021." Louisiana Public

Broadcasting. <https://www.youtube.com/watch?v=SuquGa6rJI8> Accessed 29 Mar 2022.

<sup>21</sup> 2:24:50 "Louisiana House and Governmental Affairs Committee, 2/10/22."

[https://redist.legis.la.gov/default\\_video?v=house/2022/feb/0210\\_22\\_HG](https://redist.legis.la.gov/default_video?v=house/2022/feb/0210_22_HG). Accessed 16 Mar 2022.

metropolitan areas, you know, seems to me, you would want to try to keep them together as best you could.<sup>22</sup>

Representative Beaulieu raised a similar concern earlier in the process:

So just from a personal standpoint, I think map five should have been labeled as map seven when I'm looking at it because it looks you got a big lucky seven in that map, or we'll call it the border map. And I guess kind of on this one, specifically, it looks like you're going all the way from Oil City to Kentwood, Louisiana. Do you think someone in the Shreveport area and the communities of interest in those two geographic areas of the state are all – I guess what was the thought there with just that border map?<sup>23</sup>

However, when presented with redistricting plans that achieved better compactness scores across multiple empirical measures than HB1 and SB5, supporters of HB1 and SB5 then rejected the measures used by courts and demographers in favor of eyeball tests and other subjective notions of appearance. For instance, Representative Ivey said about one of the coalition maps that drew two majority-minority districts, “Yeah, I mean that’s one of the craziest looking maps I’ve seen. Now, it may meet Section 2, but I’m telling you, you’ve got Shreve--parts of Shreveport, Monroe, East Baton Rouge Parish. I mean, my God, that’s a crazy-looking map.”<sup>24</sup> Chairman Stefanski said:

I’m a little more curious and you discussed the measure of how much fits in the circle. I understand that analyzation but I think for a lay person looking at that presentation, District 5 is pretty hard for just a normal person without a deep understanding of redistricting law – it’s been a long day already – to call that district compact.<sup>25</sup>

It is important to note that these and other maps with two majority-minority districts that were before the legislature still were more compact, based on objective measures used by courts and demographers, than the plans adopted by the Louisiana legislature. For instance, Senator Fields argued that his amendment was superior to SB5 in terms of compactness.<sup>26</sup> By the final debate,

<sup>22</sup> 4:25. “Louisiana Senate and Governmental Affairs Committee, 2/3/22.”

[https://redist.legis.la.gov/default\\_video?v=senate/2022/02/020322SG](https://redist.legis.la.gov/default_video?v=senate/2022/02/020322SG). Accessed 16 Mar 2022.

<sup>23</sup> 2:18:56. “Louisiana Joint Governmental Affairs Committee, 1/20/22.”

[https://redist.legis.la.gov/default\\_video?v=house/2022/jan/0120\\_22\\_JGA\\_BatonRouge\\_Redist](https://redist.legis.la.gov/default_video?v=house/2022/jan/0120_22_JGA_BatonRouge_Redist). Accessed 16 Mar 2022.

<sup>24</sup> 2:27:53. “Louisiana Joint Governmental Affairs Committee, 1/20/22.”

[https://redist.legis.la.gov/default\\_video?v=house/2022/jan/0120\\_22\\_JGA\\_BatonRouge\\_Redist](https://redist.legis.la.gov/default_video?v=house/2022/jan/0120_22_JGA_BatonRouge_Redist). Accessed 16 Mar 2022.

<sup>25</sup> 2:41:22. “Louisiana Joint Governmental Affairs Committee, 1/20/22.”

[https://redist.legis.la.gov/default\\_video?v=house/2022/jan/0120\\_22\\_JGA\\_BatonRouge\\_Redist](https://redist.legis.la.gov/default_video?v=house/2022/jan/0120_22_JGA_BatonRouge_Redist). Accessed 16 Mar 2022.

<sup>26</sup> 1:12:50. “Louisiana House Session Day 9, 2022 ES1.”

[https://house.louisiana.gov/H\\_Video/VideoArchivePlayer?v=house/2022/feb/0210\\_22\\_Day09\\_2021ES\\_Redist](https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2022/feb/0210_22_Day09_2021ES_Redist). Accessed 17 Mar 2022.

Representative Magee said that compactness was no longer a primary concern for the drafters of HB1.<sup>27</sup>

Supporters of HB1 and SB5 also stressed the importance of maintaining existing districts and communities of interest. They also expressed concerns about splitting parishes. For instance, when closing on SB5 in committee, Senator Hewitt argued for SB5 because, in her view, “it does the best job of the maps presented to this committee in keeping communities of interest, parishes and precincts together and providing for continuity of representation by preserving the cores of our current districts.”<sup>28</sup> At several points in the road shows and hearings, community members did request to be considered as communities of common interest. For instance, Kay Katz, speaking at the Monroe meeting, said:

And I hope that in the lines that were drawn, I hope that District 5 stays in Northeast and North Central Louisiana. We’re a rural area and we have the same interest. Of course, we have a great metropolitan area in Monroe, which is the big city in Northeast Louisiana, and we’re not real big. So we’re good folks together, and I hope that you will keep the lines as close as to what they were before. I support the 5th district the way it is. Thank you.<sup>29</sup>

Several people noted that Acadiana was a community of interest in the Lafayette meeting. For example, George Swift said that keeping the third congressional district intact because of common interests was important to him:

. . . we think the congressional districts need to be comprised of areas that have things in common. And in our particular district, District 3, we have of course the I-10 corridor, we have all of the things that have been talked about earlier. So we would ask that you consider keeping the congressional districts as much intact as possible with common areas and particularly we think in District 3 that that would mean that basically the metros of Lafayette and Lake Charles would stay together in the same district.<sup>30</sup>

In the Covington road show meeting, several people spoke of the North Shore as a community of interest that deserved representation separate from New Orleans. Melissa Flournoy of Louisiana Progress spoke of the North Shore as a community of interest that should have its own congressional district:

<sup>27</sup> 20:33. “Louisiana House Session Day 9, 2022 ES1.”

[https://house.louisiana.gov/H\\_Video/VideoArchivePlayer?v=house/2022/feb/0210\\_22\\_Day09\\_20221ES\\_Redist](https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2022/feb/0210_22_Day09_20221ES_Redist). Accessed 17 Mar 2022.

<sup>28</sup> 28:12. “Louisiana Senate and Governmental Affairs Committee, 2/4/2022.”

[https://redist.legis.la.gov/default\\_video?v=senate/2022/02/020422SG](https://redist.legis.la.gov/default_video?v=senate/2022/02/020422SG). Accessed 14 Mar 2022.

<sup>29</sup> 1:09:48. “Louisiana Redistricting Video, Monroe, Louisiana 10/20/21.”

[https://redist.legis.la.gov/default\\_video?v=house/2021/oct/1020\\_21\\_Monroe\\_Redist](https://redist.legis.la.gov/default_video?v=house/2021/oct/1020_21_Monroe_Redist) Accessed 29 Mar 2022.

<sup>30</sup> 1:46:02. “Louisiana Redistricting Video, Lafayette, Louisiana 10/26/21.”

[https://redist.legis.la.gov/default\\_video?v=house/2021/oct/1026\\_21\\_Lafayette\\_Redist](https://redist.legis.la.gov/default_video?v=house/2021/oct/1026_21_Lafayette_Redist). Accessed 29 Mar 2022.



We think there's an opportunity to really think of the Northshore of Louisiana really as Louisiana's Gold Coast. We look at the development here along the I-10 and I-12 corridor. It's the center of economic development and energy around redevelopment, commercial development, population growth. And as people are forced by hurricanes really to become climate migrants, we think that there'll be even additional growth in this I-10, I-12 corridor over the next ten years. So, as you consider redrawing these maps, we know it will be difficult to make everyone happy. We do think that there's an opportunity to create a Northshore congressional district, a second minority district to look at the possibility of a second minority district for the supreme court and the public service commission.<sup>31</sup>

Several other community configurations were mentioned by members of the public throughout the road shows.

For their part, several legislators who supported HB1 and SB5 also raised concerns about keeping multiple communities of interest intact. For instance, Representative Deshotel mentioned Avoyelles Parish as a community of interest:

Representative Deshotel: Thank you Mr. Chairman. Representative, I'm looking at the map and I'm obviously interested in my area and I'm looking at Avoyelles Parish. And I noticed that you have the northern portion of Avoyelles in District 3. And I'm assuming that you separated Avoyelles via the river. Is that the case?

Representative Marcelle: Absolutely.

Representative Deshotel: So, I just would like to know your thought process of giving North Avoyelles, which is a community of interest with more North Louisiana. Why did you give North Avoyelles to a district in -- that would be South Louisiana?<sup>32</sup>

Senator Hewitt identified some communities of interest that were important to her as well:

. . . we heard a lot in Iberia and St. Martin Parish just to give a shout out to our Lafayette friends about that being a community of interest certainly and Lake Charles and Lafayette see themselves as a community of interest so we want to make sure that we hear those issues as well.<sup>33</sup>

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<sup>31</sup> 1:26:59. "Louisiana Redistricting Video, Covington, Louisiana 11/30/21." [https://redist.legis.la.gov/default\\_video?v=house/2021/nov/1130\\_21\\_Northshore\\_Redist](https://redist.legis.la.gov/default_video?v=house/2021/nov/1130_21_Northshore_Redist). Accessed 29 Mar 2022.

<sup>32</sup> 2:12:38. "Louisiana House and Governmental Affairs Committee, 2/10/22." [https://redist.legis.la.gov/default\\_video?v=house/2022/feb/0210\\_22\\_HG](https://redist.legis.la.gov/default_video?v=house/2022/feb/0210_22_HG). Accessed 16 Mar 2022.

<sup>33</sup> 2:53:54. "Louisiana Joint Governmental Affairs Committee, 1/20/22." [https://redist.legis.la.gov/default\\_video?v=house/2022/jan/0120\\_22\\_JGA\\_BatonRouge\\_Redist](https://redist.legis.la.gov/default_video?v=house/2022/jan/0120_22_JGA_BatonRouge_Redist). Accessed 16 Mar 2022.

Representative Ivey expressed concerns with a map that split East Baton Rouge three times<sup>34</sup> and later identified “rural Louisiana” and “urban Louisiana” as separate communities of interest.<sup>35</sup> In the final debate on HB1, Representative Magee said that “the people of Monroe have a certain community of interest, the people of Shreveport have a certain community of interest, the people of Lafayette have a certain community of interest, the people in Terrebonne have a certain community of interest, the north shore has its own flavor, all of that is maintained in this map.”<sup>36</sup> Representative Magee said that he had concerns that maps with two majority-minority districts split LaFourche and Terrebonne parishes.<sup>37</sup> Senator Hewitt identified several other communities of interest:

We ensure that Louisiana’s agriculture heritage continues to be respected by maintaining a primarily rural and agricultural-based district. We preserve the connectivity of Louisiana’s Acadiana region. Louisiana’s major cities and their surrounding communities are preserved and connected to the maximum extent possible. We ensure that Louisiana’s major military installations remain strong and in connection with their surrounding communities of support, which is very important when you’re looking at brack implications. This maintains the connection with the community of interest of Baton Rouge and its surrounding communities. It maintains the connections of the communities of interest of the New Orleans region and its surrounding communities. It maintains the connections and the community of interest of the Shreveport region, and its surrounding communities and the same for Alexandria, and Monroe.<sup>38</sup>

Based on these statements, there are clearly multiple communities of interest that could be accounted for when drawing congressional districts.

However, there was little sense of which communities of interest were to be prioritized over others and why, a point poignantly made by Devonte Lewis of Baton Rouge:

. . . you’ve probably heard from George Swift about keeping Lake Charles and Lafayette in the same congressional district. And this map does that. But I’ve heard Black people

<sup>34</sup> 2:27:16. “Louisiana Joint Governmental Affairs Committee, 1/20/22.”

[https://redist.legis.la.gov/default\\_video?v=house/2022/jan/0120\\_22\\_JGA\\_BatonRouge\\_Redist](https://redist.legis.la.gov/default_video?v=house/2022/jan/0120_22_JGA_BatonRouge_Redist). Accessed 16 Mar 2022.

<sup>35</sup> 1:37:40. “Louisiana House and Governmental Affairs Committee, 2/4/2022.”

[https://redist.legis.la.gov/default\\_video?v=house/2022/feb/0204\\_22\\_HG](https://redist.legis.la.gov/default_video?v=house/2022/feb/0204_22_HG). Accessed 11 Mar 2022.

<sup>36</sup> 14:05. “Louisiana House Session Day 9, 2022 ES1.”

[https://house.louisiana.gov/H\\_Video/VideoArchivePlayer?v=house/2022/feb/0210\\_22\\_Day09\\_2022ES\\_Redist](https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2022/feb/0210_22_Day09_2022ES_Redist). Accessed 17 Mar 2022.

<sup>37</sup> 22:55. “Louisiana House Session Day 9, 2022 ES1.”

[https://house.louisiana.gov/H\\_Video/VideoArchivePlayer?v=house/2022/feb/0210\\_22\\_Day09\\_2022ES\\_Redist](https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2022/feb/0210_22_Day09_2022ES_Redist). Accessed 17 Mar 2022.

<sup>38</sup> 2:03:51. “Louisiana Senate Chamber Day 6, 2022 ES1.”

[https://senate.la.gov/s\\_video/videoarchive.asp?v=senate/2022/02/020822SCHAMB](https://senate.la.gov/s_video/videoarchive.asp?v=senate/2022/02/020822SCHAMB). Accessed 17 Mar 2022.



say, give me an opportunity and they haven't been heard. And so, all I'm asking is that this committee gives Black people, minorities, and some of us the same privilege that we give Mr. Swift. I love George Swift, but I want to know why his voice is more powerful than mine. Why do we value the interest of that community more than we value the interest of Black and Brown people of this state?<sup>39</sup>

Similarly, when Representative Miguez asked why HB1 split St. Martin and St. Mary parishes, Representative Magee just said that sometimes the lines have to move.<sup>40</sup> Ultimately, the House plan split Rapides Parish when it was first adopted, spurring objections.<sup>41</sup> After the compromise bill split Grant Parish, Representative Firment responded, "All along we've heard about continuity of representation and communities of interest, but those two factors do not seem to have been considered in this amendment."<sup>42</sup> Ultimately, supporters of HB 1 and SB5 felt they had to sacrifice some of these communities of interest, but there was no a clear explanation in the record of why some interests were spared over others.

It is important to note that there were several maps that managed to incorporate two majority-minority districts while keeping certain parishes or communities together to the same degree as the map ultimately adopted by the legislature. For example, SB2, SB9, and SB11 do not split Avoyelles Parish. SB2 and SB11, like SB5, split East Baton Rouge into only two districts. HB8 and HB12 both drew two majority-minority districts while splitting the same or fewer parishes than the plan ultimately adopted by the legislature also while keeping Terrebonne and LaFourche parishes whole. Representative Dupiessis said that he presented an option that did not break up Grant Parish.<sup>43</sup> Some alternative bills also show that it is possible to create two majority-minority districts while splitting even fewer parishes than the plans in HB1 and SB5; for example, HB8, HB9, and SB9 split fewer than 15 parishes overall. The plan adopted in HB1/SB5 splits 15 parishes.<sup>44</sup> In any event, when members raised issues with particular districts

<sup>39</sup> 2:49:54. "Louisiana House and Governmental Affairs Committee, 2/4/2022."  
[https://redist.legis.la.gov/default\\_video?v=house/2022/feb/0204\\_22\\_HG](https://redist.legis.la.gov/default_video?v=house/2022/feb/0204_22_HG). Accessed 11 Mar 2022.

<sup>40</sup> 18:06. "Louisiana House Session Day 9, 2022 ES1."  
[https://house.louisiana.gov/H\\_Video/VideoArchivePlayer?v=house/2022/feb/0210\\_22\\_Day09\\_2022ES\\_Redist](https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2022/feb/0210_22_Day09_2022ES_Redist). Accessed 17 Mar 2022.

<sup>41</sup> 1:02. "Louisiana House Session Day 9, 2022 ES1."  
[https://house.louisiana.gov/H\\_Video/VideoArchivePlayer?v=house/2022/feb/0210\\_22\\_Day09\\_2022ES\\_Redist](https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2022/feb/0210_22_Day09_2022ES_Redist). Accessed 17 Mar 2022.

<sup>42</sup> 10:50. "Louisiana House Session Day 15, 2022 ES1."  
[https://house.louisiana.gov/H\\_Video/VideoArchivePlayer?v=house/2022/feb/0218\\_22\\_Day15\\_2022ES\\_Redist](https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2022/feb/0218_22_Day15_2022ES_Redist). Accessed 17 Mar 2022.

<sup>43</sup> 37:04. "Louisiana House Session Day 15, 2022 ES1."  
[https://house.louisiana.gov/H\\_Video/VideoArchivePlayer?v=house/2022/feb/0218\\_22\\_Day15\\_2022ES\\_Redist](https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2022/feb/0218_22_Day15_2022ES_Redist). Accessed 17 Mar 2022.

<sup>44</sup> Enrolled Senate Bill 5. <https://legis.la.gov/legis/ViewDocument.aspx?d=1248635>

or communities of interest in maps with two majority-minority districts, the sponsors of those maps always expressed willingness to redraw the maps to keep particular areas intact.<sup>45</sup>

It is also important to note that the prominent voices in the road show who stressed that New Orleans and Baton Rouge were *not* communities of common interest were ignored. Such sentiments came up at multiple points in the road shows, committee hearings, and debates.<sup>46</sup> For instance, in the House Governmental Affairs Committee Hearing on February 4, Devonte Lewis said:

I live in here in the Garden District in Baton Rouge. But I live on what's known on the south side, which is typically considered Black. You walk up the street, you enter the sixth congressional district, Garry Graves, same neighbors, same power line, same water infrastructure, but the only thing that is different between my neighbor on Park Boulevard and me on South 18th is I start what known as the Black side of the city and so I got thrown into the second congressional district. Even though if we took communities of interest of my community and my neighborhood, I would be with my neighbor, Garry Graves, who lives three blocks down. So, when we talk about community of interest, it seems that the only time Black community of interest matters is when it's being diluted, not when we are giving the opportunity to succeed and have our voices be heard.<sup>47</sup>

The issue also came up in this exchange with Senator Hewitt:

Michael Pernick: . . . One of the most significant requests that I've heard from members of the public just following this process was to not place East Baton Rouge and Orleans Parish in the same congressional district. . .

Senator Hewitt:: Well, we certainly heard that in a couple places primarily in New Orleans and that was a theme in Baton Rouge as well.<sup>48</sup>

<sup>45</sup> For instance, see 2:17:00. "Louisiana House and Governmental Affairs Committee, 2/10/22." [https://redist.legis.la.gov/default\\_video?v=house/2022/feb/0210\\_22\\_HG](https://redist.legis.la.gov/default_video?v=house/2022/feb/0210_22_HG). Accessed 16 Mar 2022. Or 2:54:09. "Louisiana Joint Governmental Affairs Committee, 1/20/22." [https://redist.legis.la.gov/default\\_video?v=house/2022/jan/0120\\_22\\_JGA\\_BatonRouge\\_Redist](https://redist.legis.la.gov/default_video?v=house/2022/jan/0120_22_JGA_BatonRouge_Redist). Accessed 16 Mar 2022. Or at 1:41:22. "Louisiana House and Governmental Affairs Committee, 2/4/2022." [https://redist.legis.la.gov/default\\_video?v=house/2022/feb/0204\\_22\\_HG](https://redist.legis.la.gov/default_video?v=house/2022/feb/0204_22_HG). Accessed 11 Mar 2022.

<sup>46</sup> This statement from Melissa Flournoy, also cited above, is one example. 1:26:59. "Louisiana Redistricting Video, Covington, Louisiana, 11/30/21." [https://redist.legis.la.gov/default\\_video?v=house/2021/nov/1130\\_21\\_Northshore\\_Redist](https://redist.legis.la.gov/default_video?v=house/2021/nov/1130_21_Northshore_Redist). Accessed 29 Mar 2022.

<sup>47</sup> 2:51:43. "Louisiana House and Governmental Affairs Committee, 2/4/2022." [https://redist.legis.la.gov/default\\_video?v=house/2022/feb/0204\\_22\\_HG](https://redist.legis.la.gov/default_video?v=house/2022/feb/0204_22_HG). Accessed 11 Mar 2022.

<sup>48</sup> 2:53:25. Louisiana Joint Governmental Affairs Committee, 1/20/22." [https://redist.legis.la.gov/default\\_video?v=house/2022/jan/0120\\_22\\_JGA\\_BatonRouge\\_Redist](https://redist.legis.la.gov/default_video?v=house/2022/jan/0120_22_JGA_BatonRouge_Redist). Accessed 16 Mar 2022.

Representative Stefanski also acknowledged the concerns over Baton Rouge publicly:

If anyone was listening to the road show we had in Baton Rouge there was a lot of talk about that. A lot of talk about Baton Rouge not being split, talks about Baton Rouge not being included in an Orleans congressional district. So I think that's an evolving conversation. Certainly in Baton Rouge there is a high minority population so if the conversations are devolving on a second majority-minority district, it's hard to have those conversations without Baton Rouge in em [sic].<sup>49</sup>

As Senator Hewitt and Representative Stefanski both noted, this sentiment was raised repeatedly in the road shows. In Baton Rouge, Roland Volk said:

People often ask me, why is the U.S. Congress so confrontational and what can be done? I believe the answer is we need to move to congressional districts that are not gerrymandered. With one district, with all minority and low-income people packed into it. In the other district's minority and low-income voters influence is diluted. How do we regain the sense of community in our politics? The answer is to adjust political districts to match the communities they serve rather than being gerrymandered for political gains. The North Baton Rouge to New Orleans district is a classic example.<sup>50</sup>

Albert Samuels also said in Baton Rouge, "Fairness might ask the question of why is the Scotlandville area, the North Baton Rouge area, lumped in with a district that really predominantly represents New Orleans?"<sup>51</sup> Ultimately, the legislature did not act on these expressions of community: Representative Marcelle's amendment that would give the legislature the opportunity to split Baton Rouge from New Orleans failed.<sup>52</sup>

Finally, it is important to note that Black Louisianans constitute a community of common interest whose needs should be considered. This viewpoint was shared at several points during the road shows and hearings. For instance, Sheila Lewis, in Baton Rouge, said, "It is time for Louisiana to do the right thing. It is time for us to be able to say that we, people of color, have a seat at the table where there is representation that takes care of the well-being of all citizens of

<sup>49</sup> 23:00. "State Rep. John Stefanski Press Club 11/22/2021." Louisiana Public Broadcasting. <https://www.youtube.com/watch?v=SuquGa6rJI8> Accessed 29 Mar 2022.

<sup>50</sup> 1:45:00. "Louisiana Redistricting Video, Baton Rouge, Louisiana 11/16/21." [https://redist.legis.la.gov/default\\_video?v=house/2021/nov/1116\\_21\\_BatonRouge\\_RedistSU](https://redist.legis.la.gov/default_video?v=house/2021/nov/1116_21_BatonRouge_RedistSU). Accessed 29 Mar 2022.

<sup>51</sup> 1:18:30. "Louisiana Redistricting Video, Baton Rouge, Louisiana 11/16/21." [https://redist.legis.la.gov/default\\_video?v=house/2021/nov/1116\\_21\\_BatonRouge\\_RedistSU](https://redist.legis.la.gov/default_video?v=house/2021/nov/1116_21_BatonRouge_RedistSU). Accessed 29 Mar 2022.

<sup>52</sup> "House Floor Amendments." <http://www.legis.la.gov/legis/ViewDocument.aspx?d=1247152>. Accessed 31 Mar 2022.

this great state of Louisiana.”<sup>53</sup> Valerie D. Oliver, also from Baton Rouge, said, “I am concerned about policing in my community, and who will understand what it is like to wonder, every single day, if I am pulled over for a busted taillight, if I am going to make it home?”<sup>54</sup> At the Joint Governmental Affairs Committee Hearing, Chris Kaiser of the ACLU said:

Kaiser: And so, I would just offer that in this date, minority voters and in particular Black voters are themselves communities of common interest—

Representative Ivey: Absolutely.<sup>55</sup>

However, the legislature failed to provide Black Louisianans with the two districts they had requested.

In summary, it is clear from the record that, although sponsors of HB1 and SB5 cited the importance of traditional principles of redistricting, such as compactness, maintaining communities of interest, or respecting political boundaries, when presented with alternative bills that added a second majority-minority district while outperforming SB5 and HB1 on those metrics, they backed away from their strict adherence to traditional principles. By the end of the process, the supporters of HB1 in particular had shifted their legislative priorities. Instead of compactness or other measures, Representative Magee said that the primary criterion for drawing the congressional districts had become “to honor the traditional boundaries as best as possible to create this map that we believe is legal.”<sup>56</sup> Representative Magee said the drafters of HB1 prioritized the traditional boundaries after looking at all the other criteria they could have used. He refused to even say why HB1, which he sponsored, was superior to other bills.<sup>57</sup> Later, he said that HB1 was designed to “maintain traditional boundaries, communities of interest, geography, and make sure it accounted for the population deviation, and that it comported with federal law.”<sup>58</sup> Representative Magee said that he did not even look at any performance data or

<sup>53</sup> 1:03:20. “Louisiana Redistricting Video, Baton Rouge, Louisiana 11/16/21.” [https://redist.legis.la.gov/default\\_video?v=house/2021/nov/1116\\_21\\_BatonRouge\\_RedistSU](https://redist.legis.la.gov/default_video?v=house/2021/nov/1116_21_BatonRouge_RedistSU). Accessed 7 Mar 2022.

<sup>54</sup> 2:01:40. “Louisiana Redistricting Video, Baton Rouge, Louisiana 11/16/21.” [https://redist.legis.la.gov/default\\_video?v=house/2021/nov/1116\\_21\\_BatonRouge\\_RedistSU](https://redist.legis.la.gov/default_video?v=house/2021/nov/1116_21_BatonRouge_RedistSU). Accessed 7 Mar 2022.

<sup>55</sup> 1:23:15. “Louisiana Joint Governmental Affairs Committee, 1/20/22.” [https://redist.legis.la.gov/default\\_video?v=house/2022/jan/0120\\_22\\_JGA\\_BatonRouge\\_Redist](https://redist.legis.la.gov/default_video?v=house/2022/jan/0120_22_JGA_BatonRouge_Redist). Accessed 16 Mar 2022.

<sup>56</sup> 12:55. “Louisiana House Session Day 9, 2022 ES1.” [https://house.louisiana.gov/H\\_Video/VideoArchivePlayer?v=house/2022/feb/0210\\_22\\_Day09\\_20221ES\\_Redist](https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2022/feb/0210_22_Day09_20221ES_Redist). Accessed 17 Mar 2022.

<sup>57</sup> 15:25. “Louisiana House Session Day 9, 2022 ES1.” [https://house.louisiana.gov/H\\_Video/VideoArchivePlayer?v=house/2022/feb/0210\\_22\\_Day09\\_20221ES\\_Redist](https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2022/feb/0210_22_Day09_20221ES_Redist). Accessed 17 Mar 2022.

<sup>58</sup> 20:30. “Louisiana House Session Day 9, 2022 ES1.” [https://house.louisiana.gov/H\\_Video/VideoArchivePlayer?v=house/2022/feb/0210\\_22\\_Day09\\_20221ES\\_Redist](https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2022/feb/0210_22_Day09_20221ES_Redist). Accessed 17 Mar 2022.

metrics to compare HB1 with plans that would create two majority-minority districts.<sup>59</sup> Representative Magee did not know of any performance analysis that had been done on HB1.<sup>60</sup> The legislature had the opportunity to adopt maps that performed better on metrics such as compactness, population deviation, parish, and precinct splits, and with similar groupings with respect to communities of interest that established two majority-minority districts. The members chose to reject those options.

*Resistance to Adding a Second Majority-minority District*

Supporters of HB1 and SB5 resisted the idea of adding a second majority-minority district. When asked, they admitted that they did not prioritize, consider, or even try incorporating changes in the racial demographics of Louisiana into their maps. For instance, when asked specifically whether the map in HB1 reflects changes in the racial demographics of Louisiana, in particular the decline of the White population percentage relative to the Black population percentage, Representative Magee replied, “That is not something that I think is the primary driver, it’s an important driver, it’s a factor, but this map was based off of maintaining the traditional maps that we’ve always had in the State of Louisiana.”<sup>61</sup> When asked by Representative Marcelle whether the authors of HB1 even attempted to draw a plan with a second minority district, Representative Magee replied, “I cannot say that it rose to the level of attempt.”<sup>62</sup> When pushed to provide a map or draft that they worked on that attempted a second majority-minority district, Representative Magee said, “There has been no draft maps that answers your questions.”<sup>63</sup> Under lengthy questioning, Representative Stefanski never said that any attempt to draw a second majority-minority district was ever made, and refused to give any reasons for why it was not possible for the bill’s authors to have done so:

Representative W. Carter: What specific did you do in order to comply with section 2? Did you draw a map and find that map didn’t work, or did you draw a proposed district and couldn’t get enough numbers in there because you had to comply with the population

<sup>59</sup> 50:30. “Louisiana House Session Day 9, 2022 ES1.”

[https://house.louisiana.gov/H\\_Video/VideoArchivePlayer?v=house/2022/feb/0210\\_22\\_Day09\\_20221ES\\_Redist](https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2022/feb/0210_22_Day09_20221ES_Redist). Accessed 17 Mar 2022.

<sup>60</sup> 53:00. “Louisiana House Session Day 9, 2022 ES1.”

[https://house.louisiana.gov/H\\_Video/VideoArchivePlayer?v=house/2022/feb/0210\\_22\\_Day09\\_20221ES\\_Redist](https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2022/feb/0210_22_Day09_20221ES_Redist). Accessed 17 Mar 2022.

<sup>61</sup> 09:45. “Louisiana House Session Day 9, 2022 ES1.”

[https://house.louisiana.gov/H\\_Video/VideoArchivePlayer?v=house/2022/feb/0210\\_22\\_Day09\\_20221ES\\_Redist](https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2022/feb/0210_22_Day09_20221ES_Redist). Accessed 17 Mar 2022.

<sup>62</sup> 21:10. “Louisiana House Session Day 9, 2022 ES1.”

[https://house.louisiana.gov/H\\_Video/VideoArchivePlayer?v=house/2022/feb/0210\\_22\\_Day09\\_20221ES\\_Redist](https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2022/feb/0210_22_Day09_20221ES_Redist). Accessed 17 Mar 2022.

<sup>63</sup> 22:09. “Louisiana House Session Day 9, 2022 ES1.”

[https://house.louisiana.gov/H\\_Video/VideoArchivePlayer?v=house/2022/feb/0210\\_22\\_Day09\\_20221ES\\_Redist](https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2022/feb/0210_22_Day09_20221ES_Redist). Accessed 17 Mar 2022.

requirement of the congressional act? What specific did you do or the speaker or the authors of the bill do to try to comply with Section 2?

Representative Stefanski: Well, specifically, we're discussing a senate instrument that I am not the author of I've just been asked to carry so there's not a lot—my efforts are minimal because it's not mine.

Representative W. Carter: But my point is, you just said this is a compromise between the two.

Representative Stefanski: Yeah.

Representative W. Carter: You did the other phase of the bill, the other half. I'm very interested in the southern part of the state. That's where I'm from. Okay? So I thank you for keeping Calcasieu together, whole, in the compromise. But, that second half of the state is really the speaker's bill.

Representative Stefanski: Yes.

Representative W. Carter: You handled that bill for the speaker.

Representative Stefanski: Well, Representative Magee was actually the one who handled that.

Representative W. Carter: Well your committee was the one who was responsible.

Representative Stefanski: Yes it was, correct.

Representative W. Carter: You had to put the hours into the bill to get it into a form that it could be presented to this body is what I'm saying. Now, I just want to know what you did to comply with section 2. Did you draw a district—attempt to draw a second minority district, and couldn't do it because of numbers? Or because you had to damage too many communities of interest? Or because there was not enough population in the south or in the north? What specific kept you from being able to create a second minority district? That's all I'm saying.

Representative Stefanski: I have probably drawn more maps than I ever want to draw in the rest of my life. There were a number of different versions in multiple different bills that were made. I took our population, I took the geography of the state, I took our communities of interest, I took the will of the public, the will of the legislature, and I balanced all of that with the law, and came up with something that the speaker and I believed was the best for Louisiana.

Representative W. Carter: Which one of those things that you just mentioned prevented a second minority majority district? Which one of those things—

Representative Stefanski: It is not a simple answer, as you know as well, it is a complicated process that involves a holistic view of all the elements to try to decide what works best for the state of Louisiana. It is not a one-word answer that I can give you on



that. It's everything. You look at all these factors, and you weigh them, and you balance them with the law, and then you make a policy decision on what you believe that your attempt is the best for Louisiana.

Representative W. Carter: I've heard people say, in this body, the reason why they couldn't create a second minority district was because it'd have to damage too many communities of interest, okay. And, that apparently was not the problem you had in your work with this bill.

Representative Stefanski: It's a factor, it's not—In order to decide—In order to redistrict, you have to look at all of these elements, and you have to balance all of these and come up with an instrument not only that you believe is the best for Louisiana, but that also can meet the legislative process. As you know, this is a power that is vested in the legislature. The constitution says the legislature shall do this. You have been around this body for a long time. You understand what it takes for a bill to become a law. So that's an element that you balance as well. All of those elements that you have to balance to come up with something.<sup>64</sup>

In other words, the sponsors of HB1 were given multiple opportunities to say they tried to draft a plan with a second majority-minority district and declined to say that they had.

Similarly, on the senate side, it was unclear that there was ever any attempt to draw maps with a second majority-minority district. When questioned about the process on the senate floor, Senator Hewitt said that her team tried to produce a second majority-minority district map and couldn't, but when asked for drafts, details, or documentation about that map she was unable to provide any.<sup>65</sup>

Sponsors of HB1 and SB5 further argued that the Voting Rights Act did not require them to consider adding a second majority-minority district. As Senator Hewitt said:

[T]he fact that one third of the population around the state is a minority population does not guarantee that there should be two minority districts and I think that statement in Section B clearly says that it does not provided [sic] that nothing in this section establishes a right to have members of a protected class elected in numbers equal to their proportion in the population. So it doesn't mean that you have the default is because it's a third that you have two minority districts.<sup>66</sup>

<sup>64</sup> 21:44. "Louisiana House Session Day 15, 2022 ES1."

[https://house.louisiana.gov/H\\_Video/VideoArchivePlayer?v=house/2022/feb/0218\\_22\\_Day15\\_2022ES\\_Redist](https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2022/feb/0218_22_Day15_2022ES_Redist). Accessed 17 Mar 2022.

<sup>65</sup> 2:36:42-2:37:27. "Louisiana Senate Chamber Day 6, 2022 ES1."

[https://senate.la.gov/s\\_video/videoarchive.asp?v=senate/2022/02/020822SCHAMB](https://senate.la.gov/s_video/videoarchive.asp?v=senate/2022/02/020822SCHAMB). Accessed 17 Mar 2022.

<sup>66</sup> 10:28. "Louisiana Senate and Governmental Affairs Committee."

[https://redist.legis.la.gov/default\\_video?v=senate/2022/02/020322SG](https://redist.legis.la.gov/default_video?v=senate/2022/02/020322SG). Accessed 16 Mar 2022.

Likewise, Representative Farnum said, “Yeah. I just know that the Voting Right [*sic*] Act does not guarantee that a third of six is two. I know that to be true.”<sup>67</sup> However, that interpretation of the Voting Rights Act was disputed several times on the record. For instance, Senator Luneau said in response to Senator Hewitt:

I interpret that to mean that the minority people are given the opportunity to elect the person they wanted, it doesn’t guarantee that a minority is going to be elected. It’s never intended to do that. And what this map does is just that, it doesn’t guarantee that they’re going to elect a minority, it guarantees that the minority will have the opportunity to elect the people that they want to elect. It gives them the right to come in and vote in who they choose to. And like I said earlier. I’m a living example of that if they don’t want to elect a minority, they don’t have to but it gives that segment of the population an equal opportunity to come in and elect people. You could dilute it.<sup>68</sup>

Representative Carter argued that under the Voting Rights Act:

If you didn’t attempt to create a district, and didn’t set down why you couldn’t do it, in plain English, ‘this is why we couldn’t do it, we had too many districts or couldn’t get the population, population wasn’t compact enough,’ none of those things have been enumerated from that podium as a problem of complying with section 2. So, you don’t violate section 2 necessarily by not creating a district, you violate section 2 by not trying to allow a protected class if they have sufficient numbers, sufficient compactness in order to elect a person of their choice to represent them.<sup>69</sup>

However, Senator Hewitt continued to make the claim that the Voting Rights Act did not necessitate a second majority-Black district. Senator Hewitt says that Kate McKnight, a lawyer with the law firm Baker Hostetler, told her that the map she presented complied with the Voting Rights Act, and that she has exchanged emails with her containing legal advice about compliance with the Voting Rights Act.<sup>70</sup>

Proponents of SB5 and HB1 also resisted adding a second majority-minority district because the current map, which was cleared by the Department of Justice in 2010, does not have one. As Representative Magee claimed:

<sup>67</sup> 2:26:58. “Louisiana House and Governmental Affairs Committee, 2/10/22.”

[https://redist.legis.la.gov/default\\_video?v=house/2022/feb/0210\\_22\\_HG](https://redist.legis.la.gov/default_video?v=house/2022/feb/0210_22_HG). Accessed 16 Mar 2022.

<sup>68</sup> 9:28. “Louisiana Senate and Governmental Affairs Committee.”

[https://redist.legis.la.gov/default\\_video?v=senate/2022/02/020322SG](https://redist.legis.la.gov/default_video?v=senate/2022/02/020322SG). Accessed 16 Mar 2022

<sup>69</sup> 26:39. “Louisiana House Session Day 15, 2022 ES1.”

[https://house.louisiana.gov/H\\_Video/VideoArchivePlayer?v=house/2022/feb/0218\\_22\\_Day15\\_20221ES\\_Redist](https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2022/feb/0218_22_Day15_20221ES_Redist). Accessed 17 Mar 2022.

<sup>70</sup> 2:39:00-2:39:45; 2:44:15. “Louisiana Senate Chamber Day 6, 2022 ES1.”

[https://senate.la.gov/s\\_video/videoarchive.asp?v=senate/2022/02/020822SCHAMB](https://senate.la.gov/s_video/videoarchive.asp?v=senate/2022/02/020822SCHAMB). Accessed 17 Mar 2022.



What we really have to do is just, keep what we have. And that's exactly what this map does. Yes, its malapportioned, certain districts lost, certain districts gained, but it keeps the status quo. And it's based off of the traditional lines of this body that was drawn before, that has passed legal muster, and we believe this map will also pass legal muster.<sup>71</sup>

When asked later to provide the basis for his claim that HB1 was legal, Representative Magee declined to cite to any particular laws or analysis, but referenced his own consideration of the legislative testimony.<sup>72</sup> This idea also was discussed in an exchange during a meeting of the Joint Governmental Affairs Committee:

Representative Ivey: So my point is I don't believe based on the conversations I've had with staff and everything that, you know, obviously I think just about everywhere there's always some challenging, but I do believe that we passed muster and the Justice Department accepted our maps and so there wasn't any – I mean, obviously, there was a bigger issue.

Chris Kaiser: One quick response to that though, irrespective of the Section 2 compliance. In 2010, remember Section 5, it was this pre-Shelby County and so the question whether—

Representative Ivey: I wasn't here, so I couldn't remember but—

Chris Kaiser: Shelby County was handed down in 2013 and Section 5 has to do with whether the Department of Justice wants to intervene in a change to election law. That's no longer what we're talking about.<sup>73</sup>

When this claim arose again, Michael Pernick of the NAACP LDF noted:

Mr. Representative Farnum, if I may, I think it's important to clarify that the standard that the Department of Justice used to measure preclearance under Section 5 of the Voting Rights Act is a different standard than Section 2. There have been many maps that have been pre-cleared under Section 5 that have subsequently been struck down by federal courts under Section 2, including here in Louisiana. The Supreme Court has made very clear that they – and this is almost an exact quote that they will not equate the Section 2 vote dilution standard with the Section 5 non-retrogression standard. So, I would caution – with respect, I would caution you not to rely on DOJ preclearance in 2011 as a free

<sup>71</sup> 08:34. “Louisiana House Session Day 9, 2022 ES1.”

[https://house.louisiana.gov/H\\_Video/VideoArchivePlayer?v=house/2022/feb/0210\\_22\\_Day09\\_2022ES\\_Redist](https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2022/feb/0210_22_Day09_2022ES_Redist). Accessed 17 Mar 2022.

<sup>72</sup> 10:43. “Louisiana House Session Day 9, 2022 ES1.”

[https://house.louisiana.gov/H\\_Video/VideoArchivePlayer?v=house/2022/feb/0210\\_22\\_Day09\\_2022ES\\_Redist](https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2022/feb/0210_22_Day09_2022ES_Redist). Accessed 17 Mar 2022.

<sup>73</sup> 1:26:04. “Louisiana Joint Governmental Affairs Committee, 1/20/22.”

[https://redist.legis.la.gov/default\\_video?v=house/2022/jan/0120\\_22\\_JGA\\_BatonRouge\\_Redist](https://redist.legis.la.gov/default_video?v=house/2022/jan/0120_22_JGA_BatonRouge_Redist). Accessed 16 Mar 2022.

ticket on those maps because it's a different legal standard and we know from experience that does not necessarily mean that the maps comply with Section 2.<sup>74</sup>

It is not clear whether the proponents of SB5 or HB1 received advice from other attorneys about the validity of this claim.

Senator Hewitt also said that she was particularly resistant to adding a second majority-minority district because she was concerned about minority vote dilution. Senator Hewitt makes this argument in the committee hearings as well as in the floor debates:

I do not believe, and there is too much uncertainty to convince us otherwise, that a second majority-minority district can be drawn in Louisiana that is sufficiently compact and would perform as a minority district without greatly diminishing the opportunity to elect a candidate of choice that has currently afforded the voters in Congressional District 2. By taking minority voters out of a district that is 56 percent Black VAP today and creating two underperforming districts as proposed in several other bills, we would jeopardize the current majority-minority district and this legislature would be remiss in our obligations to comply with the Voting Rights Act.<sup>75</sup>

Representative Stefanski also raised this point in his public comments before the Press Club:

Certainly it is being considered, so there's a ton of dynamics in that. Number one, which I think is the most prominent in the maps that I've seen submitted to me is that, you know, are these districts effective? And what I mean by that is, you know, what's the minority population located in these districts, what is the voting age population located in these districts, what is the registration located in these districts. There's a limit to what becomes an effective district to produce the desired results. The second thing I will say is that some of these districts look very similar to districts that have been struck down in the past as racial gerrymanders. As we can remember in the—I believe it was the early 2000s they two districts, one that is commonly referred to as the Zorro district and one that is commonly referred to as the Slash district. Both those were struck down by the courts and I think its difficult to draw two majority-minority districts that are legal.<sup>76</sup>

Representative Ivey echoes this concern in an exchange in the House and Governmental Affairs Committee:

Representative Ivey: . . . So, it's possible, I would imagine, to draw a map that would produce that two 50 plus 1 districts, but yet maybe a candidate wouldn't be able – maybe the minority in either district would not be able to actually elect a candidate in a choice

<sup>74</sup> 1:58:40. “Louisiana House and Governmental Affairs Committee, 2/4/2022.” [https://redist.legis.la.gov/default\\_video?v=house/2022/feb/0204\\_22\\_HG](https://redist.legis.la.gov/default_video?v=house/2022/feb/0204_22_HG). Accessed 11 Mar 2022.

<sup>75</sup> 28:44. “Louisiana Senate and Governmental Affairs Committee, 2/4/2022.” [https://redist.legis.la.gov/default\\_video?v=senate/2022/02/020422SG](https://redist.legis.la.gov/default_video?v=senate/2022/02/020422SG). Accessed 14 Mar 2022.

<sup>76</sup> 15:27. “State Rep. John Stefanski Press Club 11/22/2021.” Louisiana Public Broadcasting. <https://www.youtube.com/watch?v=SuquGa6rJI8> Accessed 29 Mar 2022.

based on the traditional turnout or even it had to – you know what I’m saying? Is that a concern that y’all have had in how these additional districts are shaped?

Jamison: Well, I will say it may possibly be a concern, right? But as you’ve heard, some of our colleagues from NAACP LDF, they’ve actually compared this analysis and watch these trends as well and they’re very confident in their performance.<sup>77</sup>

Senator Hewitt made this argument again when presenting the final version of SB5:

And in addition, I am concerned about taking a currently performing majority-minority district that’s performing at about 58 percent Black voting age population, taking some of the Black voters out of that district to create a second district where you end up with two districts that are 51 percent or 51 percent Black voting age population. So there is no evidence that we have seen yet, and considerable uncertainty, as to whether both of those districts would perform as minority districts. And so you could very likely, in an attempt to create a second district, you could put the current minority district in jeopardy and end up with no minority representation whatsoever. And so again, I think the law provides some guidance on that issue, and where there is too much uncertainty about whether a second majority-minority district would perform sufficiently, the deference to the courts have been to the map drawer, and that’s why I have chosen in my bill to not have a second district--minority district, to only have one but to know that that district is going to continue to perform to give the minorities an opportunity to elect the candidate of their choice. And so for those reasons, I object to this amendment.

However, there is no evidence to support the claim that the two majority-minority districts presented in any of the alternative bills would not perform with respect to allowing Black voters to elect a candidate of their choice. Senator Hewitt or other legislators who made that claim did not offer any supporting evidence or data analysis. When pressed on this point, Senator Hewitt admits that an analysis of racially polarized voting would be needed to see whether two majority-minority districts would perform, but she did not have one done:

Obviously, what needs to be done is to have, you know, a racially polarized voting analysis done, there have been folks that have testified at the table that they have done them, I haven’t seen them, I’ve asked for that so that we can see. You know, what you have to have in a study you have to have enough election history, enough knowledge of voter turnout, you have to be able to have enough data to be able to be statistically significant so that you can predict a trend with some certainty, and so any information. . . I’ve had a number of people talk to me with some interest in this and maybe some statistical information and no one has had the confidence to be able to predict with some certainty any of the trends. Again, what I keep hearing is that there is too much noise in the data, there’s not enough consistency in the performance on voter turnout and other

<sup>77</sup> 2:33:50. “Louisiana House and Governmental Affairs Committee, 2/4/2022.” [https://redist.legis.la.gov/default\\_video?v=house/2022/feb/0204\\_22\\_HG](https://redist.legis.la.gov/default_video?v=house/2022/feb/0204_22_HG). Accessed 11 Mar 2022.

things in different areas to be able to model it with any confidence. And so, for lack of certainty on that, again, I think the best course of action currently is the action that I've chosen to take, is to not create the second district because I want to make sure that we're preserving the integrity of the current minority district.<sup>78</sup>

Senator Hewitt did not have a racially polarized voting analysis done, nor did she present documentation that anyone told her that such an analysis was impossible because of data limitations or other reasons.<sup>79</sup> Senator Hewitt admitted talking with Baker Hostetler about hiring consultants to conduct a racially polarized voting analysis but said that she was told that an unidentified person at Stanford University thought it was not possible to conduct the analysis.<sup>80</sup>

Moreover, as Ms. Jamison says above, the analyses of the plans with two majority-minority districts that were conducted by advocacy groups such as the NAACP LDF show that they reliably allow Black voters to elect candidates of their choice. What's more, interested stakeholders agree. As Representative Wilford Carter argues:

You know that's another important point I want to make. I looked at both maps I said, they're not that much different. All you did is cut off that part of District 2 that come in in East Baton Rouge Parish and create another district by reducing District 2 numbers. And if Troy Carter don't have any problem with it, I ain't got a problem with it, okay. So, apparently, you must have satisfied him that the studies you've done would be that he would -- that district produce favorable to him. And I assume you did the same study for District 5.<sup>81</sup>

In other words, while Senator Hewitt claims without evidence that adding a second minority district would dilute Black voting power, members of the Black community, their elected representatives, and several statistical analyses showed time and time again on the record that it is possible to add that second district in ways that would reliably allow Black voters to elect two candidates of their choice.

### *Summary*

This examination of the legislative debate shows that it is possible to accomplish the goals that the sponsors of HB1 and SB5 consider important, such as compactness, keeping

<sup>78</sup> 2:49:08. "Louisiana Senate Chamber Day 6, 2022 ES1."

[https://senate.la.gov/s\\_video/videoarchive.asp?v=senate/2022/02/020822SCHAMB](https://senate.la.gov/s_video/videoarchive.asp?v=senate/2022/02/020822SCHAMB). Accessed 17 Mar 2022.

<sup>79</sup> 2:51:49. "Louisiana Senate Chamber Day 6, 2022 ES1."

[https://senate.la.gov/s\\_video/videoarchive.asp?v=senate/2022/02/020822SCHAMB](https://senate.la.gov/s_video/videoarchive.asp?v=senate/2022/02/020822SCHAMB). Accessed 17 Mar 2022.

<sup>80</sup> 2:55:30. "Louisiana Senate Chamber Day 6, 2022 ES1."

[https://senate.la.gov/s\\_video/videoarchive.asp?v=senate/2022/02/020822SCHAMB](https://senate.la.gov/s_video/videoarchive.asp?v=senate/2022/02/020822SCHAMB). Accessed 17 Mar 2022.

<sup>81</sup> 2:42:51. "Louisiana House and Governmental Affairs Committee, 2/10/22."

[https://redist.legis.la.gov/default\\_video?v=house/2022/feb/0210\\_22\\_HG](https://redist.legis.la.gov/default_video?v=house/2022/feb/0210_22_HG). Accessed 16 Mar 2022.

certain parishes and communities of interest together, keeping precincts whole, and ensuring that Black voters can elect candidates of their choosing, in plans that provide for two majority-minority districts. In fact, on all of their expressed redistricting priorities, plans with two majority-minority districts performed equally or better than the plans passed by the legislature. Proponents of SB5 and HB1 provided no evidence to the contrary. These facts came up before legislators clearly and repeatedly over the months and weeks leading up to the final vote. For instance, regarding Amendment 88, Representative Gaines said:

This bill is going to give you an opportunity to bring Louisiana in line with fairness and the Voting Rights Act. It doesn't guarantee anything it just gives us an opportunity to invoke, create fair representation for this state. This particular bill is more compact than any bill that's been presented, HB1 or SB5, it has minimal population deviation, and it prioritizes community of interest. It also has the lowest population deviation of any map that's been presented today or last week. It has the fewest number of split parishes. So this bill does all this and still enables Blacks to elect someone of their choice, someone from their community, someone who has shared values, someone who has shared interests. It still creates that opportunity.”<sup>82</sup>

No one disputed or questioned Representative Gaines's characterization of the amendment. Amendment 88 failed anyway. Senator Fields also presented an amendment on the senate side that added a second majority-minority district while outperforming SB5 on metrics such as compactness and population deviation. It failed as well. There is nothing in the record to support the claim that adding a second majority-minority district is incompatible with other goals of the legislature.

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<sup>82</sup> 1:12:50. “Louisiana House Session Day 9, 2022 ES1.” [https://house.louisiana.gov/H\\_Video/VideoArchivePlayer?v=house/2022/feb/0210\\_22\\_Day09\\_20221ES\\_Redist](https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2022/feb/0210_22_Day09_20221ES_Redist). Accessed 17 Mar 2022.

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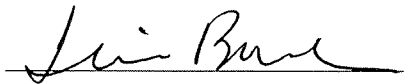
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Per 28 U.S. Code § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 14, 2022.

A handwritten signature in black ink, appearing to read "Traci Burch", is written over a horizontal line.

Traci Burch, Ph.D

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## APPENDIX 1

### Traci Burch

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#### Employment

- Associate Professor, Northwestern University Department of Political Science (2014-Present)
- Research Professor, American Bar Foundation (2007- Present)
- Assistant Professor, Northwestern University Department of Political Science (2007-2014)

#### Education

- *Harvard University*  
Ph.D. in Government and Social Policy  
Dissertation: *Punishment and Participation: How Criminal Convictions Threaten American Democracy*  
Committee: Jennifer Hochschild (Chair), Sidney Verba, and Gary King
- *Princeton University*  
A.B. in Politics, *magna cum laude*

#### Publications

- Burch, Traci. 2022. "Officer-Involved Killings and the Repression of Protest." *Urban Affairs Review*.
- Burch, Traci. 2021. "Not All Black Lives Matter: Officer-Involved Deaths and the Role of Victim Characteristics in Shaping Political Interest and Voter Turnout." *Perspectives on Politics*.
- Kay Lehman Schlozman, Philip Edward Jones, Hye Young You, Traci Burch, Sidney Verba, Henry E. Brady. 2018. "Organizations and the Democratic Representation of Interests: What Happens When Those Organizations Have No Members?" *Perspectives on Politics*.
- Burch, Traci. 2016. "Political Equality and the Criminal Justice System." In Resources, Engagement, and Recruitment. Casey Klofstad, ed. Philadelphia: Temple University Press.
- Burch, Traci. 2016. "Review of The First Civil Right by Naomi Murakawa." *The Forum*.

- Kay Lehman Schlozman, Philip Edward Jones, Hye Young You, Traci Burch, Sidney Verba, Henry E. Brady. 2015. "Louder Chorus – Same Accent: The Representation of Interests in Pressure Politics, 1981-2011." In Darren Halpin, David Lowery, Virginia Gray, eds. The Organization Ecology of Interest Communities. New York: Palgrave Macmillan.
- Burch, Traci. 2015. "Skin Color and the Criminal Justice System: Beyond Black-White Disparities in Criminal Sentencing." *Journal of Empirical Legal Studies* 12(3): 395-420.
- Burch, Traci. 2014. "The Old Jim Crow: Racial Residential Segregation and Neighborhood Imprisonment." *Law & Policy* 36(3) 223-255.
- Burch, Traci. 2014. "The Effects of Imprisonment and Community Supervision on Political Participation." Detaining Democracy Special Issue. *The Annals of the American Academy of Political and Social Science* 651 (1) 184-201.
- Burch, Traci. 2013. Trading Democracy for Justice: Criminal Convictions and the Decline of Neighborhood Political Participation. Chicago: University of Chicago Press.
- Hochschild, Jennifer, Vesla Weaver, and Traci Burch. 2012. Transforming the American Racial Order. Princeton: Princeton University Press.
- Schlozman, Kay Lehman, Sidney Verba, Henry Brady, Traci Burch, and Phillip Jones. 2012. "Who Sings in the Heavenly Chorus? The Shape of the Organized Interest System." In Schlozman, Kay Lehman, Sidney Verba, and Henry Brady, The Unheavenly Chorus, Princeton: Princeton University Press.
- Schlozman, Kay Lehman, Sidney Verba, Henry Brady, Phillip Jones, and Traci Burch. 2012. "Political Voice through Organized Interest Activity." In Schlozman, Kay Lehman, Sidney Verba, and Henry Brady, The Unheavenly Chorus, Princeton: Princeton University Press.
- Burch, Traci. 2012. "Did Disfranchisement Laws Help Elect President Bush? New Evidence on the Turnout and Party Registration of Florida's Ex-Felons." *Political Behavior* 34 (1); 1-26.
- Burch, Traci. 2011. "Turnout and Party Registration among Criminal Offenders in the 2008 General Election." *Law and Society Review* 45(3): 699-730.
- Burch, Traci. 2011. "Fixing the Broken System of Financial Sanctions." *Criminology and Public Policy* 10(3).
- Hochschild, Jennifer; Vesla Weaver, and Traci Burch. 2011. "Destabilizing the American



Racial Order.” *Daedalus* 140; 151-165.

- Burch, Traci. 2009. “Can the New Commander-In-Chief Sustain His All Volunteer Standing Army?” *The Dubois Review on Race* 6(1).
- Burch, Traci. 2009. “Review of *Imprisoning Communities*, by Todd Clear.” *Law and Society Review* 43(3) 716-18.
- Burch, Traci. 2009. “American Politics and the Not-So-Benign Neglect of Criminal Justice,” in The Future of American Politics, ed. Gary King, Kay Schlozman, and Norman Nie. (New York: Routledge).
- Schlozman, Kay Lehman and Traci Burch. 2009. “Political Voice in an Age of Inequality,” in America at Risk: Threats to Liberal Self-Government in an Age of Uncertainty, ed. Robert Faulkner and Susan Shell (Ann Arbor: University of Michigan Press).
- Hochschild, Jennifer and Traci Burch. 2007. “Contingent Public Policies and the Stability of Racial Hierarchy: Lessons from Immigration and Census Policy,” in Political Contingency: Studying the Unexpected, the Accidental, and the Unforseen, ed. Ian Shapiro and Sonu Bedi (New York: NYU Press).

## Grants

- Co-Principal Investigator. “Fellowship and Mentoring Program on Law and Inequality.” September 1, 2020 to August 31, 2023. \$349, 313. National Science Foundation.

## Honors and Fellowships

- **American Political Science Association 2014 Ralph J. Bunche Award** (for Trading Democracy for Justice).
- American Political Science Association Urban Section 2014 Best Book Award (for Trading Democracy for Justice).
- American Political Science Association Law and Courts Section 2014 C. Herman Pritchett Award (for Trading Democracy for Justice).
- Research grant, Stanford University Center for Poverty and Inequality (2012).
- American Political Science Association E. E. Schattschneider Award for the best doctoral dissertation in the field of American Government (2009)
- American Political Science Association William Anderson Award for the best doctoral dissertation in the field of state and local politics, federalism, or intergovernmental relations (2008)

- American Political Science Association Urban Section Best Dissertation in Urban Politics Award (2008)
- Harvard University Robert Noxon Toppan Prize for the best dissertation in political science (2007)
- Institute for Quantitative Social Sciences Research Fellowship (2006-07)
- *European Network on Inequality* Fellowship (2005)
- Research Fellowship, The Sentencing Project (2005)
- Doctoral Fellow, Malcolm Weiner Center for Inequality and Social Policy (2004-07)

### **Professional Service**

- APSA Law and Courts Section Best Paper Award Committee (2020-2021)
- APSA Elections, Public Opinion, and Voting Behavior Executive Committee (2020-2023)
- General Social Survey Board of Overseers (2020-2025)
- APSA Kammerer Prize Committee (2017)
- Associate Editor, *Political Behavior* (2015-2019)
- APSA Law and Courts Section, Lifetime Achievement Award Prize Committee (2014-2015)
- Law and Society Association, Kalven Prize Committee (2013-2014)
- American Political Science Association, Urban Politics Section Dissertation Prize Committee (2012-13)
- American Political Science Association, Urban Politics Section Executive Committee (2012-13)
- Law and Society Association Diversity Committee, (2012-2013)
- American Political Science Association, Urban Politics Section Program Co-Chair (2011)
- Associate Editor, *Law and Social Inquiry*
- American Political Science Association, Urban Politics Section Book Prize Committee (2009)

- Reviewer for *The American Political Science Review*, *Public Opinion Quarterly*, *American Politics Research*, and *Time-Sharing Experiments in the Social Sciences*.

### **Presentations and Invited Talks**

- University of Pennsylvania. Virtual. “Voice and Representation in American Politics.” April 2021.
- University of Michigan. Virtual. “Which Lives Matter? Factors Affecting Mobilization in Response to Officer-Involved Killings.” February 2021.
- University of Pittsburgh. Virtual. “Policing and Participation.” November 2020.
- Hamilton College Constitution Day Seminar. Virtual. “Racial Protests and the Constitution.” September 2020.
- New York Fellows of the American Bar Foundation. New York, NY. “Police Shootings and Political Participation.” March 2020.
- Pennsylvania State University, State College, PA. “Effect of Officer Involved Killings on Protest. November 2019.
- Princeton University. Princeton NJ. “Effects of Police Shootings on Protest among Young Blacks.” November 2019.
- Missouri Fellows of the American Bar Foundation. Branson, MO. Police Shootings and Political Participation in Chicago. September 2019.
- Northwestern University. “Police Shootings and Political Participation.” November, 2018.
- Princeton University. Princeton, NJ. “Police Shootings and Political Participation.” September, 2018.
- University of California at Los Angeles. Los Angeles, CA. “Police Shootings and Political Participation.” August, 2018.
- American Bar Association Annual Meeting. Chicago, IL. “Police Shootings and Political Participation.” August 2018.
- American Bar Endowment Annual Meeting. Lexington, KY. “Effects of Police Shooting in Chicago on Political Participation.” June 2018.
- Vanderbilt University. “Effects of Police Shootings in Chicago on Political Participation.”

April 2018.

- Washington University in St. Louis. “Effects of Pedestrian and Auto Stops on Voter Turnout in St. Louis.” February 2018.
- Fellows of the American Bar Foundation, Los Angeles. “Assaulting Democracy.” January 2018.
- Northwestern University Reviving American Democracy Conference. Panel presentation. “Barriers to Voting.” January 2018.
- University of Illinois at Chicago. “Effects of Police Shootings in Chicago on Political Participation.” October, 2017.
- Chico State University. “Constitution Day Address: Policing and Political Participation.” September, 2017.
- Fellows of the American Bar Foundation, Atlanta, Georgia. “Policing in Georgia.” May 2017.
- United States Commission on Civil Rights. Testimony. “Collateral Consequences of Mass Incarceration.” May 2017.
- Northwestern University Pritzker School of Law. “Effects of Police Stops of Cars and Pedestrians on Voter Turnout in St. Louis.” April 2017.
- University of California at Los Angeles. Race and Ethnic Politics Workshop. “Effects of Police Stops of Cars and Pedestrians on Voter Turnout in St. Louis.” March 2017.
- University of North Carolina at Chapel Hill. American Politics Workshop. “Effects of Police Stops of Cars and Pedestrians on Voter Turnout in St. Louis.” February 2017.
- National Bar Association, St. Louis MO. “Political Effects of Mass Incarceration.” July 2016.
- Harvard University, Edmond J. Safra Center for Ethics. Inequalities/Equalities in Cities Workshop. April 2016.
- American Political Science Association Annual Meeting. September 2015. “Responsibility for Racial Justice.” Discussant.
- St. Olaf College. April 2015. “The Collateral Consequences of Mass Incarceration.”
- Northwestern University. Institute for Policy Research. February 2015. “The Civic Culture

Structure.”

- Texas A&M University. Race, Ethnicity, and Politics Workshop. September 2014. “Trading Democracy for Justice.”
- Columbia University Teachers College. The Suburban Promise of Brown Conference. May 2014. “Can We All Get Along, Revisited: Racial Attitudes, the Tolerance for Diversity, and the Prospects for Integration in the 21<sup>st</sup> Century.”
- University of Kentucky. Reversing Trajectories: Incarceration, Violence, and Political Consequences Conference. April 2014. “Trading Democracy for Justice.”
- University of Chicago. American Politics Workshop. March 2014. “How Geographic Differences in Neighborhood Civic Capacity Affect Voter Turnout.”
- Kennedy School of Government, Harvard University. February 2014. “Trading Democracy for Justice.”
- University of Michigan. American Politics Workshop. December 2013. “Trading Democracy for Justice.”
- Yale University. American Politics and Public Policy Workshop. September 2013. “Trading Democracy for Justice.”
- American Political Science Association Annual Meeting. August 2013. “The Heavenly Chorus Is Even Louder: The Growth and Changing Composition of the Washington Pressure System.” With Kay Lehman Schlozman, Sidney Verba, Henry Brady, and Phillip Jones.
- National Bar Association, Miami Florida, July 2013. “The Collateral Consequences of Mass Imprisonment.”
- Loyola University. American Politics Workshop. December 2012. “Mass Imprisonment and Neighborhood Voter Turnout.”
- Marquette University School of Law. November 2012. “The Collateral Consequences of Mass Imprisonment.”
- Yale University. Detaining Democracy Conference. November 2012. “The Effects of Imprisonment and Community Supervision on Political Participation.”
- Brown University. American Politics Workshop. October 2012. “Mass Imprisonment and Neighborhood Voter Turnout.”

- American Bar Association National Meeting, August 2012. “Mass Imprisonment: Consequences for Society and Politics.”
- University of Madison-Wisconsin. American Politics Workshop. March 2012. “The Spatial Concentration of Imprisonment and Racial Political Inequality.”
- American Political Science Association Annual Meeting. 2011. **“Theme Panel: How Can Political Science Help Us Understand the Politics of Decarceration?”**
- University of Pennsylvania. Democracy, Citizenship, and Constitutionalism Conference. April, 2011. “Vicarious Imprisonment and Neighborhood Political Inequality.”
- University of Chicago School of Law. Public Laws Colloquium. Chicago, IL. November, 2010. ““The Effects of Neighborhood Incarceration Rates on Individual Political Efficacy and Perceptions of Discrimination.”
- Pomona College. November, 2010. “Incarceration Nation.”
- University of Washington. Surveying Social Marginality Workshop. October 2010. “Using Government Data to Study Current and Former Felons.”
- American Bar Foundation, Chicago, IL, September 2010. “The Effects of Neighborhood Incarceration Rates on Individual Political Attitudes.”
- Northwestern University. Chicago Area Behavior Conference. May 2010. “Trading Democracy for Justice: The Spillover Effects of Incarceration on Voter Turnout in Charlotte and Atlanta.”
- Annual Meeting of the Law and Society Association, Chicago, IL, May 2010. “Neighborhood Criminal Justice Involvement and Voter Turnout in the 2008 General Election.”
- Annual Meeting of the Southern Political Science Association, Atlanta, GA, January 2010. “The Art and Science of Voter Mobilization: Grassroots Perspectives on Registration and GOTV from Charlotte, Atlanta, and Chicago.”
- University of Illinois at Chicago. Institute for Government and Public Affairs. November 2009. “Turnout and Party Registration among Convicted Offenders during the 2008 Presidential Election.”
- Annual Meeting of the American Political Science Association, Toronto, Ontario, Canada, September 2009. “‘I Wanted to Vote for History:’ Turnout and Party Registration among Convicted Offenders during the 2008 Presidential Election.”

- Harris School of Public Policy, University of Chicago. American Politics Workshop. December 2008. “Trading Democracy for Justice? The Spillover Effects of Imprisonment on Neighborhood Voter Participation.”
- Northwestern University School of Law. Law and Political Economy Colloquium. November 2008. “Did Disfranchisement Laws Help Elect President Bush? New Evidence on the Turnout Rates and Candidate Preferences of Florida's Ex-Felons.”
- University of California, Berkeley. Center for the Study of Law and Society. October 2008. “Trading Democracy for Justice? The Spillover Effects of Imprisonment on Neighborhood Voter Participation.”
- Law and Society Association Annual Meeting, Montreal, Canada, May 2008. “Did Disfranchisement Laws Help Elect President Bush? New Evidence on the Turnout Rates and Candidate Preferences of Florida's Ex-Felons.”
- Law and Society Association Annual Meeting, Montreal, Canada, May 2008. “Trading Democracy for Justice? The Spillover Effects of Imprisonment on Neighborhood Voter Participation.”
- Midwest Political Science Association Conference, Chicago, IL, April 2007. Paper: “Concentrated Incarceration: How Neighborhood Incarceration Decreases Voter Registration.”

### **Working Papers Under Review**

- “Introduction” (with Jenn Jackson and Periloux Peay) in *Freedom Dreams: A Symposium on Abolition*. Eds. Jenn Jackson, Periloux Peay, and Traci Burch. Social Science Quarterly.
- “The Effects of Community Police Performance on Protest in Chicago” (For Symposium Honoring John Hagan)
- “How Police Departments Frame Low-Threat Victims of Officer-Involved Killings”
- Which Lives Matter?

### **Additional Activities**

- Expert witness in *Kelvin Jones vs. Ron DeSantis, etc. et al.* (U.S. District Court for the Northern District of Florida Consolidated Case No. 4:19-cv-00).
- Expert witness in *Community Success Initiative, et al., Plaintiffs v. Timothy K. Moore* (Superior Court, Wake County, NC Case No. 19-cv-15941).

- Expert witness in *People First of Alabama v. Merrill* (U.S. District Court in Birmingham, Alabama, Case No. 2: 20-cv-00619-AKK)
- Expert witness in *Florida State Conference of the NAACP v. Lee* (U.S. District Court in the Northern District of Florida, Case No. 4:21-cv-00187-MW-MAF)
- Expert witness in *One Wisconsin Institute Inc. v. Jacobs* (U.S. District Court in the Western District of Wisconsin, Case No. 15-CV-324-JDP).
- Expert witness in *Alpha Phi Alpha Fraternity Inc., et al. v. Raffensperger* (U.S. District Court for the Northern District of Georgia, Case No. 1:21-cv-05337-SCJ)

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# Exhibit 5

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**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.*

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

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-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.

  
Dr. Press Robinson

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# Exhibit 6

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**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.*

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

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-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 vote 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

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# Exhibit 7

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**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.*

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

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-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:

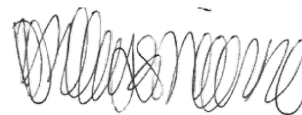
1. My name is Dorothy Nairne. I am over 18 years of age and am competent to make this declaration. I have personal knowledge of the statements made in this affidavit and each is true and correct.
2. I am Black and a U.S. citizen.
3. I am a resident of the State of Louisiana, and I currently reside in 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.

A handwritten signature in dark ink, appearing to read 'Dorothy Nairne', is written above a horizontal line.

Dr. Dorothy Nairne

# Exhibit 8

RETRIEVED FROM DEMOCRACYDOCKET.COM

**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.*

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

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-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.

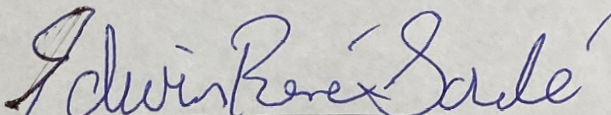
6. I have been politically active for over the past 40 years. I regularly attend rallies and town halls in Hammond and neighboring parishes, as well as legislative committee hearings at the State Capitol in Baton Rouge. I worked as campaign manager for a candidate for CD 5, Sandra “Candy” Christophe, 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 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

# Exhibit 9

RETRIEVED FROM DEMOCRACYDOCKET.COM

**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.*

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

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-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

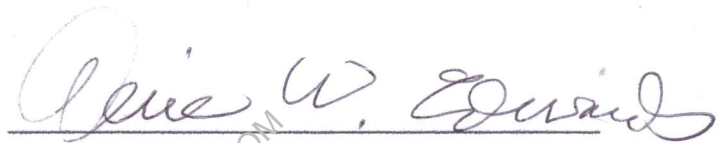
have kept the Black community in Baton Rouge intact, while also providing Black voters in CD 6 with an equal opportunity to elect candidates of their choice.

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 dark ink, appearing to read "Alice W. Washington", is written over a horizontal line.

Dr. Alice Washington

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# Exhibit 10

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**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.*

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

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-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.

A handwritten signature in dark ink, appearing to read "Clee Lowe". The signature is written in a cursive style with a horizontal line drawn through the middle of the letters.

Rev. Clee Lowe

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**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.*

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

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-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



# Exhibit 12

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

PRESS ROBINSON, et al.,

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*Defendant.*

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*Defendant.*

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

**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 that 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.

A handwritten signature in black ink, appearing to read 'Martha Davis', written over a horizontal line.

Martha Davis

# Exhibit 13

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

PRESS ROBINSON, et al.,

*Plaintiffs,*

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*Defendant.*

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*Defendant.*

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

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

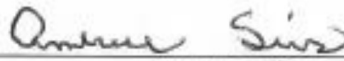
Pursuant to 28 U.S.C. § 1746, I, Ambrose Sims, declare as follows:

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 districted 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

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**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.*

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

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-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 Congressman.

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.

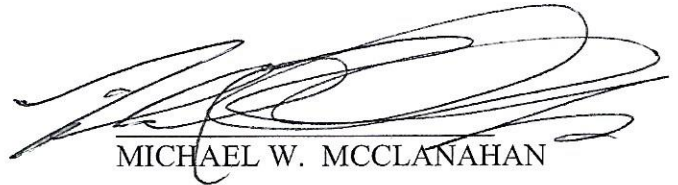
27. I believe that this institutional and environmental racism can be attributed in part to the way our congressional maps are drawn, which perpetuates longstanding discrimination against Black people. The configuration of the congressional map with only one majority-Black district means that Black Louisianans, 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

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# Exhibit 15

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**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.*

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

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-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

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# Exhibit 16

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# 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
<b>Deadline: Specials</b>	n/a	12/29/2021	n/a	6/22/2022	n/a
<b>Deadline: Propositions</b>	n/a	12/29/2021	3/7/2022	6/22/2022	10/17/2022
<b>Qualifying Dates</b>	n/a	1/26/2022 – 1/28/2022	n/a	7/20/2022 – 7/22/2022	n/a
<b>In Person/By Mail Registration Deadline</b>	12/15/2021	2/23/2022	3/30/2022	10/11/2022*	11/9/2022
<b>Geaux Vote Online Registration Deadline</b>	12/25/2021	3/5/2022	4/9/2022	10/18/2022	11/19/2022
<b>Deadline to Request a Mail Ballot from Registrar</b> (other than Military and Overseas)	1/11/2022	3/22/2022	4/26/2022	11/4/2022	12/6/2022
<b>Deadline for Registrar to Receive Voted Mail Ballot</b> (other than Military and Overseas)	1/14/2022	3/25/2022	4/29/2022	11/7/2022	12/9/2022
<b>Early Voting Begins</b>	➤ 1/3/2022	3/12/2022	4/16/2022	10/25/2022	11/26/2022
<b>Early Voting Ends</b>	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**

Revised 12/2021

# Exhibit 17

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## 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

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

BY JESSICA WILLIAMS | [jwilliams@theadvocate.com](mailto: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 rewarded 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



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.”

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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.

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**FOLLOW JESSICA WILLIAMS ON TWITTER, @JWILLIAMSNOLA.**

# Exhibit 19

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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

- 2 -

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).

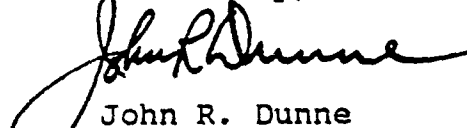
In light of the considerations discussed above, I cannot conclude, as I must under the Voting Rights Act, that the state's burden has been sustained in this instance. Therefore, on behalf of the Attorney General, I must object to the 1991 redistricting plan for the State House of Representatives to the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

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[https://www.nola.com/news/politics/article\\_b608193c-c9f4-531a-8e24-01534407c15a.html](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.

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"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](mailto:jodonoghue@nola.com) or on Twitter at **@jsodonoghue**. Please consider following us on Facebook at **NOLA.com** and **NOLA.com-Baton Rouge**.

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# Exhibit 21

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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.

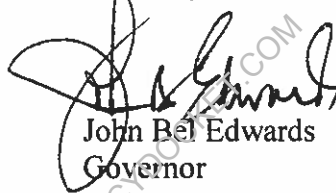
It is my firm belief that this map violates Section 2 of the Voting Rights Act of 1965 and further is not in line with the principle of fundamental fairness that should have driven this process. In choosing this map, the Legislature rejected numerous alternative maps with two majority minority districts, 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

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# Exhibit 22

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*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"),<sup>1</sup> which we have reattached as **Appendix 1** of this letter. In particular, Chair Stefanski articulated potential objections to drawing a second district

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<sup>1</sup> 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.<sup>2</sup> 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.<sup>3</sup> 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.<sup>4</sup>

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.<sup>5</sup> These results demonstrate that it is possible to draw two majority-Black opportunity districts that

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<sup>2</sup> 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.

<sup>3</sup> 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>.

<sup>4</sup> 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.

<sup>5</sup> 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.<sup>6</sup>

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.<sup>7</sup>

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.<sup>8</sup> 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.<sup>9</sup> 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

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<sup>6</sup> 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*).

<sup>7</sup> *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.

<sup>8</sup> See Compactness Reports for Illustrative Maps (on file with LDF).

<sup>9</sup> *Hays I*, 839 F. Supp. at 1200-01.

credible enough to survive a motion to dismiss.<sup>10</sup> 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.<sup>11</sup> 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.<sup>12</sup>

The Supreme Court has expressly “refuse[d] to equate a Section 2 vote dilution inquiry with the Section 5 retrogression standard.”<sup>13</sup> 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.<sup>14</sup> For that matter, the fact that a federal court denied in 2019 a motion to dismiss a Section 2 claim again

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

<sup>11</sup> *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>.

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

<sup>13</sup> *See Georgia v. Ashcroft*, 539 U.S. 461 (2003).

<sup>14</sup> *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.<sup>15</sup>

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.”<sup>16</sup> 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.<sup>17</sup> Moreover, the constitutional requirement that congressional districts must be drawn with “precise mathematical equality”<sup>18</sup> makes it

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<sup>15</sup> See *Johnson*, 2019 WL 2329319 at \*4.

<sup>16</sup> HCR 90, Joint Rule No. 21(G).

<sup>17</sup> 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).

<sup>18</sup> *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](mailto: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.

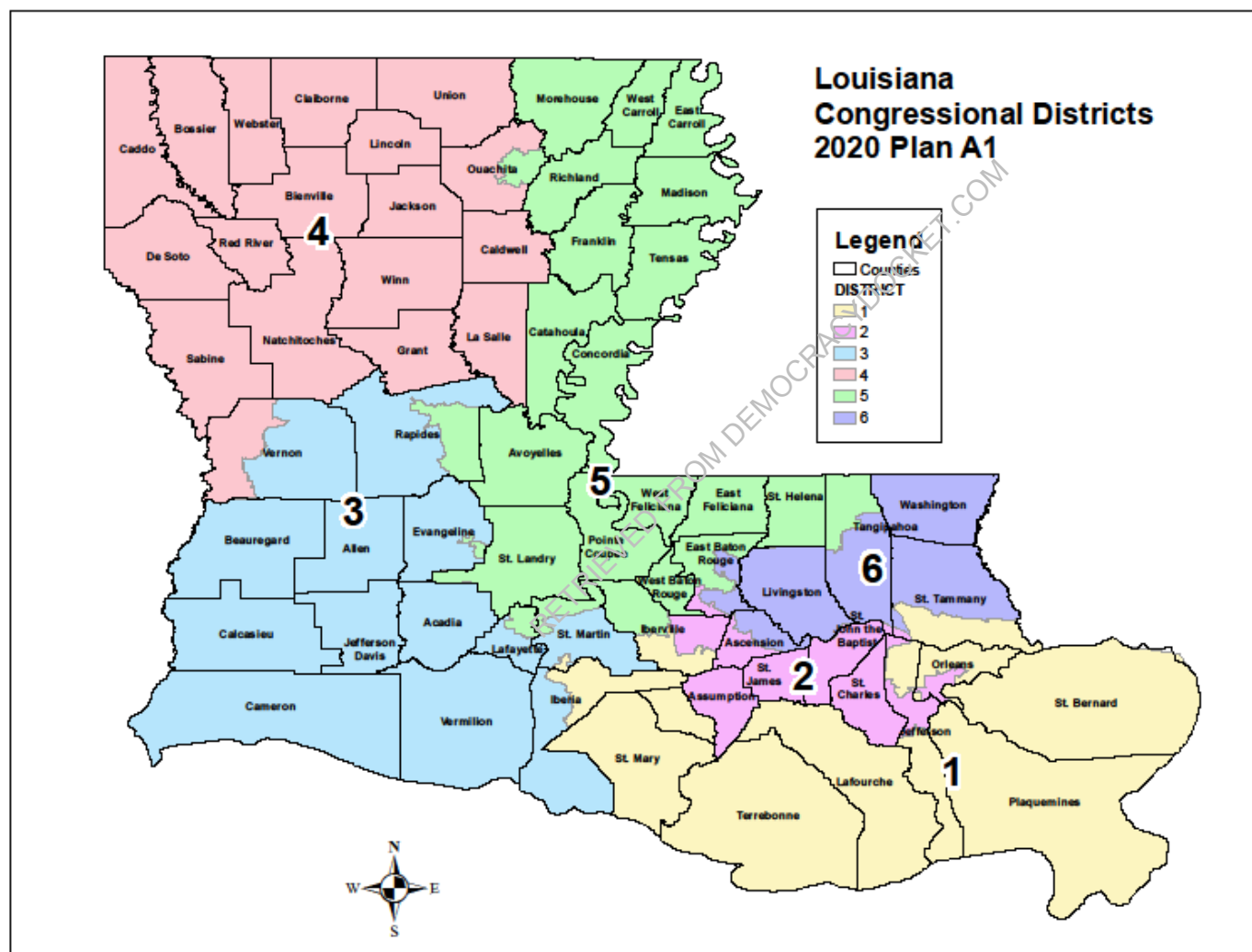
#### Power Coalition for Equity and Justice

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.

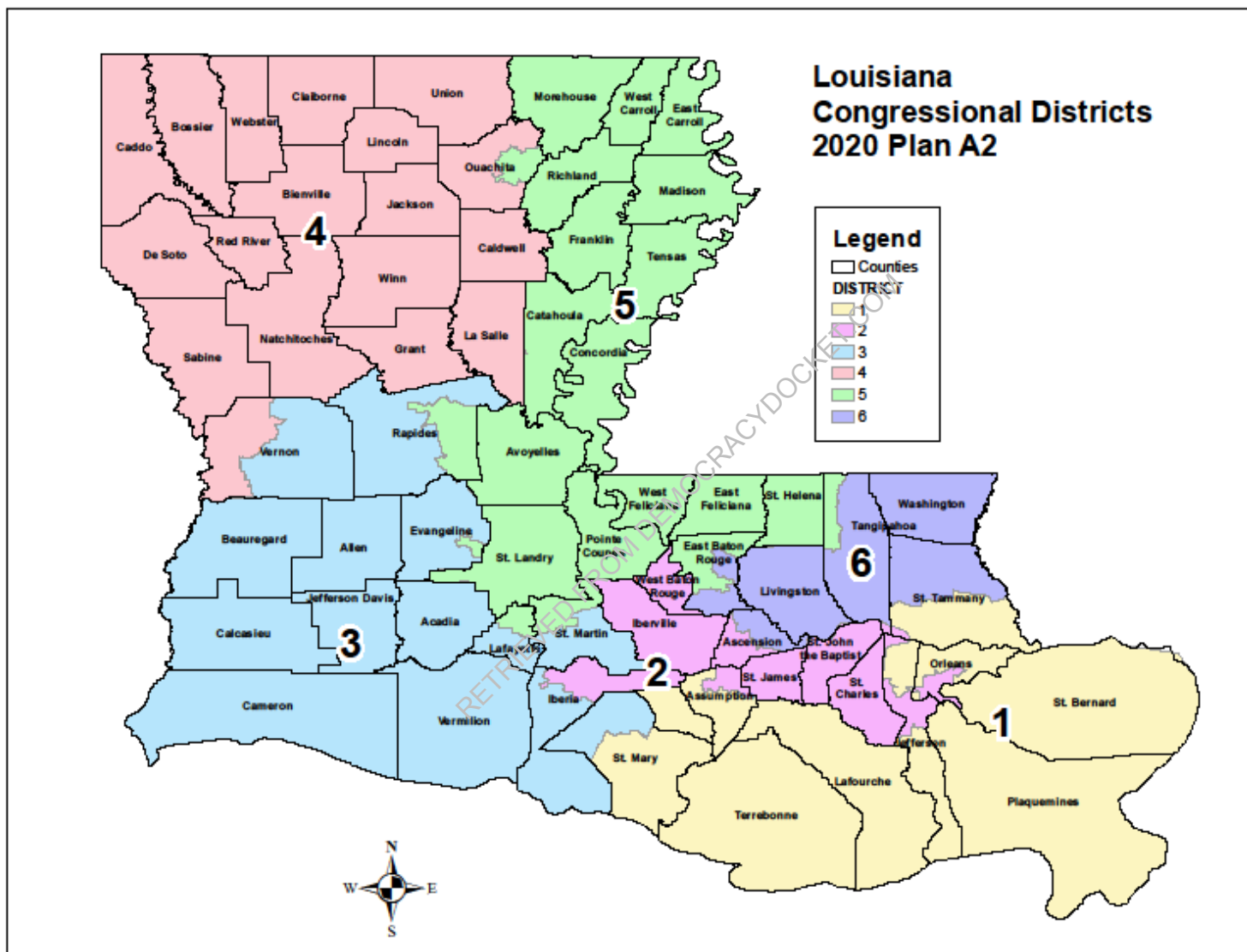
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## APPENDIX 1

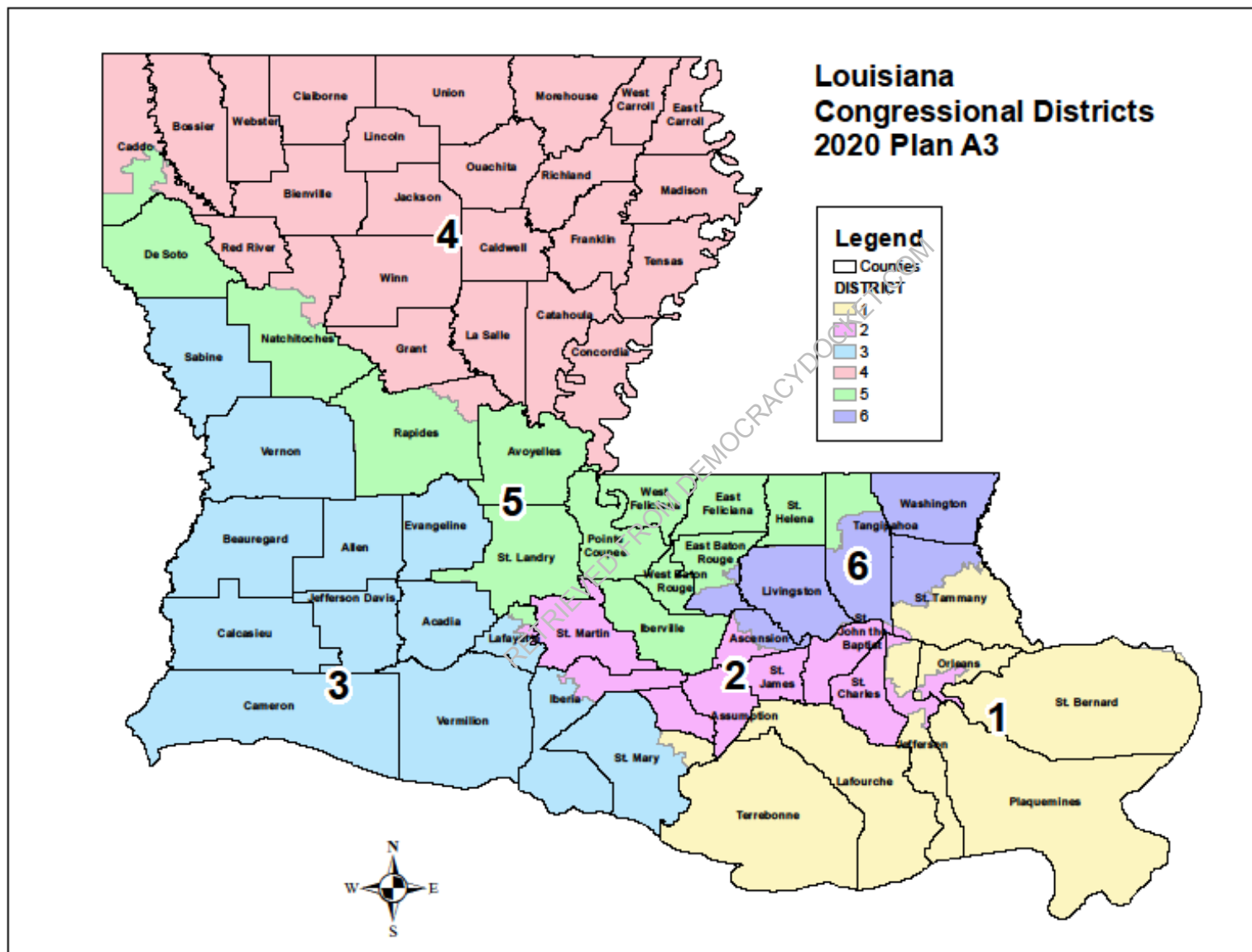
### *Seven Illustrative Maps (A1 – A7) with Two Majority-Minority Opportunity Districts*



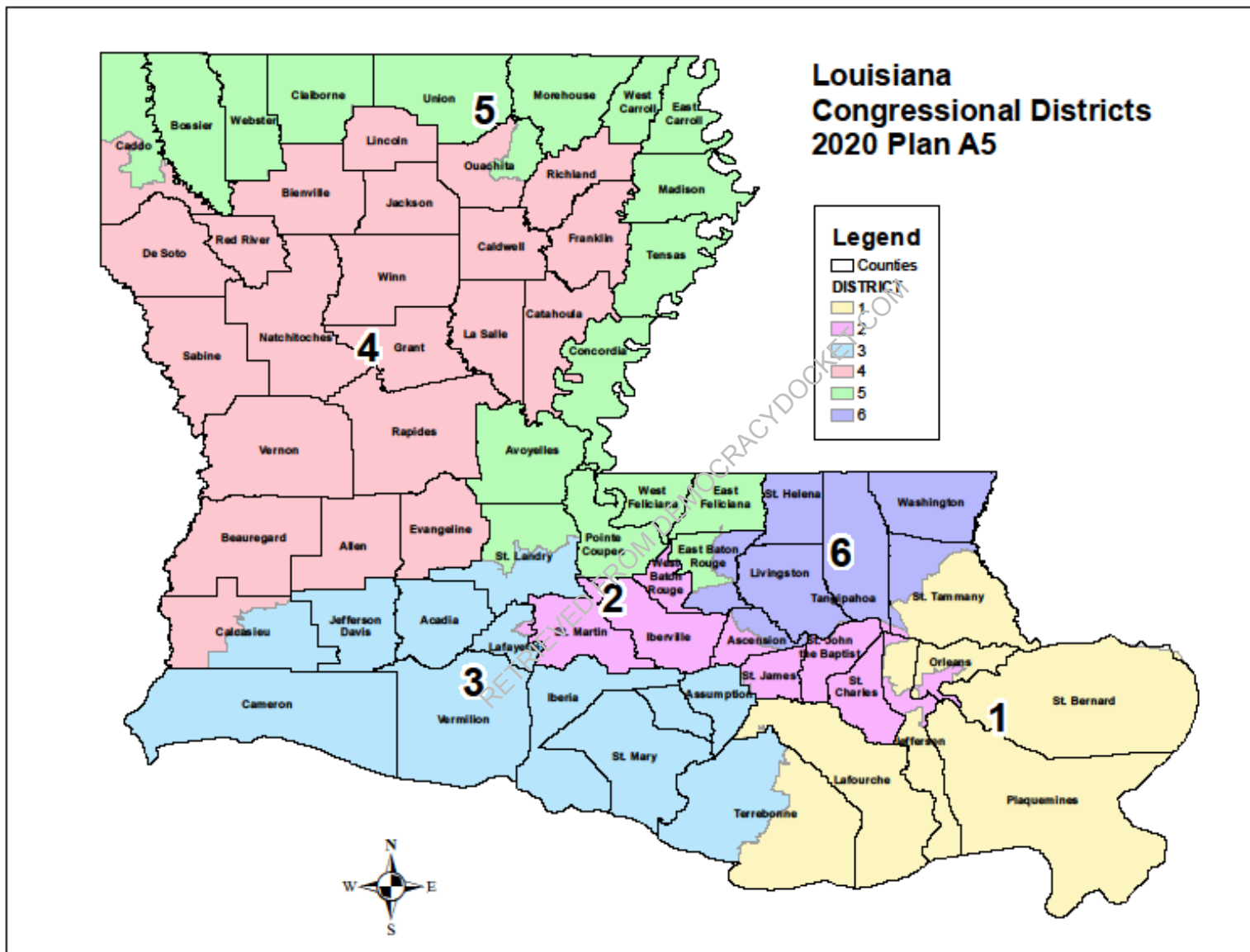


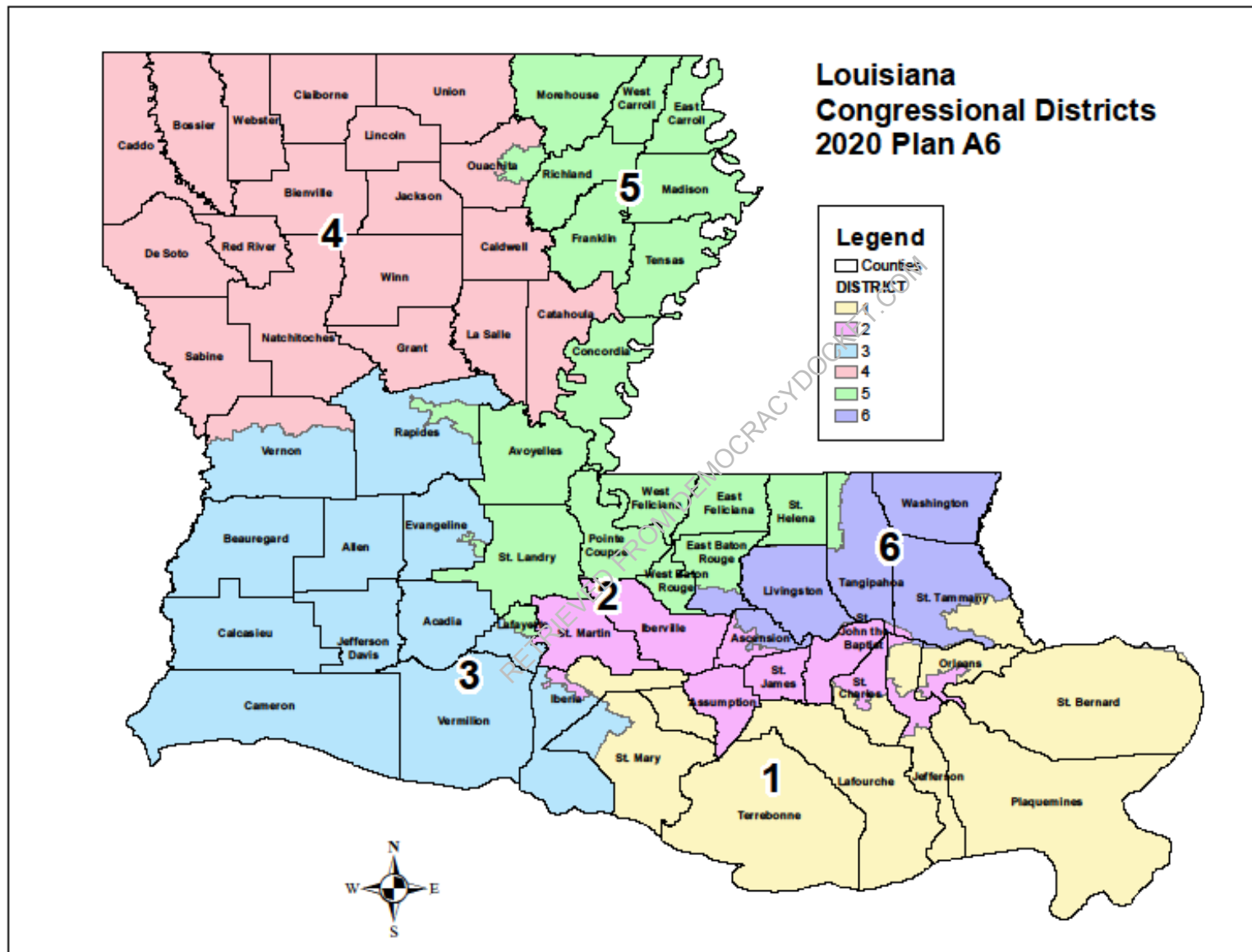


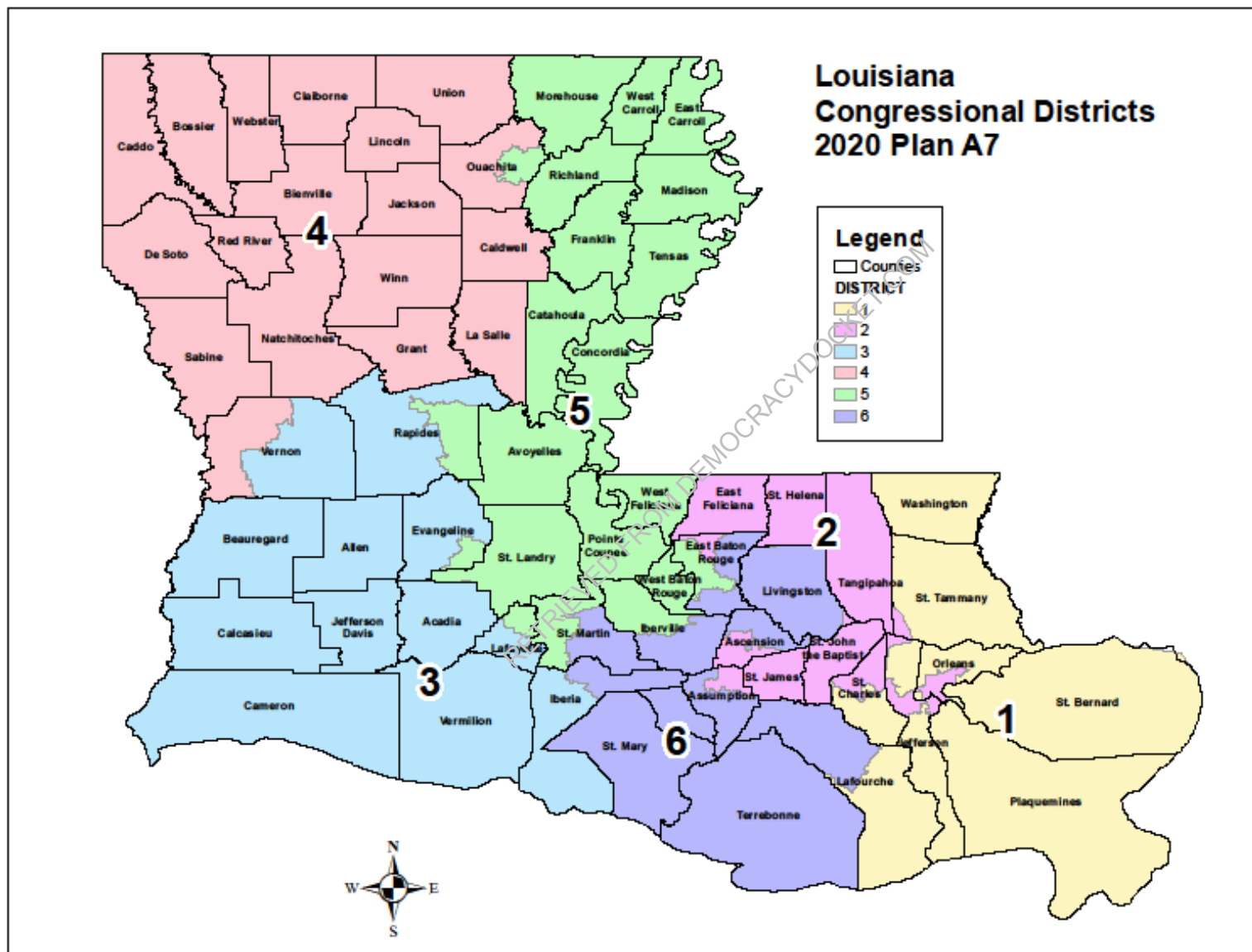












**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF LOUISIANA**

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.*

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

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-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.

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United States District Judge

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