Plan Evaluation Form

Plan Type: Congress - Public Submissions

Plan Name: NAACPLDF Coalition CD Plan A1 v2

Plan Submitted By:

Plan Submitted By:	I
Question	Response/Quantify or Explain if necessary
If a statewide plan (House, Senate, PSC, BESE, Congress, or Supreme Court), does the plan assign all the geography of the state?	Yes
Is each district within the plan composed of contiguous geography?	Yes (See attachment - Compactness Report)
If a House, Senate, PSC, BESE, or Congressional Plan, is the plan comprised of single-member districts?	Yes (See attachment - Plan Statistics)
For House and Senate Plans, give the # of districts if less than the current number.	
What is the overall deviation of the plan?	Absolute=1 Relative=0% (See attachment - Plan Statistics)
How many majority-minority districts are contained within the plan? List each minority district, quantify by type of protected class, list Tot Pop %, VAP %, Vot Reg %, and describe where in the state each minority district is located.	2 (See attachment - District Population)
How many parishes are split in the plan? Please list. Include any explanation given for each split.	14 (See attachment - Split Parishes)
How many municipalities are split in the plan? Please list. Include any explanation given for each split.	34 (See attachment - Split Places)
How many VTDs (precincts) are split in the plan?	21 (See attachment - Split VTDs)
If there are split VTD's, are they split using visible census tabulation boundaries?	See other observations
Please list each split VTD by Parish and VTD in alpha and numeric order and include the number of districts each VTD is split into and also specify the district numbers. Include any explanation given for each split.	See attachment - Split VTDs
each split. Any other observations regarding the plan?	

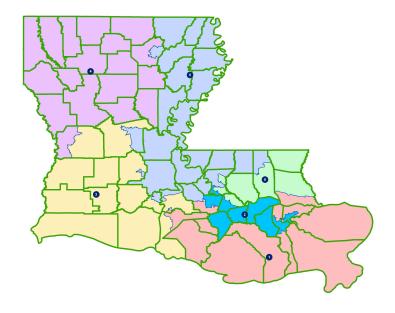
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Snapshot Report

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Compactness Report

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District	Part	Area (sa miles)	Perimeter	Normalized Area	Reock	Schwartzberg	Holes
District 1	1	11333.95	884.09	0.1822	0.3925	2.34	0
District 2	1	2018.19	435.55	0.1337	0.3254	2.73	0
District 3	1	11712.18	947.3	0.164	0.5248	2.47	0
District 4	1	13376.42	767.23	0.2856	0.5784	1.87	0
District 5	1	10985.28	1186.64	0.098	0.3536	3.19	0
District 6	1	2976.74	425.97	0.2062	0.4155	2.2	0

Plan Statistics

Districts:	# of Members	Actual Popul	ation	Ideal Population	Absolute Deviation	Relative Deviation
District 1	1	776	,292	776,292	0	0.000%
District 2	1	776	,293	776,292	1	0.000%
District 3	1	776	,293	776,292	1	0.000%
District 4	1	776	,293	776,292	1	0.000%
District 5	1	776	,293	776,292	1	0.000%
District 6	1	776	,293	776,292	1	0.000%
Grand Total:	6	4,657,	757	4,657,752		
Ideal Population	Per Member:	776292			Ideal - Act	tual: -5
Number of Distric	ts for Plan Type:	6			Remain	der: 5
Range of District	Populations:	776,292	to	776,293	Unassigned Populat	
Absolute Mean D	eviation:	0				
Absolute Range:		0	to	1		
Absolute Overal	l Range:	1				
Relative Mean De	eviation:	0.00%				
Relative Range:		0.00%	to	0.00%		
Relative Overall	Range:	0.00%				

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District Population

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	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021	
District 1																	
Iberia	54,389	28,005	22,320	1,446	2,040	2,557	40,986	22,488	15,569	1,050	1,455	1,752	34,386	19,969	13,109	1,308	
Iberville	3,487	3,246	92	8	88	119	2,853	2,675	55	8	68	89	2,486	2,397	38	51	
Jefferson	237,070	152,179	30,464	11,551	38,604	48,279	189,699	127,396	22,277	8,731	28,072	34,517	144,781	113,529	12,362	18,890	
Lafourche	97,557	71,710	15,855	1,025	4,743	5,672	74,619	56,838	11,077	738	3,189	3,743	58,278	48,467	7,164	2,647	
Orleans	77,166	58,520	9,131	3,169	5,431	8,535	64,290	49,217	7,642	2,488	4,207	7,059	54,357	42,686	5,761	5,910	
Plaquemines	23,515	14,287	5,428	1,317	1,786	2,236	17,334	10,856	3,857	925	1,196	1,377	13,908	9,513	3,134	1,261	
St. Bernard	43,764	24,497	12,309	1,381	4,630	6,010	31,775	18,992	7,944	982	3,169	4,028	25,653	18,233	5,497	1,923	
St. Martin	4,333	2,902	1,266	35	90	108	3,480	2,390	969	30	59	67	3,194	2,119	1,017	54	
St. Mary	49,406	26,949	15,991	835	3,961	4,524	37,521	21,594	11,520	593	2,641	2,954	30,210	18,712	9,891	1,607	
St. Tammany	76,025	47,140	20,344	2,208	4,631	5,778	58,437	38,144	14,016	1,627	3,346	3,996	49,527	34,236	11,396	3,890	
Terrebonne	109,580	69,934	23,147	1,743	6,119	7,358	82,505	55,631	15,796	1,239	4,089	4,701	61,720	45,395	11,566	4,759	
District 1	776,292 100.000%	499,369 64.327%	156,347 20.140%	24,718 3.184%	72,123 9.291%	91,176 11.745%	603,499 100.000%	406,221 67.311%	110,722 18.347%	18,411 3.051%	51,491 8.532%	64,283 10.652%	478,500 79.288%	355,256 74.244%	80,935 16.914%	42,300 8.840%	
District 2																	
Ascension	30,522	11,398	16,797	320	1,710	2,099	22,473	9,079	11,812	225	1,158	1,374	19,575	8,203	10,532	839	
Assumption	21,039	13,722	6,220	96	743	914	16,616	11,145	4,707	57	510	631	14,439	9,700	4,510	229	
East Baton Rou	ige 75,771	30,783	34,574	4,157	5,469	6,907	61,695	27,021	26,753	3,397	3,902	4,993	38,496	16,026	19,506	2,958	
Iberville	23,201	9,812	11,961	181	1,069	1,239	18,368	8,339	8,834	133	920	1,051	15,093	6,362	8,393	338	
Jefferson	203,711	68,756	95,753	11,473	24,315	30,778	154,955	56,739	69,898	8,961	16,745	20,967	118,320	46,087	57,214	15,019	
Orleans	306,831	67,942	209,838	9,687	16,613	22,482	241,906	61,035	158,426	8,032	12,201	16,097	201,887	49,300	135,764	16,823	
St. Charles	52,549	33,550	13,928	837	3,309	4,141	39,541	26,154	9,890	529	2,301	2,737	34,985	24,309	8,797	1,879	
St. James	20,192	9,973	9,762	60	315	343	15,505	7,883	7,297	31	230	237	14,966	7,254	7,501	211	
St. John the Ba	ptist 42,477	13,877	25,196	403	2,536	3,291	32,503	11,622	18,437	323	1,771	2,210	28,913	10,219	17,234	1,460	
District 2	776,293 100.000%	259,813 33.468%	424,029 54.622%	27,214 3.506%	56,079 7.224%	72,194 9.300%	603,562 100.000%	219,017 36.287%	316,054 52.365%	21,688 3.593%	39,738 6.584%	50,297 8.333%	486,674 80.634%	177,460 36.464%	269,451 55.366%	39,756 8.169%	
District 3																	
Acadia	57,576	44,480	10,864	238	1,421	1,641	42,943	34,071	7,383	173	916	1,026	37,678	30,555	6,407	716	
Allen	22,750	16,327	4,490	246	740	1,893	17,510	12,751	3,275	182	656	1,755	12,201	9,478	2,217	506	
Beauregard	36,549	29,529	4,649	402	917	1,271	27,489	22,304	3,495	269	648	828	22,294	18,771	2,369	1,154	
Calcasieu	216,785	139,772	59,386	4,702	9,389	11,384	163,166	108,789	41,898	3,359	6,516	7,570	120,511	85,659	29,513	5,339	
Cameron	5,617	5,232	125	30	155	197	4,358	4,100	79	23	109	130	4,789	4,610	88	91	
Evangeline	23,988	18,552	3,854	176	1,164	1,222	18,192	14,131	2,726	132	1,013	1,037	15,120	12,680	2,170	270	
Iberia	15,540	11,201	2,236	677	1,210	1,340	11,805	8,807	1,500	512	829	905	10,140	8,318	1,243	579	
Jefferson Davis		25,066	5,837	183	692	734	24,039	19,121	4,006	111	476	489	20,013	16,350	3,202	461	
Lafavette	172,744	127,412	26,450	5,883	10,407	12,251	132,110	100,495	18,140	4,265	7,238	8,486	110,095	90,886	12,676	6,535	

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District Population

Plan Type: Congress - Public Submissions

	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021	
District 3																	,
Rapides	69,584	54,292	8,596	1,655	2,875	3,332	53,146	42,439	5,966	1,201	1,906	2,130	44,131	37,503	4,522	2,106	
St. Martin	32,455	21,392	9,215	483	1,025	1,163	24,701	16,896	6,494	336	704	787	21,853	15,480	5,815	562	
Vermilion	57,359	44,477	8,810	1,447	2,002	2,296	43,012	34,363	5,787	1,037	1,337	1,496	36,769	30,505	4,994	1,270	
Vernon	33,096	23,479	5,127	1,110	2,339	3,385	24,501	17,831	3,458	838	1,644	2,236	14,204	11,374	1,591	1,245	
District 3	776,293 100.000%	561,211 72.294%	149,639 19.276%	17,232 2.220%	34,336 4.423%	42,109 5.424%	586,972 100.000%	436,098 74.296%	104,207 17.753%	12,438 2.119%	23,992 4.087%	28,875 4.919%	469,798 80.038%	372,169 79.219%	76,807 16.349%	20,834 4.435%	
District 4																	
Bienville	12,981	6,950	5,600	57	167	211	10,073	5,486	4,284	30	111	141	8,847	4,843	3,917	87	
Bossier	128,746	81,052	32,551	3,492	8,378	10,237	95,876	62,931	22,440	2,448	5,580	6,619	69,743	50,861	14,838	4,044	
Caddo	237,848	103,457	119,304	4,034	7,213	8,381	182,407	85,059	86,359	3,008	5,023	5,618	151,296	73,113	71,249	6,934	
Caldwell	9,645	7,646	1,632	51	166	221	7,478	5,969	1,224	46	123	163	6,031	5,124	818	89	
Claiborne	14,170	7,263	6,360	88	274	479	11,507	6,258	4,824	55	230	403	8,598	4,632	3,820	146	
De Soto	26,812	15,284	9,973	117	698	762	20,440	11,909	7,425	86	463	495	18,713	11,330	6,810	573	
Grant	22,169	17,709	3,335	133	348	1,333	17,527	13,964	2,717	97	242	1,179	12,688	11,174	1,176	338	
Jackson	15,031	9,967	4,166	175	468	468	11,783	7,967	3,125	140	377	372	9,449	6,647	2,610	192	
La Salle	14,791	11,348	1,422	283	1,366	1,402	11,563	8,636	1,065	264	1,327	1,325	8,792	7,978	637	177	
Lincoln	48,396	26,034	19,364	892	1,444	1,754	38,655	21,306	15,119	744	960	1,187	25,649	15,672	9,016	961	
Natchitoches	37,515	19,361	15,725	255	1,313	1,490	29,349	16,010	11,415	198	1,043	1,140	23,107	12,850	9,224	1,033	
Ouachita	90,931	73,075	11,060	1,411	3,278	3,419	68,794	56,511	7,398	987	2,256	2,208	58,175	50,722	5,444	2,016	
Red River	7,620	4,195	3,106	25	123	188	5,714	3,338	2,164	3	93	113	5,631	3,130	2,418	83	
Sabine	22,155	15,036	3,861	94	441	710	17,064	12,054	2,655	66	319	502	14,547	11,023	2,184	1,340	
Union	21,107	14,460	5,224	62	1,023	1,135	16,632	11,807	3,861	39	671	709	15,221	11,066	3,692	463	
Vernon	15,654	11,608	2,484	332	671	790	11,760	8,934	1,675	236	485	504	9,856	7,808	1,420	622	
Webster	36,967	22,735	12,679	208	658	688	28,753	18,144	9,464	154	433	434	22,737	14,938	7,339	460	
Winn	13,755	8,594	3,727	210	961	1,023	10,906	6,932	2,695	170	902	941	8,406	5,988	2,292	126	
District 4	776,293 100.000%	455,774 58.712%	261,573 33.695%	11,919 1.535%	28,990 3.734%	34,691 4.469%	596,281 100.000%	363,215 60.913%	189,909 31.849%	8,771 1.471%	20,638 3.461%	24,053 4.034%	477,486 80.077%	308,899 64.693%	148,904 31.185%	19,684 4.122%	
District 5																	
Avoyelles	39,693	25,625	11,678	434	1,189	1,485	30,578	20,269	8,311	379	1,049	1,257	23,426	16,534	6,294	598	
Catahoula	8,906	5,776	2,395	46	570	614	6,951	4,557	1,736	33	538	558	6,467	4,639	1,770	58	
Concordia	18,687	10,275	7,725	122	332	459	14,217	8,108	5,613	100	229	310	11,964	7,222	4,540	202	
East Baton Ro	uge 188,062	35,841	138,485	3,879	8,557	9,912	140,173	29,649	100,696	2,910	5,912	6,772	115,063	25,588	84,439	5,036	
East Carroll	7,459	2,054	5,272	29	61	115	5,901	1,773	4,043	19	39	80	4,709	1,306	3,359	44	
East Feliciana	19,539	11,516	7,341	91	329	391	16,183	9,740	5,918	61	266	317	13,600	7,959	5,186	455	
Evangeline	8,362	2,802	5,381	65	76	114	6,216	2,329	3,757	55	48	74	5,433	1,886	3,473	74	

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District Population

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	Total	Total	Total	Total	Total	Total						VAP Hispanic	Reg Total				
	Population	White	Black	Asian	Other	Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	Total	Dec 2021	Dec 2021	Dec 2021	Dec 2021	
District 5																	
Franklin	19,774	12,492	6,802	70	205	276	15,028	9,901	4,779	44	151	183	13,159	9,015	4,034	110	
Iberville	3,553	1,775	1,677	13	45	60	2,865	1,448	1,343	8	34	47	2,883	1,373	1,466	44	
Lafayette	69,009	25,951	38,686	571	3,183	3,732	51,765	21,113	27,777	399	2,061	2,343	43,398	17,759	23,805	1,832	
Madison	10,017	3,475	6,363	20	100	204	7,435	2,906	4,391	9	81	149	7,278	2,494	4,674	110	
Morehouse	25,629	12,281	12,484	160	334	381	20,062	10,095	9,300	117	271	292	16,922	8,505	8,131	286	
Ouachita	69,437	15,470	50,157	1,377	1,879	2,239	51,406	13,463	34,892	1,131	1,503	1,738	41,577	9,793	30,214	1,563	
Pointe Coupee	20,758	12,395	7,504	107	593	625	16,250	10,108	5,502	91	430	429	14,675	9,320	5,121	234	
Rapides	60,439	23,218	33,996	773	1,516	1,758	45,646	18,934	24,239	585	1,188	1,312	36,045	15,329	19,253	1,463	
Richland	20,043	11,785	7,603	83	314	400	15,383	9,338	5,546	66	230	293	13,662	8,470	4,961	231	
St. Helena	10,920	4,527	6,031	39	189	216	8,463	3,805	4,371	28	150	149	8,321	3,628	4,565	128	
St. Landry	82,540	43,611	35,836	499	1,958	2,178	61,811	34,209	25,497	353	1,301	1,374	54,482	30,093	23,005	1,384	
St. Martin	14,979	8,965	5,440	79	336	408	11,223	6,992	3,830	41	250	290	10,073	6,335	3,549	189	
Tangipahoa	22,080	9,856	11,327	124	561	679	16,662	7,920	8,117	105	382	452	13,700	6,664	6,713	324	
Tensas	4,147	1,744	2,312	23	42	67	3,235	1,446	1,728	12	26	46	3,455	1,503	1,917	35	
West Baton Ro	uge 27,199	14,307	11,170	287	1,109	1,244	20,526	11,146	8,149	209	803	871	17,141	9,937	6,865	339	
West Carroll	9,751	7,894	1,425	27	225	325	7,532	6,223	1,010	20	143	192	7,038	5,913	1,040	85	
West Feliciana	15,310	10,883	3,740	89	373	651	12,783	9,283	2,951	56	319	572	7,407	5,092	2,180	135	
District 5	776,293 100.000%	314,518 40.515%	420,830 54.210%	9,007 1.160%	24,076 3.101%	28,533 3.676%	588,294 100.000%	254,755 43.304%	303,496 51.589%	6,831 1.161%	17,404 2.958%	20,100 3.417%	491,878 83.611%	216,357 43.986%	260,554 52.971%	14,959 3.041%	
District 6																	
Ascension	95,978	69,743	15,419	1,980	7,129	8,284	69,484	52,057	10,327	1,289	4,620	5,287	60,342	48,597	8,282	3,464	
East Baton Ro	uge 192,948	129,445	40,339	8,389	12,136	13,732	153,744	107,211	29,341	6,292	8,781	9,774	125,705	96,618	20,730	8,363	
Livingston	142,282	116,855	12,658	1,697	7,961	8,791	105,141	88,432	8,136	1,099	5,163	5,390	84,568	76,062	5,425	3,081	
St. Tammany	188,545	149,501	18,299	3,566	13,221	15,066	143,791	116,477	12,745	2,448	9,264	10,314	129,252	111,488	9,746	8,023	
Tangipahoa	111,077	71,480	30,552	1,350	5,453	6,563	84,829	57,285	21,100	995	3,760	4,388	62,556	46,248	13,812	2,495	
Washington	45,463	29,943	13,434	216	1,134	1,410	34,951	23,743	9,732	154	761	901	27,587	18,835	8,102	650	
District 6	776,293 100.000%	566,967 73.035%	130,701 16.837%	17,198 2.215%	47,034 6.059%	53,846 6.936%	591,940 100.000%	445,205 75.211%	91,381 15.438%	12,277 2.074%	32,349 5.465%	36,054 6.091%	490,010 82.780%	397,848 81.192%	66,097 13.489%	26,076 5.322%	
Grand Total	4,657,757 100.000%	2,657,652 57.059%	1,543,119 33.130%	107,288 2.303%	262,638 5.639%	322,549 6.925%	3,570,548 100.000%	2,124,511 59.501%	1,115,769 31.249%	80,416 2.252%	185,612 5.198%	223,662 6.264%	2,894,346 81.062%	1,827,989 63.157%	902,748 31.190%	163,609 5.653%	

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	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021
District 1																
Iberia	54,389	28,005	22,320	1,446	2,040	2,557	40,986	22,488	15,569	1,050	1,455	1,752	34,386	19,969	13,109	1,308
Iberville	3,487	3,246	92	8	88	119	2,853	2,675	55	8	68	89	2,486	2,397	38	51
Jefferson	237,070	152,179	30,464	11,551	38,604	48,279	189,699	127,396	22,277	8,731	28,072	34,517	144,781	113,529	12,362	18,890
Orleans	77,166	58,520	9,131	3,169	5,431	8,535	64,290	49,217	7,642	2,488	4,207	7,059	54,357	42,686	5,761	5,910
St. Martin	4,333	2,902	1,266	35	90	108	3,480	2,390	969	30	59	67	3,194	2,119	1,017	54
St. Tammany	76,025	47,140	20,344	2,208	4,631	5,778	58,437	38,144	14,016	1,627	3,346	3,996	49,527	34,236	11,396	3,890
District 2																
Ascension	30,522	11,398	16,797	320	1,710	2,099	22,473	9,079	11,812	225	1,158	1,374	19,575	8,203	10,532	839
East Baton Ro	ouge 75,771	30,783	34,574	4,157	5,469	6,907	61,695	27,021	26,753	3,397	3,902	4,993	38,496	16,026	19,506	2,958
Iberville	23,201	9,812	11,961	181	1,069	1,239	18,368	8,339	8,834	133	920	1,051	15,093	6,362	8,393	338
Jefferson	203,711	68,756	95,753	11,473	24,315	30,778	154,955	56,739	69,898	8,961	16,745	20,967	118,320	46,087	57,214	15,019
Orleans	306,831	67,942	209,838	9,687	16,613	22,482	241,906	61,035	158,426	8,032	12,201	16,097	201,887	49,300	135,764	16,823
District 3																
Evangeline	23,988	18,552	3,854	176	1,164	1,222	18,192	14,131	2,726	132	1,013	1,037	15,120	12,680	2,170	270
Iberia	15,540	11,201	2,236	677	1,210	1,340	11,805	8,807	1,500	512	829	905	10,140	8,318	1,243	579
Lafayette	172,744	127,412	26,450	5,883	10,407	12,251	132,110	100,495	18,140	4,265	7,238	8,486	110,095	90,886	12,676	6,535
Rapides	69,584	54,292	8,596	1,655	2,875	3,332	53,146	42,439	5,966	1,201	1,906	2,130	44,131	37,503	4,522	2,106
St. Martin	32,455	21,392	9,215	483	1,025	1,163	24,701	16,896	6,494	336	704	787	21,853	15,480	5,815	562
Vernon	33,096	23,479	5,127	1,110	2,339	3,385	24,501	17,831	3,458	838	1,644	2,236	14,204	11,374	1,591	1,245
District 4																
Ouachita	90,931	73,075	11,060	1,411	3,278	3,419	68,794	56,511	7,398	987	2,256	2,208	58,175	50,722	5,444	2,016
Vernon	15,654	11,608	2,484	332	671	790	11,760	8,934	1,675	236	485	504	9,856	7,808	1,420	622
District 5																
East Baton Ro	ouge 188,062	35,841	138,485	3,879	8,557	9,912	140,173	29,649	100,696	2,910	5,912	6,772	115,063	25,588	84,439	5,036
Evangeline	8,362	2,802	5,381	65	76	114	6,216	2,329	3,757	55	48	74	5,433	1,886	3,473	74
Iberville	3,553	1,775	1,677	13	45	60	2,865	1,448	1,343	8	34	47	2,883	1,373	1,466	44
Lafayette	69,009	25,951	38,686	571	3,183	3,732	51,765	21,113	27,777	399	2,061	2,343	43,398	17,759	23,805	1,832
Ouachita	69,437	15,470	50,157	1,377	1,879	2,239	51,406	13,463	34,892	1,131	1,503	1,738	41,577	9,793	30,214	1,563
Rapides	60,439	23,218	33,996	773	1,516	1,758	45,646	18,934	24,239	585	1,188	1,312	36,045	15,329	19,253	1,463
St. Martin	14,979	8,965	5,440	79	336	408	11,223	6,992	3,830	41	250	290	10,073	6,335	3,549	189
Tangipahoa	22,080	9,856	11,327	124	561	679	16,662	7,920	8,117	105	382	452	13,700	6,664	6,713	324
District 6																
Ascension	95,978	69,743	15,419	1,980	7,129	8,284	69,484	52,057	10,327	1,289	4,620	5,287	60,342	48,597	8,282	3,464
East Baton Ro	ouge 192,948	129,445	40,339	8,389	12,136	13,732	153,744	107,211	29,341	6,292	8,781	9,774	125,705	96,618	20,730	8,363

Split Parishes

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												VAP					
	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021	
District 6																	
St. Tammany	188,545	149,501	18,299	3,566	13,221	15,066	143,791	116,477	12,745	2,448	9,264	10,314	129,252	111,488	9,746	8,023	
Tangipahoa	111,077	71,480	30,552	1,350	5,453	6,563	84,829	57,285	21,100	995	3,760	4,388	62,556	46,248	13,812	2,495	

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	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021	
District 1																	
Iberia																	
New Iberia	27,541	12,228	13,069	868	1,083	1,380	20,653	10,012	8,972	677	778	970	16,682	8,598	7,340	739	
Iberville																	
Crescent	173	159	11	0	3	2	133	122	8	0	3	2	111	109	3	2	
White Castle	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Jefferson																	
Jefferson	9,432	6,312	1,703	188	1,049	1,319	7,992	5,535	1,375	157	790	969	5,786	4,471	813	511	
Kenner	54,578	27,440	9,187	3,503	13,485	16,823	42,404	22,594	6,556	2,642	9,896	12,132	31,170	19,581	4,443	7,150	
Metairie	141,124	93,505	16,668	6,702	21,856	27,233	113,026	78,435	12,044	5,034	15,702	19,304	85,593	69,866	5,956	9,767	
River Ridge	11,276	9,505	562	206	845	1,084	9,222	7,876	441	150	639	793	8,603	7,839	238	529	
Orleans																	
New Orleans	77,166	58,520	9,131	3,169	5,431	8,535	64,290	49,217	7,642	2,488	4,207	7,059	54,357	42,686	5,761	5,910	
St. Martin																	
Cade	101	67	30	0	3	5	72	51	18	0	2	1	69	56	11	3	
St. Martinville	887	413	457	1	16	17	689	330	351	1	7	3	674	232	436	4	
St. Tammany																	
Lacombe	2,334	1,562	531	29	137	180	1,947	1,349	430	20	89	115	1,690	1,208	363	121	
Slidell	28,123	17,529	7,446	705	1,755	2,317	21,394	14,091	5,013	522	1,273	1,620	17,879	12,805	3,816	1,296	
District 2																	
Ascension																	
Gonzales	7,482	2,328	4,396	74	593	734	5,575	1,951	3,091	55	419	487	4,241	1,411	2,559	273	
Prairieville	107	75	17	9	3	6	84	67	13	2	0	1	78	58	16	5	
Sorrento	118	68	35	3	9	11	79	45	26	1	7	6	72	57	12	2	
East Baton Rouge																	
Baton Rouge	49,730	19,123	25,705	2,389	2,064	2,898	42,082	17,534	20,407	2,099	1,674	2,389	25,479	8,855	14,977	1,641	
Oak Hills Place	560	375	147	14	17	20	469	328	110	9	15	14	463	297	127	40	
Iberville																	
Crescent	638	353	258	1	13	22	518	298	197	1	12	18	533	340	191	6	
White Castle	1,722	127	1,572	2	13	13	1,230	118	1,101	1	5	9	1,273	153	1,104	14	
Jefferson																	
Jefferson	1,201	254	788	21	125	130	1,018	223	681	18	88	91	933	149	717	65	
Kenner	11,870	2,303	6,637	135	2,641	3,118	8,795	1,870	4,957	91	1,762	2,092	6,517	1,401	4,488	630	
Metairie	2,383	201	1,995	13	163	211	1,872	165	1,578	9	116	132	1,820	115	1,619	86	

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	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021	
District 2																	
Jefferson																	
River Ridge	2,315	799	1,209	45	221	287	1,882	687	985	34	149	184	1,296	475	737	84	
Orleans																	
New Orleans	306,831	67,942	209,838	9,687	16,613	22,482	241,906	61,035	158,426	8,032	12,201	16,097	201,887	49,300	135,764	16,823	
District 3																	
Evangeline																	
Ville Platte	962	731	190	11	20	20	739	603	101	11	15	13	714	622	79	10	
Iberia																	
New Iberia	1,014	704	221	21	59	65	779	550	159	18	47	49	670	507	130	35	
Lafayette	•																
Lafayette	84,888	61,972	13,012	3,466	5,206	6,249	68,095	51,382	9,299	2,664	3,774	4,514	55,874	46,138	6,095	3,652	
Ossun	573	483	67	2	17	21	414	359	44	1	9	10	372		17	16	
Scott	7,224	5,041	1,287	160	606	688	5,597	4,113	872	111	405	459	4,426		772	230	
Rapides																	
Alexandria	13,740	9,422	2,796	823	469	529	10,636	7,570	1,973	612	318	370	8,734	6,749	1,402	606	
Pineville	4,753	3,452	846	153	188	228	3,822	2,819	661	124	135	167	2,931	2,441	347	153	
St. Martin	•	,					,	,					,	,			
Breaux Bridge	5,165	3,155	1,718	94	150	150	3,820	2,575	1,072	51	85	96	3,293	2,421	787	83	
Cade	1,773	986	623	75	75	81	1,371	791	461	48	58	59	1,156	833	286	43	
Cecilia	30	26	2	0	1	1	23	21	0	0	1	1	21	17	3	0	
St. Martinville	4,492	1,469	2,881	26	69	91	3,579	1,267	2,201	22	51	66	3,180		2,064	42	
Vernon	•	•	•				•	•	•				•	•	•		
New Llano	1,274	547	490	97	106	146	1,019	457	370	78	84	118	715	322	282	109	
Leesville	1,686	927	541	77	108	132	1,282	743	378	58	78	88	710		180	74	
District 4	,				_		, -										
Ouachita																	
Brownsville	4,337	2,424	1,314	36	465	509	3,318	2,023	887	28	303	327	2,221	1,531	610	81	
Monroe	4,33 <i>1</i> 9,575	2,424 7,874	1,060	223	465 278	290	7,502	6,305	742	161	303 176	32 <i>1</i> 175	6,852	6,061	539	259	
Richwood	9,575	7,874	0	0	0	290	7,502	0,303	0	0	0	0	0,032		0	0	
Swartz	2,165	1,521	527	15	52	59	1,600	1,177	332	15	33	35	1,361	1,146	173	48	
West Monroe	9,044	6,274	2,077	116	439	505	7,177	5,234	1,442	88	303	355	5,148	-	786	205	
Vernon	0,014	٠,٢٠٠	2,0.7		.00	550	.,	3,204	1,172	00	230	550	5,140	1,101	, 00	230	
New Llano	939	335	455	49	78	76	663	248	298	38	61	55	517	305	164	53	
INGW LIAIIU	333	333	400	43	70	10	003	240	230	36	O I	55	317	303	104	55	

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	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021	
District 4																	
Vernon																	
Leesville	3,963	1,824	1,605	135	272	332	2,908	1,412	1,104	89	203	230	2,219	1,111	910	198	
District 5	-,	,-	,				,	,	, -				, -	,			
East Baton Rouge																	
Baton Rouge	103,519	10,940	83,999	2,706	5,300	6,178	77,022	9,649	61,213	2,049	3,643	4,213	59,724	7,536	49,225	2,951	
Central	1,515	845	583	27	40	42	1,096	639	404	18	23	21	1,098	620	432	45	
Evangeline	.,0.0	0.0					.,000						.,000	020	.02		
Ville Platte	5,341	1,145	4,092	44	36	60	3,932	997	2,855	37	25	43	3,410	810	2,551	43	
Lafayette	5,5 . 1	.,	.,	• •		30	0,002	301	_,500	0.	_0	10	3,.10	310	_,501	.5	
Lafayette	36,486	8,605	26,342	249	1,030	1,282	27,933	7,441	19,435	198	683	831	23,576	5,766	16,852	964	
Ossun	1,572	576	926	6	56	62	1,115	453	610	3	41	40	970	507	426	44	
Scott	895	642	171	16	46	49	653	487	115	14	24	26	475	258	188	20	
Ouachita		-						-	-				-				
Brownsville	16	2	12	0	2	2	12	1	10	0	1	1	7	1	4	0	
Monroe	38,127	6,724	29,997	736	463	698	27,956	5,942	20,942	599	307	449	23,370	3,820	18,730	822	
Richwood	3,881	556	2,312	230	771	787	3,361	546	1,821	228	760	781	1,162	13	1,116	33	
Swartz	2,189	1,410	654	30	51	47	1,654	1,150	425	24	26	22	1,466	868	541	56	
West Monroe	4,059	958	2,824	32	190	239	2,917	836	1,899	24	115	157	2,227	635	1,485	109	
Rapides																	
Alexandria	31,535	7,368	22,935	334	611	746	23,887	6,330	16,653	249	448	518	19,181	4,677	13,748	747	
Pineville	9,631	4,714	4,287	224	223	263	7,267	3,827	2,963	166	158	184	5,393	3,269	1,886	242	
St. Martin																	
Breaux Bridge	2,348	506	1,770	8	43	42	1,708	426	1,235	6	26	31	1,631	577	1,028	22	
Cecilia	1,777	1,057	657	6	30	32	1,310	805	462	3	28	26	1,231	806	397	26	
Tangipahoa																	
Independence	628	151	444	8	21	16	426	126	275	8	14	6	310	106	191	9	
District 6																	
Ascension																	
Gonzales	4,749	2,316	1,597	60	643	844	3,650	1,900	1,164	55	431	578	2,934	1,777	939	215	
Prairieville	33,090	23,831	5,236	1,076	2,416	2,763	23,508	17,379	3,548	695	1,545	1,701	21,168	16,827	2,957	1,385	
Sorrento	1,396	1,025	232	12	101	102	1,040	777	168	10	64	67	953	754	169	31	
East Baton Rouge																	
Baton Rouge	74,221	49,928	16,393	3,152	3,840	4,442	61,136	42,457	12,441	2,501	3,000	3,398	47,583	35,976	8,272	3,326	

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												VAP				
	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021
District 6																
East Baton Rouge																
Central	28,050	22,773	3,140	330	1,254	1,307	21,119	17,619	2,027	214	821	837	19,199	16,944	1,688	567
Oak Hills Place	8,679	6,380	1,263	525	417	452	7,209	5,365	1,040	401	329	348	6,317	4,861	946	504
St. Tammany																
Lacombe	6,323	4,041	1,575	75	487	465	5,011	3,330	1,167	52	359	319	4,262	3,042	919	298
Slidell	658	358	185	38	58	71	521	295	141	21	47	58	385	280	75	31
Tangipahoa																
Independence	1,007	592	352	2	50	60	770	475	253	1	30	40	629	409	193	25

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	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021
District 1																
Jefferson																
116	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Orleans	-	•		_		-		_			-	-	•		_	-
5-16	579	419	75	20	53	58	513	391	55	18	40	43	395	318	33	44
5-17	710	650	2	21	37	43	544	491	2	20	31	38	699	626	10	63
14-19	911	700	54	52	92	110	780	613	34	44	76	87	623	500	30	93
St. Martin																
8	389	104	280	0	5	11	317	83	231	0	3	4	340	24	312	0
St. Tammany																
S19	1,247	402	571	27	205	278	865	301	360	23	146	200	572	162	366	39
District 2	•															
Ascension																
34	118	68	35	3	9	11	79	45	26	1	7	6	72	57	12	2
35	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
43	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
East Baton Rouge																
1-66	915	335	483	12	75	76	677	260	352	6	53	63	505	299	165	35
1-69	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Jefferson																
116	1,337	655	480	26	164	193	1,153	579	424	25	116	138	709	422	228	59
Orleans																
5-16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5-17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14-19	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
District 3																
Evangeline																
5030	375	332	19	1	16	21	279	250	12	0	10	14	263	246	4	13
Lafayette																
66	784	568	156	14	34	59	686	523	111	11	30	43	496	388	77	33
St. Martin																
8	1,217	69	1,131	3	1	11	948	57	878	2	0	9	1,014	69	932	17
19	1,138	683	389	17	38	37	836	564	242	6	16	18	730	514	188	28

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	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021	
District 3																	
Vernon																	
1-1	1,775	1,166	420	50	108	127	1,408	968	301	35	84	95	790	549	177	70	
District 4	,	,					,										
Ouachita																	
17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
31	1,967	1,145	478	22	281	310	1,521	976	325	16	172	188	948	586	319	43	
63	540	396	79	15	35	42	437	338	53	12	20	26	336	198	124	21	
Vernon																	
1-1	222	128	64	4	26	30	177	108	43	2	24	25	98	66	21	5	
District 5																	
East Baton Rouge																	
2-15	1,060	340	675	14	16	32	772	282	451	12	14	27	638	215	387	36	
Evangeline																	
5030	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Lafayette																	
66	36	14	16	5	0	2	33	12	15	5	0	1	23	18	3	0	
Ouachita																	
17	1,417	138	1,258	2	10	27	988	121	849	1	9	18	791	67	705	19	
18	3,881	556	2,312	230	771	787	3,361	546	1,821	228	760	781	1,162	13	1,116	33	
31	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
63	1,336	467	755	49	52	65	992	388	518	36	39	52	737	417	262	51	
St. Martin																	
19	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Tangipahoa																	
26	908	240	619	10	33	29	623	202	386	8	22	14	454	152	287	16	
District 6																	
Ascension																	
34	1,396	1,025	232	12	101	102	1,040	777	168	10	64	67	953	754	169	31	
35	1,908	1,693	48	12	116	145	1,398	1,269	34	2	69	85	1,290	1,223	24	43	
43	1,606	1,327	106	11	128	169	1,242	1,064	60	5	85	106	1,135	1,034	55	46	
East Baton Rouge																	

Split VTDs

Time: 12:46 PM

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Plan Type: Congress - Public Submissions

Plan: NAACPLDF Coalition CD Plan A1 v2

Split VTDs

Page: 3 of 3

												VAP				
	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021
District 6																
East Baton Rouge	е															
1-66	1,799	880	736	50	112	126	1,482	785	542	39	98	106	1,118	668	374	82
1-69	3,473	2,577	520	200	131	188	3,021	2,276	419	172	119	169	1,927	1,585	201	141
2-15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
St. Tammany																
S19	455	70	351	3	17	18	342	47	273	2	7	11	226	68	145	18
Tangipahoa																
26	18	5	11	1	1	5	16	5	9	1	1	4	11	4	6	0

Lucas, Lorri

From: Michael Pernick <mpernick@naacpldf.org>

Sent: Monday, October 18, 2021 11:13 AM

To: Sen. & Gov Affairs Cmte; House & Governmental Affairs

Cc:Arielle McTootle; Jared Evans; Kathryn SadasivanSubject:Written Submission - Congressional Redistricting

Attachments: 2021.10.18 - Letter re Louisiana Congressional Redistricting.pdf

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Good morning,

Attached is a written submission regarding congressional redistricting for distribution to the Committee on House and Governmental Affairs and Committee on Senate Governmental Affairs in advance of the upcoming roadshow, submitted on behalf of the NAACP Legal Defense & Educational Fund, Louisiana State Conference of the NAACP, Power Coalition for Equity and Justice, American Civil Liberties Union of Louisiana, the ACLU Voting Rights Project, Campaign Legal Center, Southern Poverty Law Center Action Fund, Voters Organized to Educate, Voice of the Experienced, Louisiana Progress, Fair Districts Louisiana, E Pluribus Unum, Black Voters Matter Fund, Louisiana Budget Project, League of Women Voters of Louisiana, Urban League of Louisiana, and Crescent City Media Group.

Please feel free to reach out to me with any questions.

Sincerely, Michael Pernick

Michael Pernick (he/him/his)
Redistricting Counsel
NAACP Legal Defense and Educational Fund, Inc.
40 Rector Street, 5th Floor, New York, NY 10006

■ t 212.965.3708 = c 917.790.3597 × mpernick@naacpldf.org

www.naacpldf.org 🤟 🚯

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Sent Via Email

October 18, 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: Congressional Redistricting Compliance with Section 2 of the Voting Rights Act

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

The NAACP Legal Defense and Educational Fund, Inc., Louisiana State Conference of the NAACP, Power Coalition for Equity and Justice, American Civil Liberties Union of Louisiana, the ACLU Voting Rights Project, Campaign Legal Center, Southern Poverty Law

Center Action Fund, Voters Organized to Educate, Voice of the Experienced, Louisiana Progress, Fair Districts Louisiana, E Pluribus Unum, Black Voters Matter Fund, Louisiana Budget Project, League of Women Voters of Louisiana, Urban League of Louisiana, and Crescent City Media Group write to highlight your affirmative obligation to comply with Section 2 of the Voting Rights Act ("Section 2") during this reapportionment and redistricting cycle when preparing a new district map to elect Louisiana's six members of the United States House of Representatives. In particular, we urge you to consider whether Section 2 requires this body to enact a map with <u>two</u> opportunity districts each comprised of a majority of Black voters ("majority-minority opportunity district"). Under the existing map, there is one majority-minority opportunity district.

It is fair, necessary, and logical that Black Louisianans—who comprise nearly one-third of Louisiana's residents, according to 2020 Census data—have an opportunity to elect their preferred congressional representatives. Members of Congress make decisions and enact policies that impact every aspect of American life, including access to education, economic opportunity, housing, health care, and criminal justice. An additional majority-minority opportunity district, which Section 2 likely requires, would provide Black voters with representation to address the state's pervasive and ongoing record of inequality of opportunity in various aspects of life.

I. Background

In the next few months, the state legislature will redraw district maps for Louisiana's six congressional districts based on data from the 2020 census. Your committees play an important role in that process. It is critical that the state legislature uses this opportunity to remedy the long-standing dilution of Black voting strength in Louisiana's congressional map. Nearly one-third of Louisiana residents are Black, but the state has had only four Black Congresspeople since Reconstruction. This is a direct consequence of the configuration of Louisiana's congressional districts: Black voters are packed into District 2, the state's only majority-minority opportunity district, and Black communities are cracked among the state's five majority-white districts (Districts 1, 3, 4, 5, 6). Although District 2 has elected Black candidates in all but one congressional race over the past 30 years, one of the majority-

Congressional maps are drawn by the state legislature and subject to gubernatorial veto. La. Const. Art. III, § 6.

U.S. Census Bureau QuickFacts, United States Census Bureau, https://www.census.gov/quickfacts/fact/table/LA/POP010220#POP010220 (last visited Sep. 10, 2021). According to 2020 Census data, the total number of Black Louisiana residents over the age of 18 (also known as the Black voting age population, or BVAP) has increased by 4.4 percent since 2010.

See Black-American Members by State and Territory, 1870-Present, History, Art & Archives: United States House of Representatives, https://history.house.gov/Exhibitions-and-Publications/BAIC/Historical-Data/Black-American-Representatives-and-Senators-by-State-and-Territory/ (last accessed Sep. 1, 2021).

Voters in District 2 have elected a Black candidate in all but one congressional election since 1990. See Louisiana's 2nd Congressional District, Ballotpedia, https://ballotpedia.org/Louisiana%27s_2nd_Congressional_District (last visited Aug. 31, 2021).

white districts have ever elected a Black Congressperson.⁵ Simply put, Black voters in Louisiana are afforded less opportunity to elect candidates of their choice than white voters.

II. The State Legislature Has an Obligation to Comply with Section 2 of the Voting Rights Act in Redistricting.

The state legislature has an affirmative obligation to comply with the Voting Rights Act in the redistricting process. In particular, this Committee has an obligation under Section 2 of the Voting Rights Act to ensure that, under the totality of circumstances, racial minority voters, such as Black Louisianans, have equal opportunity "to participate in the electoral process and to elect representatives of their choice." A Section 2 violation may require states, under certain circumstances, to draw majority-minority opportunity districts to provide minority voters with an effective opportunity to elect their preferred candidates.

A chief purpose of Section 2 is to prohibit minority vote dilution at all levels of government. A district map may violate Section 2 when it dilutes the voting power of voters of color, including by "packing" Black voters into districts where they constitute an unnecessarily large majority and depriving them of the opportunity to elect candidates of choice in other districts. Section 2 prohibits minority vote dilution regardless of whether a plan was adopted with a discriminatory purpose. Indeed, Section 2 outlaws redistricting plans that result in a reduced ability of voters of color to elect candidates of their choice.

In Thornburg v. Gingles, 478 U.S. 30 (1986), the U.S. Supreme Court set forth three conditions indicating that a districting plan or voting system has resulted in vote dilution. The three "Gingles preconditions" are whether: (1) an alternative districting plan can be drawn that includes one or more single-member districts in which the minority community is sufficiently large and geographically compact to constitute a majority in the district; (2) the minority group is politically cohesive in its support for its preferred candidates; and (3) in the absence of majority-minority districts, candidates preferred by the minority group would usually be defeated due to the political cohesion of non-minority voters in support of different candidates. Together, the second and third Gingles preconditions are commonly referred to as racial bloc or racially polarized voting.

If these three *Gingles* preconditions are met, a decisionmaker must then evaluate the "totality of circumstances" to determine whether minority voters "have less opportunity than other members of the electorate to participate in the political process and to elect representatives of their choice." ¹² Courts consider several factors (commonly known as the

See United States Congressional Delegations from Louisiana, Ballotpedia, https://ballotpedia.org/United_States_congressional_delegations_from_Louisiana (last visited Aug. 31, 2021).

⁶ Thornburg v. Gingles, 478 U.S. 30, 34 (1986).

See St. Bernard Citizens For Better Gov't v. St. Bernard Par. Sch. Bd., No. CIV.A. 02-2209, 2002 WL 2022589, at *10 (E.D. La. Aug. 26, 2002); Fifth Ward Precinct 1A Coal. & Progressive Ass'n v. Jefferson Par. Sch. Bd., No. CIV.A. 86-2963, 1989 WL 3801, at *1 (E.D. La. Jan. 18, 1989).

⁸ See Gingles, 478 U.S. at 46, n.11.

⁹ *Id.* at 35.

¹⁰ Id. at 50-51.

Racially polarized voting occurs when different racial groups vote for different candidates. In a racially polarized election, for example, Black people vote together for their preferred (frequently Black) candidate, and most non-Black voters vote for the opposing (typically white) candidate.

^{12 52} U.S.C. § 10301(b); League of United Latin Am. Citizens v. Perry, 548 U.S. 399, 425 (2006).

"Senate Factors") pertaining to the jurisdiction's history of voter discrimination to determine whether the minority vote has been diluted impermissibly. ¹³ It will be "only the very unusual case in which the plaintiffs can establish the existence of the three *Gingles* factors but still have failed to establish a violation of § 2 under the totality of circumstances." ¹⁴

III. A New Congressional District Map With Only One Majority-Minority Opportunity District Likely Violates Section 2 of the Voting Rights Act.

Based on the results of the 2020 Census, a new congressional district map for Louisiana that includes only one majority-minority opportunity district likely violates Section 2 of the Voting Rights Act. Each of the three *Gingles* preconditions are likely present in Louisiana, and there is ample evidence that under the totality of circumstances, Black voters have less opportunity than other members of the electorate to participate in the political process and elect candidates of their choice.

a. Gingles Precondition One: It Is Possible to Draw a Congressional District Map with Two Majority-Minority Opportunity Districts.

It is entirely possible to draw a second majority-minority opportunity district in the six-district congressional map. Appendix 1 provides seven different demonstrative district map plans, based on 2020 Census data, in which two districts are comprised of a majority of Black voters.

In each plan, the Black community, measured by the Black voting age population (BVAP) within each of the two majority-minority opportunity districts, is sufficiently large and geographically compact to satisfy the first *Gingles* precondition. First, each of the seven maps includes a second majority-minority opportunity district (in addition to District 2) where the BVAP is over 50%. ¹⁵ Second, as compared to the current map, the illustrative maps include geographically compact communities of Black voters, as reflected by traditional redistricting principles. ¹⁶ Indeed, each of the seven illustrative maps is equally or more

Courts examine the "totality of the circumstances" based on the so-called "Senate Factors," named for the Senate Report accompanying the 1982 Voting Rights Act amendments in which they were first laid out. Gingles, 478 U.S. at 43-45. The Senate Factors are: (1) the extent of any history of discrimination related to voting; (2) the extent to which voting is racially polarized; (3) the extent to which the state or political subdivision uses voting practices that may enhance the opportunity for discrimination; (4) whether minority candidates have access to candidate slating processes; (5) the extent to which minority voters bear the effects of discrimination in areas of life like education, housing, and economic opportunity; (6) whether political campaigns have been characterized by overt or subtle racial appeals; (7) the extent to which minority people have been elected to public office; (8) whether elected officials are responsive to the needs of minority residents; and (9) whether the policy underlying the voting plan is tenuous. Id. at 36-37. However, "there is no requirement that any particular number of factors be proved, or that a majority of them point one way or the other." Id. at 45.

¹⁴ Clark v. Calhoun Cty., 21 F.3d 92, 97 (5th Cir. 1994).

See infra Appendix 2. The Supreme Court has held that a minority community is sufficiently large when it "make[s] up more than 50 percent of the voting-age population in the relevant geographical area." Bartlett v. Strickland, 556 U.S. 1, 18 (2009).

League of United Latin Am. Citizens, 548 U.S. at 433 ("While no precise rule has emerged governing § 2 compactness, the inquiry should take into account traditional districting principles such as maintaining communities of interest and traditional boundaries.").

compact than the current map on at least two of the three widely recognized statistical measures of compactness. 17

As set forth in Appendix 1, there are numerous and varied district configurations with two majority-minority opportunity districts where the BVAP is the numerical majority, and the Black voting community is geographically compact. Accordingly, the first *Gingles* precondition would likely be satisfied if Louisiana's new congressional map fails to provide a second majority-minority opportunity district.¹⁸

b. Gingles Preconditions Two and Three: Louisiana Elections Reflect Racially Polarized Voting Patterns.

There is ample evidence to suggest that the second and third *Gingles* preconditions are satisfied due to Louisiana's well-documented history and ongoing record of racially polarized voting in elections across the state.

Over the past three decades, numerous federal courts have found that racially polarized voting pervades Louisiana statewide and local elections. ¹⁹ In the past two decades—including as recently as this year—the Department of Justice (DOJ) has sued local parishes under Section 2 three times; in each case, the DOJ identified racially polarized voting patterns within the parish. ²⁰

The 2020 congressional elections similarly reflected racially polarized voting patterns. For instance, in the five districts comprised of a majority of white voters, there were four

¹⁷ See Compactness Reports for Illustrative Maps (on file with LDF).

¹⁸ See Gingles, 478 U.S. at 50.

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

Most recently, in 2021, the DOJ sued the City of West Monroe under Section 2 over its at-large alderman elections. The DOJ contended that there was racially polarized voting sufficient to satisfy *Gingles* because "[i]n contests between Black candidates and White candidates for West Monroe Board of Alderman and other parish, state, and federal positions, White voters cast their ballots sufficiently as a bloc to defeat the minority's preferred candidate." The court agreed and entered a consent decree between the parties. *United States v. City of West Monroe*, No. 21-cv-0988 (W.D. La. Apr. 14, 2021); see also United States v. City of Morgan, No. 00-cv-1541 (W.D. La. Aug. 17, 2000) ("Racially polarized voting patterns prevail in elections for the City Council of Morgan City. In contests between [B]lack and white candidates for City Council, [B]lack voters consistently vote for [B]lack candidates and white voters vote sufficiently as a bloc to usually defeat the [B]lack voters' candidates of choice."); Greig v. City of St. Martinville, No. 00-cv-00603 (W.D. La. Jun. 3, 2000) (The DOJ asserted that "[e]lections in the City of St. Martinville are racially polarized").

contests in which voters had a choice between Black and white congressional candidates. In each of these four races, white candidates were elected over Black candidates.²¹ Therefore, there is ample evidence to support the conclusion that there are racially polarized voting patterns that may satisfy *Gingles* preconditions two and three.

c. Totality of Circumstances: Louisiana's Voters of Color Have Less Opportunity to Elect Candidates of Their Choice.

In addition to the indicia of the three *Gingles* preconditions, under the "totality of circumstances," Black voters have "less opportunity than other members of the electorate to participate in the political process and to elect representatives of their choice" in Louisiana's congressional elections. ²² Several of the Senate Factors, listed in footnote 13 above, strongly indicate that vote dilution is occurring, including: the extent of the history of voting discrimination in Louisiana (Factor 1); the extent of racially polarized voting in Louisiana (Factor 2); the extent to which Louisiana has used voting practices that may enhance the opportunity for discrimination against Black voters (Factor 3); the extent to which Black voters bear the effects of discrimination in a variety of areas of life (Factor 5); whether political campaigns in Louisiana have been characterized by overt or subtle racial appeals (Factor 6); and the extent to which Black candidates have been elected to public office in Louisiana (Factor 7). The following are a sample of the indicia under the totality of circumstances impacting Black voters' ability to participate equally in Louisiana's congressional elections:

- The state of Louisiana has an extensive history and ongoing record of voting discrimination that has adversely impacted the right of Black and other minority voters to register to vote, to vote, or otherwise to participate in the political process. Since Reconstruction, Louisiana has passed countless laws to deny Black democratic participation, including grandfather clauses, poll taxes, and educational and property qualifications. 4
- Louisiana has a long history and ongoing record of employing voting practices, such as at-large elections and redistricting, that have diluted the weight of Black Louisianans' vote once they cast them. As mentioned above, the DOJ has sued parishes in Louisiana for violating Section 2's non-vote dilution prohibition three

Debo P. Adegbile, Voting Rights in Louisiana: 1982 -2006, 17 S. Cal. Rev. L. & Soc. Just. 416-418 (2008).

See United States House of Representatives elections in Louisiana, 2020, Ballotpedia, https://ballotpedia.org/United_States_House_of_Representatives_elections_in_Louisiana,_2020 (last accessed Sep. 1, 2021).

²² Gingles, 478 U.S. at 36-37 (quoting 42 U.S.C. § 10301(b)).

St. Bernard Citizens For Better Gov't, 2002 WL 2022589, at *9 (quoting Citizens for a Better Gretna, 636 F. Supp. at 1124) ("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 multivolumed treatise to properly describe the persistent, and often violent, intimidation visited by white citizens upon black efforts to participate in Louisiana's political process.")

times over the past thirty years.²⁵ Most recently, the DOJ successfully challenged the City of West Monroe's at-large alderman elections under Section 2.²⁶ From the passage of the Voting Rights Act in 1965 until the Supreme Court's *Shelby County v. Holder* decision in 2013, the DOJ blocked nearly 150 proposed changes to voting policies or practices in Louisiana on the grounds that they discriminated against Black voters or diluted Black voting strength, pursuant to Section 5 of the Voting Rights Act.²⁷

- Louisiana's statewide district maps have been challenged under the Voting Rights Act in numerous reapportionment cycles since 1965.²⁸ Indeed, District 2, Louisiana's only majority-minority district, was established in 1983 only after a federal district court held that the 1981 proposed congressional map diluted Black voting power in Orleans Parish by dispersing the parish's Black majority into two different congressional districts.²⁹
- Louisiana political campaigns have been characterized by subtle and overt racial appeals impacting the political process. Current U.S. Representative for Louisiana's first congressional district, Steve Scalise, spoke to a white supremacist group in 2002 while serving as a Louisiana state legislator. David Duke, the former grand wizard of the Ku Klux Klan, has run for public office in Louisiana several times; most recently, in 2016, he unsuccessfully ran for U.S. Senate to "defend the heritage of European American people." Even with his explicit ties to white supremacy, Duke received over 58,000 votes. 22 In 2018, a white

²⁵ See Cases Rising Claims Under Section 2 of the Voting Rights Act, Department of Justice, https://www.justice.gov/crt/cases-raising-claims-under-section-2-voting-rights-act-0 (last accessed Aug. 25, 2021).

²⁶ See United States v. City of West Monroe, No. 21-cv-0988 (W.D. La. Apr. 14, 2021).

²⁷ See Voting Determination Letters for Louisiana, Department of Justice, https://www.justice.gov/crt/voting-determination-letters-louisiana (last accessed Aug. 25, 2021).

See Louisiana House of Representatives v. Ashcroft, No. 02-0062 (D.D.C. May 21, 2003) (challenge to congressional redistricting after the 2000 census); Hays v. Louisiana, 936 F. Supp. 2d 820, 824-826 (M.D. La. 1996) (challenge to congressional redistricting after 1990 Census); Major v. Treen, 574 F. Supp. 325 (E.D. La. 1983) (challenge to congressional redistricting after 1980 Census); Bussie v. Governor of La., 333 F. Supp. 452, 454, 463 (E.D. La. 1971) (challenge to state legislative redistricting after 1970 Census).

See Major, 574 F. Supp at 327. Although this case predated Gingles, the district court found that racially polarized voting, combined with "Louisiana's history of racial discrimination, both de jure and de facto, continue to have an adverse effect on the ability of its [B]lack residents to participate fully in the electoral process." Id. at 339-40.

Dan Roberts, Senior Republican Steve Scalise spoke at white supremacist meeting in 2002, The Guardian, (Dec. 30, 2014), https://www.theguardian.com/us-news/2014/dec/29/senior-republican-steve-scalise-spoke-at-white-supremicist-meeting-in-2002.

Camila Domonoske, Former KKK Leader David Duke Says 'Of Course' Trump Voters Are His Voters, NPR, (Aug. 5, 2016), https://www.npr.org/sections/thetwo-way/2016/08/05/488802494/former-kkk-leader-david-duke-says-of-course-trump-voters-are-his-voters.

³² United States Senate election in Louisiana, 2016, Ballotpedia, https://ballotpedia.org/United_States_Senate_election_in_Louisiana,_2016 (last accessed Sep. 1, 2021).

Tangipahoa School Board Member and candidate for reelection posted a picture of a noose on Facebook with the caption "IF WE WANT TO MAKE AMERICA GREAT AGAIN WE WILL HAVE TO MAKE EVIL PEOPLE FEAR PUNISHMENT." 33

- In 2001, the St. Bernard Parish School Board was sued under Section 2 for its redistricting plan that eliminated the only district where Black voters had an opportunity to elect a candidate of choice. Lynn Dean, a white state senator who was involved in the redistricting and the highest-ranking public official in the Parish, testified that he use[d] the ["n-word"] and "ha[d] done so recently." 34
- Black Louisianans continue to experience the brunt of racial discrimination in every sector of public life. 35 Black Louisianans experience higher unemployment rates than white Louisianans. Unemployment data from early 2021 shows that Black people were unemployed at a rate of 12%, compared to 5.3% for white people. 36 Black Louisianans also experience socioeconomic disparities as a result of systemic discrimination. In 2019, 29.4% of Black people lived below the poverty line, compared to 12.5% of white people. 37 Health disparities also persist among Black as compared to white Louisianans. Although only one-third of Louisiana's population, Black people accounted for more than 70% of the people who died of COVID-19. 38
- Black people have been largely underrepresented in Louisiana public offices.³⁹ Louisiana has never had a Black U.S. Senator and has not had a Black governor since Reconstruction. As described above, Louisianans rarely elect Black

Caroline Grueskin, Tangipahoa School Board member who posted noose meme opts for last-minute run for reelection, The Advocate (Jul. 31, 2018), https://www.theadvocate.com/baton_rouge/news/communities/livingston_tangipahoa/article_e099 9182-9506-11e8-bf14-fb6afcf2a6ee.html.

³⁴ St. Bernard Citizens For Better Gov't, 2002 WL 2022589, at *10.

[&]quot;Congress and the Courts have recognized the effect lower socio-economic status has on minority participation in the political process." *Id.* In *Citizens for a Better Gretna*, the court found that "depressed levels of income, education and employment are a consequence of severe historical disadvantage" that in turn engenders "depressed levels of participation in voting and candidacy." 636 F. Supp. at 1120.

State unemployment by race and ethnicity, Economic Policy Institute, https://www.epi.org/indicators/state-unemployment-race-ethnicity/ (last updated July 2021).

Poverty Rate by Race/Ethnicity, KFF, https://www.kff.org/other/state-indicator/poverty-rate-by-raceethnicity/?currentTimeframe=0&sortModel=%7B%22colId%22:%22Location%22,%22sort%22:%22asc%22%7D (last accessed Sep. 1, 2021).

Black Communities Are Hit Hardest By COVID-19 In Louisiana And Elsewhere, New Orleans Public Radio, (Apr. 6, 2020), https://www.wwno.org/latest-news/2020-04-06/black-communities-are-hit-hardest-by-covid-19-in-louisiana-and-elsewhere.

The U.S. Supreme Court has held that one of the "predominant" factors under Section 2 is "the extent to which members of the minority group have been elected to public office in the jurisdiction." Gingles, 478 U.S. at 37. See also Citizens for a Better Gretna, 636 F. Supp. at 1120 ("Where members of the minority group have not been elected to public office, it is of course evidence of vote dilution.")

candidates to Congress; the state has had only four Black Congresspeople since Reconstruction, all of whom were elected to represent majority Black districts. 40 By contrast, since the Voting Rights Act was adopted in 1965, Louisiana has sent 45 white representatives to Congress. 41 As noted above, none of the majority white districts in Louisiana has ever elected a Black representative. Louisiana's first Black chief Justice of the state Supreme Court was appointed in 1994 following a consent decree that was entered in a case challenging the use of at-large judicial districts. As part of the consent decree, the court created a majority-minority judicial district that has continued to elect the only Black member of the State Supreme Court. 42

IV. The Louisiana State Legislature Can And Must Enact a Map with Two Majority-Minority Opportunity Districts.

For the reasons explained above, the state Legislature must earnestly consider its obligations under the Voting Rights Act and adopt a congressional map with two majority-minority opportunity districts to ensure Black voters' right to an equal opportunity to elect candidates of their choice. The seven maps submitted with this letter—each of which includes two majority-minority districts—show that doing so is entirely feasible. We urge the state to fully consider and adopt a congressional map that ensures non-dilution of Black voting strength in Louisiana. Failure to do so may lead to costly litigation. We are happy to discuss the contents of this letter further and to provide additional assistance with developing a more inclusive congressional districting plan.

Please feel free to contact LDF Redistricting Counsel Michael Pernick at (917) 790-3597 or by email at mpernick@naacpldf.org with any questions or to discuss these issues in more detail.

Three of the Black Congresspeople were elected in large part due to Black voter support in District 2. See Black-American Members by State and Territory, 1870-Present, History, Art & Archives: United States House of Representatives, https://history.house.gov/Exhibitions-and-Publications/BAIC/Historical-Data/Black-American-Representatives-and-Senators-by-State-and-Territory/ (last accessed Sep. 1, 2021).

⁴¹ See United States Congressional Delegations from Louisiana, Ballotpedia, https://ballotpedia.org/United_States_congressional_delegations_from_Louisiana (last visited Aug. 31, 2021).

⁴² See Chisom v. Jindal, 890 F. Supp. 2d 696, 702-705 (E.D. La. 2012).

The Census Bureau will provide states, upon request, with data files to allow states to reallocate incarcerated populations to their pre-incarceration addresses for redistricting and other purposes. See Final 2020 Census Residence Criteria and Residence Situations, 83 Fed. Reg. 5525 (Feb. 8, 2018), available at https://www.federalregister.gov/documents/2018/02/08/2018-02370/final-2020-census-residence-criteria-and-residence-situations#p-47. We urge your committee to request this data from the Census Bureau and draw maps that reallocate incarcerated populations to their pre-incarceration residences.

NAACP Legal Defense and Educational Fund, Inc., The Cost (in Time, Money, and Burden) of Section 2 of the Voting Rights Act Litigation as of February 21, NAACP Legal Defense and Educational Fund, https://www.naacpldf.org/wp-content/uploads/Section-2-costs-2.19.21.pdf (last visited Aug. 2, 2021).

Sincerely,

/s/ Michael Pernick

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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.

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.

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.

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.

Campaign Legal Center

The nonpartisan Campaign Legal Center advances democracy through the law at the federal, state and local levels, fighting for every American's rights to responsive government and a fair opportunity to participate in and affect the democratic process. Since the organization's founding in 2002, CLC has participated in major redistricting, voting rights, and campaign finance cases before the U.S. Supreme Court as well as numerous other federal and state court cases. CLC's work promotes every citizen's right to participate in the democratic process.

Southern Poverty Law Center Action Fund

SPLC Action is a catalyst for racial justice in the South and beyond, working in partnership with communities to dismantle white supremacy, strengthen intersectional movements, and advance the human rights of all people.

Voters Organized to Educate

Voters Organized is a 501(c)4 non-profit focused on building collective power to create change in the criminal legal system. We are dedicated to building an educated and engaged democracy. We do this by keeping people informed regarding elections, and ongoing issues in city, state, and national policy reform. Through working with organizations and individuals that believe in the principles of social justice and equality, Voters Organized impacts elections and legislation in Louisiana and beyond. We educate and mobilize organizations and individuals that believe in the principles of grassroots movement building, social justice, and equality.

Voice of the Experienced (VOTE)

VOTE is a grassroots organization founded and run by formerly incarcerated people (FIP), our families and our allies. We are dedicated to restoring the full human and civil rights of those most impacted by the criminal (in)justice system. Together we have the experiences, expertise and power to improve public safety in New Orleans and beyond without relying on mass incarceration.

Louisiana Progress

Louisiana Progress works with citizens, community leaders, activists, advocates, students, and policymakers to inform Louisianans on important issues, engage people in the political process, and help them mobilize to fight for people-centered, solutions-driven public policies.

Fair Districts Louisiana

Fair Districts Louisiana is a Louisiana-based grassroots redistricting and voting reform organization.

E Pluribus Unum

Founded by former New Orleans Mayor Mitch Landrieu, E Pluribus Unum (EPU) is a nonprofit, nonpartisan organization whose mission is to build a more just, equitable, and inclusive South, uprooting the barriers that have long divided the region by race and class.

EPU is focused on changing the divisive narratives that perpetuate systemic and interpersonal racism, cultivating and empowering courageous leaders who are advancing racial equity, and championing transformative policy change.

Black Voters Matter Fund

The Black Voter's Matter Fund believes in the value of the voter 365. In this vein not only do we support our partners voting rights during and in between elections, we also support capacity and power building all year long.

Louisiana Budget Project

The Louisiana Budget Project (LBP) monitors and reports on public policy and how it affects Louisiana's low- to moderate-income families. We believe that the lives of Louisianans can be improved through profound change in public policy, brought about by: creating a deeper understanding of the state budget and budget-related issues, looking at the big picture of how the budget impacts citizens, encouraging citizens to be vocal about budget issues that are important to them, and providing insight and leadership to drive the policy debate.

League of Women Voters of Louisiana

The League of Women Voters of Louisiana is a nonpartisan political organization encouraging informed and active participation in government. It influences public policy through education and advocacy.

Urban League of Louisiana

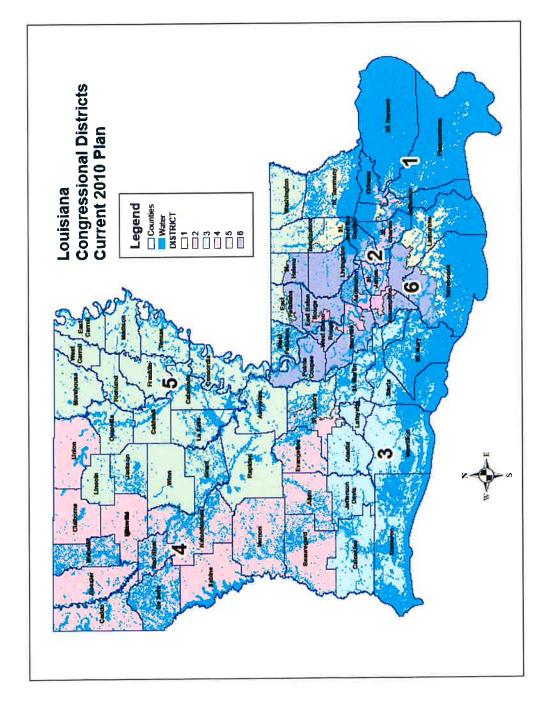
The Urban League of Louisiana's mission is to assist African Americans and other communities seeking equity to secure economic self-reliance, parity, and civil rights. As an affiliate of the National Urban League, and for over 83 years, the Urban League of Louisiana has worked to ensure quality education, equal employment, entrepreneurial opportunities, economic inclusion, and shared dignity under the law.

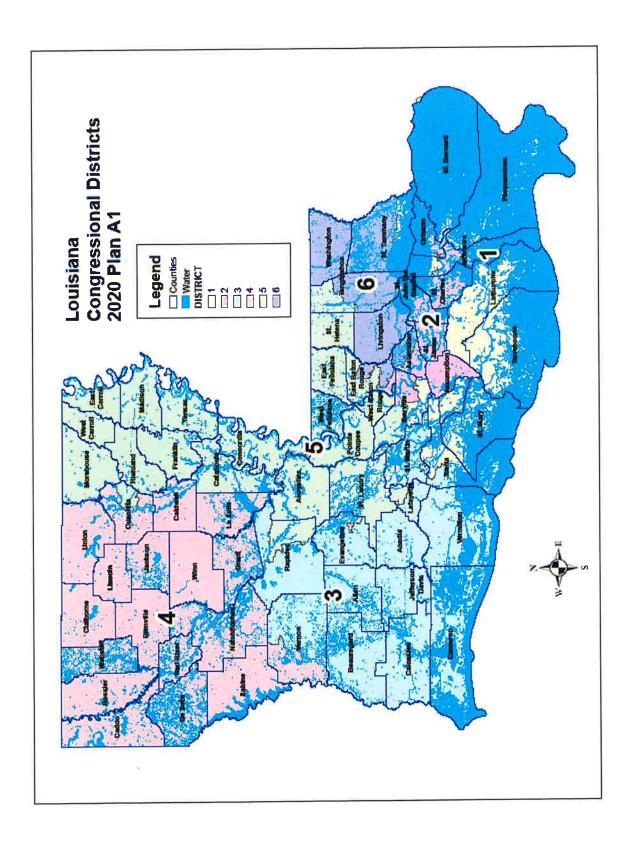
Crescent City Media Group

Crescent City Media Group is a civil rights, community engagement and media advocacy organization serving at the nexus of public interest and policy advocacy in communities of color across the state of Louisiana and the US South.

APPENDIX 1

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





APPENDIX 2

Demographic Data for Illustrative Maps

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rent 2	Current 2010 Plan w/2010 Data	010 Data		-6			
rict	District TTLPop10 Deviatio	Deviation ⁴⁵	TTLWht10%	TTLBlk10%	VAP10	WhtVAP10%	WhtVAP10% BlkVAP20%
	755,445	-117	74.48%	13.56%	579,661	76.63%	12.00%
0.7	755,538	-24	28.67%	62.24%	569,601	31.77%	59.05%
~	755,596	34	68.95%	25.46%	561,690	71.52%	23.20%
4	755,605	43	59.61%	34.58%	566,830	62.24%	32.45%
10	755,581	19	%69.09	35.67%	567,667	63.05%	33.50%
9	755,607	45	69.57%	23.42%	569,908	71.96%	21.37%

Under the Equal Protection Clause, congressional districts must have equal population "as nearly as practicable." Wesberry v. Sanders, 376 U.S. 1, 8 (1964). See also 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). 45

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District	District TTLPop20	Deviation	m TTLWht20%	TTLBIk20%	VAP20	WhtVAP20%	WhtVAP20% BlkVAP20%
1	812,550	36,257	66.36%	15.47%	659, 199	69.24%	14.03%
2	775,522	-771	27.02%	29.79%	599,605	29.82%	57.70%
3	785,821	9,528	64.43%	26.01%	593,569	67.03%	24.23%
4	728,332	-47,961	55.84%	34.94%	554,869	58.26%	33.11%
ນຕ	739.258	-37,035	58.09%	34.86%	567,686	60.38%	32.75%
9	816,274	39,981	61.94%	26.04%	625,020	64.53%	24.46%

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TOTAL TAT							
District	TTLPop20 Deviation	Deviation	TTLWht20%	TTLB1k20%	VAP20	WhtVAP20%	WhtVAP20% BlkVAP20%
-	776,292	-1	62.15%	19.38%	603,499	65.33%	17.70%
2	776,293	0	32.14%	53.51%	603,562	35.06%	51.46%
က	776,293	0	70.95%	18.96%	586,972	73.07%	17.53%
4	776,293	0	57.67%	33.37%	596,281	59.95%	31.61%
2	776,293	0	39.93%	53.84%	588,294	42.75%	51.28%
9	776.293	0	71.66%	16.55%	591,940	74.05%	15.24%

Field Descriptions:

TTLPop 10 - 2010 Total Population (TTL Pop)

TTLPop20 - 2020 Total Population (TTL Pop)

TTLWht20% - 2020 Not-Hispanic White Alone Total Pop%

 $TTLBlk20\% - 2020\ Not-Hispanic\ Any\ Part\ Black\ Total\ Pop\%$

VAP20 - 2020 Voting Age Population (VAP)

WhtVAP20% - 2020 Not-Hispanic White Alone VAP%

BlkVAP20% - 2020 Not-Hispanic Any Part Black VAP%

