Plan Evaluation Form

Plan Type: Congress - Public Submissions

Plan Name: NAACPLDF Coalition CD Plan A3 v2

Plan Submitted By:

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? For House and Senate Plans, give the # of districts if less than the current number.	Yes (See attachment - Plan Statistics)
What is the overall deviation of the plan?	Absolute=2 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.	18 (See attachment - Split Parishes)
How many municipalities are split in the plan? Please list. Include any explanation given for each split.	23 (See attachment - Split Places)
How many VTDs (precincts) are split in the plan?	25 (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
Any other observations regarding the plan?	

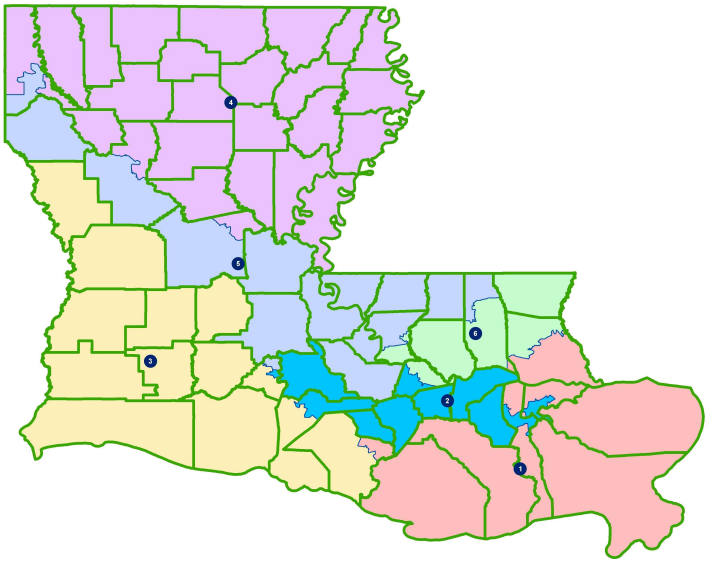
Date: January 19, 2022
Time: 12:24 PM

Snapshot Report

DB: LA_2020_12 - CENSUS

Plan: NAACPLDF Coalition CD Plan A3 v2

Plan Type: Congress - Public Submissions



Date: January 19, 2022
Time: 12:24 PM

Compactness Report

DB: LA_2020_12 - CENSUS

Plan: NAACPLDF Coalition CD Plan A3 v2

Plan Type: Congress - Public Submissions

District	Part	Area (sq miles)	Perimeter	Normalized Area	Reock	Schwartzberg	Holes
District 1	1	9927.74	770.15	0.2103	0.4697	2.18	0
District 2	1	2875.36	567.03	0.1124	0.2096	2.98	0
District 3	1	12822.89	900.27	0.1988	0.2972	2.24	0
District 4	1	15743.52	936.66	0.2255	0.5033	2.11	0
District 5	1	8372.58	1053.06	0.0949	0.1775	3.25	0
District 6	1	2660.66	383.25	0.2276	0.3349	2.1	0

Plan Statistics

Districts:	# of Members	Actual Population	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	776,292	776,292	0	0.000%
District 4	1	776,293	776,292	1	0.000%
District 5	1	776,294	776,292	2	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**		
Number of Districts for Plan Type:	6		
Range of District Populations:	776,292	to	776,294
Absolute Mean Deviation:	0		
Absolute Range:	0	to	2
Absolute Overall Range:	**2**		
Relative Mean Deviation:	0.00%		
Relative Range:	0.00%	to	0.00%
Relative Overall Range:	**0.00%**		

Ideal - Actual:	***-5***
Remainder:	***5***
Unassigned Population:	***0***

Date: January 19, 2022
Time: 12:24 PM

District Population

DB: LA_2020_12 - CENSUS

Plan: NAACPLDF Coalition CD Plan A3 v2

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 1																
Jefferson	264,122	165,364	39,332	13,191	41,323	51,747	210,080	137,865	28,553	9,981	29,987	36,883	161,626	122,793	17,883	20,950
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	68,809	52,898	7,585	2,755	4,734	7,634	57,095	44,228	6,403	2,141	3,645	6,349	48,150	38,512	4,594	5,044
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. James	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
St. Mary	27,766	17,066	6,067	633	3,248	3,691	20,960	13,588	4,182	468	2,153	2,390	15,819	11,764	3,089	966
St. Tammany	141,179	95,741	29,337	3,373	9,399	11,172	108,067	76,154	20,328	2,429	6,648	7,612	92,873	69,777	16,384	6,711
Tangipahoa	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
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**	**511,497**	**139,060**	**25,418**	**75,982**	**95,520**	**602,435**	**414,152**	**98,140**	**18,903**	**54,076**	**67,083**	**478,027**	**364,454**	**69,311**	**44,261**
	100.000%	**65.890%**	**17.913%**	**3.274%**	**9.788%**	**12.305%**	**100.000%**	**68.746%**	**16.291%**	**3.138%**	**8.976%**	**11.135%**	**79.349%**	**76.241%**	**14.499%**	**9.259%**
District 2																
Ascension	33,255	13,468	17,190	421	1,824	2,236	24,282	10,468	12,070	275	1,230	1,467	21,422	9,616	10,837	969
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
Iberia	34,333	16,235	16,112	660	1,018	1,307	25,644	12,975	11,253	471	711	878	22,642	11,898	9,984	739
Jefferson	176,659	55,571	86,885	9,833	21,596	27,310	134,574	46,270	63,622	7,711	14,830	18,601	101,475	36,823	51,693	12,959
Lafayette	28,834	4,510	23,184	147	808	1,024	21,568	3,909	16,935	112	505	647	19,261	3,007	15,489	765
Orleans	315,188	73,564	211,384	10,101	17,310	23,383	249,101	66,024	159,665	8,379	12,763	16,807	208,094	53,474	136,931	17,689
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 Baptist	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
St. Martin	51,767	33,259	15,921	597	1,451	1,679	39,404	26,278	11,293	407	1,013	1,144	35,120	23,934	10,381	805
Terrebonne	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
District 2	**776,293**	**267,729**	**425,782**	**23,155**	**50,910**	**65,628**	**598,738**	**222,728**	**315,169**	**18,295**	**35,864**	**45,359**	**501,317**	**190,234**	**273,357**	**37,705**
	100.000%	**34.488%**	**54.848%**	**2.983%**	**6.558%**	**8.454%**	**100.000%**	**37.200%**	**52.639%**	**3.056%**	**5.990%**	**7.576%**	**83.729%**	**37.947%**	**54.528%**	**7.521%**
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	32,350	21,354	9,235	241	1,240	1,336	24,408	16,460	6,483	187	1,061	1,111	20,553	14,566	5,643	344
Iberia	35,596	22,971	8,444	1,463	2,232	2,590	27,147	18,320	5,816	1,091	1,573	1,779	21,884	16,389	4,368	1,148
Jefferson Davis	32,250	25,066	5,837	183	692	734	24,039	19,121	4,006	111	476	489	20,013	16,350	3,202	461

District Population

DB: LA_2020_12 - CENSUS

Plan: NAACPLDF Coalition CD Plan A3 v2

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																
Lafayette	186,915	134,343	32,079	6,021	11,732	13,731	142,889	106,155	22,204	4,374	8,079	9,407	117,730	95,336	15,482	6,913
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
St. Landry	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
St. Mary	21,640	9,883	9,924	202	713	833	16,561	8,006	7,338	125	488	564	14,391	6,948	6,802	641
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	48,750	35,087	7,611	1,442	3,010	4,175	36,261	26,765	5,133	1,074	2,129	2,740	24,060	19,182	3,011	1,867
District 3	**776,292**	**543,557**	**165,315**	**16,711**	**34,684**	**42,791**	**586,847**	**423,259**	**115,552**	**12,071**	**24,307**	**29,397**	**467,420**	**359,372**	**86,280**	**21,790**
	100.000%	**70.020%**	**21.295%**	**2.153%**	**4.468%**	**5.512%**	**100.000%**	**72.124%**	**19.690%**	**2.057%**	**4.142%**	**5.009%**	**79.649%**	**76.884%**	**18.459%**	**4.662%**
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	112,397	76,855	25,688	3,147	4,215	4,781	88,196	62,551	18,420	2,322	2,998	3,242	74,084	55,535	14,467	4,082
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
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
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
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 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
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
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
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
Natchitoches	9,310	5,936	2,767	68	281	244	7,272	4,843	1,972	60	182	148	6,044	4,220	1,589	234
Ouachita	160,368	88,545	61,217	2,788	5,157	5,658	120,200	69,974	42,290	2,118	3,759	3,946	99,752	60,515	35,658	3,579
Rapides	24,427	20,739	1,722	333	760	855	18,231	15,758	1,037	239	532	571	14,861	13,662	681	518
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
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
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
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
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
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
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 Population

DB: LA_2020_12 - CENSUS

Plan: NAACPLDF Coalition CD Plan A3 v2

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 4	**776,293**	**477,804**	**242,941**	**12,592**	**27,972**	**33,518**	**596,110**	**380,211**	**174,847**	**9,349**	**20,228**	**23,596**	**481,187**	**325,052**	**139,394**	**16,740**
	100.000%	**61.549%**	**31.295%**	**1.622%**	**3.603%**	**4.318%**	**100.000%**	**63.782%**	**29.331%**	**1.568%**	**3.393%**	**3.958%**	**80.721%**	**67.552%**	**28.969%**	**3.479%**
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
Caddo	125,451	26,602	93,616	887	2,998	3,600	94,211	22,508	67,939	686	2,025	2,376	77,212	17,578	56,782	2,852
Catahoula	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
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
East Baton Rouge	198,371	44,453	143,245	2,162	7,026	8,290	149,085	36,144	105,281	1,638	4,864	5,653	126,032	31,355	90,227	4,450
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	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Iberville	30,241	14,833	13,730	202	1,202	1,418	24,086	12,462	10,232	149	1,022	1,187	20,462	10,132	9,897	433
Lafayette	26,004	14,510	9,873	286	1,050	1,228	19,418	11,544	6,778	178	715	775	16,502	10,302	5,510	689
Natchitoches	28,205	13,425	12,958	187	1,032	1,246	22,077	11,167	9,443	138	861	992	17,063	8,630	7,635	799
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	105,596	56,771	40,870	2,095	3,631	4,235	80,561	45,615	29,168	1,547	2,562	2,871	65,315	39,170	23,094	3,051
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	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Tangipahoa	19,655	8,006	10,852	100	507	634	14,800	6,430	7,816	85	342	421	12,128	5,356	6,493	279
West Baton Rouge	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 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	**776,294**	**316,748**	**418,417**	**7,582**	**23,884**	**28,203**	**591,272**	**256,339**	**304,781**	**5,684**	**17,172**	**19,739**	**492,479**	**216,416**	**259,664**	**16,399**
	100.000%	**40.803%**	**53.899%**	**0.977%**	**3.077%**	**3.633%**	**100.000%**	**43.354%**	**51.547%**	**0.961%**	**2.904%**	**3.338%**	**83.291%**	**43.944%**	**52.726%**	**3.330%**
District 6																
Ascension	93,245	67,673	15,026	1,879	7,015	8,147	67,675	50,668	10,069	1,239	4,548	5,194	58,495	47,184	7,977	3,334
East Baton Rouge	258,410	151,616	70,153	14,263	19,136	22,261	206,527	127,737	51,509	10,961	13,731	15,886	153,232	106,877	34,448	11,907
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	123,391	100,900	9,306	2,401	8,453	9,672	94,161	78,467	6,433	1,646	5,962	6,698	85,906	75,947	4,758	5,202
Tangipahoa	113,502	73,330	31,027	1,374	5,507	6,608	86,691	58,775	21,401	1,015	3,800	4,419	64,128	47,556	14,032	2,540
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**	**540,317**	**151,604**	**21,830**	**49,206**	**56,889**	**595,146**	**427,822**	**107,280**	**16,114**	**33,965**	**38,488**	**473,916**	**372,461**	**74,742**	**26,714**
	100.000%	**69.602%**	**19.529%**	**2.812%**	**6.339%**	**7.328%**	**100.000%**	**71.885%**	**18.026%**	**2.708%**	**5.707%**	**6.467%**	**79.630%**	**78.592%**	**15.771%**	**5.637%**
Grand Total	**4,657,757**	**2,657,652**	**1,543,119**	**107,288**	**262,638**	**322,549**	**3,570,548**	**2,124,511**	**1,115,769**	**80,416**	**185,612**	**223,662**	**2,894,346**	**1,827,989**	**902,748**	**163,609**
	100.000%	**57.059%**	**33.130%**	**2.303%**	**5.639%**	**6.925%**	**100.000%**	**59.501%**	**31.249%**	**2.252%**	**5.198%**	**6.264%**	**81.062%**	**63.157%**	**31.190%**	**5.653%**

Date: January 19, 2022
Time: 12:24 PM

Split Parishes

DB: LA_2020_12 - CENSUS
Plan Type: Congress - Public Submissions

Plan: NAACPLDF Coalition CD Plan A3 v2

	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	264,122	165,364	39,332	13,191	41,323	51,747	210,080	137,865	28,553	9,981	29,987	36,883	161,626	122,793	17,883	20,950
Orleans	68,809	52,898	7,585	2,755	4,734	7,634	57,095	44,228	6,403	2,141	3,645	6,349	48,150	38,512	4,594	5,044
St. James	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
St. Mary	27,766	17,066	6,067	633	3,248	3,691	20,960	13,588	4,182	468	2,153	2,390	15,819	11,764	3,089	966
St. Tammany	141,179	95,741	29,337	3,373	9,399	11,172	108,067	76,154	20,328	2,429	6,648	7,612	92,873	69,777	16,384	6,711
Tangipahoa	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
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 2																
Ascension	33,255	13,468	17,190	421	1,824	2,236	24,282	10,468	12,070	275	1,230	1,467	21,422	9,616	10,837	969
Iberia	34,333	16,235	16,112	660	1,018	1,307	25,644	12,975	11,253	471	711	878	22,642	11,898	9,984	739
Jefferson	176,659	55,571	86,885	9,833	21,596	27,310	134,574	46,270	63,622	7,711	14,830	18,601	101,475	36,823	51,693	12,959
Lafayette	28,834	4,510	23,184	147	808	1,024	21,568	3,909	16,935	112	505	647	19,261	3,007	15,489	765
Orleans	315,188	73,564	211,384	10,101	17,310	23,383	249,101	66,024	159,665	8,379	12,763	16,807	208,094	53,474	136,931	17,689
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. Martin	51,767	33,259	15,921	597	1,451	1,679	39,404	26,278	11,293	407	1,013	1,144	35,120	23,934	10,381	805
Terrebonne	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
District 3																
Evangeline	32,350	21,354	9,235	241	1,240	1,336	24,408	16,460	6,483	187	1,061	1,111	20,553	14,566	5,643	344
Iberia	35,596	22,971	8,444	1,463	2,232	2,590	27,147	18,320	5,816	1,091	1,573	1,779	21,884	16,389	4,368	1,148
Lafayette	186,915	134,343	32,079	6,021	11,732	13,731	142,889	106,155	22,204	4,374	8,079	9,407	117,730	95,336	15,482	6,913
St. Landry	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
St. Mary	21,640	9,883	9,924	202	713	833	16,561	8,006	7,338	125	488	564	14,391	6,948	6,802	641
District 4																
Caddo	112,397	76,855	25,688	3,147	4,215	4,781	88,196	62,551	18,420	2,322	2,998	3,242	74,084	55,535	14,467	4,082
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
Natchitoches	9,310	5,936	2,767	68	281	244	7,272	4,843	1,972	60	182	148	6,044	4,220	1,589	234
Rapides	24,427	20,739	1,722	333	760	855	18,231	15,758	1,037	239	532	571	14,861	13,662	681	518
District 5																
Caddo	125,451	26,602	93,616	887	2,998	3,600	94,211	22,508	67,939	686	2,025	2,376	77,212	17,578	56,782	2,852
Catahoula	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
East Baton Rouge	198,371	44,453	143,245	2,162	7,026	8,290	149,085	36,144	105,281	1,638	4,864	5,653	126,032	31,355	90,227	4,450
Evangeline	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Lafayette	26,004	14,510	9,873	286	1,050	1,228	19,418	11,544	6,778	178	715	775	16,502	10,302	5,510	689
Natchitoches	28,205	13,425	12,958	187	1,032	1,246	22,077	11,167	9,443	138	861	992	17,063	8,630	7,635	799

Split Parishes

Plan: NAACPLDF Coalition CD Plan A3 v2

	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 5																
Rapides	105,596	56,771	40,870	2,095	3,631	4,235	80,561	45,615	29,168	1,547	2,562	2,871	65,315	39,170	23,094	3,051
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	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Tangipahoa	19,655	8,006	10,852	100	507	634	14,800	6,430	7,816	85	342	421	12,128	5,356	6,493	279
District 6																
Ascension	93,245	67,673	15,026	1,879	7,015	8,147	67,675	50,668	10,069	1,239	4,548	5,194	58,495	47,184	7,977	3,334
East Baton Rouge	258,410	151,616	70,153	14,263	19,136	22,261	206,527	127,737	51,509	10,961	13,731	15,886	153,232	106,877	34,448	11,907
St. Tammany	123,391	100,900	9,306	2,401	8,453	9,672	94,161	78,467	6,433	1,646	5,962	6,698	85,906	75,947	4,758	5,202
Tangipahoa	113,502	73,330	31,027	1,374	5,507	6,608	86,691	58,775	21,401	1,015	3,800	4,419	64,128	47,556	14,032	2,540

Split Places

DB: LA_2020_12 - CENSUS

Plan: NAACPLDF Coalition CD Plan A3 v2

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 1																
Jefferson																
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
Marrero	4,000	1,705	1,643	279	322	423	2,999	1,432	1,071	223	229	288	2,500	1,431	777	297
Metairie	141,366	93,539	16,841	6,704	21,887	27,270	113,211	78,463	12,175	5,036	15,726	19,331	85,748	69,886	6,082	9,778
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	68,809	52,898	7,585	2,755	4,734	7,634	57,095	44,228	6,403	2,141	3,645	6,349	48,150	38,512	4,594	5,044
St. Mary																
Bayou Vista	4,213	3,253	412	43	372	429	3,254	2,609	269	32	240	282	2,316	2,066	140	110
Patterson	2,842	1,208	1,461	15	99	103	2,186	986	1,070	12	79	77	1,717	953	708	55
St. Tammany																
Abita Springs	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Mandeville	3,502	2,995	154	56	226	219	2,862	2,486	119	33	166	171	2,670	2,380	123	175
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	359	273	63	11	8	13	279	224	45	3	4	7	270	215	42	15
Iberia																
New Iberia	15,259	5,095	9,124	441	466	628	11,303	4,224	6,304	348	327	429	9,399	3,715	5,275	388
Jefferson																
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
Marrero	28,382	9,129	15,348	1,671	1,802	2,353	22,068	7,823	11,272	1,319	1,326	1,695	18,263	6,166	10,349	1,737
Metairie	2,141	167	1,822	11	132	174	1,687	137	1,447	7	92	105	1,665	95	1,493	75
River Ridge	2,315	799	1,209	45	221	287	1,882	687	985	34	149	184	1,296	475	737	84
Lafayette																
Lafayette	27,377	4,034	22,294	132	748	946	20,448	3,500	16,275	103	471	597	18,340	2,705	14,921	723
Orleans																
New Orleans	315,188	73,564	211,384	10,101	17,310	23,383	249,101	66,024	159,665	8,379	12,763	16,807	208,094	53,474	136,931	17,689
District 3																
Iberia																
New Iberia	13,296	7,837	4,166	448	676	817	10,129	6,338	2,827	347	498	590	7,953	5,390	2,195	386
Lafayette																

Split Places

Plan: NAACPLDF Coalition CD Plan A3 v2

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																
Lafayette																
Carencro	237	123	70	1	40	45	179	109	43	1	24	28	180	138	36	5
Lafayette	89,261	64,251	14,899	3,531	5,313	6,389	71,848	53,392	10,868	2,719	3,865	4,622	58,002	47,419	6,825	3,767
St. Mary																
Bayou Vista	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Patterson	3,089	1,585	1,223	40	156	159	2,219	1,207	821	29	100	105	1,724	907	738	84
District 4																
Caddo																
Greenwood	3,151	1,952	915	39	155	158	2,564	1,664	681	26	119	105	2,396	1,537	742	117
Shreveport	74,024	49,532	17,482	2,812	2,797	3,328	58,180	40,545	12,383	2,091	2,046	2,318	49,185	36,994	9,140	3,081
Natchitoches																
Clarence	36	21	13	0	2	1	27	16	9	0	2	1	29	16	8	5
Natchitoches	2,692	1,893	649	35	76	79	2,143	1,547	485	27	50	44	1,905	1,361	445	102
Rapides																
Pineville	986	700	135	65	69	111	838	602	102	63	60	97	468	402	47	24
District 5																
Caddo																
Greenwood	15	0	12	0	3	2	12	0	10	0	2	2	7	0	5	0
Shreveport	110,661	16,647	89,789	775	2,541	3,130	82,453	14,432	65,001	601	1,711	2,087	67,614	11,288	53,842	2,493
East Baton Rouge																
Baton Rouge	106,358	9,431	90,885	1,370	4,150	5,040	80,397	8,636	67,345	1,099	2,888	3,483	64,217	5,683	56,005	2,518
Central	18,003	14,214	2,531	183	724	771	13,582	11,051	1,666	114	473	491	12,394	10,556	1,474	363
Lafayette																
Carencro	9,035	3,984	4,494	120	355	442	6,535	3,161	3,009	73	235	281	5,376	2,796	2,342	237
Lafayette	4,736	2,292	2,161	52	175	196	3,732	1,931	1,591	40	121	126	3,108	1,780	1,201	126
Natchitoches																
Clarence	290	48	236	0	3	1	227	43	179	0	3	0	255	49	205	4
Natchitoches	15,347	4,797	9,700	114	539	831	12,041	4,311	7,025	94	460	714	8,221	2,577	5,288	354
Rapides																
Pineville	13,398	7,466	4,998	312	342	380	10,251	6,044	3,522	227	233	254	7,856	5,308	2,186	371
Tangipahoa																
Amite City	3,048	973	2,013	20	24	68	2,497	853	1,595	19	17	56	1,780	542	1,189	39

Split Places

DB: LA_2020_12 - CENSUS

Plan: NAACPLDF Coalition CD Plan A3 v2

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 5																
Tangipahoa																
Independence	646	156	455	9	22	21	442	131	284	9	15	10	321	110	197	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	32,838	23,633	5,190	1,074	2,411	2,756	23,313	17,222	3,516	694	1,541	1,695	20,976	16,670	2,931	1,375
East Baton Rouge																
Baton Rouge	121,112	70,560	35,212	6,877	7,054	8,478	99,843	61,004	26,716	5,550	5,429	6,517	68,569	46,684	16,469	5,400
Central	11,562	9,404	1,192	174	570	578	8,633	7,207	765	118	371	367	7,903	7,008	646	249
St. Tammany																
Abita Springs	2,631	2,179	180	30	197	215	2,052	1,769	100	20	133	145	1,883	1,626	108	112
Mandeville	9,690	7,899	553	377	711	809	7,530	6,285	384	244	512	547	6,534	5,817	226	485
Tangipahoa																
Amite City	957	686	228	13	25	20	736	551	152	11	18	16	678	562	99	18
Independence	989	587	341	1	49	55	754	470	244	0	29	36	618	405	187	25

Split VTDs

DB: LA_2020_12 - CENSUS

Plan: NAACPLDF Coalition CD Plan A3 v2

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 1																
Jefferson																
116	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
188	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Orleans																
3-20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
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. James																
18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
St. Mary																
25	399	58	329	0	8	13	299	43	246	0	8	12	270	83	181	6
St. Tammany																
312	498	391	32	9	49	52	364	293	13	8	34	34	252	211	20	20
Tangipahoa																
Voting Districts Not Defined	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Terrebonne																
65	1,130	610	405	9	58	54	871	512	289	6	33	36	662	417	217	28
District 2																
Ascension																
35	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
40	2,270	1,151	983	26	89	109	1,586	846	660	17	47	63	1,666	1,029	569	68
Iberia																
1-3	1,089	463	540	15	59	72	836	386	390	12	37	57	682	394	253	23
3-3	22	6	6	1	6	11	18	6	2	1	6	10	8	5	2	0
4-3	1,836	265	1,487	37	37	61	1,395	227	1,108	30	25	37	1,220	192	985	36
7-1	1,207	928	190	13	65	84	955	755	129	9	52	63	925	768	115	41
Jefferson																
116	1,337	655	480	26	164	193	1,153	579	424	25	116	138	709	422	228	59
188	1,325	128	1,117	18	52	65	973	113	802	10	41	44	949	96	800	53
Orleans																
3-20	663	402	136	19	100	128	580	373	102	18	81	98	441	310	78	53

Split VTDs

Plan: NAACPLDF Coalition CD Plan A3 v2

	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																
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
St. James																
18	1,433	940	455	1	28	25	1,145	749	363	1	23	19	1,069	665	393	11
St. Martin																
26	1,195	985	159	9	22	33	923	776	111	4	15	29	800	693	87	20
Terrebonne																
65	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
Iberia																
1-3	429	245	156	4	21	24	335	215	103	2	12	15	278	162	107	21
3-3	1,948	947	755	160	73	105	1,518	763	598	99	49	69	847	516	270	62
4-3	493	130	344	13	5	11	371	102	252	13	4	10	326	53	265	15
7-1	97	59	16	8	10	12	65	44	9	8	2	3	62	52	8	3
Lafayette																
4	311	175	120	4	12	13	218	129	84	0	5	6	185	91	87	8
St. Landry																
1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
St. Mary																
25	957	380	511	6	42	45	711	292	360	6	38	37	644	197	428	19
District 4																
Caddo																
122	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Catahoula																
9-3	212	183	16	2	2	7	170	147	12	1	1	7	201	199	1	1
Natchitoches																
1-7	1,194	812	305	13	36	33	973	673	238	11	23	17	800	538	214	47
District 5																

Split VTDs

DB: LA_2020_12 - CENSUS

Plan: NAACPLDF Coalition CD Plan A3 v2

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 5																
Caddo																
122	3,910	519	3,291	20	60	58	3,082	447	2,567	19	35	33	2,044	278	1,700	66
Catahoula																
9-3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
East Baton Rouge																
3-12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Evangeline																
5030	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Lafayette																
4	2,663	1,071	1,466	16	88	119	1,883	865	935	14	55	76	1,608	794	752	61
Natchitoches																
1-7	222	118	101	0	1	2	211	112	96	0	1	2	173	117	47	10
St. Landry																
1	1,474	902	510	13	40	37	1,131	697	394	7	25	27	837	550	271	16
St. Martin																
26	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
District 6																
Ascension																
35	1,908	1,693	48	12	116	145	1,398	1,269	34	2	69	85	1,290	1,223	24	43
40	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
East Baton Rouge																
3-12	3,399	1,002	1,569	140	645	739	2,512	914	1,030	109	433	505	1,551	700	701	150
St. Tammany																
312	2,937	2,085	373	117	304	371	2,408	1,802	238	93	225	270	1,674	1,400	137	138
Tangipahoa																
Voting Districts Not Defined	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	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 Sadasivan
Subject: Written Submission - Congressional Redistricting
Attachments: 2021.10.18 - Letter re Louisiana Congressional Redistricting.pdf

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

LDF
DEFEND EDUCATE EMPOWER

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 **two** 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.[1] 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,[2] but the state has had only four Black Congresspeople since Reconstruction.[3] 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,[4] none of the majority-

---

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

2 *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.

3 *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).

4 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."[6] 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.[7] 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.[8] Section 2 prohibits minority vote dilution regardless of whether a plan was adopted with a discriminatory purpose.[9] 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.[10] Together, the second and third *Gingles* preconditions are commonly referred to as racial bloc or racially polarized voting.[11]

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

---

5 *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).

7 *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.

11 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

---

13 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).

15 *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).

16 *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.

19 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).

20 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.[23] Since Reconstruction, Louisiana has passed countless laws to deny Black democratic participation, including grandfather clauses, poll taxes, and educational and property qualifications.[24]
- 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

---

21 *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)).

23 *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 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.")

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

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.[30] 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."[31] Even with his explicit ties to white supremacy, Duke received over 58,000 votes.[32] 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).

28 *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).

29 *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.

30 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.

31 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

---

33 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_e0999182-9506-11e8-bf14-fb6afcf2a6ee.html.

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

35 "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.

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

37 *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).

38 *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.

39 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.[43] Failure to do so may lead to costly litigation.[44] 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.

---

40 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).

43 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.

44 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
Michael Pernick
Leah C. Aden, Deputy Director of Litigation
Stuart Naifeh, Manager of the Redistricting Project
Kathryn Sadasivan
Arielle McTootle
Jared Evans
Victoria Wenger
NAACP Legal Defense & Educational Fund, Inc.
40 Rector Street, 5th Fl.
New York, NY 10006

President Michael McClanahan
Louisiana State Conference of the NAACP
3313 Government Street
Baton Rouge, LA 70806

Ashley Shelton
Power Coalition for Equity and Justice
4930 Washington Ave.
New Orleans, LA 70125

Alanah Odoms, Executive Director
Chris Kaiser, Advocacy Director
Megan Snider, Staff Attorney
ACLU of Louisiana
P.O. Box 56157
New Orleans, LA 70156-6157

T. Alora Thomas
Samantha Osaki
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004

Sarah Brannon
American Civil Liberties Union Foundation
915 15th St., NW
Washington, DC 20005

Mark Gaber, Senior Director of Redistricting
Chris Lamar
Valencia Richardson
Campaign Legal Center
1101 14th Street NW, Suite 400
Washington, DC 20002

Terry C. Landry, Jr.
Louisiana Policy Director
Southern Poverty Law Center Action Fund

Bruce Reilly
Voters Organized to Educate

Norris Henderson
Executive Director
Voice of the Experienced

Peter Robins-Brown
Policy & Advocacy Director
Louisiana Progress

Stephen Kearny
Fair Districts Louisiana

Mitch Landrieu,
Founder and President
E Pluribus Unum
1055 St. Charles Avenue
Suite 300
New Orleans, Louisiana

Omari Ho-Sang, State Organizing Manager – Louisiana
Keturah Butler-Reed, Southern Region Organizer – Louisiana
Black Voters Matter Fund

Davante Lewis,
Director of Public Affairs
Louisiana Budget Project

Hilda Walker Thomas
President
League of Women Voters of Louisiana

Judy Reese Morse,
President and CEO,
Urban League of Louisiana
4640 S. Carrollton Avenue
New Orleans, LA 70119

Trupania Bonner
Crescent City Media Group

Tracie L. Washington, Esq.

Louisiana Justice Institute
Suite 132
3157 Gentilly Boulevard, Suite 132
New Orleans, Louisiana 70122

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

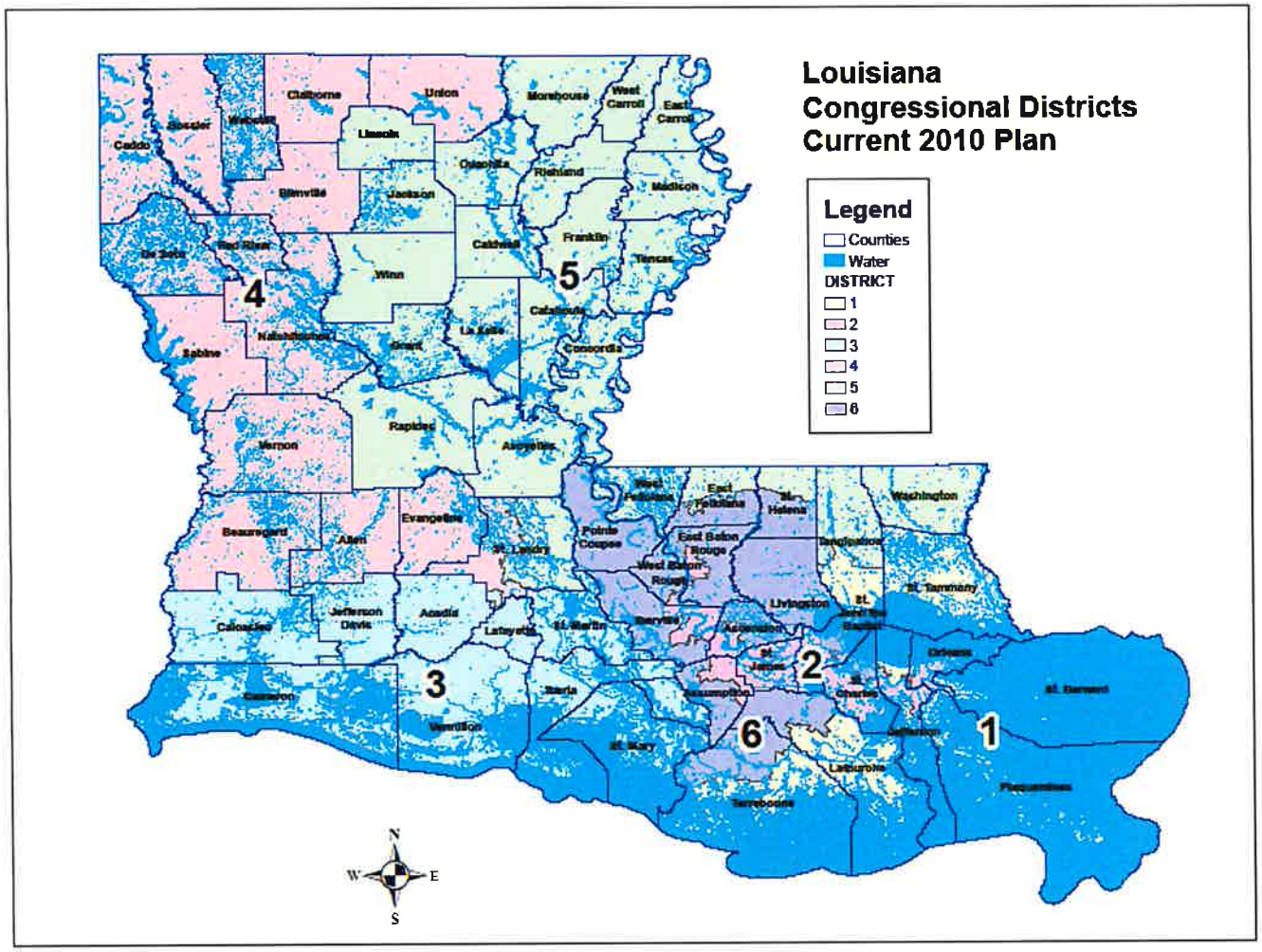
The Urban League of Louisiana's mission is to assist African Americans and other communities seeking equity to secure economic self-reliance, parity, and civil rights. As an affiliate of the National Urban League, and for over 83 years, the Urban League of Louisiana has worked to ensure quality education,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

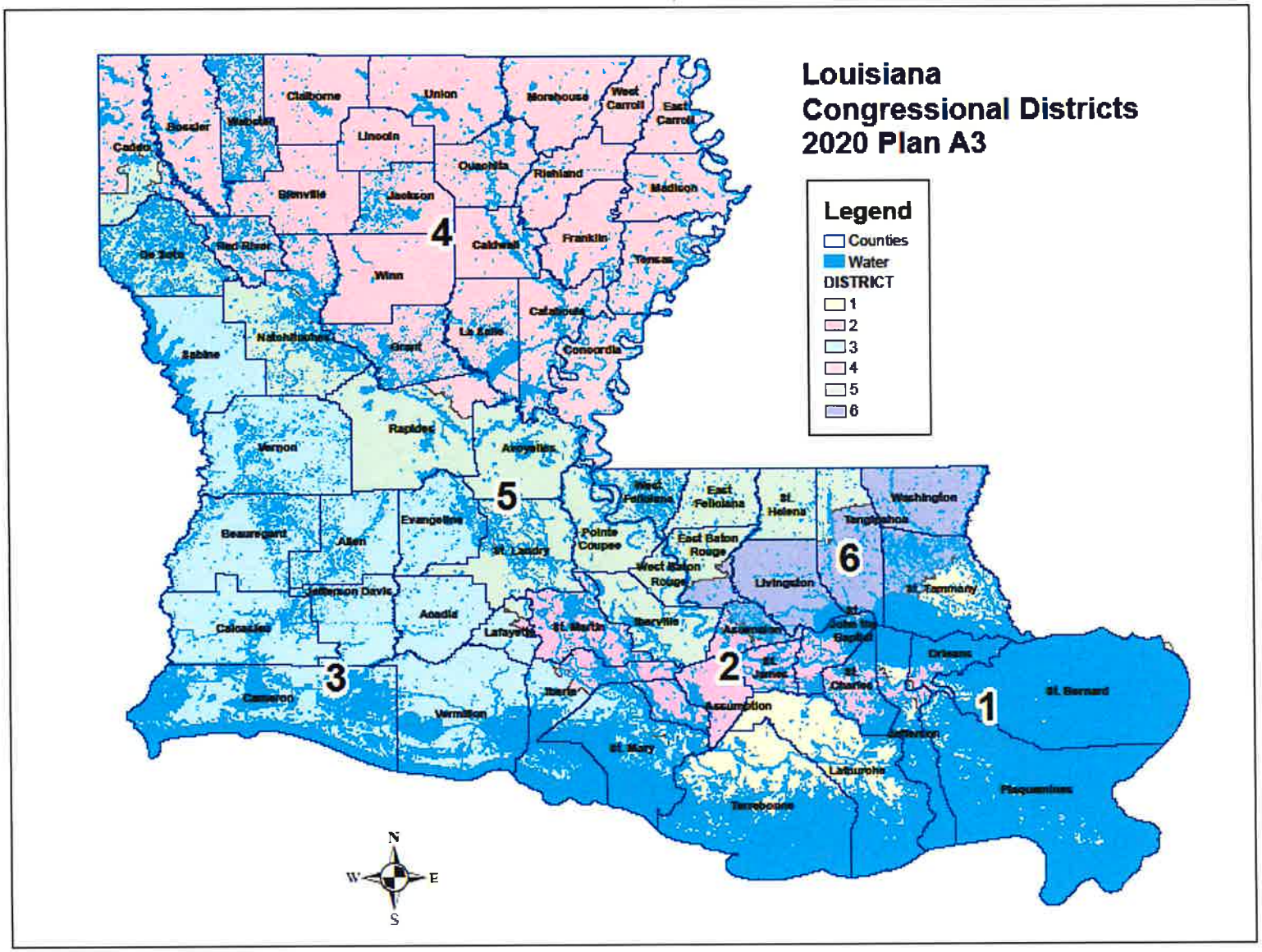
Crescent City Media Group

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




Louisiana
Congressional Districts
2020 Plan A3
Legend
Counties
Water
DISTRICT
1
2
3
4
5
6
N
W
E
S

APPENDIX 2

Demographic Data for Illustrative Maps

Current 2010 Plan w/2010 Data

District	TTLPop10	Deviation[45]	TTLWht10%	TTLBlk10%	VAP10	WhtVAP10%	BlkVAP20%
1	755,445	-117	74.48%	13.56%	579,661	76.63%	12.00%
2	755,538	-24	28.67%	62.24%	569,601	31.77%	59.05%
3	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%
5	755,581	19	60.69%	35.67%	567,667	63.05%	33.50%
6	755,607	45	69.57%	23.42%	569,908	71.96%	21.37%

[45] 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).

Plan A2

District	TTLPop20	Deviation	TTLWht20%	TTLBlk20%	VAP20	WhtVAP20%	BlkVAP20%
1	776,292	-1	64.33%	16.78%	603,887	67.39%	15.29%
2	**776,293**	**0**	**33.13%**	**53.31%**	**598,629**	**35.89%**	**51.34%**
3	776,293	0	70.15%	19.80%	587,394	72.26%	18.40%
4	776,293	0	57.61%	33.40%	596,328	59.88%	31.65%
5	**776,293**	**0**	**39.76%**	**54.04%**	**589,344**	**42.61%**	**51.46%**
6	776,293	0	69.53%	18.28%	594,966	71.89%	16.95%

Plan A3

District	TTLPop20	Deviation	TTLWht20%	TTLBlk20%	VAP20	WhtVAP20%	BlkVAP20%
1	776,292	-1	63.59%	17.15%	602,435	66.68%	15.64%
2	**776,293**	**0**	**33.31%**	**53.76%**	**598,738**	**36.11%**	**51.75%**
3	776,292	-1	68.68%	20.96%	586,847	70.91%	19.45%
4	776,293	0	60.56%	30.98%	596,110	62.86%	29.10%
5	**776,294**	**1**	**40.14%**	**53.53%**	**591,272**	**42.74%**	**51.25%**
6	776,293	0	68.21%	19.22%	595,146	70.68%	17.80%

Field Descriptions:

TTLPop10 - 2010 Total Population (TTL Pop)

TTLPop20 - 2020 Total Population (TTL Pop)

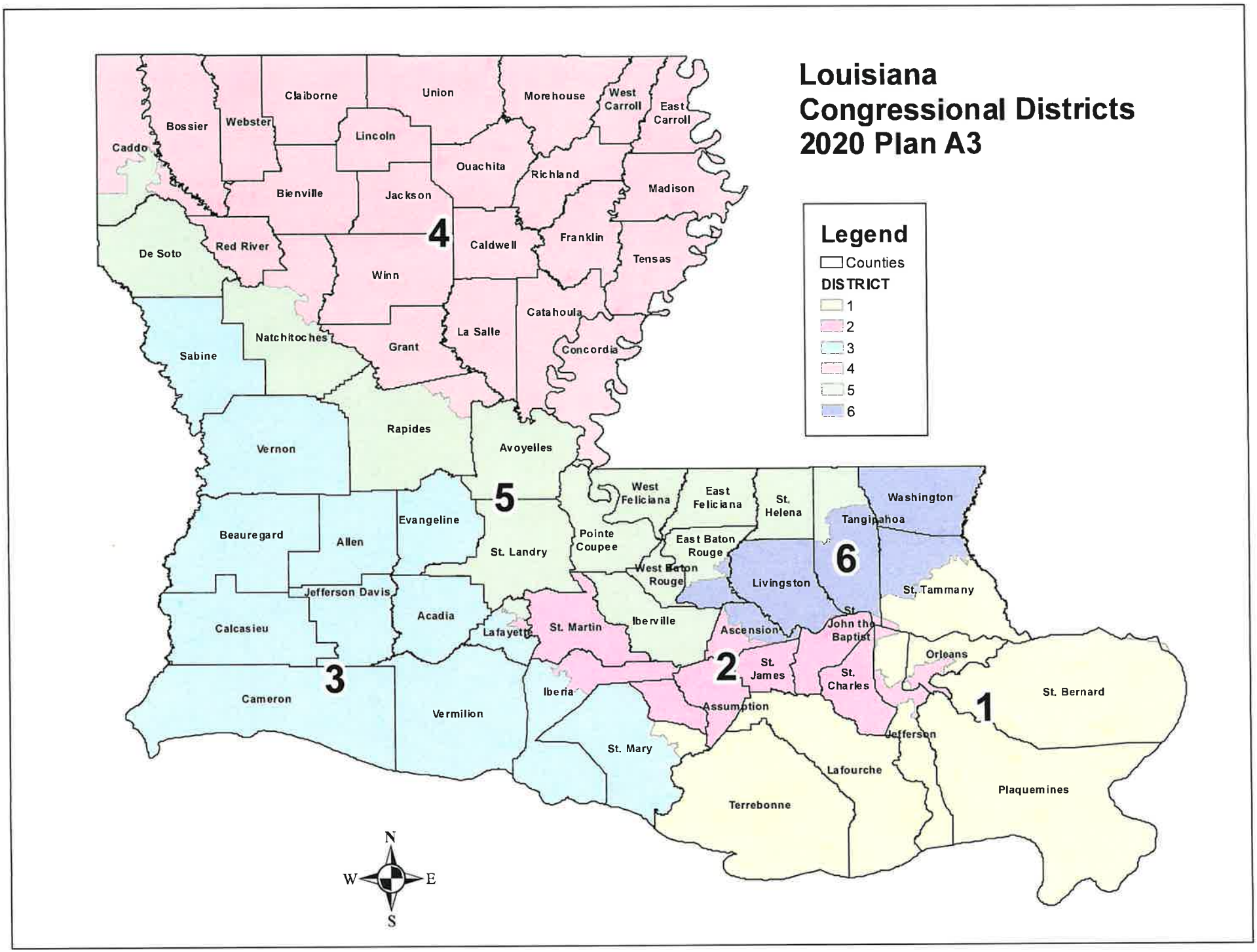
TTLWht20% - 2020 Not-Hispanic White Alone Total Pop%

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%


Louisiana
Congressional Districts
2020 Plan A3
Legend
Counties
DISTRICT
1
2
3
4
5
6
Claiborne
Union
Morehouse
West Carroll
East Carroll
Bossier
Webster
Lincoln
Caddo
Ouachita
Richland
Madison
Bienville
Jackson
4
Caldwell
Franklin
Tensas
De Soto
Red River
Winn
Catahoula
La Salle
Natchitoches
Grant
Concordia
Sabine
Rapides
Avoyelles
Vernon
5
West Feliciana
East Feliciana
St. Helena
Washington
Tangipahoa
Evangeline
Beauregard
Allen
St. Landry
Pointe Coupee
East Baton Rouge
6
West Baton Rouge
Livingston
St. Tammany
Jefferson Davis
Acadia
Iberville
St. John the Baptist
Calcasieu
Lafayette
St. Martin
Ascension
Orleans
2
St. James
St. Charles
St. Bernard
Cameron
3
Iberia
Vermilion
Assumption
1
Jefferson
St. Mary
Lafourche
Plaquemines
Terrebonne
N
W
E
S