

Plan Evaluation Form

Plan Type: Congress - Public Submissions

Plan Name: NAACPLDF Coalition CD Plan A7 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.	17 (See attachment - Split Parishes)
How many municipalities are split in the plan? Please list. Include any explanation given for each split.	36 (See attachment - Split Places)
How many VTDs (precincts) are split in the plan?	28 (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?	

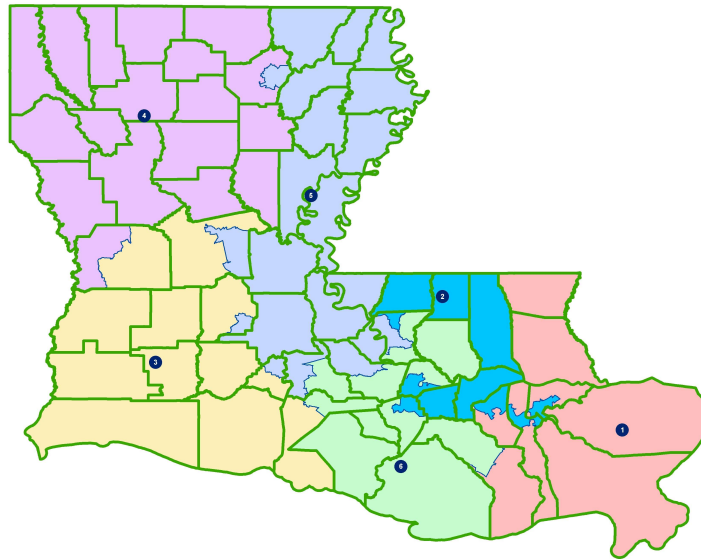
# Snapshot Report

DR: I A 2020 12 - CENSUS

**Plan: NAACPLDF Coalition CD Plan A7 v2**

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Page: 1 of 1



Date: January 19, 2022  
Time: 12:30 PM

## Compactness Report

DR: I A 2020 12 - CENSUS

**Plan: NAACPLDF Coalition CD Plan A7 v2**

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Page: 1 of 1

District	Part	Area (sq miles)	Perimeter	Normalized Area	Reock	Schwartzberg	Holes
District 1	1	8442.9	777.23	0.1756	0.415	2.39	0
District 2	1	2946.83	593.3	0.1052	0.3427	3.08	0
District 3	1	11264.4	829.02	0.206	0.5197	2.2	0
District 4	1	13424.87	762.88	0.2899	0.5805	1.86	0
District 5	1	9978.28	1113.16	0.1012	0.2949	3.14	0
District 6	1	6345.47	652.72	0.1872	0.5179	2.31	0

Plan Statistics

Districts:	# of Members	Actual Population	Ideal Population	Absolute Deviation	Relative Deviation
District 1	1	776,294	776,292	2	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	776,292	776,292	0	0.000%
District 5	1	776,293	776,292	1	0.000%
District 6	1	776,292	776,292	0	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%				

District Population

	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	273,467	171,882	40,185	14,108	42,158	52,824	218,075	143,511	29,446	10,650	30,620	37,692	168,313	127,669	18,733	21,913
Lafourche	19,316	15,207	572	325	1,490	1,810	14,714	11,985	340	249	971	1,165	11,144	10,104	174	867
Orleans	71,977	54,482	8,665	2,993	4,978	7,937	59,712	45,594	7,239	2,335	3,853	6,591	50,593	39,681	5,481	5,431
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. Charles	34,222	24,520	6,445	539	2,063	2,607	25,494	18,952	4,308	348	1,423	1,682	22,988	17,979	3,785	1,224
St. Tammany	264,570	196,641	38,643	5,774	17,852	20,844	202,228	154,621	26,761	4,075	12,610	14,310	178,779	145,724	21,142	11,913
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 1	776,294	531,459	125,681	26,653	76,091	95,678	604,283	428,254	89,627	19,718	54,603	67,746	498,965	387,738	66,048	45,182
	100.000%	68.461%	16.190%	3.433%	9.802%	12.325%	100.000%	70.870%	14.832%	3.263%	9.036%	11.211%	82.571%	77.708%	13.237%	9.055%
District 2																
Ascension	25,185	7,543	15,854	181	1,389	1,742	18,477	6,143	11,117	133	940	1,152	15,903	5,407	9,850	640
Assumption	5,985	2,474	3,338	21	118	156	4,704	1,984	2,577	14	105	128	4,282	1,698	2,536	48
East Baton Rouge	21,180	9,618	10,500	284	503	581	15,373	7,353	7,283	188	352	379	13,837	6,903	6,428	506
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
Jefferson	167,314	49,053	86,032	8,916	20,761	26,233	126,579	40,624	62,729	7,042	14,197	17,792	94,788	31,947	50,843	11,996
Orleans	312,020	71,980	210,304	9,863	17,066	23,080	246,484	64,658	158,829	8,185	12,555	16,565	205,651	52,305	136,044	17,302
St. Charles	18,327	9,030	7,483	298	1,246	1,534	14,047	7,202	5,582	181	878	1,055	11,997	6,330	5,012	655
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. 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
Tangipahoa	133,154	81,335	41,877	1,474	6,014	7,242	101,488	65,204	29,215	1,100	4,142	4,840	76,254	52,911	20,525	2,819
District 2	776,293	270,926	423,718	21,630	50,466	64,809	599,806	226,218	313,355	17,286	35,586	44,824	488,512	186,561	265,724	36,220
	100.000%	34.900%	54.582%	2.786%	6.501%	8.349%	100.000%	37.715%	52.243%	2.882%	5.933%	7.473%	81.445%	38.190%	54.395%	7.414%
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	22,862	17,662	3,660	177	1,124	1,162	17,409	13,506	2,601	134	978	1,007	14,285	11,965	2,061	259
Iberia	53,384	26,564	21,786	1,850	2,599	3,127	40,221	21,463	15,123	1,395	1,819	2,136	32,719	18,675	12,522	1,523
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
Lafayette	170,390	125,633	25,993	5,874	10,325	12,162	130,427	99,150	17,864	4,263	7,198	8,443	108,694	89,725	12,482	6,487
Natchitoches	1	0	0	0	1	0	1	0	0	0	1	0	0	0	0	0

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 3																
Rapides	71,828	55,420	9,595	1,682	2,937	3,399	54,952	43,416	6,697	1,219	1,961	2,183	45,606	38,282	5,155	2,172
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	28,942	20,822	4,100	947	2,106	3,095	21,209	15,645	2,696	706	1,481	2,029	11,946	9,774	1,133	1,036
District 3	776,293	550,984	159,295	17,778	34,408	42,361	586,736	428,679	110,904	12,871	24,096	29,092	467,505	364,349	82,143	21,014
	100.000%	70.976%	20.520%	2.290%	4.432%	5.457%	100.000%	73.062%	18.902%	2.194%	4.107%	4.958%	79.679%	77.935%	17.571%	4.495%
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	37,514	19,361	15,725	255	1,312	1,490	29,348	16,010	11,415	198	1,042	1,140	23,107	12,850	9,224	1,033
Ouachita	86,777	69,908	10,367	1,360	3,112	3,261	65,538	53,907	6,953	950	2,154	2,118	55,439	48,466	5,072	1,901
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	19,808	14,265	3,511	495	904	1,080	15,052	11,120	2,437	368	648	711	12,114	9,408	1,878	831
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	776,292	455,264	261,907	12,031	29,056	34,823	596,316	362,797	190,226	8,866	20,698	24,170	477,008	308,243	148,990	19,778
	100.000%	58.646%	33.738%	1.550%	3.743%	4.486%	100.000%	60.840%	31.900%	1.487%	3.471%	4.053%	79.992%	64.620%	31.234%	4.146%
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 Rouge	193,826	31,991	146,981	4,600	9,096	10,852	147,697	28,392	108,343	3,607	6,419	7,660	114,086	19,914	88,831	5,346
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
Evangeline	9,488	3,692	5,575	64	116	174	6,999	2,954	3,882	53	83	104	6,268	2,601	3,582	85
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	14,830	6,913	7,315	101	360	419	11,528	5,641	5,435	73	269	311	11,153	5,300	5,631	222

District Population

	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																
Lafayette	71,363	27,730	39,143	580	3,265	3,821	53,448	22,458	28,053	401	2,101	2,386	44,799	18,920	23,999	1,880
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	73,591	18,637	50,850	1,428	2,045	2,397	54,662	16,067	35,337	1,168	1,605	1,828	44,313	12,049	30,586	1,678
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	58,195	22,090	32,997	746	1,454	1,691	43,840	17,957	23,508	567	1,133	1,259	34,570	14,550	18,620	1,397
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. 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	45,087	27,556	15,501	453	1,130	1,280	34,109	21,655	11,014	297	805	882	30,395	19,620	10,127	646
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 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 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	313,206	420,671	9,968	24,871	29,658	589,975	254,486	304,128	7,674	18,025	21,036	487,369	212,997	259,267	15,105
	100.000%	40.346%	54.190%	1.284%	3.204%	3.820%	100.000%	43.135%	51.549%	1.301%	3.055%	3.566%	82.608%	43.703%	53.197%	3.099%
District 6																
Ascension	101,315	73,598	16,362	2,119	7,450	8,641	73,480	54,993	11,022	1,381	4,838	5,509	64,014	51,393	8,964	3,663
Assumption	15,054	11,248	2,882	75	625	758	11,912	9,161	2,130	43	405	503	10,157	8,002	1,974	181
East Baton Rouge	241,775	154,460	55,917	11,541	16,563	19,118	192,542	128,136	41,164	8,804	11,824	13,500	151,341	111,415	29,416	10,505
Iberia	16,545	12,642	2,770	273	651	770	12,570	9,832	1,946	167	465	521	11,807	9,612	1,830	364
Iberville	15,411	7,920	6,415	101	842	999	12,558	6,821	4,797	76	753	876	9,309	4,832	4,266	211
Lafourche	78,241	56,503	15,283	700	3,253	3,862	59,905	44,853	10,737	489	2,218	2,578	47,134	38,363	6,990	1,780
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. Martin	6,680	5,703	420	144	321	399	5,295	4,623	279	110	208	262	4,725	4,314	254	159
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
Tangipahoa	3	1	2	0	0	0	3	1	2	0	0	0	2	1	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 6	776,292	535,813	151,847	19,228	47,746	55,220	593,432	424,077	107,529	14,001	32,604	36,794	474,987	368,101	80,576	26,310
	100.000%	69.022%	19.561%	2.477%	6.151%	7.113%	100.000%	71.462%	18.120%	2.359%	5.494%	6.200%	80.041%	77.497%	16.964%	5.539%
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%

Split Parishes

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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	273,467	171,882	40,185	14,108	42,158	52,824	218,075	143,511	29,446	10,650	30,620	37,692	168,313	127,669	18,733	21,913
Lafourche	19,316	15,207	572	325	1,490	1,810	14,714	11,985	340	249	971	1,165	11,144	10,104	174	867
Orleans	71,977	54,482	8,665	2,993	4,978	7,937	59,712	45,594	7,239	2,335	3,853	6,591	50,593	39,681	5,481	5,431
St. Charles	34,222	24,520	6,445	539	2,063	2,607	25,494	18,952	4,308	348	1,423	1,682	22,988	17,979	3,785	1,224
District 2																
Ascension	25,185	7,543	15,854	181	1,389	1,742	18,477	6,143	11,117	133	940	1,152	15,903	5,407	9,850	640
Assumption	5,985	2,474	3,338	21	118	156	4,704	1,984	2,577	14	105	128	4,282	1,698	2,536	48
East Baton Rouge	21,180	9,618	10,500	284	503	581	15,373	7,353	7,283	188	352	379	13,837	6,903	6,428	506
Jefferson	167,314	49,053	86,032	8,916	20,761	26,233	126,579	40,624	62,729	7,042	14,197	17,792	94,788	31,947	50,843	11,996
Orleans	312,020	71,980	210,304	9,863	17,066	23,080	246,484	64,658	158,829	8,185	12,555	16,565	205,651	52,305	136,044	17,302
St. Charles	18,327	9,030	7,483	298	1,246	1,534	14,047	7,202	5,582	181	878	1,055	11,997	6,330	5,012	655
Tangipahoa	133,154	81,335	41,877	1,474	6,014	7,242	101,488	65,204	29,215	1,100	4,142	4,840	76,254	52,911	20,525	2,819
District 3																
Evangeline	22,862	17,662	3,660	177	1,124	1,162	17,409	13,506	2,601	134	978	1,007	14,285	11,965	2,061	259
Iberia	53,384	26,564	21,786	1,850	2,599	3,127	40,221	21,463	15,123	1,395	1,819	2,136	32,719	18,675	12,522	1,523
Lafayette	170,390	125,633	25,993	5,874	10,325	12,162	130,427	99,150	17,864	4,263	7,198	8,443	108,694	89,725	12,482	6,487
Natchitoches	1	0	0	0	1	0	1	0	0	0	1	0	0	0	0	0
Rapides	71,828	55,420	9,595	1,682	2,937	3,399	54,952	43,416	6,697	1,219	1,961	2,183	45,606	38,282	5,155	2,172
Vernon	28,942	20,822	4,100	947	2,106	3,095	21,209	15,645	2,696	706	1,481	2,029	11,946	9,774	1,133	1,036
District 4																
Natchitoches	37,514	19,361	15,725	255	1,312	1,490	29,348	16,010	11,415	198	1,042	1,140	23,107	12,850	9,224	1,033
Ouachita	86,777	69,908	10,367	1,360	3,112	3,261	65,538	53,907	6,953	950	2,154	2,118	55,439	48,466	5,072	1,901
Vernon	19,808	14,265	3,511	495	904	1,080	15,052	11,120	2,437	368	648	711	12,114	9,408	1,878	831
District 5																
East Baton Rouge	193,826	31,991	146,981	4,600	9,096	10,852	147,697	28,392	108,343	3,607	6,419	7,660	114,086	19,914	88,831	5,346
Evangeline	9,488	3,692	5,575	64	116	174	6,999	2,954	3,882	53	83	104	6,268	2,601	3,582	85
Iberville	14,830	6,913	7,315	101	360	419	11,528	5,641	5,435	73	269	311	11,153	5,300	5,631	222
Lafayette	71,363	27,730	39,143	580	3,265	3,821	53,448	22,458	28,053	401	2,101	2,386	44,799	18,920	23,999	1,880
Ouachita	73,591	18,637	50,850	1,428	2,045	2,397	54,662	16,067	35,337	1,168	1,605	1,828	44,313	12,049	30,586	1,678
Rapides	58,195	22,090	32,997	746	1,454	1,691	43,840	17,957	23,508	567	1,133	1,259	34,570	14,550	18,620	1,397
St. Martin	45,087	27,556	15,501	453	1,130	1,280	34,109	21,655	11,014	297	805	882	30,395	19,620	10,127	646
District 6																
Ascension	101,315	73,598	16,362	2,119	7,450	8,641	73,480	54,993	11,022	1,381	4,838	5,509	64,014	51,393	8,964	3,663
Assumption	15,054	11,248	2,882	75	625	758	11,912	9,161	2,130	43	405	503	10,157	8,002	1,974	181



Split Parishes

	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 6																
East Baton Rouge	241,775	154,460	55,917	11,541	16,563	19,118	192,542	128,136	41,164	8,804	11,824	13,500	151,341	111,415	29,416	10,505
Iberia	16,545	12,642	2,770	273	651	770	12,570	9,832	1,946	167	465	521	11,807	9,612	1,830	364
Iberville	15,411	7,920	6,415	101	842	999	12,558	6,821	4,797	76	753	876	9,309	4,832	4,266	211
Lafourche	78,241	56,503	15,283	700	3,253	3,862	59,905	44,853	10,737	489	2,218	2,578	47,134	38,363	6,990	1,780
St. Martin	6,680	5,703	420	144	321	399	5,295	4,623	279	110	208	262	4,725	4,314	254	159
Tangipahoa	3	1	2	0	0	0	3	1	2	0	0	0	2	1	0	0

Time: 12:30 PM

## Split Places

Plan Type: Congress - Public Submissions

## Plan: NAACPLDF Coalition CD Plan A7 v2

Page: 1 of 4

	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																
Estelle	15,764	8,239	4,406	1,047	1,633	2,095	11,875	6,508	3,119	770	1,156	1,405	9,738	5,737	2,753	1,251
Harvey	601	443	80	34	35	44	500	390	52	29	23	27	417	318	38	64
Kenner	55,985	28,197	9,476	3,563	13,757	17,156	43,502	23,219	6,786	2,679	10,077	12,355	32,023	20,121	4,651	7,256
Marrero	9,868	6,131	1,975	564	955	1,261	8,005	5,254	1,420	446	699	910	6,309	4,378	1,139	781
Metairie	141,476	93,608	16,849	6,709	21,911	27,297	113,308	78,528	12,182	5,040	15,746	19,351	85,825	69,935	6,101	9,788
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
Woodmere	307	29	260	10	6	7	232	24	192	10	6	5	305	33	247	23
Lafourche																
Larose	3,302	2,529	160	142	257	291	2,504	1,975	112	105	167	191	1,857	1,614	97	150
Orleans																
New Orleans	71,977	54,482	8,665	2,993	4,978	7,937	59,712	45,594	7,239	2,335	3,853	6,591	50,593	39,681	5,481	5,431
St. Charles																
Boutte	2,179	1,030	980	26	114	164	1,579	792	667	20	73	101	1,240	628	543	65
Destrehan	11,266	7,992	2,012	233	848	1,048	8,495	6,254	1,357	156	610	720	7,820	6,123	1,140	561
Luling	13,673	9,943	2,368	235	855	1,077	9,989	7,540	1,552	146	561	646	9,213	7,367	1,406	445
New Sarpy	428	326	52	0	37	36	326	269	22	0	27	22	281	228	36	13
St. Rose	241	176	52	6	3	8	197	147	43	5	2	2	184	153	20	11
District 2																
Ascension																
Gonzales	7,443	2,300	4,403	70	580	732	5,565	1,944	3,103	54	408	492	4,205	1,364	2,566	275
East Baton Rouge																
Baker	1,890	205	1,625	11	39	57	1,332	176	1,114	11	25	36	1,044	223	784	40
Zachary	13,402	6,431	6,228	224	332	361	9,518	4,792	4,215	145	235	229	8,730	4,631	3,761	342
Jefferson																
Estelle	2,188	719	971	122	327	419	1,581	579	644	102	212	276	1,194	378	630	181
Harvey	21,635	6,380	10,399	1,571	2,968	3,673	16,326	5,304	7,481	1,221	2,057	2,533	10,832	3,786	5,377	1,667
Kenner	10,463	1,546	6,348	75	2,369	2,785	7,697	1,245	4,727	54	1,581	1,869	5,664	861	4,280	524
Marrero	22,514	4,703	15,016	1,386	1,169	1,515	17,062	4,001	10,923	1,096	856	1,073	14,454	3,219	9,987	1,253

Split Places

	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																
New Orleans	312,020	71,980	210,304	9,863	17,066	23,080	246,484	64,658	158,829	8,185	12,555	16,565	205,651	52,305	136,044	17,302
St. Charles																
Boutte	875	35	779	11	42	49	625	23	562	4	30	35	585	12	563	10
Destrehan	74	1	72	0	0	1	49	0	49	0	0	0	51	10	40	3
Luling	43	37	4	1	1	2	34	29	4	1	0	1	31	15	13	0
New Sarpy	741	182	531	1	16	18	556	129	407	1	10	11	524	168	346	6
St. Rose	7,263	3,038	3,140	187	804	973	5,574	2,499	2,317	108	569	660	4,648	2,166	2,088	394
District 3																
Evangeline																
Ville Platte	1,151	876	234	11	20	22	915	747	133	11	15	15	863	699	147	12
Iberia																
New Iberia	23,574	9,053	12,591	796	914	1,155	17,582	7,457	8,679	630	659	820	13,856	6,164	7,056	635
Lafayette																
Lafayette	84,924	61,986	13,028	3,471	5,206	6,251	68,128	51,394	9,314	2,669	3,774	4,515	55,897	46,156	6,098	3,652
Ossun	573	483	67	2	17	21	414	359	44	1	9	10	372	343	17	16
Scott	7,224	5,041	1,287	160	606	688	5,597	4,113	872	111	405	459	4,426	3,420	772	230
Rapides																
Alexandria	15,160	10,327	3,220	847	518	580	11,795	8,368	2,260	629	359	411	9,571	7,361	1,580	653
Pineville	4,753	3,452	846	153	188	228	3,822	2,819	661	124	135	167	2,931	2,441	347	153
Vernon																
New Llano	526	248	173	42	46	58	386	182	119	28	41	45	308	201	71	33
Leesville	5	3	1	1	0	0	3	3	0	0	0	0	1	1	0	0
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	5,421	4,707	367	172	112	132	4,246	3,701	297	124	74	85	4,116	3,805	167	144
Richwood	0	0	0	0	0	0	0	0	0	0	0	0	0	0	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	4,151	786	205
Vernon																
New Llano	1,687	634	772	104	138	164	1,296	523	549	88	104	128	924	426	375	129
Leesville	5,644	2,748	2,145	211	380	464	4,187	2,152	1,482	147	281	318	2,928	1,573	1,090	272

Split Places

DR: I A 2020 12 - CENSUS

Plan Type: Congress - Public Submissions

Plan: NAACPLDF Coalition CD Plan A7 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																
East Baton Rouge																
Baker	10,565	1,493	8,777	32	222	235	8,134	1,391	6,535	20	152	170	6,790	1,071	5,547	168
Baton Rouge	136,790	20,906	104,831	3,748	6,494	7,865	104,824	19,053	77,523	2,962	4,618	5,591	77,220	11,940	61,398	3,875
Zachary	5,901	2,713	2,812	138	174	196	4,085	1,939	1,878	87	126	136	3,706	1,685	1,881	139
Evangeline																
Ville Platte	5,152	1,000	4,048	44	36	58	3,756	853	2,823	37	25	41	3,261	733	2,483	41
Iberville																
Crescent	173	159	11	0	3	2	133	122	8	0	3	2	111	109	3	2
Plaquemine	6,159	2,830	3,041	62	162	205	4,720	2,334	2,172	45	115	138	4,405	2,100	2,199	90
Lafayette																
Lafayette	36,450	8,591	26,326	244	1,030	1,280	27,900	7,429	19,420	193	683	830	23,553	5,748	16,849	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	42,281	9,891	30,690	787	629	856	31,212	8,546	21,387	636	409	539	26,106	6,076	19,102	937
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	30,115	6,463	22,511	310	562	695	22,728	5,532	16,366	232	407	477	18,344	4,065	13,570	700
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																
Henderson	82	57	13	4	7	5	64	48	7	4	4	2	55	43	5	0
St. Martinville	5,379	1,882	3,338	27	85	108	4,268	1,597	2,552	23	58	69	3,854	1,311	2,500	46
District 6																
Ascension																
Gonzales	4,788	2,344	1,590	64	656	846	3,660	1,907	1,152	56	442	573	2,970	1,824	932	213
East Baton Rouge																
Baton Rouge	90,680	59,085	21,266	4,499	4,710	5,653	75,416	50,587	16,538	3,687	3,699	4,409	55,566	40,427	11,076	4,043
Zachary	13	8	0	0	2	4	10	8	0	0	2	4	8	6	1	0
Iberia																
New Iberia	4,981	3,879	699	93	228	290	3,850	3,105	452	65	166	199	3,496	2,941	414	139

Time: 12:30 PM

## DB: I A 2020 12 - CENSUS

**Plan: NAACPLDF Coalition CD Plan A7 v2**

Page: 4 of 4

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Split VTDs

DR: LA 2020 12 - CENSUS

Plan Type: Congress - Public Submissions

Plan: NAACPLDF Coalition CD Plan A7 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																
116	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
29-K	1,517	826	297	65	296	360	1,195	690	237	41	201	243	930	589	227	116
Lafourche																
10-16	58	46	4	1	5	6	47	35	4	1	5	6	32	27	4	2
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
St. Charles																
4-1	1,886	1,446	313	8	52	69	1,431	1,141	189	5	43	50	1,102	904	173	25
District 2																
Ascension																
58	337	171	134	2	27	37	256	143	90	2	20	27	200	135	48	11
Jefferson																
116	1,337	655	480	26	164	193	1,153	579	424	25	116	138	709	422	228	59
29-K	73	44	14	0	15	16	64	44	11	0	9	10	51	31	12	6
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
St. Charles																
4-1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Tangipahoa																
117	1,849	1,206	293	22	297	320	1,371	972	190	10	173	190	1,001	816	138	48
District 3																
Evangeline																
5030	375	332	19	1	16	21	279	250	12	0	10	14	263	246	4	13
Iberia																
7-2	1,740	1,339	245	13	116	156	1,336	1,048	166	9	92	119	1,080	947	98	36
Lafayette																
62	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Natchitoches																
4-6	1	0	0	0	1	0	1	0	0	0	1	0	0	0	0	0

Time: 12:30 PM

## Split VTDs

Plan Type: Congress - Public Submissions

## Plan: NAACPLDF Coalition CD Plan A7 v2

Page: 2 of 3

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Split VTDs

	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																
C21	2,767	467	2,207	27	50	65	2,108	407	1,639	21	32	41	1,753	353	1,346	54
C22	20	9	4	0	3	0	14	7	4	0	2	0	11	9	0	0
C25	2,114	645	1,375	28	57	93	1,558	553	936	26	37	60	1,213	379	763	71
C26	1,147	572	465	52	41	50	905	492	328	43	31	33	628	379	201	48
C30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
S14	3	0	0	0	0	0	3	0	0	0	0	0	2	1	0	0
S19	407	277	101	2	16	19	317	226	69	2	9	12	206	163	37	6
St. Martin																
13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
25	15	13	1	0	1	0	10	8	1	0	1	0	8	6	0	0
District 6																
Ascension																
58	1,835	1,052	567	20	177	220	1,353	845	375	15	105	126	1,057	723	257	83
East Baton Rouge																
1-52	1,002	664	203	62	61	51	764	513	143	49	48	45	603	429	108	62
1-68	18	0	18	0	0	0	16	0	16	0	0	0	17	0	16	0
Iberia																
7-2	43	25	4	0	6	6	37	20	4	0	6	6	29	26	2	0
Lafourche																
10-16	1,068	661	152	33	151	143	776	525	96	21	96	87	546	444	68	33
St. Martin																
13	1,445	1,378	32	5	19	25	1,121	1,085	14	4	11	12	1,029	1,013	4	12
25	1,535	965	175	118	244	286	1,141	748	113	91	160	190	958	766	94	100
Tangipahoa																
117	3	1	2	0	0	0	3	1	2	0	0	0	2	1	0	0



**Lucas, Lorri**

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**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

**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](mailto:mpernick@naacpldf.org)

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**LDF**

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*Sent Via Email*

October 18, 2021

Senate and Governmental Affairs Committee  
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House and Governmental Affairs Committee  
Louisiana House of Representatives  
P.O. Box 94062  
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**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.<sup>1</sup> 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,<sup>2</sup> but the state has had only four Black Congresspeople since Reconstruction.<sup>3</sup> 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,<sup>4</sup> none of the majority-

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

<sup>2</sup> 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.

<sup>3</sup> 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).

<sup>4</sup> Voters in District 2 have elected a Black candidate in all but one congressional election since 1990. See *Louisiana’s 2<sup>nd</sup> Congressional District*, Ballotpedia, [https://ballotpedia.org/Louisiana%27s\\_2nd\\_Congressional\\_District](https://ballotpedia.org/Louisiana%27s_2nd_Congressional_District) (last visited Aug. 31, 2021).

white districts have ever elected a Black Congressperson.<sup>5</sup> 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.”<sup>6</sup> 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.<sup>7</sup> 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.<sup>8</sup> Section 2 prohibits minority vote dilution regardless of whether a plan was adopted with a discriminatory purpose.<sup>9</sup> 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.<sup>10</sup> Together, the second and third *Gingles* preconditions are commonly referred to as racial bloc or racially polarized voting.<sup>11</sup>

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.”<sup>12</sup> Courts consider several factors (commonly known as the

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<sup>5</sup> See *United States Congressional Delegations from Louisiana*, Ballotpedia, [https://ballotpedia.org/United\\_States\\_congressional\\_delegations\\_from\\_Louisiana](https://ballotpedia.org/United_States_congressional_delegations_from_Louisiana) (last visited Aug. 31, 2021).

<sup>6</sup> *Thornburg v. Gingles*, 478 U.S. 30, 34 (1986).

<sup>7</sup> 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).

<sup>8</sup> See *Gingles*, 478 U.S. at 46, n.11.

<sup>9</sup> *Id.* at 35.

<sup>10</sup> *Id.* at 50-51.

<sup>11</sup> Racially polarized voting occurs when different racial groups vote for different candidates. In a racially polarized election, for example, Black people vote together for their preferred (frequently Black) candidate, and most non-Black voters vote for the opposing (typically white) candidate.

<sup>12</sup> 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.<sup>13</sup> 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.”<sup>14</sup>

### **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%.<sup>15</sup> Second, as compared to the current map, the illustrative maps include geographically compact communities of Black voters, as reflected by traditional redistricting principles.<sup>16</sup> Indeed, each of the seven illustrative maps is equally or more

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<sup>13</sup> 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.

<sup>14</sup> *Clark v. Calhoun Cty.*, 21 F.3d 92, 97 (5th Cir. 1994).

<sup>15</sup> 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).

<sup>16</sup> *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.<sup>17</sup>

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.<sup>18</sup>

**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.<sup>19</sup> 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.<sup>20</sup>

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

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<sup>17</sup> See *Compactness Reports for Illustrative Maps* (on file with LDF).

<sup>18</sup> See *Gingles*, 478 U.S. at 50.

<sup>19</sup> A district court recently found that there was sufficient preliminary evidence of racially polarized voting statewide to support plaintiffs' challenge to Louisiana's Supreme Court district map. *Louisiana State Conference of NAACP v. Louisiana*, 490 F. Supp. 3d 982, 1019 (M.D. La. 2020). In *St. Bernard Citizens For Better Government*, the district court found racially polarized voting patterns in statewide gubernatorial elections, as well as local parish elections. *St. Bernard Citizens For Better Gov't*, 2002 WL 2022589, at \*7 (E.D. La. Aug. 26, 2002). See, e.g., *Terrebonne Par. Branch NAACP v. Jindal*, 274 F. Supp. 3d 395, 436-37 (M.D. La. 2017), *rev'd sub nom. Fusilier v. Landry*, 963 F.3d 447 (5th Cir. 2020) (The district court found that there were racially polarized voting patterns in the parish's judicial elections, and although the Fifth Circuit reversed the district court's decision, it held that the district court did not err in its finding of racially polarized voting); *Citizens for a Better Gretna v. City of Gretna*, 636 F. Supp. 1113, 1124 (E.D. La. 1986); *Major v. Treen*, 574 F. Supp. 325, 337 (E.D. La. 1983) (The court held that there was racial polarization in Orleans Parish).

<sup>20</sup> 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.<sup>21</sup> 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.<sup>22</sup> 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.<sup>23</sup> Since Reconstruction, Louisiana has passed countless laws to deny Black democratic participation, including grandfather clauses, poll taxes, and educational and property qualifications.<sup>24</sup>
- 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

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<sup>21</sup> See *United States House of Representatives elections in Louisiana, 2020*, Ballotpedia, [https://ballotpedia.org/United\\_States\\_House\\_of\\_Representatives\\_elections\\_in\\_Louisiana,\\_2020](https://ballotpedia.org/United_States_House_of_Representatives_elections_in_Louisiana,_2020) (last accessed Sep. 1, 2021).

<sup>22</sup> *Gingles*, 478 U.S. at 36-37 (quoting 42 U.S.C. § 10301(b)).

<sup>23</sup> *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.”)

<sup>24</sup> 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.<sup>25</sup> Most recently, the DOJ successfully challenged the City of West Monroe's at-large alderman elections under Section 2.<sup>26</sup> 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.<sup>27</sup>

- Louisiana's statewide district maps have been challenged under the Voting Rights Act in numerous reapportionment cycles since 1965.<sup>28</sup> 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.<sup>29</sup>
- 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.<sup>30</sup> 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."<sup>31</sup> Even with his explicit ties to white supremacy, Duke received over 58,000 votes.<sup>32</sup> In 2018, a white

<sup>25</sup> 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).

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

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

<sup>28</sup> 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).

<sup>29</sup> 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.

<sup>30</sup> 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-supremacist-meeting-in-2002>.

<sup>31</sup> 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>.

<sup>32</sup> *United States Senate election in Louisiana, 2016*, Ballotpedia, [https://ballotpedia.org/United\\_States\\_Senate\\_election\\_in\\_Louisiana,\\_2016](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.”<sup>33</sup>

- 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.”<sup>34</sup>
- Black Louisianans continue to experience the brunt of racial discrimination in every sector of public life.<sup>35</sup> 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.<sup>36</sup> 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.<sup>37</sup> 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.<sup>38</sup>
- Black people have been largely underrepresented in Louisiana public offices.<sup>39</sup> 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

<sup>33</sup> 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](https://www.theadvocate.com/baton_rouge/news/communities/livingston_tangipahoa/article_e0999182-9506-11e8-bf14-fb6afcf2a6ee.html).

<sup>34</sup> *St. Bernard Citizens For Better Gov’t*, 2002 WL 2022589, at \*10.

<sup>35</sup> “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.

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

<sup>37</sup> *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).

<sup>38</sup> *Black Communities Are Hit Hardest By COVID-19 In Louisiana And Elsewhere*, New Orleans Public Radio, (Apr. 6, 2020), <https://www.wno.org/latest-news/2020-04-06/black-communities-are-hit-hardest-by-covid-19-in-louisiana-and-elsewhere>.

<sup>39</sup> 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.<sup>40</sup> By contrast, since the Voting Rights Act was adopted in 1965, Louisiana has sent 45 white representatives to Congress.<sup>41</sup> 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.<sup>42</sup>

#### **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.<sup>43</sup> Failure to do so may lead to costly litigation.<sup>44</sup> 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](mailto:mpernick@naacpldf.org) with any questions or to discuss these issues in more detail.

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<sup>40</sup> 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).

<sup>41</sup> See *United States Congressional Delegations from Louisiana*, Ballotpedia, [https://ballotpedia.org/United\\_States\\_congressional\\_delegations\\_from\\_Louisiana](https://ballotpedia.org/United_States_congressional_delegations_from_Louisiana) (last visited Aug. 31, 2021).

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

<sup>43</sup> 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.

<sup>44</sup> 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

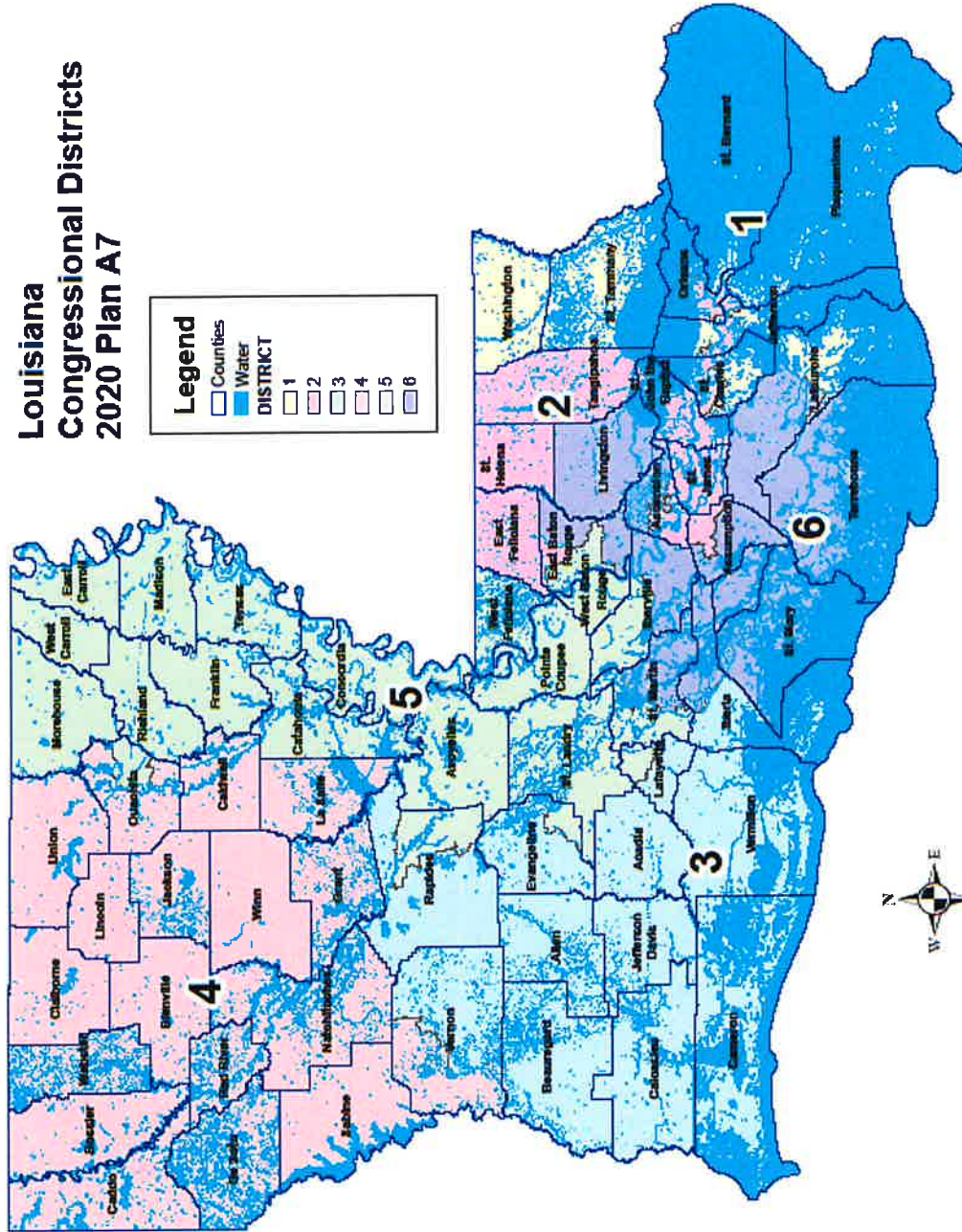
Crescent City Media Group is a civil rights, community engagement and media advocacy organization serving at the nexus of public interest and policy advocacy in communities of color across the state of Louisiana and the US South.

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





# Louisiana Congressional Districts 2020 Plan A7



## APPENDIX 2

### Demographic Data for Illustrative Maps

Current 2010 Plan w/2010 Data

District	TTLPop10	Deviation <sup>45</sup>	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%

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<sup>45</sup> 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 A6

District	TTLPop20	Deviation	TTLWht20%	TTLBlk20%	VAP20	WhtVAP20%	BlkVAP20%
1	776,293	0	64.13%	17.23%	604,170	67.19%	15.72%
2	776,294	1	32.95%	53.41%	598,799	35.77%	51.39%
3	776,292	-1	70.14%	19.69%	587,052	72.28%	18.24%
4	776,292	-1	57.73%	33.38%	596,684	59.99%	31.62%
5	776,294	1	39.68%	53.84%	587,486	42.50%	51.36%
6	776,292	-1	69.88%	18.07%	596,357	72.10%	16.86%

Plan A7

District	TTLPop20	Deviation	TTLWht20%	TTLBlk20%	VAP20	WhtVAP20%	BlkVAP20%
1	776,294	1	66.02%	15.42%	604,283	68.67%	14.18%
2	776,293	0	33.72%	53.52%	599,806	36.63%	51.38%
3	776,293	0	69.64%	20.19%	586,736	71.84%	18.66%
4	776,292	-1	57.60%	33.41%	596,316	59.87%	31.66%
5	776,293	0	39.72%	53.80%	589,975	42.54%	51.23%
6	776,292	-1	67.80%	19.28%	593,432	70.42%	17.91%

***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 A7

**Legend**

□ Counties

**DISTRICT**

1 2 3 4 5 6

Map showing Louisiana Congressional Districts 2020 Plan A7. The map displays 64 parishes, each assigned to one of six districts. The districts are color-coded: District 1 (yellow), District 2 (pink), District 3 (light blue), District 4 (light green), District 5 (light green), and District 6 (blue). The map includes a legend in the top left corner and a north arrow in the bottom right corner.

Parishes shown on the map:

- West Carroll
- Morehouse
- Union
- Claiborne
- Webster
- Bossier
- Caddo
- Richland
- Madison
- Tensas
- Franklin
- Catahoula
- Concordia
- Caldwell
- La Salle
- Winn
- Grant
- Natchitoches
- Sabine
- De Soto
- Red River
- Blenville
- Vernon
- Rapides
- Avoyelles
- St. Landry
- Pointe Coupee
- West Feliciana
- East Feliciana
- St. Helena
- Washington
- Tangipahoa
- St. Tammany
- Orleans
- St. Bernard
- Plaquemines
- Jefferson
- St. Charles
- St. James
- Assumption
- Iberia
- St. Mary
- Terrebonne
- Lafourche
- Iberville
- St. Martin
- Lafayette
- Acadia
- Vermilion
- Cameron
- Calcasieu
- Jefferson Davis
- Allen
- Beauregard

