

June 20, 2023

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Secretary James M. LeBlanc
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Re: Unconstitutional Overdetention Practices by the Louisiana Department of Public Safety & Corrections Impacting People Convicted Under Anti-LGBTQ+ Statute

Dear Ms. Smith and Secretary LeBlanc,

The ACLU of Louisiana (“ACLU-LA”) writes to notify the Department of Justice (“DOJ”) and the Louisiana Department of Public Safety & Corrections (“LDOC”) that LDOC is engaging in an unconstitutional overdetention practice. As Ms. Smith and Secretary LeBlanc well know, DOJ issued its findings into LDOC’s unconstitutional overdetention practices on January 25, 2023. DOJ’s report and findings, however, make no mention of the ongoing constitutional violations resulting from holding those convicted under the Crime Against Nature by Solicitation (“CANS”) statute—now R.S. 14:89.2, though previously a subsection of R.S. 14:89—past their release dates. Specifically, individuals with CANS¹ convictions are still being denied their constitutional right to a timely release due to the misapplication of release requirements reserved only for individuals designated as sex offenders.

In addition to its constitutional repugnance, this particular overdetention practice is both dangerous and deeply upsetting to the LGBTQ+ community because the CANS statute was drafted with the unlawful intention of targeting LGBTQ+ individuals – and has in practice also had a significantly disproportionate impact on cisgender and transgender women. Moreover, the statute’s requirement that those convicted be designated as sex offenders and required to register on the Louisiana Sex Offender and Child Predator Registry (“Registry”) was found to be unconstitutional more than a decade ago.² Pursuant to *Doe v. Caldwell*, the Registry should have been entirely purged of

¹ Throughout this letter, we sometimes refer to both the original CAN statute, La. R.S. 14:89, and the CANS statute, La. R.S. 14:89.2 interchangeably as “CANS.” When referring to an individual with a conviction of CANS, we mean they have a conviction involving solicitation of a so-called Crime Against Nature.

² See *Doe v. Jindal*, 851 F.Supp.2d 995, 1006 (E.D. La. 2012).

individuals solely registered because of a conviction involving solicitation of a so-called Crime Against Nature.³

We have identified thirty-two (32) individuals with suspected CANS convictions who have been held past their release dates since 2012,⁴ with delays ranging from one day to nearly two years.⁵ Based on these findings, ACLU-LA asks LDOC to take the actions described in Section III of this letter.

This letter is divided into three sections. Section I contextualizes why people with CANS convictions fall within a unique class of individuals harmed by LDOC's systemic and unconstitutional overdetention practices. Section II identifies thirty-two (32) individuals with suspected CANS offenses who appear to have been subjected to LDOC's unconstitutional overdetention practices. Section III identifies proposed remedies to the systemic and unconstitutional overdetention of individuals convicted of CANS or its predecessor, the solicitation subsection of Crimes Against Nature ("CAN").



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I. Decade-Old Legal Rulings Striking Down Sex Offense Registration Requirements Resulting from a CANS Conviction Are Ignored by LDOC, Underscoring Age-old Anti-LGBTQ+ Practices That Result in Unconstitutional Overdetention.

LDOC continues to designate individuals with CANS convictions as sex offenders despite the United States District Court for the Eastern District of Louisiana holding in 2012 that the sex offender registration requirement for individuals convicted under Louisiana's CANS statute violated the Fourteenth Amendment of the United States Constitution. *Doe v. Jindal*, 851 F.Supp.2d. 995 (E.D. La. 2012). One year later, in *Doe v. Caldwell*, this holding was applied retroactively to the entire class of individuals required to register with the Registry solely due to CANS convictions. 913 F.Supp.2d 262 (E.D. La. 2013). In line with the court-approved stipulated settlement agreement from the *Caldwell* litigation, Defendants agreed to remove all individuals designated as sex offenders solely as a result of a CANS conviction from the Registry.

After the ruling in Doe v. Jindal and the settlement agreement entered into by LDOC in Doe v. Caldwell, no one convicted under CANS can be forced to register [with the Registry], or adhere to any requirements imposed on those designated as a sex offender, including policies that require an approved residence plan before being released from incarceration. Moreover, the Louisiana legislature prospectively amended the CANS statute, eliminating the registration requirement for those convicted of CANS

³ See Ex. 1, *Doe v. Caldwell*, 913 F. Supp. 2d 262 (E.D. La. 2012). Defendants settled *Doe v. Caldwell* through a stipulated settlement agreement, accepted by the Court, that specifically instructed the Superintendent of the Louisiana State Police to remove all individuals who are "entitled to removal" by October 8, 2013. See *Doe v. Caldwell*, 2:12-cv-01670 (E.D. La.) [ECF No. 76].

⁴ From 1982 to 2010, CANS was a subsection of Louisiana's broader Crime Against Nature law, R.S. 14:89. As a result, when an individual has a conviction under R.S. 14:89 on their criminal record, it is often unclear whether they have been convicted of solicitation (CANS) or violated some other portion of the law. An examination of their case files should clarify whether they were convicted of simple sodomy – which the state is also not legally permitted to criminalize – or solicitation.

⁵ See *infra* Section II.

on or after August 15, 2011.⁶ This means that there are both constitutional and statutory reasons why individuals with CANS convictions cannot be subject to requirements imposed upon those designated as sex offenders by the State of Louisiana – whether they were convicted before *or* after August 15, 2011.

Nevertheless, LDOC has on many occasions enforced such requirements against individuals with CANS convictions, and delayed their release in violation of the Constitution. Specifically, we have identified thirty-two (32) individuals with suspected CANS convictions who have been held past their release dates by LDOC for failure to comply with the residence plan requirement for individuals designated as sex offenders. But their convictions no longer constitute sex offenses under the United States Constitution and Louisiana law. Accordingly, these individuals form a subclass of individuals being unlawfully overdetained by LDOC and are entitled to a remedy.⁷

Enacted in 1982, CANS criminalizes the solicitation of oral and/or anal sex for compensation.⁸ The statute bans “solicitation by a human being of another with the intent to engage in any unnatural carnal copulation for compensation.”⁹ There is direct evidence that this statute was enacted by the Louisiana Legislature with the intent of targeting vulnerable populations, specifically the LGBTQ+ community. In June 1982, during the hearing where the Louisiana House of Representatives Administration of Criminal Justice Committee voted to send CANS to the House floor, committee members made homophobic statements—emphasizing that they intended to target for criminal punishment the “fairies” and “young male hustlers” in New Orleans.¹⁰

CANS was added in 1982 to Louisiana’s preexisting Crime Against Nature (“CAN”) statute, Louisiana R.S. 14:89, which criminalized what the law deemed “unnatural carnal copulation.”¹¹ This is Louisiana’s version of a so-called sodomy law, criminalizing engagement in consensual oral or anal sex. In 2003, the United States Supreme Court held that state laws criminalizing sodomy, like Louisiana’s CAN statute, are unconstitutional, striking them down across the nation.¹² However, as of the 1982 amendment, Louisiana’s CAN statute also prohibited solicitation of such acts for compensation, and solicitation was only separated into its own CANS statute, R.S. 14:89.2, in 2010.¹³ Because of this, individuals who were arrested for allegedly committing a solicitation offense before 2010 have a conviction of R.S. 14:89, or CAN,

⁶ On June 28, 2011, the Louisiana Legislature eliminated all disparities in penalties and consequences between CANS and Prostitution convictions as well as all registration requirements, effective August 15, 2011. Compare La. Rev. Stat. Ann. § 14:82(C) with 2011 La. Sess. Law Serv. 223 (West) (H.B. 141)(enacted 2011). As with convictions under the solicitation provision of the Prostitution statute, CANS convictions occurring after August 15, 2011 no longer require sex offender registration. 2011 La. Sess. Law Serv. 223 (West) (H.B. 141).

⁷ La. Dep’t of Corrections. Data collected pursuant to La. Rev. Stat. § 44:1. Received June 14, 2022.

⁸ La. Stat. Ann. § 14:89.2.

⁹ *Id.*

¹⁰ Audiocassette Recording: Mins. of the La. H.R. Administration of Criminal Justice Comm., H.B. 853, (June 17, 1982) (on file with author).

¹¹ La. Stat. Ann. § 14:89.

¹² *Lawrence v. Texas*, 539 U.S. 558 (2003).

¹³ S.B. 381, La. Reg. Sess. (La. 2010)(enacted), <https://legis.la.gov/Legis/ViewDocument.aspx?d=720623>, (Amending R.S. 14:89(A) and adding 14:89.2).



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on their records. This matters because incarcerated individuals with both CAN and CANS convictions on their records are being unconstitutionally held past their release dates for failure to adhere to release requirements for those designated as sex offenders.

The sex offender registration requirement for CANS (and, thereby solicitation of CAN) was only fully removed in 2012. When the solicitation aspect of CAN passed, Louisiana already had an anti-prostitution statute on the books, R.S. 14:82, that outlawed the same conduct as CANS. This law criminalized sex work generally—solicitation of vaginal, oral, and/or anal sex for compensation—and treated violations of the law as misdemeanors. By contrast, while the solicitation aspect of CAN and CANS also criminalized solicitation of oral and/or anal sex for compensation,¹⁴ they treated said violations as felonies.¹⁵ Accordingly, prior to 2012, individuals with CAN solicitation convictions or CANS convictions were required to register with Louisiana’s Registry, while those convicted more generally of prostitution were not.¹⁶ Once registered in Louisiana, that information was then turned over to the National Sex Offender Registry, which includes all states and tribal nations’ registries for individuals designated as sex offenders.

The registration requirement for people convicted of the solicitation of CAN or CANS persisted for nearly two decades. In 2010, the Louisiana legislature finally amended the statute and eliminated the registration requirements imposed for first-time CANS convictions. In 2011, the legislature also removed the requirement for subsequent offenses. The amendments, however, were not retroactive, and individuals with previous solicitation of CAN or CANS convictions remained on the Registry. As a result, in 2012, nine plaintiffs with previous CANS convictions who had been deprived of the benefits of the legislative changes sued, seeking removal from the Registry.¹⁷ On March 29, 2012, the court held that it was unconstitutional to require those with CANS convictions to register with Louisiana’s Registry when those convicted of prostitution faced no such requirement for the same conduct. The Court reasoned that it violated the Equal Protection clause of the Fourteenth Amendment to the United States Constitution for two laws that criminalize the same conduct to issue unequal penalties where the difference in treatment has no rational relation to a legitimate government interest.¹⁸

The *Jindal* ruling established the unconstitutionality of the sex-offender status resulting from a CANS conviction. Thus, as of March 29, 2012, it became unlawful for LDOC to designate individuals with CANS convictions as sex offenders.¹⁹ In 2013, a

¹⁴ La. Stat. Ann. § 14:82.

¹⁵ *Doe v. Jindal*, 851 F. Supp. 2d 995, 998 (E.D. La. 2012)

¹⁶ *Id.* at 998-999.

¹⁷ *Doe v. Jindal* at 999.

¹⁸ *Id.* at 1007 (explaining that “the classification has no rational relation to any legitimate government objective: there is no legitimating rationale in the record to justify targeting only those convicted of Crime Against Nature by Solicitation for mandatory sex offender registration.”).

¹⁹ Ex. 1 at 1 (noting that “The Superintendent of the LSP...will, within 120 days...notify all municipal, state, and federal agencies that have been provided with information about individuals on the SOCPR [including...the Department of Public Safety and Corrections...] that the class members have been removed from the SOCPR and inform such agencies that class members are no longer subject to the Registry and Notification Laws.”).



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group of state agencies, including LDOC, ultimately agreed to a stipulation of settlement in *Doe v. Caldwell*,²⁰ which mandated that all people who were required to register as sex offenders solely due to CANS be removed from the Registry.²¹ (Following this stipulation of settlement, 878 people who had been unconstitutionally classified as sex offenders were ultimately removed from the Registry.) Denial of timely release to individuals with CANS convictions for failure to meet requirements imposed on individuals designated as sex offenders is illegal and a violation of an individual’s due process rights.

Overdetention of people with CANS convictions is part and parcel of the State of Louisiana’s systemic problem with unlawful, widespread overdetention. Louisiana has a well-documented history of overdetaining incarcerated individuals past their release dates. In 2012, LDOC admitted to a systemic problem with prolonged incarceration. Indeed, it conducted an internal investigation called the Lean Six Sigma Study (“LSSS”), which revealed that at the time of the study, over 83% of those in LDOC custody should have already been released.²² In sum, the report revealed that LDOC was, on average, overdetaining at least 2,000 people past their release date annually.²³ Moreover, the average length of the prolonged detentions at issue exceeded 70 days.²⁴ Anecdotal evidence provided by LDOC employees nearly a decade later corroborates this long-standing practice. Several LDOC employees testified that, nearly a decade after the LDOC study, it was routine for them to identify one or two people per week who were still incarcerated despite the passage of their release date.²⁵ For example, an LDOC employee named Tracy DiBenedetto testified that people are sometimes overdetained for periods of up to a year.²⁶

Because LDOC did little to rectify these serious issues,²⁷ in April 2020, the Promise of Justice Initiative (PJI) filed a class action lawsuit against LDOC and its Secretary, James LeBlanc. The suit alleged that LDOC, as a practice, unlawfully and knowingly holds individuals past their release date[s].²⁸ In short, LeBlanc had known since the 2012 LSSS that “thousands of people in the custody of the Department of Corrections for whatever reason were being held past their release date.”²⁹ LeBlanc even later conceded that LDOC is legally bound to release people on their release dates and that overdetention is a “big problem.”³⁰ After PJI filed suit, DOJ initiated an investigation into LDOC’s overdetention practices.³¹ DOJ released its findings on January 25, 2023. It

²⁰ *Caldwell*, 913 F. Supp. 2d 262 at 265.

²¹ See Ex. 1 ([Caldwell Stipulation of Settlement](#)).

²² See Ex. 2 (Lean Six Sigma report) at 4.

²³ *Id.* at 20.

²⁴ *Id.*

²⁵ *Parker v. Louisiana Dep’t of Pub. Safety & Corr.*, No. CV 18-1030-JWD-EWD, 2020 WL 4353564, at *4 (M.D. La. July 29, 2020).

²⁶ *Id.*

²⁷ *Id.*

²⁸ *Humphrey v. LeBlanc*, 2021 WL 3560842, 3 (M.D. La. Nov. 9, 2021).

²⁹ See Ex. 3 (*Humphrey Am. Compl.*) at 6.

³⁰ *Id.* at 1.

³¹ Press Release, U.S. Dep’t of Just., *Justice Department Announces Civil Investigation into Louisiana’s Prisoner Release Practices* (Dec. 3, 2020), <https://www.justice.gov/opa/pr/justice-department-announces-civil-investigation-louisianas-prisoner-release-practices>.



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found that there is reasonable cause to believe that LDOC consistently keeps individuals confined past their legally-mandated release dates, thereby violating their Fourteenth Amendment rights.³² DOJ found that between January and April 2022, 26.8 percent of those individuals released from LDOC custody were held past their release dates.³³ The problem, of which LDOC has been on notice for more than a decade, continues to gain national attention. Just last December, the *New York Times* published a detailed report on how Louisiana systemically overdetains individuals in its custody.³⁴

Since *Doe v. Jindal* was decided in 2012, thirty-two (32) incarcerated individuals with suspected CANS convictions have been held past their release dates, with delays ranging from one day to nearly two years.³⁵ Further, the Fifth Circuit Court of Appeals established that “a jailer has a duty to ensure that inmates are timely released from prison.”³⁶ While short administrative delays may occur, the Fifth Circuit firmly declared that overdetention of more than thirty (30) days is a violation of an individual’s rights under the Fourteenth Amendment, which states that the “State [shall not] deprive any person of life, liberty, or property, without due process of law.”³⁷ Of the thirty-two (32) incarcerated individuals held past their release dates, nearly half were held over thirty days—an unequivocal and clear violation of their rights secured by the United States Constitution.

II. Individuals with Suspected CANS Convictions Who Appear to Have Been Detained Past Their Release Dates

Below are thirty-two (32) individuals who were released between March 29, 2012—the date *Doe v. Jindal* was decided and the sex offense status of CANS was ruled unconstitutional³⁸—and December 31, 2021. For each of these individuals, the recorded reason for the individual’s overdetention was “Residence Plan Required – Sex Offender.” None of these individuals, however, appear to have been convicted of an *actual* sex offense; rather, only CAN or CANS convictions appear on their record[s]. Because individuals with solicitation of CAN or CANS convictions cannot constitutionally be required to register with the Registry and the sex-offense status of the CANS statute was declared unconstitutional, overdetaining these individuals for failure to provide a residence plan in compliance with the requirements Louisiana imposes on those

³² Investigation, U.S. Dep’t of Just., *Investigation of the Louisiana Department of Public Safety & Corrections* (Jan. 25, 2023), <https://www.justice.gov/opa/press-release/file/1564036/download>.

³³ *Id.*

³⁴ Glenn Thrush, *Some Prisoners Remain Behind Bars in Louisiana Despite Being Deemed Free*, N.Y. Times (Dec. 11, 2022), <https://www.nytimes.com/2022/12/11/us/politics/louisiana-prison-overdetention.html>.

³⁵ La. Dep’t of Corrections. Data collected pursuant to La. Rev. Stat. § 44:1. Received June 14, 2022.

³⁶ *Porter v. Epps*, 659 F.3d 440, 445 (5th Cir. 2011).

³⁷ U.S. Const. amend. IV; *see also Douthit v. Jones*, 619 F.2d 527, 532 (5th Cir. 1980).

³⁸ Even if LDOC argues that *Jindal*’s ruling only applied to the nine named plaintiffs and the starting date should be when *Caldwell* was settled, the starting date would still be almost ten years ago—June 10, 2023. However, we confidently assert that the ruling in *Jindal* made the sex offense status of CANS unconstitutional from that date.



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designated as sex offenders violates the Due Process Clause of the Fourteenth Amendment to the United States Constitution.

The below table identifies the aforementioned thirty-two (32) overdetailed individuals and is organized alphabetically by last name.³⁹ It is possible that, since this data was gathered, additional individuals with CANS convictions have been held past their release dates.

***Overdetained Individuals**



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Last Name	First Name	DOC #	Reason for Non-Timely Release	Days Over Detained
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	5 (GTPS**)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	96 (Exp.***)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	153 (Exp.)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	36 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	267 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	3 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	619 (Exp.)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	28 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	61 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	48 (Exp.)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	2 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	124 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	24 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	12 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	8 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	54 (Exp.)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	252 (Exp.)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	626 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	5 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	88 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	17 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	19 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	13 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	1 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	4 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	14 (Exp.)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	14 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	35 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	24 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	390 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	250 (GTPS)
[REDACTED]	[REDACTED]	[REDACTED]	Residence Plan Denied	253 (Exp.)

**Good Time Parole Supervision

*** Expiration of Term

³⁹ In the public version of this letter, all names and DOC numbers are redacted to protect the privacy of those affected.

III. LDOC Should Immediately Implement These Outlined Steps to Cure the Ongoing Constitutional Violations Related to the Overdetention of Individuals with CANS Convictions.

Overdetention is a violation of an individual's constitutional rights and LDOC must prioritize ensuring that no one is incarcerated past their official release date. Accordingly, LDOC should:

- Comprehensively review its databases for individuals who have been convicted under RS 14:89 or RS 14:89.2 in order to determine if any of these individuals are still being unconstitutionally designated as sex offenders.
- Immediately release those individuals who have been unconstitutionally designated as sex offenders and whose release dates have passed.
- Remove the requirement that individuals erroneously designated as sex offenders adhere to any residence plan requirement imposed on those designated as sex offenders.
- As part of the remedial plan being designed with DOJ relating to its January 23, 2023 findings, ensure that individuals convicted under RS 14:89 or RS 14:89.2, who are scheduled to be released in the future, are not erroneously required to provide a residence plan or adhere to any other requirement that only applies to individuals designated sex offenders.
- Renumerate any individual subjected to overdetention for more than 30 days a minimum amount of \$110.00 per day, in accordance with La. Stat. Ann. § 15:572.8.⁴⁰

In conclusion, LDOC is unconstitutionally preventing the timely release of individuals convicted under Louisiana R.S. 14:89.2, CANS, and its predecessor, the solicitation provision of Louisiana R.S. 14:89, CAN, by erroneously designating them as sex offenders. In doing so, LDOC is further delaying release dates by forcing individuals to come up with an adequate residency plan as a prerequisite for release. LDOC must release overdetained individuals with CAN and/or CANS convictions and end its practice of systemic, unconstitutional, and prolonged overdetention to ensure timely release in accordance with Louisiana law and the United States Constitution.

Respectfully, the ACLU of Louisiana requests that the LDOC explain in writing how it intends to address the specific issue of overdetention that plagues those with CAN or CANS convictions within 30 (thirty) days of receipt of this letter.

⁴⁰ Though this statute is intended for those individuals whose convictions have been reversed or vacated, it provides guidance on a reasonable amount in which the State should pay a person who has been wrongfully incarcerated, as are those who have been overdetained under CANS.



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/s/Alexis Agathocleous

Alexis Agathocleous, Deputy Director
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American Civil Liberties Union

A handwritten signature in black ink, appearing to read "Matt Nadel".

Matt Nadel
Investigative Journalist
Director/Producer, *CANS Can't Stand*

A handwritten signature in blue ink, appearing to read "Susan Hazeldean".

Susan V. Hazeldean, Professor of Law
Director, LGBTQ Advocacy Clinic
Rachel Conte, Law Student Intern
Miri Reinhold, Law Student intern
Brooklyn Law School

A handwritten signature in black ink, appearing to read "Wendi Cooper".

Wendi Cooper
Executive Director, Transcending Women
Founder, CANScantSTAND Campaign

/s/ Taylor Brown

Taylor Brown, Staff Attorney
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