



May 2, 2023

Sent via email

Committee on Senate and Governmental Affairs
c/o Laur`en M Cimino
P.O. Box 94183
Baton Rouge, LA 70804
s&g@legis.la.gov
marinovichl@legis.la.gov

Re: Support for Senate Bill 80

Dear Chair Hewitt and Members of the Committee on Senate and Governmental Affairs,

The NAACP Legal Defense & Educational Fund, Inc. ("LDF"), Power Coalition for Equity and Justice, ACLU of Louisiana, Voice of the Experience ("VOTE"), Anti-Defamation League South Central, National Council of Jewish Women Greater New Orleans Section, Urban League of Louisiana, and Southern Poverty Law Center Action Fund write in support of Senate Bill 80 ("SB 80") and all efforts to ensure meaningful and robust public participation and transparency in future redistricting processes. SB 80 codifies many of the best practices proactively adopted by this Committee during this past and prior redistricting processes and ensures community participation and transparency are tantamount to all future redistricting efforts in Louisiana at all levels of government. Our sup-

port for SB 80 builds on years of advocacy calling for inclusive and transparent map drawing and lessons learned during the most recent redistricting cycle.¹ We strongly encourage you to support SB 80 through each phase of this legislative session.

I. Public Participation: SB 80 ensures future generations of Louisianians have an opportunity to shape the redistricting process.

It is critical that all Louisianians have a meaningful opportunity to fully participate in redistricting. The “redistricting roadshow,” when Louisiana’s Joint Committees on Governmental Affairs tour the state with legislative colleagues to hear directly from community members about their goals and values for the redistricting process, has become a critical mechanism to ensure legislator, staff, and map drawers hear directly from Louisianians in diverse communities across the state. In 2011, the Legislature provided nine hearings statewide over the course of twelve days, starting on February 17 and concluding on March 1, 2011.² Between October 2021 and January 2022, the Joint Committees on Governmental Affairs conducted public hearings in nine cities across each corner of the state.³ These meetings provided critical opportunities for members of the public to speak directly to the legislators charged with drawing the districts for their representatives in state and federal government. In both oral and written testimony provided throughout the roadshow, members of the public defined the needs of their communities of interest and articulated the values they wanted to be central to the redistricting process—including fairness, equity, and transparency.⁴ For many Louisianians, these roadshow hearings

¹ See, e.g., Appendix I; Testimony of Victoria Wenger at Shreveport Redistricting Roadshow Hearing, Oct. 21, 2021 at 1:05, https://redist.legis.la.gov/default_video?v=house/2021/oct/1021_21_Shreveport_Redist1 (“There are so many Louisianians who cannot be here tonight, or at any point in the roadshow, because of displacement due to Hurricane Ida, vulnerability due to COVID-19, or because they simply do not have the flexibility, mobility, or transportation to join the roadshow in person . . . I implore you to consider hosting at least one virtual roadshow session to allow Louisianians unable to attend in person the chance to not just write to you or watch online, but to speak to you about their stories, their communities, and their priorities for the districts they call home.”)

² La. House of Representatives, Redistricting Timeline (Dec. 1, 2010), https://house.louisiana.gov/H_Redistricting2011/2011_RedistrictingTimelineAsOf12-1-2010.pdf.

³ Redistricting State of La., <https://redist.legis.la.gov/default> (last visited April 29, 2023).

⁴ See, e.g., Testimony of Sharon Smith LaHoste at New Orleans Redistricting Roadshow Hearing, Jan. 5, 2022 at 2:15–16, https://redist.legis.la.gov/default_video?v=house/2022/jan/0105_22_GA_NewOrleans_Redist (“Minorities have a community of interest in that the State’s past practices have resulted in the problems they disproportionately face every day . . . but for far too long minorities have been deprived of a fair opportunity to participate in developing the laws and policies that affect their own futures.”); Testimony by Frankie Robertson, reading a prepared statement by Raymond A. Jetson, at Baton Rouge Redistricting Roadshow Hearing, Jan. 20, 2022 at 50:50–51:14, https://redist.legis.la.gov/default_video?v=house/2022/jan/0120_22_JGA_BatonRouge_Redist (“The solution is drawing fair maps . . . maps that support equitable majority-minority districts and maps that are absent of vote dilution. Maps that provide opportunities for minorities in majority white districts to have an influential voice in expressing their needs and concerns in the community.”); Email Testimony by Lorenzo Lee, October 20, 2021, https://redist.legis.la.gov/2020_Files/MtgFiles/Oct21/Email-Testimony-Lorenzo-Lee_Redacted.pdf (“Please be fair, equitable and transparent in your rational for designating districts and utilize this data (Secretary of State & Census) objectively, so the districts accurately reflects the State’s voters by party and by race as per the Voting Rights Act.”).

were the only opportunity to speak directly to lawmakers before the extraordinary legislative session in Baton Rouge, which was conducted largely during work and school day hours when Louisianians from far reaches of the state cannot take time to attend hearings at the state capitol.

SB 80 would codify the redistricting roadshow as a sustained, formalized process, rather than an informal best practice that could easily be ignored by future legislative leaders. Moreover, it would ensure more Louisianians are included in the redistricting process by providing for “testimony via electronic means” for at least one hearing (e.g., via Zoom), making it inclusive for persons with disabilities and a best practice endorsed by accessibility experts and championed by members of this Committee for other public meetings⁵ and provided to members of the public in Louisiana in other contexts.⁶ The bill further ensures that public meetings are provided in local redistricting processes, so community members are not excluded from any level of redistricting in the state. These baseline standards for public inclusion mirror best practices endorsed by the U.S. Election Assistance Commission (“EAC”) and other states and communities nationwide.⁷

The public is uniquely positioned to discern which maps best reflect their communities of interest and provide a meaningful choice in electing their representatives. SB 80 ensures these perspectives are solicited in standardized and accessible forums by codifying opportunities for written, in-person, and virtual testimony statewide. This Committee should wholly promote these standards as law.

II. Transparency: SB 80 ensures each phase of the mapmaking process is transparent and accessible to Louisianians statewide.

Informed public participation requires transparency at all stages of the redistricting process. In recent redistricting cycles, the Legislature has maintained a redistricting website,⁸ which is a best practice SB 80 would codify as law. The bill would further require that the materials posted on the website include those necessary for community members

⁵ See, e.g., Final Recommendations of the HCR 14 Disability Voting Task Force (Feb. 10, 2023), <https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:59599f59-718f-3dbd-b321-89f3bb5d2258>; La. SB 201 (2023), <https://www.legis.la.gov/legis/BillInfo.aspx?i=244625>.

⁶ See, e.g., La. State Board of Elections Supervisors, Notice and Agenda (Jan. 28, 2021) <https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:6804f7b6-d36b-39d1-9d8a-ece8274987a8> (providing for a public meeting via Zoom, with instruction for members of the public to provide real-time testimony by writing in the “chat” feature or “raising their hand” virtually to be acknowledged for oral testimony).

⁷ See, e.g., U.S. Elections Assistance Comm’n, *Local Election Officials Guide to Redistricting* (Aug. 25, 2021), https://www.eac.gov/sites/default/files/2021-08/LEO_Guide_to_Redistricting.pdf; Erica Hernandez, ‘Let’s Talk Texas’: State Senate Redistricting Committee Looking for Public Input in Virtual Regional Hearings, KSAT.Com (Jan. 22, 2021), <https://www.ksat.com/news/local/2021/01/22/lets-talk-texas-state-senate-redistricting-committee-looking-for-public-input-in-virtual-regional-hearings/>; Mass. Special Joint Comm. on Redistricting, *Virtual Public Hearing*, malegislature.gov (Apr. 14, 2021), <https://malegislature.gov/Events/Hearings/Detail/3670>.

⁸ See Redistricting State of La., <https://redist.legis.la.gov/> (last visited Apr. 29, 2023); La. of Representatives, House & Governmental Affairs Comm., Redistricting: Meetings, https://house.louisiana.gov/H_Redistricting2011/default_RedistMeetings2011_Past.htm (last visited Apr. 29, 2023).

to fully engage in and audit the redistricting process—both through viewing testimony and accessing the files needed to assess proposed maps (e.g., shapefiles, etc.).

III. Best Practices at *Every* Level: SB 80 ensures that state-, parish-, and local-level redistricting includes community input and honors transparency.

This Legislature’s protocols during redistricting serve as an exemplar for those adopted and enforced at the local level. SB 80 not only codifies and expands the community engagement and transparency best practices adopted by this Committee and its’ legislative peers in recent redistricting cycles, but it ensures that similar, practical measures are required of all parish and local government boards charged with redistricting responsibilities. Many community engagement protocols—including providing for public hearings, community testimony, and posted materials online—were already adopted by parish- and local-level governing authorities in the most recent redistricting cycle.⁹ SB 80 would codify these best practices and ensure that access to the redistricting process is equitable for all communities statewide in future redistricting cycles. Every Louisianian should have a fair opportunity to share their views during the map-drawing process and monitor whether the districts drawn reflect the needs of their community. SB 80 is a necessary and practical measure to codify the values of inclusion and transparency into redistricting law in Louisiana.

Please feel free to contact Victoria Wenger at vwenger@naacpldf.org for further information. Thank you for your consideration.

_____/s/
Victoria Wenger
Michael Pernick
NAACP Legal Defense and Educational Fund, Inc.
40 Rector Street
New York, NY 10006

Jared Evans
Sara Rohani
NAACP Legal Defense and Educational Fund, Inc.
700 14th St. N.W., Ste. 600
Washington, D.C. 20005

Ashley Shelton
Power Coalition for Equity and Justice

⁹ See, e.g., Jefferson Parish Schools, *Proposed School Board Redistricting Maps Now Available for Public View* (May 31, 2022), <https://www.jpschools.org/RedistrictingMaps>; Joshua Manning, *Terrebonne Parish Redistricting*, S. Cent. Planning and Dev. Comm’n (Sept. 15, 2021), <https://storymaps.arcgis.com/stories/33c5204a5e2840f98ad1d901e8947908>; Heidi Guidry, *Terrebonne Parish Redistricting Process Leads to Feb. 1 Public Hearing*, HOUMA TIMES (Jan. 25, 2022) (<https://www.houmatimes.com/news/terrebonne-parish-redistricting-process-leads-to-feb-1-public-hearing/>).

4930 Washington Ave.
New Orleans, LA 70125

Chris Kaiser
ACLU of Louisiana
PO Box 56157
New Orleans, LA 70156

Norris Henderson
Voice of the Experienced
4930 Washington Ave.
New Orleans, LA 70125

M. Christian Green
President
League of Women Voters of Louisiana

Aaron Ahlquist
Anti-Defamation League South Central

Sylvia Finger
National Council of Jewish Women
Greater New Orleans Section

Tyronne B. Walker
Urban League of Louisiana
4640 S. Carrollton Avenue, Ste. 210
New Orleans, LA

Terry C. Landry Jr.
Chandra Shae Foster
Southern Poverty Law Center Action Fund
201 St. Charles Avenue Suite 2000
New Orleans, LA 70170

The Legal Defense Fund (LDF)

Founded in 1940, the Legal Defense Fund (LDF) is the nation's first civil rights law organization. LDF's Thurgood Marshall Institute is a multi-disciplinary and collaborative hub within LDF that launches targeted campaigns and undertakes innovative research to shape the civil rights narrative. In media attributions, please refer to us as the Legal Defense Fund or LDF. Please note that LDF has been completely separate from the National Association for the Advancement of Colored People (NAACP) since 1957—although LDF was originally founded by the NAACP and shares its commitment to equal rights.

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.

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.

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.

Voice of the Experience (VOTE)

VOTE is a grassroots organization founded and run by formerly incarcerated people (FIP), our families and our allies. We build power through community organizing, policy advocacy, and civic engagement. 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 Louisiana and beyond without relying on mass incarceration.

Anti-Defamation League South Central

ADL is the leading anti-hate organization in the world. Founded in 1913, its timeless mission is “to stop the defamation of the Jewish people and to secure justice and fair treatment to all.” Today, ADL continues to fight all forms of antisemitism and bias, using innovation and partnerships to drive impact. A global leader in combating antisemitism, countering extremism and battling bigotry wherever and whenever it happens, ADL works to protect democracy and ensure a just and inclusive society for all.

National Council of Jewish Women (NCJW)

The National Council of Jewish Women (NCJW) is a grassroots organization of volunteers and advocates who turn progressive ideals into action. Inspired by Jewish values, NCJW strives for social justice by improving the quality of life for women, children, and families and by safeguarding individual rights and freedoms.

Urban League of Louisiana

The mission of the Urban League of Louisiana is to assist African Americans and other communities seeking equity to secure economic self-reliance, parity, power and civil rights.

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.

APPENDIX I



May 21, 2021

Sent via email

Committee on House and Governmental Affairs
P.O. Box 94062
Baton Rouge, LA 70804
Email: h&ga@legis.la.gov

Committee on Senate and Governmental Affairs
P.O. Box 94183
Baton Rouge, LA 70804
Email: s&g@legis.la.gov

Cc: Louisiana Legislative Black Caucus
445 N. 12th Street
Baton Rouge, LA 70802

Re: Recommendations, Best Practices, and Requirements for Transparency, Public Involvement, and Fair Representation During the Upcoming Redistricting Process

Dear Chair Stefanski, Chair Hewitt, Chairman James, Members of the Committees on House and Senate Governmental Affairs, and Members of the Louisiana Legislature,

The NAACP Legal Defense & Educational Fund (“LDF”), the American Civil Liberties Union (“ACLU”), the ACLU of Louisiana, Fair Districts Louisiana, Louisiana Progress, and Power Coalition for Equity and Justice write to encourage the Committees on House and Governmental Affairs and Senate and Governmental Affairs, and the entire Louisiana Legislature engaged in the redistricting process, if they have not

already, to commit to the following recommended best practices to ensure meaningful and robust public participation and transparency in the redistricting process. We also write to remind Louisiana’s legislature of some of its affirmative obligations to ensure fair representation and non-discrimination in the redistricting process, including after the release of the decennial population census data later this year.¹

I. Meaningful Public Participation: All Louisianians’ Should Have the Opportunity to Be Included in the Redistricting Process

The configuration of maps that Louisiana’s legislature will consider are likely to be in place for at least the next decade and will be foundational to all Louisiana residents’ access to representation and voters’ access to candidates of choice for congressional, legislative bodies and judicial bodies.² Redistricting by the Legislature also sets the standard and tone for local redistricting in the State. It is therefore critical that all Louisianians have a meaningful opportunity to fully participate in, provide input on, and receive feedback from legislative members during the redistricting process. The public is especially well-suited to discern which maps allow (or do not allow) communities of interest to have a voice and choice in the process for electing their representatives, and these perspectives must be incorporated into any maps that the legislature proposes or otherwise considers.

To provide the public with a meaningful opportunity to engage in the redistricting process, we recommend the legislature adopt rules requiring:

1. *Multiple accessible public hearings*: Louisiana should offer at least 12 public hearings regarding redistricting in the following cities: Covington, New Orleans, Houma, Baton Rouge, Lake Charles, Lafayette, Shreveport, Monroe and Alexandria, with two public hearings offered in New Orleans, Baton Rouge and Shreveport.³ Members of the public must be permitted to participate⁴ in each

¹ To date, the Census Bureau has released information on the apportionment of the 435 House of Representatives. Census Bureau, *2020 Census Apportionment Results Delivered to the President*, Census.gov (Apr. 26, 2021), <https://www.census.gov/newsroom/press-releases/2021/2020-census-apportionment-results.html>. The Census Bureau has announced that it will deliver data necessary to redistrict, i.e., draw the lines for electing these and representatives at all other levels of government by September 30, 2021. Census Bureau, *Census Bureau Statement on Redistricting Data Timeline*, Census.gov (Feb. 12, 2021), <https://www.census.gov/newsroom/press-releases/2021/statement-redistricting-data-timeline.html>.

² La. Const. Art. III, § 6(A); *Chisom v. Roemer*, 501 U.S. 380 (1991).

³ In 2011, the Legislature provided 9 hearings over the course of 12 days (starting on February 17, 2011 and concluding on March 1, 2011). La. House of Representatives, *Redistricting Timeline* (Dec. 1, 2010), https://house.louisiana.gov/H_Redistricting2011/2011_RedistrictingTimelineAsOf12-1-2010.pdf. The Legislature should plan to conduct all 12 hearings within a 4-week period.

⁴ The Legislature should invest money in placing ads in local newspapers, radio, and TV, particularly those that serve communities of color, as well as on the Internet, to ensure Louisianians are given the information they need to get involved.

of these public hearings either in person or remotely over Zoom or another virtual platform.⁵

2. *Meaningful opportunities to review, comment on and propose community maps:* The public must have at least one-week's advance notice, and unrestricted ability to comment on, the legislature's proposed maps. In addition, the public should be given the tools necessary to propose maps for consideration, including both statewide maps and maps for specific regions that identify community boundaries and communities of interest. Any maps proposed by the public should become part of the public record and be available for anyone to review on the state's website.⁶
3. *Prohibit backroom negotiations:* To ensure transparency in the redistricting process, legislative decisionmakers must conduct all redistricting meetings, hearings, or other sessions in public, and permit members of the public to view the proceedings remotely.⁷ In addition to the roadshow, the public must also be permitted to provide testimony to legislative decisionmakers at numerous points throughout the redistricting process.

II. Transparency: All Louisianans' Should Be Afforded Opportunities to Meaningfully Participate in the Redistricting Process

Informed participation by Louisiana residents requires transparency and meaningful public participation at all stages of the redistricting process. The state should maintain a website specifically focused on redistricting that is updated daily to ensure that members of the public can remain fully informed and able to engage throughout the process. Specifically, the Legislature should:

1. *Publicize* all data used by the Louisiana Legislature during the redistricting process and make it available, in real time, to the public, including any data

⁵ Erica Hernandez, 'Let's Talk Texas': State Senate Redistricting Committee Looking for Public Input in Virtual Regional Hearings, KSAT.Com (Jan. 22, 2021, 2:08PM), <https://www.ksat.com/news/local/2021/01/22/lets-talk-texas-state-senate-redistricting-committee-looking-for-public-input-in-virtual-regional-hearings/>; Mass. Special Joint Committee on Redistricting, *Virtual Public Hearing*, malegislature.gov (Apr. 14, 2021), <https://malegislature.gov/Events/Hearings/Detail/3670>. Press Release, *Rasmey Invites Submission of Senate Redistricting Plans*, KnoxBlog (Sept. 16, 2011), http://knoxblogs.com/humphreyhill/2011/09/16/rasmey_invites_submission_of_sl/.

⁶ For example, Alabama offers the public the opportunity to submit partial and local maps using the Alabama Legislative Reapportionment Office's map drawing tools every Friday. California offers members of the public a tool along these lines a similar tool at drawmycommunity.org. The State's redistricting website should also have an easy-to-remember URL.

⁷ *North Carolina State Conference of N.A.A.C.P. v. McCrory*, 831 F.3d 204, 227-29 (4th Cir. 2016).

released by the U.S. Census Bureau relevant to Louisiana and redistricting. This data should be publicized in format that can be manipulated by the public.

2. *Update* the State’s redistricting website daily with public meeting notices, proposed meeting agendas, proposed maps (posted at least a week before the legislature considers the map), along with all relevant district-level data associated with proposed maps, including but not limited to demographic data. The identity of any expert or consultant the State engages to assist with the redistricting process should also be posted.
3. *Ensure* a mechanism for Louisianans to submit written comments and questions regarding the state’s proposed maps, to submit alternative maps that are available to other members of the public, and to incorporate these maps into the legislative record.
4. *Collaborate* with the public, potentially through the statewide road shows, to determine the criteria the legislature should consider in drawing new districts in addition to, and after ensuring that, minority voters have an opportunity to elect representatives of their choice, as required by federal law.

III. Satisfy Your Obligation to Ensure that Voters of Color Have an Equal Opportunity to Elect Candidates of Their Choice

To ensure fair and non-discriminatory representation, the cornerstone of our democracy, electoral districts must be drawn to ensure non-dilution of minority voting strength. Furthermore, maps must comply with the one-person, one vote principle, embodied in the U.S. Constitution. Maps may fail to comply with this principle if, for legislative bodies, they do not contain near absolute or as near as practicable, respectively, equal number of people. Maps also may violate Section 2 of the Voting Rights Act if (1) a district can be drawn in which the minority community is sufficiently large and geographically compact to constitute a majority; (2) the minority group is politically cohesive; (3) in the absence of a majority-minority district, candidates preferred by the minority group would usually be defeated due to the political cohesion of non-minority voters for their preferred candidates; and (4) under the totality of the circumstances, the political process is not equally open to minority voters.⁸ Because of Louisiana’s continuing stark patterns of voting along racial lines,⁹ which strikes at

⁸ *Thornburg v. Gingles*, 478 U.S. 30, 47-52, 78 (1986); *Chisom*, 501 U.S. at 403-04.

⁹ See, e.g., *Terrebonne Par. Branch NAACP v. Jindal*, 274 F. Supp. 3d 395 (M.D. La. 2017), *rev’d sub nom. Fusilier v. Landry*, 963 F.3d 447 (5th Cir. 2020); *Hall v. Louisiana*, 108 F. Supp. 3d 419 (M.D. La. 2015); *Nw. Austin Mun. Util. Dist. No. One v. Mukasey*, 573 F. Supp. 2d 221, 251 (D.D.C. 2008) (As of 2006, “not one redistricting plan for the Louisiana House of Representatives had ever been

the heart of evidence of potential minority vote dilution¹⁰ this body must be attuned to its obligations under Section 2 of the Voting Rights Act, and its obligation to assess that redistricting lines do not dilute the ability of minority voters to elect candidates of their choice.

IV. Provide for Transparency, Public Involvement, and Fair Representation in Redistricting at the Local Level

This body's practices during redistricting can serve as an exemplar for the practices of other bodies charged with redistricting, particularly at the local level. Moreover, consistent with its authority, the Legislature should require all local governments charged with redistricting responsibilities to commit to and follow similar best practices for redistricting at the local level—for school boards, parish councils, police juries, and other critical representational and electoral bodies.

As with the state and judicial bodies, the Voting Rights Act requires that minority voters are able to elect representatives of their choice including to city councils, parish councils, boards of education, and other elected bodies. It is therefore critical to the democratic process that local redistricting follows the same strictures and best practices, including as may be required by federal law.

* * *

Please feel free to contact Kathryn Sadasivan at 332-600-9546 or by email at ksadasivan@naacpldf.org with any questions or to discuss these concerns in more detail. We also encourage you to review ***Power on the Line, Making Redistricting Work for Us***,¹¹ a guide for community partners and policy makers who intend to engage in

precleared as originally submitted.”); *St. Bernard Citizens For Better Gov't v. St. Bernard Par. Sch. Bd.*, No. 02-2209, 2002 WL 2022589 (E.D. La. Aug. 26, 2002); *Hays v. Louisiana*, 936 F. Supp. 360, 362 (W.D. La. 1996) (challenge to congressional redistricting after 1990 Census); *Major v. Treen*, 574 F. Supp. 325, 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); *Bannister v. Davis*, 263 F. Supp. 202, 202, 205 (E.D. La. 1966) (challenge to state legislative apportionment after *Reynolds v. Sims*, 377 U.S. 533 (1964)).

¹⁰ *Citizens for a Better Gretna v. City of Gretna*, 834 F.2d 496, 499 (5th Cir. 1987) (“Racially polarized voting is the linchpin of a § 2 vote dilution claim.”); *McMillan v. Escambia County*, 748 F.2d 1037, 1043 (5th Cir. 1984) (“[RPV] will ordinarily be the keystone of a dilution case”); see also *Clark v. Calhoun Cty.*, 88 F.3d 1393, 1397 (5th Cir. 1996); *Gingles*, 478 U.S. at 48 n.15; *Westwego Citizens for Better Gov't v. City of Westwego*, 946 F.2d 1109, 1122 (5th Cir. 1991).

¹¹ N.A.A.C.P. LDF, *Civil Rights Organizations Release Redistricting Guide to Support Black, Latino, and AAPI Communities' Participation in Crucial Process*, [naacpldf.org](https://www.naacpldf.org) (May 11, 2021), <https://www.naacpldf.org/press-release/civil-rights-organizations-release-redistricting-guide-to-support-black-latino-and-aapi-communities-participation-in-crucial-process/>.

the redistricting process at all levels of government. It provides information consistent with our recommendations herein as well as other relevant information about the redistricting process.

/s/ Kathryn Sadasivan

Leah C. Aden, Deputy Director of Litigation
Kathryn Sadasivan, Redistricting Counsel
Michael Pernick, Redistricting Counsel
NAACP Legal Defense & Educational Fund,
Inc.
40 Rector Street, 5th Fl.
New York, NY 10006

/s/ Stephen Kearny

Evan Bergeron, General Counsel
Matt Bailey, Co-Founder
Stephen Kearny, Co-Founder
Peter Robins-Brown, Legislative Liaison
Fair Districts Louisiana
1700 Josephine Street Ste. 206
New Orleans, LA 70130

/s/ Ashley Shelton

Founder, President & C.E.O.
The Power Coalition for Equity & Justice
4930 Washington Ave.
New Orleans, LA 70125

/s/ Alora Thomas

Alora Thomas, Senior Staff Attorney
Sarah Brannon, Managing Attorney
Samantha Osaki, EJW Fellow
Voting Rights Project
American Civil Liberties Union
125 Broad St.
New York, NY 10004

/s/ Chris Lamar

Mark Gaber, Director, Redistricting
Chris Lamar, Senior Legal Counsel, Redistricting
Valencia Richardson, Legal Fellow, Voting
Rights and Redistricting
Campaign Legal Center
1101 14th Street NW, Suite 400
Washington, DC 20005

/s/ Melissa Flournoy

Melissa Flournoy, Board Chair
Peter Robins-Brown, Policy & Advocacy Director
Louisiana Progress
650 N. 6th St.
Baton Rouge, LA 70802

/s/ Alanah Odoms

Alanah Odoms, Executive Director
Chris Kaiser, Advocacy Director
Nora Ahmed, Legal Director
A’Niya Robinson, Advocacy Strategist
ACLU of Louisiana
PO Box 56157
New Orleans, LA 70156

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 political participation, education, economic justice, and criminal justice. Throughout its history, LDF has worked to enforce and promote laws and policies that increase access to the electoral process and prohibit voter discrimination, intimidation, and suppression. LDF has been fully separate from the National Association for the Advancement of Colored People (“NAACP”) since 1957, though LDF was originally founded by the NAACP and shares its commitment to equal rights.

ACLU of Louisiana

Since 1956, 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. We are part of a nationwide network of affiliates that fights tirelessly in all 50 states, Puerto Rico, and Washington, D.C.

Louisiana Progress

Louisiana Progress is an advocacy organization that focuses on policy at the state and local level. We work with grassroots organizations to identify problems that face communities across Louisiana, particularly low- and moderate-income communities, and develop and advocate for policy solutions that address those problems.

The 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.

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.

Voting Rights Project of the ACLU

Established in 1965, the ACLU Voting Rights Project has worked to protect the gains in political participation won by racial and language minorities since passage of the 1965 Voting Rights Act (VRA). And since its inception, the Voting Rights Project has litigated over 300 voting rights cases, and has aggressively and successfully challenged efforts that dilute minority voting strength or obstruct the ability of minority communities to elect candidates of their choice.