

Respectfully submitted by:

Ron Ceasar 8/16/2012

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MEMORANDUM IN SUPPORT

Relief Requested and Applicable Standard

This honorable court should immediately issue a preliminary injunction staying the November 6, 2012 election of congressmen in the 3rd, 4th, and 5th Congressional Districts until after this honorable court rules upon Petitioner's challenge to the present congressional districts lines drawn up by the Louisiana State Legislature and approved by Governor "Bobby" Jindal. Demographer and State Legislature knew or should have known that such actions clearly violates the voting rights of minorities.

To grant a preliminary injunction, this honorable court examines four factors: (1) whether there is a substantial likelihood that plaintiff will prevail on the merits; (2) whether the plaintiff and the good citizens of St. Landry Parish of Louisiana will suffer irreparable injury if the injunction is not granted; (3) whether no third parties will be unjustifiably harmed if the injunction is granted; and (4) whether the public interest will be served by the injunction.

II. Petitioner is likely to succeed on the merits of his challenge petition.

Petitioner has no adequate remedies to redress the harm he will suffer as a voter in St. Landry Parish if the present congressional lines in the named congressional districts stands for the November 6, 2012 election.

III. No third parties will be unjustifiably harmed if the injunction is granted and the public interest will be served.

No one will be injured if this honorable court allows Petitioner to challenge his district reapportionment from the old 7th Congressional District, because Petitioner is fully complying with procedures allowed by federal law, when a discovery is of grave importance to the public interest regarding the protection of minorities voting rights cited in the 1965 Voting Rights Act, Section 7 and as amended. It protects these sacred rights of minorities, especially Blacks who have suffered a history of racial discrimination when it comes to voting rights allowed by the United States Constitution for all citizens. Until 1965, Black citizens suffered irreparable harm in huge magnitudes due to racial intolerances in the South. The United States local justice department erred in approving a flawed 5th district.

IV. Conclusion

A preliminary injunction should issue because:

- (1) Petitioner is likely to succeed on the merits of his challenge petition
- (2) An injunction is necessary to provide Petitioner a meaningful opportunity to challenge his reapportioned congressional district which dilutes the Black vote. St. Landry Parish was carved up like a Thanksgiving Turkey and divided into 3 districts unlike any other in the state of Louisiana, simply to protect incumbent

congressmen and to the detriment of the citizens of St. Landry Parish due to racial gerrymandering implemented by the Louisiana Legislature of predominately white Republicans with little or no interests in protecting the voting rights of minorities in a protected class by federal law. The governor of Louisiana, personally got involved in the reapportionment of these congressional districts due to conflict of interest for electing and reelecting white republicans to office.

- (3) The governor broke his own promise not to get involved in reapportionment plans for Louisiana. The governor once purposely did not shake the hands of State Chairman (Reapportionment Committee) Richard Gallot (D) of Grambling, Louisiana who wanted to get input from the good citizens of the (in a legislative session) concerned districts. Jindal gave him the “dirty south” treatment toward Black men (open disrespect and ignore as a man}. King Jindal, as he is known in the Black Community, wishes to dictate the congressional lines and retaliates against those who disagrees with him. Jindal has a history of bullying women, who are minorities also in his administration and either fires dissenters or excludes them from further involvement in his decision-making processes.


Blacks have regressed under this governor more than at any time in the history of Louisiana in the form of education and healthcare concerns.

Therefore, the reapportionment process was tainted by a dictatorial governor who clearly does not give a dam about Black folks and their voting rights protected by the 1965 Voting Rights Act.

Petitioner and the good citizens of St. Landry Parish, Louisiana will suffer irreparable harm if the present congressional lines stand due to dilution of the Black vote, uncommon interests with the north, and violations of the 1965 Voting Rights Acts, Section 7.

4) Granting Petitioner injunctive relief is the appropriate way to serve the public interest in this matter.

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