

# **Exhibit II**

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF LOUISIANA—MONROE DIVISION**

PHILLIP CALLAIS, LLOYD PRICE, )  
 BRUCE ODELL, ELIZABETH ERSOFF, )  
 ALBERT CAISSIE, DANIEL WEIR, )  
 JOYCE LACOUR, CANDY CARROLL )  
 PEAVY, TANYA WHITNEY, MIKE )  
 JOHNSON, GROVER JOSEPH REES, )  
 ROLFE MCCOLLISTER, )

Plaintiffs, )

v. )

Case No. 3:24-cv-00122

NANCY LANDRY, IN HER OFFICIAL )  
 CAPACITY AS LOUISIANA )  
 SECRETARY OF STATE, )

Defendant. )

**DECLARATION OF JOYCE LACOUR IN SUPPORT OF PLAINTIFFS'  
MOTION FOR PRELIMINARY INJUNCTION**

My name is Joyce LaCour and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I declare the following:

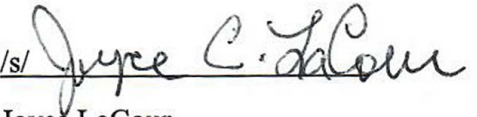
1. I am a non-African American voter who resides in Gonzales, Louisiana and Ascension Parish.
2. I resided at the same address before SB8 was enacted.
3. Prior to the enactment of SB8, my address was in congressional District 6.
4. SB8 now places my address in District 2.
5. I am registered to vote in the State of Louisiana based upon my current residency and have been registered to vote at this address since at least the time of the congressional elections of 2020 and 2022.
6. I plan to vote in the 2024 congressional election.

7. I have been injured by being placed in District 2 under SB8 predominantly based on race.
8. My personal dignity, and the personal dignity of my neighbors in my new District and my adjoining District(s), have been injured as a result of SB8, in that SB8 racially stigmatizes us, racially stereotypes us, and racially maligns us as citizens who will supposedly make vital decisions as voters based on our race, even though our race is an unchangeable physical characteristic that does not compel our beliefs, our character, our judgments, or our votes.
9. I have also suffered from the State's discrimination against me based on race in SB8.
10. These personal injuries to me, and my neighbors, arising from the classification of voters by race shall continue if SB8 is allowed to be implemented for the 2024 congressional election cycle.
11. My injury would be redressed if the Court adopted a remedial map that complied with traditional redistricting criteria.
12. These personal injuries to me, and my neighbors, arising from the classification of voters by race would be eliminated, remedied, and redressed if the Court:
  - a. declares SB8 null and void as violative of the Fourteenth and Fifteenth Amendments of the U.S. Constitution, and
  - b. adopts a replacement districting plan that complies with our constitutional one-person, one vote requirements, and traditional redistricting criteria, without allowing racial identity of voters to predominate in the configuration of each District.
13. I believe it is imperative that this Court promptly establish a replacement congressional districting plan for the upcoming 2024 election cycle, so that:

- a. I and the other voters of Louisiana have the opportunity to determine the effective boundaries of all the new Districts;
- b. all the possible congressional candidates have the opportunity to determine the boundaries of all the new Districts and to qualify as candidates;
- c. I and the other voters of Louisiana have a reasonable time period to evaluate electoral choices; and
- d. I and the other voters of Louisiana have the time to cast informed votes.

I declare under penalty of perjury that the foregoing is true and correct.

Date: February 5, 2024

/s/   
Joyce LaCour