

NINETEENTH JUDICIAL DISTRICT COURT  
PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

No. 716837

SECTION 25

DIVISION

NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE  
("NAACP") LOUISIANA STATE CONFERENCE, POWER COALITION FOR EQUITY  
AND JUSTICE, DOROTHY NAIRNE, EDWIN RENE SOULE, ALICE WASHINGTON,  
AND CLEE EARNEST LOWE

VERSUS

KYLE ARDOIN, in his official capacity as Secretary of State for Louisiana

FILED: \_\_\_\_\_

\_\_\_\_\_  
DEPUTY CLERK

AFFIDAVIT

STATE OF LOUISIANA

PARISH OF \_\_\_\_\_

BEFORE ME, the undersigned Notary, personally came and appeared:

ASHLEY SHELTON

1. I am 45 years old and competent to make this declaration.
2. I am a U.S. citizen.
3. I am a lawfully registered voter. I am registered in Congressional District  
(“CD”) 6.
4. I have voted in Louisiana since I turned 18 years old and have never lost my

right to vote by reason of a felony conviction or court order.

5. I am a resident of Baton Rouge, Louisiana, where I have lived my whole life. I serve as the President and CEO of the Power Coalition for Equity and Justice ("PCEJ"). I am also a member of several boards, including Center for Planning Excellence, Southern Mutual Help Association, and Voice of the Experienced.

6. PCEJ is a nonpartisan, nonprofit statewide civic engagement table in Louisiana that works to build grassroots power, advocate for community-centered policies, and increase voter participation.

7. PCEJ's mission is to support community-driven activism and grassroots leadership development to empower citizens to address classism, racism, and other marginalization in their own lives and communities. PCEJ advances its mission with the support of a small full- and part-time staff, community volunteers, and a membership of nonprofit and advocacy organizations united around an integrated civic engagement strategy to educate and empower voters across Louisiana.

8. I reside in Congressional District ("CD") 6. PCEJ's member organizations have members who live in some of the overpopulated congressional districts.

9. In 2019, PCEJ staff, volunteers, and member organizations engaged with 465,406 infrequent and semi-frequent voters of color through hundreds of thousands of doors knocked, phone calls, and text messages, totaling over 1.2 million contact attempts in an effort to support civic participation. In 2020, PCEJ's efforts, including over 2.7 million contact attempts to infrequent and semi-frequent voters of color, helped contribute to the highest early voter turnout in Louisiana history. PCEJ continued this work in 2021, activating participation in local elections through outreach and registration drives. In

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recent election cycles, PCEJ also provided rides to the polls and rapid response voter support during early voting and election days.

10. PCEJ relies heavily on volunteers for our voter advocacy and Election Day efforts. We have recently been forced to divert volunteer recruitment from our own "Get Out the Vote" ("GOTV"), rides to the polls, and election monitoring efforts to instead steer potential volunteers to advocacy efforts related to the redistricting roadshows, special session, and veto campaigns.

11. PCEJ hosted over five trainings on the redistricting process before the roadshow began. PCEJ hosted nine trainings during the redistricting roadshow. In addition, PCEJ organized approximately 250 Louisiana voters to travel to Baton Rouge and make public comments during the redistricting special session. The resounding theme of the testimony was the need for fair and equitable maps and a second majority-Black district.

12. On behalf of Power Coalition, I attended the roadshow in Baton Rouge and the majority of the special session hearings. Members of PCEJ staff were present at every roadshow hearing and throughout the special session.

13. PCEJ submitted three letters to the Legislature and one to the Governor during the redistricting process. One of these letters, submitted in October 2021, included seven different maps that would have complied with Constitutional apportionment requirements, as well as the Voting Rights Act. Similar maps were introduced as legislation and amendments during the redistricting special session. None, however, made it out of committee.

14. After Louisiana failed to pass any maps that increased representation for

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Black voters and Power Coalition's broad and diverse constituencies, we launched campaigns to demand the Governor veto the maps. These efforts have coincided with the timing of the recent municipal elections in the majority of parishes statewide. As a result, this has required that PCEJ divert staff time and resources from our routine voter mobilization efforts to advocate for fair and equal districts.

15. I have long referred to a map that includes a second majority-Black district as the "North Star" of PCEJ's work. However, due to the Legislature's failure to pass a map that complies with the Voting Rights Act and provides an equal opportunity for Black voters to elect the candidates of their choice, our members and constituencies are left without a map that achieves even the basic requirements of equal population.

16. Because the Legislature has not enacted a new congressional map, PCEJ will be forced to divert resources from its broader voter registration and community engagement initiatives to educate and advocate for member organizations and voters in overpopulated districts. As the 2022 congressional election approaches without a new congressional map in place, PCEJ will need to delay its broader voter education initiatives to combat the detrimental effects of vote dilution. PCEJ will be forced to divert resources from statewide voter education work to target voters in overpopulated districts by increasing education and engagement initiatives in those specific districts to ensure that voters in these districts have equal access to their candidates.

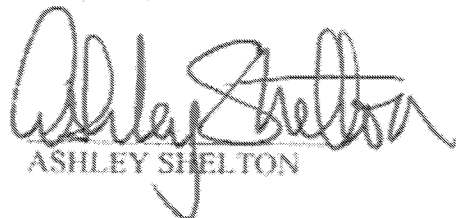
17. We are presently monitoring the current legislative session, organizing members and volunteers to actively participate in the democratic process. Due to the Legislature's failure to pass a new map, we are forced to divert resources from our usual legislative session work, which may involve advocating for equitable policies for all

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Louisianans, to address the impacts of vote dilution on voters living in overpopulated districts and to ensure our community can have a voice in their representation.

18. One example is that we regularly conduct voter education and engagement trainings, including GOTV trainings. With the congressional elections approaching, we typically would conduct these trainings during the summer and fall. But because the old, outdated congressional map is still in effect, these trainings may now be delayed because staff members and member organizations that would typically be involved with these initiatives will need to shift focus to helping, educating, and advocating for voters in overpopulated districts.

19. I have serious doubt that the Legislature will pass a new congressional map that the Governor will sign, based on my experience engaging with members of the Legislature. During the current legislative session, the Chairman of the House and Governmental Affairs Committee re-introduced a bill containing the same map as the one that Governor Edwards has already vetoed. Based both on my experience participating in the roadshows and special sessions and on the public reluctance of legislators to come to an agreement, it is highly unlikely the Legislature will pass a new map that the Governor will not veto.

  
ASHLEY SHELTON

Sworn to and subscribed before me  
This 18<sup>th</sup> day of March, 2022

  
NOTARY PUBLIC

Print Name: Jessica A. Guinn

Notary Number: LA Bar #31181

My commission expires at death.

Sworn to and subscribed before me  
This 15<sup>th</sup> day of March, 2022.

Russell Brooks  
WITNESS 1

Print Name: Russell Brooks

Sworn to and subscribed before me  
This 15<sup>th</sup> day of March, 2022.

Angela Brooks  
WITNESS 2

Print Name: Angela Brooks