

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 RENÉ SOULÉ, ALICE WASHINGTON,
AND CLEE EARNEST LOWE

VERSUS

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

FILED: _____
DEPUTY CLERK

AFFIDAVIT OF DOROTHY NAIRNE

NOW appears Dr. Dorothy Nairne who attests to the following based upon Dr. Dorothy Nairne's personal knowledge, information and beliefs:

1. My name is Dorothy Nairne. I am over 18 years of age and have personal knowledge of the statements made in this affidavit and each is true and correct.
2. I am African American and a U.S. citizen.
3. I am a resident of the State of Louisiana, and I currently reside in Assumption Parish. My address is 3651 Highway 1 Napoleonville, Louisiana 70390.
4. I am lawfully registered to vote in Congressional District ("CD") 6.
5. I am a regular voter who votes in federal, state, and local elections. Most recently, I voted in the 2020 General Election. I intend to vote in future elections, including the upcoming 2022 congressional elections. I have donated to Congressional candidates and I have contacted my Representative on issues I care deeply about. As a small business owner, I have met with members of my Congressman's Economic Development team for business planning purposes.
6. I am very active in my community. I have attended rallies and town halls, particularly around environmental justice, because advocating for the health of my community is highly important to me. In advance of the 2020 decennial census, I served as a Captain for my community through Together Louisiana. In that capacity, I knocked on doors throughout Napoleonville to encourage my neighbors to fill out their census forms and vote in the 2020 General Election.

7. I have followed this redistricting cycle since the 2020 decennial census results were released. I have been following this redistricting cycle by attending webinars on redistricting hosted by the Urban League of Louisiana and the NAACP, as well as by watching the news and reading about the legislative session. Because I have been following these updates, I am aware that the total population in my district, CD 6, has increased based on the 2020 census data. As a result of the Legislature's failure to adopt a new congressional map, I understand that CD 6 is overpopulated and contains more people relative to the other congressional districts.
8. I feel angry, paralyzed, and at times helpless knowing that my vote is not counted equally to others'. I will suffer harm if the current map remains in place for future elections because it will dilute the strength of my vote and my ability to advocate for the things I care deeply about, such as environmental, socioeconomic, and racial justice. Through my advocacy work that under the current map, I am aware that I would not get equal access to my Congressional representative when compared to voters in other districts. I am also keenly aware that if the current map remains in place, I will have to work harder to get the attention of my Congressperson compared to voters in other districts. This is not fair, and at times it feels debilitating.
9. Another problem created by Louisiana not creating a new plan for our congressional districts is that I still do not know which district I will reside in when a new plan is eventually passed. The 2022 election is approaching, and I would like to learn about the candidates I will be choosing from and what their positions are so I can make educated choices as a voter. I would like to be able to associate with other voters who would support the same candidates as I do, and who would advocate around similar issues as I would. But because I do not know what district I will reside in, I am unable to advocate for the people and causes I care about. I am worried that not knowing who our representative is will bring down the morale of my community and make it even more difficult to advocate for policies that materially improve my community's health and well-being.

10. I am a person of action. I want to make sure my choices are meaningful and propel my community forward. As an African American whose family fought for the right to vote, the efficacy of my vote deeply matters to me. My parents faced every hurdle imaginable to make sure their voices were heard and to carve out a better life for their children. I am committed to doing the same for the next generation. I want to see my community rise and the only way it can is if our voices are heard.


11. I declare under penalty of perjury under the laws of Louisiana that the foregoing is true and correct to the best of my knowledge.

Signed on this 18th day of March, 2022.


Dr. Dorothy Njirne

Sworn to and subscribed before me

This 18th day of March, 2022.


WITNESS 1

Print Name: Leonard Guillory

Sworn to and subscribed before me

This 18th day of March, 2022.


NOTARY PUBLIC

Print Name: Jacqueline C. Eschete
Notary No.: 68606

Sworn to and subscribed before me

This 18 day of March, 2022.


WITNESS 2

Print Name: Thester D. Davis