

NINETEENTH JUDICIAL DISTRICT COURT  
PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

No. 71683 7

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

**DECLARATION OF MICHAEL W. MCCLANAHAN**

1. My name is Michael W. McClanahan and I am the President of the National Association for the Advancement of Colored People Louisiana State Conference ("Louisiana NAACP"). The Louisiana NAACP is a Plaintiff in this case.

2. The Louisiana NAACP was chartered in 1943. I have served as President of the Louisiana NAACP since 2017 and am currently in my third term. We are a nonprofit and

nonpartisan organization and a State Conference of the National Association for the Advancement of Colored People. The Louisiana NAACP's work is devoted to pursuing the social, political, economic, and educational equity of Black people in this state and nation. Our mission includes eliminating racial discrimination and uplifting the protection of voting rights and fair political participation. As a nonprofit, the Louisiana NAACP depends entirely on the work of volunteers, supported by membership fees and private donors.

3. The Louisiana NAACP's work in support of voting rights includes multiple statewide initiatives. Our voter engagement work during recent elections has included "get out the vote" campaigns; widespread voter registration efforts; voter engagement and education via social media; Relational Voting and the Hustle Initiative, which are voter engagement, registration, and information programs which have engaged over 100,000 Louisiana voters; and a "Souls to the Polls" program that engaged tens of thousands of Louisiana voters during the last presidential election.

4. The Louisiana NAACP has approximately 5,000 members throughout Louisiana, including Black Louisianans who are registered voters. The Louisiana NAACP has over 40 branches comprising adult members and 16 youth and college chapters across the state. Members live and are registered voters in nearly every parish in Louisiana, including in Congressional Districts 1, 3, and 6 as drawn in 2011.

5. In particular, the Louisiana NAACP has active chapters in all three districts, including: St. Bernard (Congressional District 1); Lafayette (Congressional District 3); and Baton Rouge (Congressional District 6). If elections proceed without new congressional maps being adopted, our members in these parishes will be forced to vote in malapportioned districts that dilute their votes.

6. The Louisiana NAACP's involvement in the redistricting process has been a multi-year effort. During the 2020 Census cycle the NAACP was engaged in encouraging membership to complete the Census, knowing the Census count would directly impact the apportionment of districts.

7. The NAACP has been deeply involved in the formal legislative redistricting process. On behalf of the NAACP, I was personally in attendance at multiple committee hearings throughout the redistricting roadshow and special session. Additional members of the NAACP made their voices heard by testifying at the roadshow hearings, testifying during the redistricting session, and urging the Governor to veto the maps passed by the legislature.

8. The NAACP signed onto multiple letters throughout the redistricting process on October 18, 2021, December 14, 2021, February 4, 2022, and February 18, 2022, and submitted maps along with the first letter on October 18.

9. After the Legislature passed maps that did not increase representation for Black voters in Louisiana, including NAACP members, our organization launched several coordinated campaigns to demand the Governor veto the map. We hosted a press conference and rally at the Governor's mansion on February 23, 2022.

10. We have now shifted our efforts to ensuring that the Governor's veto is sustained. While we are adamant in our insistence that the Louisiana Legislature should do the right thing and draw a new Congressional map with two majority-Black districts, we have been provided no signs from the legislators the Louisiana NAACP has engaged with that give me confidence that this will occur.

11. The legislature will not pass a map that the Governor will sign. The Chairwoman of the Senate and Governmental Affairs committee, Sharon Hewitt, has said publicly that she

believes the maps that the legislature passed during the redistricting session were legal and, based on my experience engaging with Senator Hewitt, I believe it is highly unlikely that she will allow a map that the Governor will sign pass out of her committee. Other legislative leaders have also alluded to the fact that the body will not pass a map that the Governor will sign.

12. Failure to implement a new map will result in delayed education and outreach efforts necessary to combat the effects of vote dilution in these overpopulated districts. Not knowing which candidates will run in these districts makes it even more difficult to engage voters. Allowing the old, malapportioned map to stay in place would impede the Louisiana NAACP's mission to achieve equitable political representation. The Louisiana NAACP will be forced to divert resources from its broader voter registration and community empowerment initiatives to ensure that its constituents and members in the affected districts are able to engage with the political process on equal footing with those in other districts. In particular, the Louisiana NAACP will need to devote more of its own resources to engage with representatives who voters in overpopulated districts have impaired access to.

13. Furthermore, the Louisiana NAACP has been and will continue to be required to divert resources from our regular get-out-the-vote and election education work to advocate against the Legislature's efforts to enact a Congressional map that violates Section 2 of the Voting Rights Act.


14. Political participation is a foundation of the Louisiana NAACP's mission. Despite the significant efforts and resources that we have devoted to advocating for a representative congressional map, the Louisiana legislature failed to pass a map that complied with federal law and provided Black voters an equal opportunity to participate in the political process and elect their candidate of choice in two districts. Now, without equally apportioned

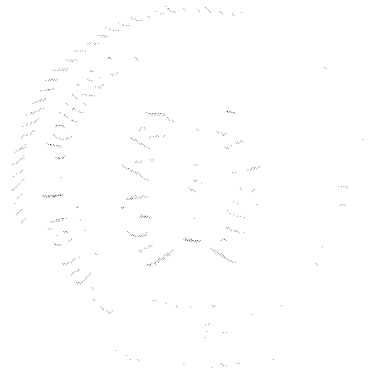
maps, the NAACP will have to amplify our efforts to convince voters that their vote matters.

15. I declare that the foregoing is true and correct to the best of my knowledge.

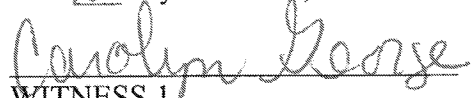
  
MICHAEL MCCLANAHAN

Sworn to and subscribed before me  
This 18 day of March, 2022

  
NOTARY PUBLIC #07290  
Print Name: Ernest Johnson  
Notary Number:



Sworn to and subscribed before me  
This 18 day of March, 2022.

  
WITNESS 1

Print Name: Carolyn George

Sworn to and subscribed before me  
This 18 day of March, 2022.

  
WITNESS 2

Print Name: Arthur L. Thomas