

# **Exhibit 3**



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# Transcript of Michael McClanahan, Designated Representative

**Date:** September 8, 2023

**Case:** Nairne, et al. -v- Ardoin

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IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF LOUISIANA

DR. DOROTHY NAIRNE, : CIVIL ACTION NO.:  
et al., : 3:22-cv-00178-SDD-SDJ  
Plaintiffs, :  
v. : Chief Judge  
R. KYLE ARDOIN, in his : Shelly D. Dick  
official capacity as : Magistrate Judge  
Secretary of State of : Scott D. Johnson  
Louisiana, :  
Defendant. :

-----x

30 (b) (6) DEPOSITION  
OF LOUISIANA STATE CONFERENCE OF THE NAACP  
through their representative  
MICHAEL McCLANAHAN  
CONDUCTED VIRTUALLY  
FRIDAY, SEPTEMBER 8, 2023  
10:04 a.m. EST

Job No.: 506194

Pages 1 - 137

Reported by: APRIL REID

Transcript of Michael McClanahan, Designated Representative  
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1 Deposition of MICHAEL McCLANAHAN, held  
2 virtually. All appeared remotely.

3  
4 A P P E A R A N C E S

5  
6 ON BEHALF OF THE NAACP LEGAL DEFENSE AND  
7 EDUCATIONAL FUND, INC.:

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Transcript of Michael McClanahan, Designated Representative  
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1 A P P E A R A N C E S cont'd

2

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Transcript of Michael McClanahan, Designated Representative  
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1 A P P E A R A N C E S cont'd

2

3 ALSO PRESENT:

4

5 AMANDA LAGROUE,  
6 Louisiana Attorney General's Office

7

8 ROB CLARK, ESQ.

9 AMANDA GIGLIO, ESQ.

10 DAKOTA KNEHANS, ESQ.

11 Cozen O'Connor - observing only

12

13 ALORA THOMAS-LUNDBORG, ESQ.

14 ACLU

15

16 JACK ADCOCK

17

18 JACKSON SCHUELER,

19 Remote Technician

20

21

22

23

24

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1 state president, you're expected to follow the  
2 constitution and by-laws?

3 A. Yes.

4 MS. ROHANI: Objection.

5 Q. What is the -- now, you said "branches."  
6 Is there a difference between branches and units?

7 A. In my mind, no.

8 Q. Okay. Why -- why do you say in your  
9 mind?

10 A. Because -- you know, because we use  
11 those terms here in Louisiana interchangeable, you  
12 know, unit, branches.

13 Q. Okay. Great.

14 Do all branches or units have to report  
15 to the State Conference?

16 A. All do. In the State of Louisiana, they  
17 do.

18 Q. Okay. How many adult branches does the  
19 Louisiana State Conference have?

20 A. About -- about 40. About 40 or so, I  
21 would imagine.

22 Q. And is that the same number for units?

23 A. Yes.

24 Q. Okay. Great.

25 And what -- what do the branches or

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1 units have to do to stay in good standing with the  
2 State Conference?

3 A. They have to maintain a membership --  
4 registered membership of at least 50 members.  
5 They have to file an annual financial report, pay  
6 the national assessment, and pay the state  
7 assessment.

8 Q. And who monitors whether branches meet  
9 those requirements?

10 A. Well, the national office has -- has an  
11 office that assigns it. If they fall below it,  
12 then they're -- if they file below 50 members,  
13 then they're deemed to be out of compliance first.  
14 But if they don't file the AFR or pay the  
15 assessment, then they're out of compliance that  
16 way, too.

17 Q. Now, the -- you mentioned the annual  
18 financial reports. Who are those sent to?

19 A. They're sent to the financial department  
20 for the international office.

21 Q. Does the State Conference have a  
22 physical office?

23 A. Yes.

24 Q. And where is that office?

25 A. We -- we recently moved this year to



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1 7600 Airline Highway.

2 Q. And do you report to that office?

3 A. Yes, I do.

4 Q. Do you go there daily?

5 A. It all depends, you know, because it's  
6 not a paid position, so...

7 Q. Right.

8 A. You know. As the need arises, I -- I  
9 will stop by.

10 Q. Okay. Does the State Conference have  
11 any paid employees?

12 A. No, we don't.

13 Q. And how is the State Conference funded?

14 A. It's funded by -- we have a -- we have a  
15 convention and a Freedom Fund banquet. We -- by  
16 that way. Or if we have -- host any type of  
17 events, like a prayer breakfast, we receive funds  
18 that way.

19 Q. You mentioned the convention. Who can  
20 attend the convention?

21 A. Anyone. It's open and free to the  
22 public.

23 Q. And are you having the convention this  
24 year?

25 A. Yes.

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1                   And we would like to have all of you  
2                   come attend. Go to our website and register and  
3                   come down and look at what we're doing and have a  
4                   great time.

5                   Q.     Well, where is it at? Let me ask you  
6                   that.

7                   A.     I'm glad you asked. I like you.

8                   It's going to be dinner at Paragon  
9                   Casino. And we're going to have a great time.  
10                  It's a three-day event, Thursday, Friday, and  
11                  Saturday. And you're welcome to -- we have  
12                  trainings for all kinds of activities. And you  
13                  will love it.

14                  (Alora Thomas-Lundborg, Esq. entered the  
15                  virtual deposition room.)

16                  Q.     Thank you very much.

17                  All right. So getting back to the  
18                  organization, does the State Conference have a  
19                  board of directors?

20                  A.     No.

21                  Q.     Does the State Conference have an  
22                  executive committee?

23                  A.     Yes.

24                  Q.     And what is the role of the Executive  
25                  Committee?

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1           A.    Executive Committee is really the -- the  
2    brain trust of the State Conference.  They -- the  
3    Executive Committee acts as, lack of a better  
4    term, the board.  But there's only one board in  
5    the NAACP, which is the national board, which I  
6    serve on also.  So the committee sets the tone for  
7    anything; the new business, the old business,  
8    anything that we do.

9           Q.    And who is on the Executive Committee  
10   for the State Conference?

11          A.    All of the officers.  You know, all of  
12   the officers.  That means vice presidents,  
13   secretary, the treasurer, they make up -- and the  
14   committee chairs make up the Executive Committee.

15          Q.    Does someone have to be a member of the  
16   NAACP to be on the Executive Committee?

17          A.    Yes.

18          Q.    Does the State Conference have any other  
19   officers?

20                I believe you mentioned VP, president,  
21   but are there -- are there other officers?

22          A.    Not at the State Conference.  There are  
23   no officers other than those, that I'm aware of.

24          Q.    Now, I believe you mentioned district  
25   vice presidents.  Do you know how many the

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1 Louisiana State Conference has?

2 A. I want to say eight. I want to say  
3 eight.

4 Q. And does someone have to be a member of  
5 the NAACP to be a district vice president?

6 A. Yes.

7 Q. Does that person have to live in a  
8 particular place?

9 A. Has to live in that particular district  
10 that that position comes from.

11 Q. Okay. And the -- I'm going to call it  
12 the jurisdiction of the VPs, because that's the  
13 way that I think about it, but please correct me  
14 if you'd like to call it something different.

15 Does the jurisdiction of the VPs cover  
16 multiple parishes?

17 A. Yes.

18 Q. So is it fair to say that a district VP  
19 needs to live in one of the parishes in their  
20 jurisdiction?

21 A. Right.

22 Q. And, Mr. McClanahan, I believe you  
23 mentioned that the State Conference has a website.

24 A. Yes.

25 Q. And that website is publicly available?

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1 Q. Sure.

2 So my understanding of the Louisiana  
3 NAACP's position is that its members' identities  
4 are protected by First Amendment associational  
5 standing or First Amendment -- First Amendment  
6 privilege. I -- excuse me.

7 MS. ROHANI: Objection. This calls for  
8 legal conclusion.

9 MS. HOLT: Okay. I'm going to move --  
10 move on from that.

11 Q. What are the qualifications for  
12 membership in the NAACP?

13 A. Membership, all I know -- all I'm  
14 familiar with is you have to pay your membership  
15 dues, for lack of a better term, and you can  
16 become a member of the NAACP.

17 MS. HOLT: And we can take down that  
18 Exhibit 2. Thank you.

19 Q. Is there a minimum age for someone to  
20 become a member?

21 A. No. You can be a baby.

22 Q. Do you have to be a certain race?

23 A. No. You could be -- we're all  
24 inclusive.

25 Q. That includes nationality as well?

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1 A. We are all inclusive.

2 Q. Do you have to be a registered voter?

3 A. Not to my knowledge, it's not -- not --  
4 it's not a requirement.

5 Q. Once an adult becomes a member, what  
6 does he or she have to do to remain in good  
7 standing?

8 A. We would like to hope that you keep your  
9 membership dues paid up. As long as your  
10 membership dues is paid up, then you're good.

11 Q. And how does someone become a member of  
12 the State Conference?

13 A. Well, they don't become members of the  
14 State Conference, per se. Not individually. They  
15 just have to become a member of the branch.

16 Q. Okay.

17 A. The branch is a member of the State  
18 Conference.

19 Q. Great.

20 So if someone becomes a member of a  
21 particular branch in Louisiana, is it fair to say  
22 they're automatically a member of the State  
23 Conference?

24 (Jack Adcock entered the virtual  
25 deposition room.)

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1           A.    Per se. Per se. But the branch has to  
2   be in good standing. So if not, then they're not  
3   in -- then the branch is not really technically a  
4   member unless it stays in good standing.

5           Q.    How does the State Conference monitor  
6   whether a branch is in good standing?

7           A.    Goes back to what I said earlier, the  
8   national office keeps track and lets us know who's  
9   in compliance and who's not.

10          Q.    Are there any branches in Louisiana  
11   currently that are not in good standing?

12          A.    I haven't checked recently because, you  
13   know, my staff -- I mean, the secretaries and  
14   those persons keep -- kind of keep that stuff up.  
15   But as it gets closer to our state convention,  
16   they'll let me know.

17          Q.    Do you recall during last year's state  
18   convention if there were any branches that weren't  
19   in good standing?

20          A.    You're asking a 58-year-old some  
21   questions that I -- I -- just -- I don't know the  
22   number, if you're asking for a number. I wouldn't  
23   know a number.

24          Q.    Well, I don't need a number, per se, but  
25   what's -- do you recall there being at least one

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1 branch not in good standing?

2 A. At least one branch not in good  
3 standing.

4 Q. Do you remember what that branch was?

5 A. I don't. Because I'm trying to get them  
6 all to be in good standing, so...

7 Q. That's fair.

8 So what does the State Conference do to  
9 make sure its members and the members of the  
10 branches, by explanation, are in good standing?

11 A. Repeat that.

12 Q. Sure.

13 So let -- let me rephrase that. You  
14 said that members pay dues; right?

15 A. Right.

16 Q. If you can audibly say that for the  
17 record, that would be great.

18 A. Right. Right. Right.

19 Q. And they need to pay dues to continue to  
20 be in good standing, I believe is what you --

21 A. Right.

22 Q. How does the State Conference track  
23 whether or not a member has paid their dues?

24 A. The national office does that because  
25 all membership fees, dues, goes to the national



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1 office.

2 Q. Does the national office send you  
3 reports on which members have and haven't paid  
4 their dues?

5 A. It would probably go to the branch as  
6 opposed to coming to me. Branches look after the  
7 members, and I look after the branches.

8 Q. And how often does the national office  
9 send reports?

10 A. I don't know. I don't know if they send  
11 them monthly, quarterly, I don't know that, but  
12 they send them. They send them periodically, I  
13 know that.

14 Q. And what happens when a nonpaying member  
15 is identified?

16 A. Well, if he's a nonpaying member -- what  
17 you mean by "nonpaying member"?

18 Q. Well, to pay his dues.

19 A. Okay. If he failed to pay his dues,  
20 then I would imagine -- I would imagine the branch  
21 would get some type of notification. I  
22 wouldn't -- I don't really look at memberships.  
23 Those things go to the branches. I deal with the  
24 branches.

25 Q. And do you know who in the branches

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1 that recorded?

2 A. It's not recorded, per se. Only when we  
3 have -- only when the branch has memorial services  
4 and they would notify -- identify that that member  
5 has more or less transitioned to -- to be with the  
6 Lord. But outside of that, I don't think there's  
7 nothing that is recorded officially. I'm not  
8 familiar with it, if it is.

9 Q. Does the State Conference know when a  
10 member has passed away?

11 A. Not all. Not all persons that pass away  
12 I would get a notice of, you know. But I pretty  
13 much get notices, you know, regularly, but I may  
14 not get all notices.

15 Q. And what do you do with those notices  
16 when you get them?

17 A. Well, what we do is try to find out --  
18 talk to the family and probably send a -- some  
19 type of flower or some type of plant, or I may  
20 attend the service, the services for the -- for  
21 the fallen soldier, transitioned soldier.

22 Q. And is their name removed from any  
23 membership list?

24 A. It is. I don't know if -- I don't know  
25 where the removing part starts that, but it is.

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1 wouldn't look at names.

2 Q. Do you compile those numbers?

3 A. Depends. Depends if we're getting ready  
4 to go to the national convention or the state  
5 convention.

6 Q. And those numbers they send to you, are  
7 they numbers to be added, numbers to be removed?

8 A. No. They're just numbers.

9 Q. They're just numbers.

10 So what do you do with those numbers?

11 A. Well, if -- if there's a branch -- if  
12 there's a branch, I look at the numbers because  
13 the numbers -- they have to be above 50. So 50 is  
14 their trigger number, that they're in  
15 compliance -- at least in compliance with that  
16 aspect. And so when we preparing for, you know,  
17 the state convention, the national convention,  
18 those numbers -- anything above 50 is a check, a  
19 check mark because they're at least complying in  
20 terms of membership.

21 Q. Okay. So do they just tell you there's  
22 50 or do you personally -- or do they provide a --  
23 a list of the 50 for you to check?

24 A. No, I never receive a list of anything  
25 other than each branch may send me a -- their

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1 number, how many -- how many persons they have on  
2 their roll. And that -- for me, that means that  
3 they're complying in terms of membership. That's  
4 the only thing that that number there means.

5 Q. So just to be clear, you don't -- do you  
6 do anything to verify that number?

7 A. No, I don't do anything to verify that  
8 number.

9 Q. And how many members does the Louisiana  
10 NAACP currently have?

11 A. You say the NAACP -- repeat that  
12 question.

13 Q. The State Conference. Excuse me.

14 A. We don't have members, per se, because  
15 we are the -- we are the -- for lack of a better  
16 term, we're the corporate office for the state --  
17 for the state of Louisiana. So we don't have  
18 members. The members are made up in the branches.

19 Q. Okay. I see.

20 And do you know how many members of the  
21 branches there are in Louisiana?

22 A. So if you're asking how many branches we  
23 have statewide, from all the branches, probably --  
24 the number's in the thousands.

25 Q. And the number of individual NAACP

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1 members in the State of Louisiana, do you know  
2 that number?

3 A. I haven't added the number up, but I  
4 know it's in the thousands because we have --  
5 because, you know, we have large branches and  
6 there are small numbers. So the number, it's  
7 all -- it's probably in the thousands, thousands  
8 of members.

9 Q. And when you say "in the thousands," are  
10 you relying on the representations of the branches  
11 as to their numbers?

12 A. Yes. If -- if a branch tells me that  
13 they have 50 or so -- and also, the national  
14 office tells you. So between those two bodies,  
15 safe to say that we're in the thousands.

16 Q. So just -- just so I'm understanding you  
17 correctly, is it your testimony that the Louisiana  
18 State Conference of the NAACP does not have any  
19 members?

20 A. We have -- our members are branches,  
21 they're not persons.

22 Q. Okay. And the -- and the thousands of  
23 members, are all of those registered to vote, do  
24 you know?

25 A. I don't know.

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1 Q. Okay. So it's not a 501(c)(3)?

2 A. We are a -- we are an association, a  
3 member of the national association, and so our  
4 status is 501(c)(4).

5 Q. Okay.

6 A. Based upon the association, the national  
7 association.

8 Q. Great.

9 And are the branches separate entities  
10 or separate 501(c)(4)s?

11 A. Yes.

12 Q. Okay. And we looked at the Amended  
13 Complaint in this matter.

14 We don't need to pull it back up.

15 But do you remember when this litigation  
16 was first brought?

17 A. In terms of the date and time and that  
18 type of stuff you're asking?

19 Q. Does the spring of 2022 sound right?

20 A. Right. I think you -- I think it  
21 said -- yeah, spring of 2022.

22 Q. Do you have a specific recollection of  
23 any meetings with state branch presidents before  
24 the spring of 2022?

25 A. I meet with -- I meet with the

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1 Q. Thank you.

2 MS. HOLT: And if we can look down on  
3 page 2 to the response. Great.

4 Q. Can you please read that first paragraph  
5 in the response to paragraph (a). I'm sorry.  
6 It's the second paragraph down under Supplemental  
7 Response, starting with -- it starts with the  
8 subsection (a).

9 A. Do I read it silently or out loud?

10 Q. If you can read it out loud for the  
11 record, please.

12 A. "Plaintiff has identified at least one  
13 member who resides in, among others, each of the  
14 following Louisiana senate districts: 2, 5, 7, 8,  
15 10, 14, 15, 17, 19, 31, 36, 38 and 39."

16 Q. Great. Thank you.

17 Is every senate district listed in this  
18 response?

19 MS. ROHANI: Objection, calls for a  
20 legal conclusion.

21 You can answer.

22 A. Now repeat your question again.

23 Q. Sure.

24 How many senate districts does Louisiana  
25 have?

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1 MS. ROHANI: Objection.

2 You can answer.

3 A. I don't know. Off the top of my head, I  
4 don't know. I know --

5 Q. That's totally fine.

6 Do you see the number 1 in this  
7 response?

8 A. I see 1 down by the house districts.

9 Q. Okay.

10 A. But I don't see nothing by the senate.

11 Q. So what I'm getting at is: Can we agree  
12 that there are numbers missing between 1 and 39 in  
13 this response?

14 A. Okay. All right. We can.

15 Q. So what does the Louisiana State  
16 Conference mean when it says it has identified at  
17 least one member?

18 MS. ROHANI: Objection.

19 You can answer.

20 A. Okay. It means that we have at least  
21 one member living in these identified senatorial  
22 districts, 2, 5, 7, 8, 10, 14, 15, 17, 19, 31, 36,  
23 38, and 39.

24 Q. And how do you know that?

25 MS. ROHANI: Objection.



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1       there.

2                   So I'm familiar with having members  
3       in -- at least one member that reside in each one  
4       of these questioned senatorial districts.

5           Q.     Do you know those members' home  
6       addresses?

7                   MS. ROHANI:  Objection, to the extent  
8       that this is protected by attorney-client  
9       privilege.

10                  But you can answer.

11          A.     I've gone to some of their homes.  I  
12       haven't -- probably haven't gone to all of them,  
13       but I've gone to a lot of homes.  And not only  
14       eaten gumbo, but crackers.  I'm telling you.

15                  I was up in Cottonport last night.  
16       That's right outside of Marksville, right.

17                  And I've gone to those places and I've  
18       sat down.

19                  And I've also attended funerals.

20                  But I might not have gone to each home,  
21       but I've gone to enough of them to understand that  
22       we have members that reside there.

23          Q.     So let me -- let me try it this way.  So  
24       do you see how it lists Senate District 2?

25          A.     Yes.

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1 Q. The member identified in that  
2 district -- I'm not asking for their identity, but  
3 do you know their home address?

4 MS. ROHANI: Objection.

5 A. I know they live there, yes.

6 Q. How do you know that?

7 A. Because I've already looked at that  
8 particular area, and I know we have at least one.  
9 I might not know every one at -- at that  
10 particular senatorial dist- -- address, but I know  
11 at least one of the membership that stays in that  
12 area. And I know -- I've been to the homes. I've  
13 been -- most of these homes I've been to.

14 And Louisiana is a welcoming state.  
15 We -- we love to bring you in, watch some LSU,  
16 southern football and eat some barbecue and some  
17 dirty rice and some -- so I've been to many of  
18 those homes. And so I -- I can get to most of  
19 their homes from -- just on memory alone.

20 Q. Okay. Now, Mr. McClanahan, I'm -- I'm  
21 not doubting that you go to certain members'  
22 homes.

23 What I'm getting at is: This response  
24 says that plaintiff has identified at least one  
25 member who resides in Senate District 2. Now, I

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1 want to know how you know that.

2 MS. ROHANI: Objection.

3 You can answer.

4 A. Okay. So as I alluded to earlier, the  
5 senate districts are a whole lot larger than the  
6 house representative districts, right. So I do  
7 know, based upon looking -- and looking at the  
8 maps that have the parishes -- Louisiana has  
9 parishes, not counties. So looking at the  
10 parishes, cross-referencing them with our  
11 branches, where our branch is located, it's easy.  
12 I know that easily, that we have branches in and  
13 the members that make up the branches in these  
14 particular senatorial districts.

15 Q. Does "member" mean member in good  
16 standing?

17 MS. ROHANI: Objection.

18 A. Either you're a member or you're not.  
19 Either you're a member -- paid dues member or  
20 you're not. I don't know if there's a quasi -- a  
21 place where members go until they get in good  
22 standing. I'm not aware of anything like that.

23 So if your \$30 paid up, then I want  
24 everybody on the call, on this Zoom, that paid  
25 their \$30 to become a member of the oldest and the

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1 the identification of members in Louisiana senate  
2 districts.

3 And do -- do you see the senate  
4 districts identified in 3(a), Mr. McClanahan?

5 A. Yes, I do.

6 Q. Did you review any list or document with  
7 addresses and names to verify that a branch member  
8 lives in each of these districts?

9 A. I didn't -- I didn't look at a list. I  
10 didn't have a list. But I do know, and -- and in  
11 reviewing this, talked with my lawyers and we took  
12 the legal maps and illustrative maps, put  
13 together. And based upon our conversations -- and  
14 I told them that I've been all over these places,  
15 and I could identify where members live in these  
16 particular senatorial districts.

17 Q. Did you speak with any branch leaders  
18 for the purpose of identifying these districts?

19 MS. ROHANI: Objection.

20 You can answer.

21 A. Did I speak to any -- any leadership  
22 about the districts?

23 Q. Any branch leaders.

24 A. What do you mean, "speak with" them?

25 Q. Did you ask any branch leaders whether

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1 BY MS. HOLT:

2 Q. All right. So let's now go to that  
3 second paragraph of this response.

4 Mr. McClanahan, can you please read that  
5 out loud, for the record?

6 A. "Plaintiff has identified at least one  
7 member who lives in, among others, each of the  
8 following Louisiana House Districts: 1, 2, 3, 4,  
9 5, 6, 7, 8, 9, 13, 22, 25, 27, 34, 35, 36, 37, 47,  
10 57, 58, 59, 60, 61, 62, 63, 65, 66, 67, 68, 69,  
11 70, 80, 88, and 101.

12 Q. Thank you, Mr. McClanahan.

13 Is that -- do you know how many house  
14 districts Louisiana has?

15 A. No, I don't. Not off the top of my  
16 head.

17 Q. Let's see. Do you see number 10 in this  
18 response?

19 A. No, I don't.

20 Q. So is it fair to say that not all the  
21 Louisiana house districts are listed in this  
22 response?

23 A. Right.

24 Q. Okay. Now, did you review any list or  
25 documents with names and addresses to verify that

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1 a member lives in each of these house districts?

2 A. I didn't have a list.

3 Q. Okay. What did you have?

4 MS. ROHANI: Objection.

5 Q. You can answer, I believe.

6 MS. ROHANI: No. Direct not to answer.

7 MS. HOLT: Direct not to answer? Okay.

8 MS. ROHANI: Yeah. It's confidential.

9 MS. HOLT: Okay.

10 BY MS. HOLT:

11 Q. On -- Mr. McClanahan, do you have  
12 personal knowledge of at least one member  
13 identified in each of these house districts?

14 A. Yes.

15 Q. And how do you know that?

16 MS. ROHANI: Objection.

17 Direct not to answer.

18 MS. HOLT: Sara, I'm a little confused.

19 MS. ROHANI: My apologies, Cassie. I  
20 merely object to the extent that this may be  
21 covered by attorney-client privileges;  
22 however, Mr. McClanahan can answer how. My  
23 apologies.

24 MS. HOLT: Okay.

25 A. Okay. Well, as I alluded to you in the

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1 answer to (a), that I'm a native Louisianan. How  
2 I travel this whole state, bad roads and all, and  
3 I looked at the illustrative maps, I looked at the  
4 illegal maps, and I know -- I know that we have  
5 members in the house district because the house  
6 district is smaller than the senatorial district.

7 So we eat, watch football games. We go  
8 to festivals. We go to Freedom Fund banquets. I  
9 go to protest police brutality. We go to stand in  
10 the school district or -- or kicking our kids out  
11 of school for literally nothing. I go there to  
12 test medication or -- or healthcare, inadequate  
13 healthcare. I've been to these areas and I've  
14 stood with members. Stood with members in all of  
15 these areas.

16 And so I know, based upon looking at the  
17 illustrative maps, looking at the illegal maps,  
18 and just knowledge of Louisiana, talked with our  
19 lawyers, knowing that we have a plaintiff -- we've  
20 identified at least one member in each one of  
21 these house districts.

22 Q. Mr. McClanahan, how many house -- do you  
23 know how many house districts Baton Rouge has?

24 A. I don't, not off the top of my head.

25 Q. Sure.

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1 Is it more than one?

2 A. Yes.

3 Q. How did you verify that at least one  
4 member lives in at least two house districts in  
5 Baton Rouge?

6 MS. ROHANI: Again, objection, to the  
7 extent that there are maybe privileged  
8 communications.

9 However, President McClanahan, you can  
10 answer.

11 THE WITNESS: Okay.

12 A. You say Baton Rouge?

13 Q. Yes, sir.

14 A. I used to be Baton Rouge vice president,  
15 so I know for a fact that we have at least one or  
16 two members living in each of the house districts  
17 in Baton Rouge area.

18 Q. How do you know that those members  
19 didn't move?

20 A. I live in Baton Rouge. I know them  
21 personally.

22 Q. Okay.

23 A. On more times than not I've been to  
24 their house. And then I've probably helped fix  
25 their house, repair their house.



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1 Q. Okay.

2 A. You know, we've been through floods and  
3 all that, hurricane. So I've been there. I've  
4 been the president -- when I was branch  
5 president -- branch president, that they can call  
6 on me to also pray for them and to welcome them,  
7 you know, when they have bursts and to help grieve  
8 with them when they've had losses.

9 So I've been to many of the houses.  
10 Been on the Southern University branch. I've been  
11 to these homes and cheered on the Jaguars. Been  
12 to these homes to cheer on the Tigers. And so  
13 we're familiar with those here in the Baton Rouge  
14 area in the house districts.

15 Q. When you go to a home, do you know which  
16 house district you're in when you visit?

17 A. Probably so.

18 Q. Probably so?

19 A. Probably so. In the State of Louisiana,  
20 probably. And in Baton Rouge, probably so.

21 Q. Now, there's -- there's other house  
22 districts listed outside of Baton Rouge in this  
23 response; is that correct?

24 A. Yes.

25 Q. Did you speak with any branch leaders

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1 within New Orleans?

2 A. I'm not -- I'm not that good. I  
3 don't -- I don't even know where my kids' rooms  
4 are in my own house.

5 Q. Do you know if any of the members  
6 identified in these house districts are registered  
7 voters?

8 A. No, I don't.

9 Q. Do you know if they are black?

10 A. No, I don't. Because the membership is  
11 diverse. And then when you talk about Orleans,  
12 you're talking about really diversity, so I  
13 wouldn't know.

14 Q. Okay. Now, let's see, house district  
15 or -- yeah, House District 1, who is the member  
16 who you identified that lives in House District 1?

17 MS. ROHANI: Again, objection.

18 Direct not to answer.

19 MS. HOLT: All right. And, Sara, is  
20 your objection and instruction going to be  
21 the same for every house district --

22 MS. ROHANI: Yes, ma'am.

23 MS. HOLT: -- listed here?

24 MS. ROHANI: Yes, Cassie.

25 MS. HOLT: All right.

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1 to the organization, its members, and Black  
2 communities in Louisiana caused by the enacted  
3 maps, the lack of responsiveness of elected  
4 officials in addressing issues faced by Black  
5 Louisianans, and other topics relevant to  
6 Plaintiffs' claims. The other plaintiffs in the  
7 case will also likely testify, including  
8 representatives from the Black Voters Matter Fund  
9 and the individual plaintiffs. Other witnesses  
10 Plaintiff may call will be identified as their  
11 identities are determined and in accordance with  
12 the pre-trial schedule and Plaintiffs' discovery  
13 obligations."

14 Q. Thank you, Mr. McClanahan.

15 I didn't want to interrupt you, but  
16 we -- we could have stopped it at "claims."

17 I'm going to ask you a few questions  
18 about the first part of that paragraph.

19 What harm has the Louisiana State  
20 Conference suffered as an organization as a result  
21 of the enacted maps?

22 MS. ROHANI: Objection.

23 But you can answer.

24 A. Okay. What we've had to do since the  
25 enactment of these illegal maps is that we have

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1 had to shift our -- our -- our action plan, for  
2 lack of a better term. You know, we had to get  
3 geared up during the -- during the time from the  
4 census through the Road Shows, the legislative  
5 Road Shows to the legislative sessions. And so we  
6 had members get up because the -- because when the  
7 census came back, it identified that we had --  
8 that we had gained population, black population,  
9 in certain areas. We're excited about that  
10 because we knew that we were going to get some  
11 additional majority-minority representatives. And  
12 so when the -- when the house passed the illegal  
13 maps, the areas that we were shifting to do the  
14 work in and keep going, because these areas were  
15 going to get excited about having a representative  
16 of their choice, possibly somebody who looks just  
17 like them, and when that didn't happen, we had to  
18 shift the resources and manpower to -- to take  
19 into account that this area that we thought was  
20 gonna have a -- probably a black representative or  
21 an Asian, if that was the case -- excuse me, or  
22 Hispanic, if that was the case, would no longer  
23 have that.

24 And we were having radio spots already  
25 getting ready to be cut. And we were doing

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1 trainings to get people excited about going to  
2 these particular areas and talking about, finally,  
3 Louisiana got it right this time.

4 But, no, we had to say that Louisiana is  
5 still Lousyana because it's going to keep us in  
6 bandage. And so we suffered not only because the  
7 people were emotionally distressed, but having to  
8 redirect manpower and resources to these areas.

9 It makes our work a little bit harder  
10 because it's easier to get you excited about  
11 something that you know is coming your way. It's  
12 easier. But it's a lot bit tougher to get you  
13 excited about something that you know should have  
14 happened but you will tell me, "I told you that  
15 things were not going to change in Louisiana."

16 You have that mindset. It's really  
17 tough for me to get you excited about just wanting  
18 to participate in the process because you know the  
19 process is not -- is not kin to you, is not liken  
20 to you. The process -- we know that in Louisiana,  
21 the good ol' boy still wins out.

22 "The good ol' boy still wins out; power  
23 does not concede power," those are the things that  
24 I would hear. And how would I combat that? And  
25 how would I combat that? I would have to pray all

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1 the time, just pray all the time that we -- that I  
2 be given encouragement, that I could encourage my  
3 members to go in these areas in Louisiana to talk  
4 about we're trying to -- we're trying to -- the  
5 process is still going to work, we just have to  
6 keep the faith. And that's tough, trying to tell  
7 somebody to keep the faith and you just slapped  
8 them in the face. It's tough.

9 It's tough going into these areas and  
10 saying, look -- I think Sam Cook says, "If changes  
11 don't come, can't stay in that zone, can't sit on  
12 the dock of the bay, can't do that." So it's a  
13 little bit tougher.

14 When you talk about harm to the -- to  
15 the State Conference, people would tell me, "Man,  
16 y'all lying, y'all are not good." It damaged our  
17 reputation because I'm getting geared up, I'm  
18 pumping them up. We'd like to do right -- for  
19 once in Louisiana's history, we're about to do  
20 right. Once. We're about to get this right.

21 And I was saying it all along because I  
22 have faith in Louisiana. I have faith in the  
23 members in the House and members in the Senate. I  
24 have faith in them. And I would tell people  
25 throughout the state, just watch, you're going to

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1 have somebody that you like, get ready. You ready  
2 to run? Let's get you ready to run. Let's get  
3 you excited about running for an office, and a --  
4 for a office position, the House or the Senate,  
5 get excited about that. And only to go back  
6 behind myself and tell them, well, next time.

7 And then that's a slap in their face  
8 because they say, you lied then, you're lying now,  
9 things ain't going to change. This is Louisiana.

10 So trying to get the harm -- the harm is  
11 to this whole state of Louisiana because our kids,  
12 as they grow up -- they grew up under the Jim Crow  
13 law. They grew up understanding what Jim Crow law  
14 is. And now they're young adults. And they  
15 saying, "It ain't gonna change. Let me move out  
16 of the state of Louisiana. Let me go to another  
17 state."

18 So let's try to keep families together.  
19 Because that breaks up families. And so the harm  
20 to the Louisiana NAACP, but it harms us all.

21 So now I'm still -- I'm still going from  
22 town to town shouting that change is gonna come  
23 some day, change is gonna come sooner than you  
24 think.

25 Q. Thank you.

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1           So you said -- I believe one part of  
2           your answer was sending members to go into these  
3           areas. What areas are you referring to?

4           A. Well -- well, when we were -- we were  
5           sending members into areas where the elections or  
6           maps saying we were going to get a -- a  
7           majority-minority representative there, right.  
8           Sending them there to get people excited about  
9           participating again in the process, the democratic  
10          process. Getting them geared up to maybe my uncle  
11          or maybe my brother's about to become a state  
12          senator or state representative, and getting them  
13          excited about what's about to happen, what's going  
14          to come, what's down the road.

15          Q. Are you aware of any specific resources  
16          that have been diverted as a result of the enacted  
17          maps?

18          A. Well, we talk about resources. Do you  
19          mean resources from the State Conference or  
20          resources from any other -- any other areas  
21          that...

22          Q. Sure, from the State Conference.

23          A. I'm aware because -- you know, because,  
24          you know, I have to make sure that we have the  
25          resources. And so we -- we've diverted resources.



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1 I'm aware of things like that. I'm aware of -- we  
2 didn't have -- we had planned to have maybe a -- a  
3 town hall or -- or a rally, I'm familiar with  
4 that. But we had to postpone that or we had to  
5 downsize or we're going to be staying and talking  
6 about the people that we were gonna make sure that  
7 got there. I'm familiar with those type of  
8 things.

9 Q. What -- I believe you mentioned town  
10 halls. What specific town halls were canceled?

11 MS. ROHANI: Objection.

12 You can answer.

13 A. Well, we're looking to go into a town  
14 called Bogalusa and engage the memberships there,  
15 the town there. We've been looking to go to  
16 Orleans because they're always excited about  
17 getting geared up to get people excited about  
18 transform to government. But we had to downsize  
19 that, or not change that at all. And other areas  
20 that we've had to do specifically, we just  
21 couldn't do.

22 Q. Now, the State Conference is still  
23 having their annual conference this year?

24 A. I like you, Cassie, because you're  
25 excited about it, just like I am.