# Attachment 1

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF LOUISIANA

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| DOROTHY NAIRNE, ET AL | * | CIVIL ACTION |
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| VERSUS | * | NO. 3:22-178-SDD |
| | * | |
| KYLE ARDOIN, ET AL | * | NOVEMBER 27, 2023 |

* * * * * * * * * * * * * * *

DAY 1
BENCH TRIAL
BEFORE THE HONORABLE SHELLY D. DICK
UNITED STATES CHIEF DISTRICT JUDGE

APPEARANCES:

FOR THE PLAINTIFFS:

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**(NOVEMBER 27, 2023)**

**(CALL TO THE ORDER OF COURT)**

**THE COURT:** GOOD MORNING.

BE SEATED, PLEASE.

OKAY. CALL THE CASE, PLEASE.

**THE DEPUTY CLERK:** THIS IS CIVIL ACTION NO. 22-178, *DR. DOROTHY NAIRNE* AND OTHERS *VERSUS KYLE ARDOIN* AND OTHERS.

**THE COURT:** OKAY. BEGINNING WITH THE PLAINTIFFS, IF COUNSEL WOULD MAKE THEIR APPEARANCES. PLEASE MAKE YOUR APPEARANCE AT THE MICROPHONE SO THAT I CAN MAKE SURE THAT I HEAR YOU AND THAT THE COURT REPORTER GETS YOU DOWN.

**MS. KEENAN:** GOOD MORNING, YOUR HONOR.

MEGAN KEENAN FOR THE PLAINTIFFS.

**THE COURT:** GOOD MORNING, MS. KEENAN.

**MS. KEENAN:** WOULD YOU LIKE US TO ALL MAKE APPEARANCES FIRST, OR WOULD YOU LIKE ME TO PROCEED INTO A COUPLE OF PRELIMINARY MATTERS FOR THE PLAINTIFFS?

**THE COURT:** I'D LIKE YOU TO MAKE APPEARANCES, AND THEN WE WILL DEAL WITH PRELIMINARIES.

**MS. KEENAN:** THANK YOU.

**MS. WENGER:** VICTORIA WENGER FROM THE LEGAL DEFENSE FUND FOR PLAINTIFFS.

**THE COURT:** WINTER?

**MS. WENGER:** WENGER.

**THE COURT:** WENGER.

09:07 **MS. WENGER:** W-E-N-G-E-R. THANK YOU.

**MS. BRANNON:** SARAH BRANNON FOR PLAINTIFFS FROM THE ACLU.

**MR. NAIFEH:** STUART NAIFEH FROM THE LEGAL DEFENSE FUND FOR THE PLAINTIFFS.

**MS. BAHN:** JOSEPHINE BAHN FROM COZEN O'CONNOR ON BEHALF OF THE PLAINTIFFS.

**MR. CLARK:** ROBERT CLARK OF COZEN O'CONNOR FOR THE PLAINTIFFS.

**MS. THOMAS:** ALORA THOMAS ON BEHALF OF THE HARVARD ELECTION LAW CLINIC ON BEHALF OF PLAINTIFFS.

**MS. GIGLIO:** AMANDA GIGLIO, G-I-G-L-I-O, FROM COZEN O'CONNOR ON BEHALF OF PLAINTIFFS.

GOOD MORNING, YOUR HONOR.

**THE COURT:** GOOD MORNING.

**MR. ADCOCK:** GOOD MORNING.

JOHN ADCOCK FROM ADCOCK LAW -- A-D-C-O-C-K -- FOR PLAINTIFFS.

**MS. ROHANI:** GOOD MORNING.

SARA ROHANI FROM THE LEGAL DEFENSE FUND ON BEHALF OF THE PLAINTIFFS.

**MR. CAMPBELL-HARRIS:** GOOD MORNING.

DAYTON CAMPBELL-HARRIS WITH THE ACLU ON BEHALF OF THE PLAINTIFFS.

**THE COURT:** OKAY. BEGINNING WITH THE DEFENDANTS,

09:09 1 WOULD YOU PLEASE MAKE YOUR APPEARANCES?
2 **MR. STRACH:** GOOD MORNING, YOUR HONOR.
3 PHIL STRACH, NELSON MULLINS, HERE FOR THE
4 SECRETARY OF STATE.
5 **THE COURT:** GOOD MORNING.
6 **MR. TUCKER:** GOOD MORNING, YOUR HONOR.
7 ROBERT TUCKER, WITH BAKER & HOSTETLER ON BEHALF
8 OF THE LEGISLATIVE DEFENDANTS.
9 **THE COURT:** GOOD MORNING, MR. TUCKER.
10 **MR. CONINE:** GOOD MORNING, JUDGE.
11 JOHN CONINE ON BEHALF OF THE DEFENDANTS
12 SECRETARY OF STATE.
13 **THE COURT:** GOOD MORNING, MR. CONINE.
14 **MR. BOWEN:** GOOD MORNING, YOUR HONOR.
15 BRENNAN BOWEN, OF HOLTZMAN VOGEL ON BEHALF OF
16 THE STATE.
17 **MS. HOLT:** GOOD MORNING, YOUR HONOR.
18 CASSIE HOLT, H-O-L-T, WITH NELSON MULLINS ON
19 BEHALF OF DEFENDANT ARDOIN.
20 **MR. LEWIS:** YOUR HONOR, GOOD MORNING.
21 PATRICK LEWIS, BAKER HOSTETLER ON BEHALF OF THE
22 LEGISLATIVE DEFENDANTS.
23 **MS. MCKNIGHT:** GOOD MORNING, YOUR HONOR.
24 KATE MCKNIGHT, BAKER HOSTETLER, ON BEHALF OF THE
25 LEGISLATIVE DEFENDANTS.

09:10 **THE COURT:** GOOD MORNING, MS. MCKNIGHT.

**MR. MENGIS:** GOOD MORNING, YOUR HONOR.

MICHAEL MENGIS, ALSO WITH BAKER HOSTETLER FOR THE LEGISLATIVE INTERVENORS.

**THE COURT:** GOOD MORNING, MR. MENGIS.

**MS. RIGGINS:** GOOD MORNING, YOUR HONOR.

ALYSSA RIGGINS, R-I-G-G-I-N-S, FROM NELSON MULLINS ON BEHALF OF THE SECRETARY OF STATE.

**THE COURT:** WAS IT MELISSA OR ALYSSA?

**MS. RIGGINS:** ALYSSA WITH AN "A," YOUR HONOR.

**THE COURT:** OKAY.

**MR. WALSH:** GOOD MORNING, YOUR HONOR.

JOHN WALSH ON BEHALF OF SECRETARY ARDOIN.

**MR. WALES:** GOOD MORNING, YOUR HONOR.

JEFFREY WALES FROM THE STATE ATTORNEY GENERAL'S OFFICE ON BEHALF OF THE STATE OF LOUISIANA.

**MR. MEGINLEY:** GOOD MORNING, MA'AM.

CHARLTON MCGINNLEY, COUNSEL FOR THE SECRETARY OF STATE, ON BEHALF KYLE ARDOIN, SECRETARY OF STATE.

**MS. FREEL:** GOOD MORNING, YOUR HONOR.

ANGELIQUE FREEL ON BEHALF OF THE STATE OF LOUISIANA.

**THE COURT:** GOOD MORNING.

**MR. GORDON:** GOOD MORNING, YOUR HONOR.

PHILLIP GORDON ON BEHALF OF THE STATE OF

09:10 LOUISIANA FROM HOLTZMAN VOGEL. THANK YOU.

**MS. LAGROUE:** GOOD MORNING, YOUR HONOR.

AMANDA LAGROUE, L-A-G-R-O-U-E, ON BEHALF OF THE STATE OF LOUISIANA WITH THE ATTORNEY GENERAL'S OFFICE.

**MR. FARR:** GOOD MORNING, YOUR HONOR.

TOM FARR FROM NELSON MULLINS, AND I'M HERE HELPING THE SECRETARY OF STATE TODAY. THANK YOU.

**THE COURT:** YES, SIR.

OKAY. COUNSEL HAVE ALL MADE THEIR APPEARANCES.

THERE ARE SOME PRELIMINARY MATTERS. BEFORE I TAKE UP THE PARTIES PRELIMINARY MATTERS, THE COURT HAS A MOTION THAT IT NEEDS TO RULE ON.

BEFORE THE COURT IS THE DEFENDANTS' JOINT MOTION TO STAY THE PROCEEDINGS, RECORD DOCUMENT 184. THE PLAINTIFFS FILED AN OPPOSITION TO THAT MOTION AT RECORD DOCUMENT 185. THE MOTION WAS FILED ON THE EVENING OF THE LAST BUSINESS DAY BEFORE TRIAL WAS SET TO BEGIN. THE DEFENDANTS ASKED THE COURT TO STAY THESE PROCEEDINGS IN LIGHT OF THE EIGHTH CIRCUIT CASE RECENT RULING *ARKANSAS STATE CONFERENCE NAACP VERSUS ARKANSAS BOARD OF APPORTIONMENT*. THE COURT WILL DISPENSE WITH THE CITATION, WHICH HELD THE EIGHTH CIRCUIT -- A THREE-JUDGE PANEL OF THE EIGHT CIRCUIT -- MAJORITY HELD THAT SECTION 2 OF THE VOTING RIGHTS ACT DOES NOT CONFER A PRIVATE RIGHT OF ACTION.

THE DEFENDANTS ALSO ARGUE THAT A STAY IS WARRANTED IN LIGHT OF THE STATE'S REQUEST TO FILE ITS PETITION

09:12 1 FOR EN BANC REHEARING OF THE FIFTH CIRCUIT'S DECISION IN THE
2 CONGRESSIONAL REDISTRICTING CASE THAT WAS BEFORE THIS COURT,
3 *ROBINSON VERSUS ARDOIN*.
4 AFTER REVIEWING THE PARTIES' BRIEFS, THE
5 ARGUMENTS AND THE APPLICABLE LAW, THE COURT WILL DENY THE
6 MOTION TO STAY.
7 THE DECISION TO GRANT A STAY IS A MATTER OF THE
8 COURT'S DISCRETION. WHEN DETERMINING WHETHER TO EXERCISE ITS
9 DISCRETION, THE RELEVANT FACTORS FOR THE COURT'S CONSIDERATION
10 ARE, NO. 1, THE POTENTIAL PREJUDICE TO THE NONMOVING PARTY;
11 NO. 2, THE HARDSHIP AND INEQUITY TO THE MOVING PARTY IF THE
12 ACTION IS NOT STAYED; AND, NO. 3, JUDICIAL ECONOMY. NOTABLY, A
13 COURT IS WITHIN ITS DISCRETION TO GRANT A STAY WHEN A RELATED
14 CASE WITH SUBSTANTIALLY SIMILAR ISSUES IS PENDING BEFORE A
15 COURT OF APPEALS.
16 HERE, HOWEVER, THE COURT IS NOT PERSUADED THAT
17 WAITING TO SEE WHETHER THE SUPREME COURT WILL DEFINITIVELY
18 RULE -- OR EVEN BE ASKED TO RULE -- ON WHETHER CONGRESS GRANTED
19 A PRIVATE PLAINTIFF THE ABILITY TO SUE UNDER SECTION 2 OF THE
20 VOTING RIGHTS IS A SUFFICIENT REASON TO STAY THESE PROCEEDINGS.
21 THE BLOW TO JUDICIAL ECONOMY AND THE PREJUDICE TO THE
22 PLAINTIFFS THAT WOULD RESULT FROM GRANTING A STAY CANNOT BE
23 JUSTIFIED BY SPECULATION OVER POSSIBLE SUPREME COURT FUTURE
24 DELIBERATIONS.
25 THE COURT IS ALSO BOUND BY THE FIFTH CIRCUIT'S

09:13 1 MOST RECENT DECISION IN THE *ROBINSON* CASE MENTIONED EARLIER,
2 WHICH ACKNOWLEDGED THAT PRIVATE PLAINTIFFS, BOTH INDIVIDUAL
3 VOTERS AND CIVIL RIGHTS ORGANIZATIONS, ARE "AGGRIEVED PERSONS"
4 WHO MAY SEEK TO ENFORCE SECTION 2 OF THE VOTING RIGHTS ACT.
5 SOME OF THOSE PARTIES, THE PARTIES IN THE *ROBINSON* CASE, ARE
6 THE VERY SAME PARTIES AS -- SOME OF THEM ARE THE SAME PARTIES
7 AS BEFORE THE COURT.
8 THE DEFENDANTS HAVE ARGUED THAT IN -- AND I
9 QUOTE, "THE FIFTH CIRCUIT WILL SOON RECEIVE THE CHANCE," CLOSE
10 QUOTES, TO ENGAGE IN AN-DEPTH ANALYSIS, LIKE THE EIGHTH CIRCUIT
11 HAS, ON THE QUESTION OF WHETHER SECTION 2 OF THE VOTING RIGHTS
12 ACT GRANTS A PRIVATE RIGHT OF ACTION. THE COURT NOTES THAT
13 THIS CHANCE TO ENGAGE DEPENDS ON WHETHER THIS CIRCUIT GRANTS
14 THE STATE'S REQUEST FOR A 60-DAY EXTENSION TO FILE ITS PETITION
15 FOR EN BANC REHEARING.
16 AS THE PLAINTIFFS NOTED, THE DEFENDANTS ARE
17 SEEKING A STAY BASED ON A PETITION FOR REHEARING THAT MIGHT BE
18 FILED AND, IF IT IS FILED, IT MIGHT BE GRANTED AND IF IT IS
19 GRANTED, IT MIGHT RESULT IN AN EN BANC OVERTURNING MULTIPLE
20 PRECEDENTS TO ALIGN ITSELF WITH A PANEL OF THE EIGHTH CIRCUIT.
21 THIS TYPE OF SPECULATIVE REASONING IS INSUFFICIENT TO WARRANT
22 THE POTENTIAL PREJUDICE TO THE NONMOVING PARTY AND A WASTE OF
23 JUDICIAL RESOURCES THAT HAVE ALREADY BEEN EXPENDED IN PREPARING
24 THIS MATTER FOR TRIAL.
25 ACCORDINGLY, THE MOTION TO STAY IS DENIED.

09:15 OKAY. NOW, THERE ARE OTHER MATTERS THAT THE PARTIES WANT TO BRING BEFORE THE COURT IN THE WAY OF HOUSEKEEPING OR PRELIMINARY MATTERS, BEGINNING WITH THE PLAINTIFFS.

**MS. KEENAN:** YES, YOUR HONOR. WOULD YOU LIKE ME TO APPROACH THE PODIUM?

**THE COURT:** YES, PLEASE.

**MS. KEENAN:** SO, YOUR HONOR, TWO PRELIMINARY MATTERS FOR THE PLAINTIFFS.

MEGAN KEENAN, AGAIN, FROM THE ACLU SPEAKING.

FIRST, WE WANTED TO MAKE THE COURT AWARE THAT WE INTEND TO CALL PRESIDENT MCCLANAHAN FROM THE NAACP TODAY AND THAT WE INTEND TO MOVE FOR A LIMITED PORTION OF HIS TESTIMONY TO BE UNDER SEAL AS WE PREVIEWED AT THE PRETRIAL CONFERENCE. WE'LL RAISE THAT AT THE APPROPRIATE TIME IN THE EXAMINATION TO GIVE THIS COURT NOTICE OF WHEN WE INTEND FOR THE TESTIMONY TO BE UNDER SEAL.

BUT FOR NOW, WE WANTED TO RAISE THAT WE INTRODUCED REDACTED COPIES OF A COUPLE OF EXHIBITS INTO JERS. WE DIDN'T WANT TO PRESUME BASED ON THE COURT'S INSTRUCTIONS AT THE PRETRIAL CONFERENCE THAT WE SHOULD PUT THE UNREDACTED VERSIONS INTO JERS WITHOUT THIS COURT'S APPROVAL. SO WE CAN HANDLE THAT UPLOAD AT LUNCH IF YOUR HONOR WOULD LIKE OR WE CAN HANDLE IT WHEN THE APPROPRIATE TIME FOR THE TESTIMONY COMES.

**THE COURT:** THE REDACTIONS ANTICIPATE THE SEALED

09:16 INFORMATION?

**MS. KEENAN:** YES. THAT'S RIGHT, YOUR HONOR.

**THE COURT:** AND THE REDACTIONS ARE PERSONAL IDENTIFYING INFORMATION?

**MS. KEENAN:** THAT'S RIGHT, YOUR HONOR.

**THE COURT:** OKAY. YOU CAN UPLOAD THEM REDACTED TO JERS. AND I APPRECIATE YOU NOT TAKING -- MAKING ASSUMPTIONS.

NEXT.

**MS. KEENAN:** OKAY. JUST TO CONFIRM: WE SHOULD NOT UPLOAD THE UNREDACTED VERSION TO JERS. CORRECT?

**THE COURT:** NO, YOU SHOULD NOT UPLOAD THE UNREDACTED VERSION.

**MS. KEENAN:** OKAY. THANK YOU.

THE ONLY OTHER THING IS WE NOTED THAT THERE ARE A COUPLE OF ADDITIONAL CHAIRS BEHIND THE DEFENSE COUNSEL'S TABLE. WE DIDN'T KNOW IF WE COULD MAKE USE OF THE SAME SPACE ON THIS SIDE FOR SOME OF THE COUNSEL FOR THE PLAINTIFFS, BUT WE DIDN'T WANT TO MOVE ANYTHING IN YOUR HONOR'S COURTROOM WITHOUT ASKING.

**THE COURT:** IF THERE IS AN EXTRA CHAIR AT THE BREAK, YOU CAN USE ANOTHER CHAIR.

**MS. KEENAN:** THANK YOU SO MUCH. THAT'S ALL WE HAVE FROM THE PLAINTIFFS.

**THE COURT:** OKAY. DO THE DEFENDANTS HAVE ANY PRELIMINARY MATTERS?

09:17 1 **MR. TUCKER:** GOOD MORNING, YOUR HONOR.
2 ROB TUCKER AGAIN.
3 WE JUST WANTED TO KNOW IF THE COURT WAS
4 ANTICIPATING WANTING ANY POST-TRIAL BRIEFINGS OR POST-TRIAL
5 FINDINGS OF FACT AND CONCLUSIONS OF LAW OR UPDATED FINDINGS OF
6 FACT, CONCLUSIONS OF LAW FOR PLANNING PURPOSES; AND WHAT THE
7 DEADLINE MIGHT BE FOR SUCH POST-TRIAL BRIEFING.
8 **THE COURT:** THE COURT DOES NOT ANTICIPATE THE NEED
9 FOR POST-TRIAL BRIEFING. I GAVE THAT SOME THOUGHT OVER THE
10 WEEKEND. PROBABLY THE MOST USEFUL THING TO THE COURT WOULD BE
11 FOR YOU TO TAKE YOUR PROPOSED CONCLUSIONS OF LAW AND FINDINGS
12 OF FACT, AND AFTER THE TRIAL TAKE THOSE SAME DOCUMENTS AND TELL
13 ME WHERE YOU BELIEVE THAT YOU'VE PROVEN THAT OR WHERE YOU
14 BELIEVE THAT THE PLAINTIFF HAS FAILED TO PROVE THAT CITING TO A
15 TESTIMONY OR AN EXPERT REPORT, TO THE EXTENT THAT THE REPORTS
16 ARE ADMITTED INTO EVIDENCE. THAT WOULD BE THE MOST HELPFUL
17 THING, RATHER THAN A WHOLE NEW SET OF DOCUMENTS.
18 AND THE COURT -- WE CAN TALK ABOUT IT MORE. I
19 REALIZE THAT THAT'S -- THAT YOU WANT TO KNOW WHAT TO EXPECT.
20 YOU SHOULD BE MAKING NOTES. I'M GOING TO BE MAKING NOTES ON
21 YOUR PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW WHERE I
22 THINK THERE IS EITHER SUFFICIENT OR DEFICIT EVIDENCE, SO YOU
23 SHOULD DO THE SAME. AND THAT WILL BE THE MOST HELPFUL TO THE
24 COURT. AND I WOULD ANTICIPATE A SHORT PERIOD OF TIME
25 AFTERWARDS.

09:18 **MR. TUCKER:** OKAY. THANK YOU, YOUR HONOR.

**THE COURT:** YOU'RE WELCOME.

IS THERE ANYTHING FURTHER?

OKAY. CAN THERE BE -- ARE THERE -- MY UNDERSTANDING FROM THE PRETRIAL CONFERENCE, AND I HAVE MY NOTES, THERE ARE SOME STIPULATIONS. LET'S GO AHEAD AND DO THOSE ON THE RECORD THIS MORNING. IT'S THE COURT'S UNDERSTANDING THAT THE AUTHENTICITY AND ADMISSIBILITY OF EXPERT REPORTS, IF THE EXPERT TESTIFIES, IS A POINT OF STIPULATION.

IS THAT CORRECT?

**MS. KEENAN:** YES, YOUR HONOR.

**MR. TUCKER:** YES.

**THE COURT:** ALL RIGHT. AND MATERIALS FROM THE LEGISLATIVE RECORD MAY BE ADMITTED WITHOUT RELEVANCE OR AUTHENTICITY OBJECTIONS. IS THAT CORRECT?

**MS. KEENAN:** YES.

**MR. TUCKER:** YES, YOUR HONOR.

**THE COURT:** OKAY. ARE THERE ANY JOINT ADMISSIONS? DO YOU WANT TO MOVE ANY OF YOUR STUFF INTO EVIDENCE RIGHT NOW? LET'S GO AHEAD AND DO THAT.

**MS. KEENAN:** MY UNDERSTANDING IS THE PARTIES HAVE AGREED THAT THE JOINT EXHIBITS THAT WERE UPLOADED INTO JERS CAN ALL BE PREADMITTED WITHOUT ANY OBJECTION FROM EITHER PARTY.

**THE COURT:** OKAY. LET ME LOOK AND SEE. I'M LOOKING AT THE EXHIBIT LIST. SO I HAVE PLAINTIFFS 1 THROUGH -- 1

09:19 THROUGH 256. I HAVE DEFENDANTS 1 -- WELL, I HAVE -- SO SECRETARY OF STATE DEFENDANT 1 THROUGH 39, INTERVENOR SEVERAL EXHIBITS. THEY LOOK LIKE THEY'VE BEEN UPLOADED TWICE. SO -- WHICH IS OKAY. BUT IT LOOKS LIKE THERE'S 45 OF THOSE. THERE IS -- THEN WE HAVE A JOINT 45. SO THERE'S AN INTERVENOR 45 AND THERE'S A JOINT 45, AND THEY ARE TWO DIFFERENT THINGS. JOINT 45 IS THE ORIGINAL BILL, HOUSE BILL 23. SO YOU HAVE A NAMING CONVENTION ISSUE.

**MS. KEENAN:** SO THE WAY WE'VE -- THE WAY WE'VE STRUCTURED IT IS THE JOINT EXHIBITS ARE THE ONES FROM BOTH THE LEGISLATIVE INTERVENORS' LIST AND THE PLAINTIFFS' LIST THAT WE WERE ABLE TO AGREE UPON, THOSE HAVE BEEN RENUMBERED SEPARATELY SO THE JOINT EXHIBITS HAVE THEIR OWN NUMBERING CONVENTION.

THE PLAINTIFFS' EXHIBITS THAT WERE FORMALLY -- WE DID NOT RENUMBER THE PLAINTIFFS' EXHIBITS. WE JUST INSERTED SLIPSHEETS THAT SAID WHICH JOINT EXHIBIT THOSE EXHIBITS CORRESPOND TO.

SO WE WERE HOPING TO JUST PREADMIT THE JOINT EXHIBITS FROM 1 THROUGH -- I'M NOT SURE WHAT THE FINAL NUMBER IS. I'M NOT SURE IF YOU KNOW OFFHAND.

**THE DEPUTY CLERK:** FIFTY-FOUR.

**MS. KEENAN:** YEAH. ONE THROUGH 54, IF WE COULD ADMIT ALL OF THOSE. AND I THINK BOTH PARTIES WILL BE USING THE JOINT EXHIBIT CONVENTION TO REFER TO THESE EXHIBITS THROUGHOUT THE TRIAL.

09:21 **THE COURT:** OKAY.

**MR. TUCKER:** CORRECT. AND THE LEGISLATIVE DEFENDANTS DID THE SAME THING WHERE OUR EXHIBITS WERE THE SAME, WE JUST PUT A SLIPSHEET IN THERE INDICATING IT IS NOW JOINT EXHIBIT 1 OR JOINT EXHIBIT 2, ET CETERA.

**THE COURT:** I SEE IT. IT'S A JOINT EXHIBIT. OKAY. SO JOINT EXHIBITS 1 THROUGH 54 ARE ADMITTED.

IS THERE ANYTHING ELSE? ARE THERE ANY FACTUAL STIPULATIONS?

**MR. STRACH:** I DON'T THINK SO.

**MS. KEENAN:** I DON'T THINK SO.

**MR. STRACH:** YOUR HONOR, I JUST WANTED TO -- I BELIEVE THE COURT KNOWS THIS, BUT WE'VE AGREED AMONG THE PARTIES THAT THE TRIAL WOULD BE EIGHT DAYS THROUGH DECEMBER 6TH. AND WE'VE AGREED TO KEEP THE TIME OURSELVES, AND WE'VE ALL DONE THIS A LOT, SO I THINK THAT IT WILL MOVE SMOOTHLY.

**THE COURT:** THAT'S FINE.

**MR. STRACH:** I JUST WANTED TO --

**THE COURT:** I DID GET THE MESSAGE THAT YOU-ALL HAD DECIDED THAT YOU DIDN'T NEED QUITE AS MUCH TIME AS THE COURT ALLOTTED FOR YOU, WHICH IS FINE. THANK YOU VERY MUCH. AND Y'ALL KEEP THE TIME, AND WE WILL GO ON FROM THERE.

**MR. STRACH:** ALL RIGHT. THANK YOU.

**THE COURT:** I APPRECIATE THAT.

09:22 **MR. STRACH:** AND THANK YOU FOR YOUR CONSIDERATION OF THE MOTION TO STAY. WE APPRECIATE THAT.

**THE COURT:** THANK YOU.

ALL RIGHT. IS THERE ANYTHING ELSE THAT WE NEED TO TAKE UP BEFORE THE FIRST WITNESS IS CALLED?

ALL RIGHT. THE PLAINTIFFS MAY CALL THEIR FIRST WITNESS.

**MS. WENGER:** GOOD MORNING, AGAIN, YOUR HONOR.

VICTORIA WENGER FROM THE LEGAL DEFENSE FUND.

PLAINTIFFS WOULD LIKE TO CALL DR. DOROTHY NAIRNE.

**DOROTHY NAIRNE, PH.D.,**

**HAVING BEEN DULY SWORN, TESTIFIED AS FOLLOWS:**

**MS. WENGER:** YOUR HONOR, MAY I APPROACH THE WITNESS TO PROVIDE HER SOME WATER?

**THE COURT:** YES, YOU MAY.

YOU MAY PROCEED.

**DIRECT EXAMINATION**

**BY MS. WENGER:**

**Q.** GOOD MORNING, DR. NAIRNE.

**A.** GOOD MORNING.

**Q.** CAN YOU PLEASE STATE YOUR FULL NAME FOR THE RECORD.

**A.** MY NAME IS DOROTHY NAIRNE.

**Q.** AND WHAT RACE DO YOU IDENTIFY AS, DR. NAIRNE?

**A.** I AM BLACK; I AM AFRICAN AMERICAN.

09:23 1 **Q.** COULD YOU PLEASE BRIEFLY DESCRIBE YOUR EDUCATIONAL
2 BACKGROUND?
3 **A.** I HAVE A BACHELOR'S DEGREE IN AFRICAN-AMERICAN STUDIES IN
4 JOURNALISM; A MASTER'S DEGREE IN AFRICAN-AMERICAN STUDIES; AND
5 A PH.D. IN INTERNATIONAL AFFAIRS IN ECONOMIC DEVELOPMENT.
6 **Q.** CAN YOU PLEASE WALK ME THROUGH YOUR PROFESSIONAL
7 BACKGROUND FOLLOWING GETTING YOUR PH.D.?
8 **A.** I LIVED IN ATLANTA, AND I WORKED IN PUBLIC HEALTH,
9 ESPECIALLY WITH BEHAVIOR CHANGE. SO MY AREA OF SPECIALIZATION
10 WAS HIV PREVENTION OF GENDER-BASED VIOLENCE AND POVERTY
11 ALLEVIATION.
12 **Q.** AND CURRENTLY WHAT DO YOU DO FOR A LIVING?
13 **A.** I HAVE A SMALL BUSINESS IN NAPOLEONVILLE, WHERE I RESIDE,
14 THAT IS LOOKING TO TAKE THE SUGARCANE WASTE, WHICH WE HAVE IN
15 ABUNDANCE, AND PRESS IT INTO TABLEWARE, BIODEGRADABLE STRAWS.
16 SOME OF THE BOTTLES YOU'RE DRINKING FROM, WE CAN MAKE THAT
17 RIGHT HERE IN LOUISIANA.
18 **Q.** AND WHAT PARISH IS YOUR TOWN OF NAPOLEONVILLE IN?
19 **A.** I LIVE IN ASSUMPTION PARISH.
20 **Q.** HOW LONG HAVE YOU LIVED AT YOUR CURRENT HOME?
21 **A.** I MOVED THERE IN 2016.
22 **Q.** AND DID YOU HAVE ANY FAMILIARITY WITH NAPOLEONVILLE PRIOR
23 TO MOVING TO YOUR CURRENT HOME?
24 **A.** I SURE DID. MY MOTHER'S FAMILY GOES BACK AS FAR AS
25 ENSLAVEMENT THERE IN ASSUMPTION PARISH. I WENT EVERY YEAR FROM

09:24 THE TIME I WAS BORN UNTIL MOVING THERE EVERY YEAR, SPENDING WEEKS AND WEEKS AT A TIME IN NAPOLEONVILLE.

**Q.** ARE YOU A REGISTERED VOTER?

**A.** YES, I AM.

**Q.** AT YOUR CURRENT ADDRESS?

**A.** YES. IN NAPOLEONVILLE.

**Q.** DO YOU REGULARLY VOTE IN STATE ELECTIONS?

**A.** YES, I DO.

**Q.** AND DO YOU PLAN TO VOTE IN FUTURE STATE ELECTIONS?

**A.** TRY AND STOP ME. YES, I'M GONNA VOTE.

**Q.** WHAT IS YOUR ROLE IN THIS CASE?

**A.** I AM A PLAINTIFF IN THIS CASE.

**Q.** AND WHAT MOTIVATED YOU TO BECOME A PLAINTIFF IN THIS CASE?

**A.** I WAS RAISED KNOWING THAT WHERE MUCH IS GIVEN, MORE IS EXPECTED. SO IT IS MY MORAL IMPERATIVE TO DO ALL THAT I CAN TO TRANSFORM MY COMMUNITY IN ASSUMPTION PARISH.

**Q.** I'D LIKE TO TALK ABOUT YOUR COMMUNITY. TO BEGIN, WHAT DOES "COMMUNITY" MEAN TO YOU?

**A.** COMMUNITY MEANS MANY DIFFERENT THINGS. IT'S THE PEOPLE WHO LIVE AROUND ME. SO IT'S MY NEIGHBORS, MY NEIGHBORHOOD. IT'S MY PARISH. IT'S MY STATE. IT'S THE PEOPLE WHO I IDENTIFY WITH. IT'S THE BLACK COMMUNITY, THE AFRICAN-AMERICAN COMMUNITY. IT'S THE PEOPLE WHO ARE IN MY CREW, THE PEOPLE WHO ARE IN ALIGNMENT WITH WHAT I SEEK IN MY COMMUNITY.

**Q.** AND DO YOU CONSIDER YOURSELF AN ACTIVE MEMBER OF YOUR

09:25 COMMUNITY?
**A.** I AM VERY ACTIVE ON MANY DIFFERENT LEVELS.
**Q.** IS IT IMPORTANT TO YOU TO BE ACTIVE IN YOUR COMMUNITY?
**A.** IT'S MY PURPOSE AND IT'S WHAT GETS ME UP IN THE MORNING.
**Q.** DO YOU ENGAGE WITH ANY CIVIC ORGANIZATIONS OR OTHER GROUPS IN YOUR COMMUNITY?
**A.** YES, I DO.
**Q.** AND WHAT ARE THEY?
**A.** I AM A CARD CARRYING, DUES PAYING MEMBER OF THE NAACP IN ASSUMPTION PARISH, AND I AM A MEMBER OF TOGETHER LOUISIANA, TOGETHER NEW ORLEANS, THE URBAN LEAGUE, AND A NUMBER OF OTHER ORGANIZATIONS THAT WORK WITH SMALL BUSINESSES.
**Q.** DO YOU HAVE ANY FAMILY ALSO RESIDING IN NAPOLEONVILLE?
**A.** I HAVE A SON, A DAUGHTER, MANY COUSINS, AND OTHER PEOPLE THAT I LOVE THERE IN NAPOLEONVILLE.
**Q.** AND HOW WOULD YOU DESCRIBE THE HISTORY OF YOUR FAMILY IN THE AREA?
**A.** MY LINEAGE GOES DEEP, DEEP, DEEP FROM ENSLAVEMENT WHERE I CAN TRACE MY GREAT, GREAT, GREAT GRANDPARENTS. AND ACTUALLY I HAVE A PLOT OF LAND THAT THEY OWNED, AND I TAKE CARE OF THAT. SO I GO BACK TO MY GRANDMOTHER WHO WAS A MIDWIFE, AND I SEE PEOPLE WHO SAY, "WOW, YOUR GRANDMOTHER BIRTHED MY GRANDMOTHER." SO I HAVE A LONG HISTORY THERE.
AND MY MOTHER WAS A FIRST GRADE TEACHER. SO I OFTEN ENCOUNTER PEOPLE WHO -- "YOUR MOTHER TAUGHT ME HOW TO READ.

09:27 YOUR MOTHER TAUGHT ME HOW TO LOVE LEARNING." SO IT'S VERY REWARDING, AND I STAND ON THEIR SHOULDERS TO CONTINUE THIS WORK.

**Q.** HOW, IF AT ALL, HAS RACE PLAYED A ROLE IN YOUR FAMILY HISTORY IN THE AREA WHERE YOU LIVE?

**A.** RACE HAS DEFINED EVERYTHING THAT WE HAVE DONE. IT'S DEFINED THE LIMITATIONS. FOR EXAMPLE, MY MOTHER HAD NO SCHOOL TO GO TO BEYOND THE SIXTH GRADE IN ASSUMPTION PARISH AT THAT TIME, SO SHE HAD TO GO TO A BOARDING SCHOOL. NONE OF HER SISTERS AND BROTHERS WERE ABLE TO CONTINUE THEIR SCHOOLING. THEY POURED INTO HER AND SHE WENT TO A BOARDING SCHOOL THAT WAS THERE IN NEW ORLEANS FOR THE CHILDREN OF THE FORMALLY ENSLAVED TO BE ABLE TO GO TO SCHOOL.

SO SHE -- IF SHE HAD BEEN ABLE TO GO TO SCHOOL THERE, WHAT A COMMUNITY IT WOULD HAVE BEEN, BUT SHE WASN'T. SO SHE HAD TO GO ELSEWHERE. AND SO LIKE HER, THE FEW THAT DID GET TO GO TO SCHOOL, HAD TO LEAVE, AND SOME OF THEM DIDN'T COME BACK. SO IT'S -- REALLY RACE HAS BEEN A MAJOR FACTOR IN THE LIVES -- IN MY FAMILY AND OTHER PEOPLE'S FAMILIES AS WELL.

**Q.** DID WHITE STUDENTS IN NAPOLEONVILLE HAVE A SCHOOL TO ATTEND AFTER SIXTH GRADE?

**A.** THEY DID. THEY HAD A SCHOOL. AND MY MOTHER USED TO TELL THE STORIES OF HOW -- EVEN WHEN THEY WERE WALKING TO SCHOOL UP AND DOWN HIGHWAY 1, WHERE THE WHITE KIDS WERE DRIVING BY ON THE BUS AND THEY'RE JUST KIND OF LIKE -- OR THEY WOULD GET THE OLD

09:28 BOOKS THAT THE WHITE KIDS NO LONGER USED, THEY DISCARDED. AND SO THE BLACK KIDS WOULD GET THE OLD BOOKS.

SO JUST ALL OF THE DISPARITIES ALONG THE WAY UP UNTIL TODAY, WHERE IF YOU LOOK AT THE SCHOOLS ALONG HIGHWAY 1 WHERE I DRIVE UP AND DOWN, YOU CAN SEE THAT -- WHO'S HERE PICKING UP YOUR CHILD AFTER SCHOOL. AND IT'S THE WHITE FAMILIES WHO ARE ABLE TO GO AND PICK UP THEIR CHILDREN. AND THOSE KIDS AFTER SCHOOL THEN GET TO GO TO AFTER-SCHOOL PROGRAMS, AFTER-CARE PROGRAMS, CHESS LESSONS, SWIMMING LESSONS. AND THE BLACK KIDS ARE THERE WAITING FOR THEIR BUSES.

SO I CAN STILL SEE THOSE DISPARITIES THAT ARE BASED UPON RACE IN MY COMMUNITY.

**Q.** DO YOU HAVE ANY OTHER PERSONAL CONNECTIONS IN YOUR LOCAL COMMUNITY?

**A.** I HAVE MANY PEOPLE THAT I LOVE AND THE BUSINESS THAT I'M TRYING TO GET STARTED THERE. AND MANY NEIGHBORS AND OTHER PEOPLE, THE CHURCH NEXT DOOR TO MY HOUSE, WHICH WAS STARTED I THINK 125 YEARS AGO, AND LOTS OF NEIGHBORS WHO SEEK TO ME FOR GUIDANCE AND HOPE, A LEVEL OF HOPE.

**Q.** IN YOUR PERCEPTION DOES YOUR COMMUNITY SHARE COMMON HISTORIES IN NAPOLEONVILLE?

**A.** WE SHARE A HISTORY OF STRUGGLE, REALLY, AND A HISTORY OF LOVE, A HISTORY OF FIGHTING FOR WHAT WE CAN SEE SO THAT OUR COMMUNITY GROWS AND THRIVES AND PROSPERS.

**Q.** HOW ABOUT SHARED INDUSTRIES?

09:30 **A.** THE SUGARCANE INDUSTRY WAS KING AND QUEEN AT SOME POINT IN ASSUMPTION PARISH, WHICH IS THE SUGAR BOWL OF LOUISIANA. SO IF YOU LOOK, YOU CAN SEE SUGARCANE AS FAR AS THE EYE CAN SEE, BUT THAT INDUSTRY THEN TOOK A DIVE WHEN IT BECAME AUTOMATED. SO ALL THE PEOPLE WHO USED TO CUT SUGARCANE NOW AND THE GRINDING SEASON, WHICH WE'RE IN, ARE PEOPLE LIKE MY GRANDMOTHER, WHO USED TO SELL FOOD TO THE WORKERS IN THE CANE FIELDS, WHO ARE NO LONGER ABLE TO WORK. SO THEN WE LACK AN INDUSTRY.

SO IN ASSUMPTION PARISH, I'D SAY THE INDUSTRY NOW IS THE DOLLAR GENERAL.

**Q.** DO YOU SHARE ANY COMMON TRADITIONS IN YOUR COMMUNITY?

**A.** IF YOU GO ON A SUNDAY, I GUARANTEE YOU WILL SEE THE TRADITION OF PEOPLE GOING TO CHURCH PROUDLY REPRESENTING, PRAYING FOR BETTER IN THEIR COMMUNITIES. AND THEN AFTER CHURCH PEOPLE ARE TOGETHER EATING AND SHARING, AND JUST THE LOVE IN THE COMMUNITY ON ANY AND EVERY GIVEN SUNDAY, IN ADDITION TO WATCHING SOME FOOTBALL.

SO WE'VE GOT THOSE TRADITIONS. AND THEN AS WE COME UP ON NEXT YEAR, WE'VE GOT CARNIVAL SEASON. SO YOU CAN SEE EVEN IN NAPOLEONVILLE WE'VE GOT CREWS THAT WILL DO THE BLOCK WITH THEIR CARNIVAL PARADES. SO WE'VE GOT A TOGETHERNESS THAT IS REALLY, I THINK, THE STRONG POINT IN NAPOLEONVILLE AND IN THAT AREA.

**Q.** BASED OFF YOUR OBSERVATIONS, DOES RACE PLAY ANY ROLE IN THE COMPOSITION OF THE CONGREGATIONS THAT YOU WITNESS?

09:31 **A.** SUNDAY IS STILL THE MOST SEGREGATED DAY OF THE WEEK WHERE THERE PROBABLY ISN'T -- IN FACT, I HAD A FRIEND WHO'S WHITE WHO WAS LOOKING FOR ME, AND SHE WALKED INTO THE CHURCH, ST. JOHN THE BAPTIST CHURCH, AND THEY WERE LIKE, "THERE'S A WHITE PERSON IN THE CHURCH." SO, YES, RACE PLAYS A BIG FACTOR ON THOSE SUNDAYS AND EVERY OTHER DAY.

SO YOU CAN LOOK ON FACEBOOK. LOOK, I MEAN, DO PEOPLE HAVE BLACK FRIENDS? DO PEOPLE HAVE WHITE FRIENDS? YOU KNOW, IF YOU'RE WHITE, YOUR PEOPLE ARE PROBABLY MOSTLY WHITE, AND IF YOU'RE BLACK, YOUR PEOPLE ARE MOSTLY BLACK.

**Q.** BASED ON YOUR EXPERIENCES LIVING IN THE AREA, WHAT DO YOU PERCEIVE AS SOME OF THE COMMON NEEDS SHARED AMONG YOUR COMMUNITY?

**A.** IF YOU DRIVE THROUGH RIGHT NOW, YOU'LL SEE NEEDS THAT ARE STARK. PEOPLE STILL FROM HURRICANE IDA -- OR EVEN THE HAIL STORM WE HAD IN JUNE -- HAVE TARPS ON THE TOPS OF THEIR ROOFS.

SO WE'VE GOT A HOUSING ISSUE, ESPECIALLY IF YOU LIVE IN A TRAILER AND YOUR HOUSE IS NOT AS STABLE. SO WE'VE GOT ISSUES RELATED TO HOUSING AND WEATHERIZATION OF OUR HOMES, AND THAT LEADS TO THEN GOOD JOBS, YOU KNOW, SO THAT PEOPLE CAN AFFORD TO HAVE INSURANCE ON THEIR HOMES.

AND WE'VE GOT ISSUES RELATED TO EMPLOYMENT AND HAVING JOBS SO THAT PEOPLE CAN WORK CLOSE TO WHERE THEY LIVE INSTEAD OF HAVING TO GO OFFSHORE, WHICH OBVIOUSLY DOESN'T WORK FOR MANY WOMEN BECAUSE WHO'S GOING TO TAKE CARE OF THE CHILDREN IF

09:33 YOU'RE WORKING OFFSHORE.

SO WE'VE GOT NEEDS RELATED TO, YOU KNOW, JUST BARE MINIMUM MATERIAL NEEDS WITHIN OUR COMMUNITY.

**Q.** DO YOU HAVE AN OPINION ABOUT HOW THESE NEEDS TRANSLATE TO STATE POLICY ISSUES?

**A.** I CAN SEE HOW THE STATE COULD PLAY A ROLE, IN MY OPINION, IN HELPING TO GET MORE GOING AND TO HELPING OUR ECONOMY SO THAT IT'S THRIVING INSTEAD OF SUFFERING AND INSTEAD OF JUST LAGGING.

**Q.** DO YOU HAVE AN OPINION AS TO HOW, IF AT ALL, RACE HAS PLAYED A ROLE IN THESE POLICY CONCERNS SHARED AMONG YOUR COMMUNITY?

**A.** ONE THING THAT'S VERY KEY IS MASS INCARCERATION HERE IN LOUISIANA, WHICH IS NO SECRET. SO I HAVE A NEIGHBOR WHO WANTED ME TO GO TO MEET HER HUSBAND WHO HAS BEEN IN PRISON FOR THE PAST 20 YEARS. SO I WAS ABLE TO GO TO HUNTSVILLE PRISON MAYBE TWO MONTHS AGO AND I THOUGHT, "WOW, THAT'S WHERE THE BLACK MEN ARE. THEY ARE IN PRISON."

SO WE HAVE TO DO SOMETHING RELATED TO HOW WE ARE OVER POLICING AND NOT HAVING PROGRAMS, BUT WE'RE BUILDING PRISONS AND KEEPING PEOPLE IN PRISON. SO THAT WOULD BE ON THE TOP OF MY LIST.

**Q.** LET'S TALK ABOUT POLITICAL REPRESENTATION IN YOUR COMMUNITY. WHICH DISTRICT DO YOU LIVE IN UNDER THE CURRENT STATE HOUSE MAP?

**A.** I AM IN DISTRICT 60.

09:34 **Q.** AND BASED ON YOUR EXPERIENCE LIVING IN DISTRICT 60, DO YOU FEEL LIKE THE CURRENT CONFIGURATION OF THE DISTRICT REFLECTS COMMUNITIES WITH SHARED INTERESTS?
**A.** NO, I DO NOT.
**Q.** AND WHY NOT?
**A.** I AM VOTING IN A VACUUM WHERE HALF THE TIME I DON'T KNOW WHERE TO GO TO VOTE. MY NEIGHBORS CAN'T ADVISE ME WHERE TO GO TO VOTE. SO I FEEL LIKE WE'RE JUST KIND OF FLOUNDERING AND LANGUISHING INSTEAD OF THRIVING AND ABLE TO ORGANIZE OURSELVES.
**Q.** DO YOU KNOW WHO YOUR REPRESENTATIVE IS IN DISTRICT 60?
**A.** MY REPRESENTATIVE IS CHAD BROWN.
**Q.** AND WHAT RACE IS YOUR CURRENT REPRESENTATIVE?
**A.** HE IS A WHITE MAN.
**Q.** DID REPRESENTATIVE BROWN HAVE AN ELECTION THIS 2023 CYCLE?
**A.** NO, HE DID NOT.
**Q.** AND DID HE HAVE AN ELECTION DURING THE 2019 CYCLE?
**A.** NO, HE DID NOT.
**Q.** AND WHY NOT?
**A.** HE RAN UNOPPOSED. I MEAN, NOBODY ELSE THREW THEIR HAT INTO THE -- THEIR NAME INTO THE HAT TO RUN AGAINST HIM.
**Q.** FOR BOTH ELECTIONS?
**A.** YES.
**Q.** AND DID YOU PARTICIPATE IN THOSE ELECTIONS?
**A.** I DID.
**Q.** DO YOU UNDERSTAND YOUR HOUSE DISTRICT, DISTRICT 60, TO BE

09:35 MAJORITY BLACK OR MAJORITY WHITE?
**A.** IT'S MAJORITY WHITE.
**Q.** TO YOUR KNOWLEDGE, HAS REPRESENTATIVE BROWN EVER CAMPAIGNED IN YOUR IMMEDIATE COMMUNITY?
**A.** I DON'T KNOW WHAT HE LOOKS LIKE.
**Q.** TO YOUR KNOWLEDGE, HAS HE EVER ATTENDED ANY EVENTS WITH THE COMMUNITY ORGANIZATIONS YOU ENGAGE WITH IN YOUR LOCAL COMMUNITY?
**A.** I HAVEN'T SEEN HIM, AND I TRY TO -- I TRY TO TAKE A LOOK AT EVERY ONE I'M IN THE ROOM WITH TO AT LEAST KNOW LIKE, OKAY, WHO'S WHO, WHO'S IN HERE, AND I HAVEN'T SEEN HIM.
**Q.** DO YOU RECALL HEARING ANY CAMPAIGN ADS FOR HIM?
**A.** NO. IN FACT, I DIDN'T KNOW HIS NAME. IT WAS LIKE WHO? SO, NO.
**Q.** ANY KNOCKS ON YOUR DOOR FROM HIM OR CAMPAIGN STAFF?
**A.** NO. NOT -- NO, NO.
**Q.** SIGNS ON YOUR STREET?
**A.** NONE.
**Q.** MAILERS IN YOUR MAILBOX?
**A.** NOT THAT I SAW.
**Q.** OKAY. DO YOU BELIEVE REPRESENTATIVE BROWN ADVOCATES FOR YOUR COMMUNITY'S NEEDS?
**A.** I DON'T BELIEVE THAT HE DOES.
**Q.** AND WHY NOT?
**A.** HE'S NOT AROUND. I HAVEN'T SEEN HIM. I HAVEN'T HEARD

09:36 ANYBODY EVEN MENTIONING LIKE, "OH, THIS IS WHAT OUR REPRESENTATIVE HAS IN MIND FOR US." AND PEOPLE TALK ABOUT THOSE KINDS OF THINGS.

**Q.** DO YOU FIND REPRESENTATIVE BROWN TO BE RESPONSIVE TO THE BLACK COMMUNITY'S NEEDS SPECIFICALLY?

**A.** NO, I DON'T. AND IT WOULD BE EASY TO BE RESPONSIVE TO OUR NEEDS. I MEAN, THERE ARE MANY, MANY DIFFERENT WORKSHOPS AND WEBINARS AND OPPORTUNITIES TO GET INVOLVED IN, AND I HAVEN'T SEEN HIM.

**Q.** DO YOU KNOW WHAT SENATE DISTRICT YOU LIVE IN UNDER THE ENACTED MAP?

**A.** I AM IN SENATE DISTRICT 2.

**Q.** AND WHO IS YOUR STATE SENATOR?

**A.** ED PRICE.

**Q.** AND WHAT RACE IS SENATOR PRICE?

**A.** ED PRICE IS A BLACK MAN.

**Q.** DO YOU THINK THAT SENATOR PRICE DOES A BETTER OR A WORSE JOB OF REPRESENTING THE INTEREST OF YOUR COMMUNITY COMPARED TO REPRESENTATIVE BROWN?

**A.** ED PRICE IS -- HE DOES A REALLY GOOD JOB. HE'S AVAILABLE. HE'S ACCESSIBLE. I CAN COUNT ON -- I'D HAVE TO EVEN GO TO MY TOES TO COUNT HOW MANY TIMES I HAVE SEEN HIM JUST THIS YEAR AT DIFFERENT EVENTS IN THE COMMUNITY IN NAPOLEONVILLE. HE IS AVAILABLE, AND WE CAN GO KNOCK ON HIS DOOR RIGHT NOW.

**Q.** DO YOU UNDERSTAND YOUR SENATE DISTRICT TO BE MAJORITY

09:37 1 BLACK OR MAJORITY WHITE?
2 **A.** IT IS BLACK.
3 **Q.** SHIFTING BACK TO REPRESENTATIVE BROWN, ARE THERE ANY VOTES
4 THAT HE'S TAKEN THAT HAVE STOOD OUT TO YOU?
5 **A.** HE VOTED FOR THE MAP THAT DOESN'T SERVE MY COMMUNITY.
6 **Q.** AND IS THAT THE HOUSE MAP THAT YOU DISCUSSED HE IS
7 REPRESENTING IN?
8 **A.** YES.
9 **Q.** DR. NAIRNE, ARE YOU FAMILIAR WITH THE MAP THAT PLAINTIFFS
10 HAVE INTRODUCED IN THIS MATTER?
11 **A.** YES, I AM.
12 **Q.** UNDER THAT ILLUSTRATIVE MAP, ARE YOU AWARE OF WHICH HOUSE
13 DISTRICT YOU WOULD RESIDE IN?
14 **A.** I WOULD THEN RESIDE IN HOUSE DISTRICT 58.
15 **Q.** IS IT YOUR UNDERSTANDING THAT DISTRICT 58 WOULD REMAIN A
16 MAJORITY-BLACK DISTRICT AS IT IS NOW?
17 **A.** YES.
18 **Q.** DO YOU THINK DISTRICT 58 IN THE ILLUSTRATIVE MAP WOULD DO
19 A BETTER OR A WORSE JOB OF KEEPING YOUR COMMUNITY TOGETHER THAN
20 DISTRICT 60 IN THE ENACTED MAP?
21 **A.** IT WOULD BE SO MUCH BETTER.
22 **Q.** AND WHY IS THAT?
23 **A.** I WANT TO SEE SOME WINS HERE WHERE WE HAVE SOME LEVEL OF
24 REPRESENTATION AND ARE ABLE TO FEEL LIKE, OKAY, YOU KNOW, I
25 HAVE A VOICE HERE IN LOUISIANA. I DON'T FEEL LIKE THAT RIGHT

09:38 NOW.
**Q.** WHAT WOULD IT MEAN TO YOU TO BE IN A HOUSE DISTRICT WITH MORE MEMBERS OF THE BLACK COMMUNITY?
**A.** OH, I WOULD BE -- I WOULD BE EXCITED FOR THAT BECAUSE I CANNOT SAY LIVING IN EVEN A STATE WHERE IT'S A THIRD BLACK THAT I FEEL LIKE I'VE GOT ANY KIND OF -- LIKE MY VOTE REALLY IS -- HAS WEIGHT. SO IT WOULD HELP ME TO KNOW WHERE TO ORGANIZE AND HOW TO ORGANIZE MORE EFFECTIVELY IN OUR LITTLE RURAL AREA.
**Q.** BASED ON YOUR OWN PERCEPTIONS AND EXPERIENCE, WOULD YOU SAY PEOPLE VOTE ALONG RACIAL LINES IN YOUR AREA?
**A.** YES, THEY DO. YES, WE DO.
**Q.** CAN YOU WALK ME THROUGH YOUR TYPICAL EXPERIENCE GOING TO VOTE?
**A.** IT'S HARD. EVEN TWO SATURDAYS AGO I HAVE BEEN TURNED AWAY FROM VOTING BECAUSE, "OH, BABY, YOU DON'T VOTE HERE. YOU GO TO ANOTHER PLACE TO VOTE." SO IT'S REALLY CONFUSING BECAUSE MY VOTING LOCATION HAS CHANGED -- CHANGES. WHETHER IT'S EARLY VOTING OR VOTING ON THE DAY OF THE ELECTION, IT'S CHAOTIC TO ME.
**Q.** AT THE SITES WHERE YOU'VE ATTEMPTED TO VOTE, HAS IT BEEN CROWDED OR EMPTY, SOMEWHERE IN BETWEEN?
**A.** VERY EMPTY.
**Q.** WHAT DO YOU PERCEIVE AS THE COMMUNITY SENTIMENTS AROUND ACCESS TO VOTING IN YOUR AREA?
**A.** IT'S DIFFICULT FOR A LOT OF PEOPLE. FOR, ONE, PEOPLE WITH

09:40 FELONY CONVICTIONS. AND THERE ARE MANY MEN, ESPECIALLY WITH FELONY CONVICTIONS WHO FEEL LIKE, "OKAY, I CAN PROBABLY NEVER VOTE AGAIN, EVEN THOUGH I'VE SERVED MY TIME. I'VE PAID MY PRICE." SO THERE'S SOME MISINFORMATION OUT THERE FOR PEOPLE WHO HAVE FELONY CONVICTIONS, WHICH IS SOMETHING TO BE ADDRESSED.

AND THEN JUST TO KNOW WHERE TO VOTE AND ON WHAT DAY TO GO TO VOTE. I MEAN, HOW DO WE VOTE IN OCTOBER? WHO PICKED THAT DATE ON A SATURDAY? WASN'T THAT GRAMBLING'S HOMECOMING AND SOUTHERN'S HOMECOMING THAT SATURDAY? SO TO HAVE THIS RANDOM DAY IN OCTOBER FOR THE ELECTION -- THEY ARE MANY PEOPLE THAT I KNOW WHO ARE LIKE, "I MISSED IT? HUH." SO IF IT'S JUST SOME, LIKE, RANDOMLY PLUCKED DATE, THEN IT'S CONFUSING.

**Q.** HAVE YOU OBSERVED ANY OTHER BARRIERS TO HOW PEOPLE IN YOUR COMMUNITY ARE ABLE TO GO AND VOTE?

**A.** TRANSPORTATION IS AN ISSUE, FOR SURE, FOR PEOPLE, ESPECIALLY PEOPLE WHO MAY BE LOW RESOURCES. THERE'S NO PUBLIC TRANSPORTATION IN THAT AREA. SO HOW DO PEOPLE GO TO VOTE, UNLESS THEY ABSOLUTELY KNOW SOMEBODY WHO, YOU KNOW, "CAN I RIDE WITH YOU?" BUT THEN IF WE GO TO THE WRONG PLACE -- SO IT'S HARD TO GO TO VOTE FOR A LOT OF PEOPLE, AND I THINK THAT MAY EXPLAIN SOME OF THE UNDER VOTING, THE NUMBERS.

**Q.** IN YOUR OBSERVATIONS, HAVE THESE BARRIERS CREATED ANY PARTICULARIZED LIMITATIONS FOR BLACK PEOPLE IN YOUR COMMUNITY?

**A.** ABSOLUTELY. BECAUSE IF PEOPLE HAVE TO GO TO WORK AT THE

09:41 BIG BOX STORE, THEY DON'T KNOW WHERE THEY'RE GOING TO VOTE.
THEN IF YOU HAVE ISSUES RELATED TO, YOU KNOW, IF IT'S RAINING AND YOU'VE GOT TO WORRY ABOUT YOUR HOUSE AND IT'S RAINING INSIDE YOUR HOUSE, THEN YOU'RE NOT TO GOING VOTE ON THAT DAY. SO IT'S ALL THE LEVELS AND THE ISSUES THAT THEN WOULD TAKE PRECEDENCE OVER GOING TO VOTE OR REMEMBERING TO GO TO VOTE.
**Q.** I'D LIKE TO TURN TO SPEAKING TO SOME OF OUR PERCEPTIONS ON RACIAL DYNAMICS AND OTHER RELATED ELEMENTS OF LIFE. FROM YOUR PERSONAL KNOWLEDGE, WHAT, IF ANY, HAVE BEEN YOUR EXPERIENCES OR OBSERVATIONS OF RACIAL INEQUITY IN EDUCATIONAL OPPORTUNITIES IN YOUR COMMUNITY?
**A.** SO AS FAR AS EDUCATION WHERE WE LACK INFORMATION ABOUT HOW TO JUST -- WHETHER THERE'S AN AFTER-CARE PROGRAM FOR KIDS OR WHETHER THERE ARE OPPORTUNITIES FOR, YOU KNOW, WHERE TO GO TO SCHOOL. SO UNLESS YOUR PARENTS WENT TO UNIVERSITY, CHANCES ARE YOU PROBABLY WON'T HAVE THAT INFORMATION YOURSELF. SO I SEE THAT VERY CLEARLY ON THE LINES OF RACE WHERE WHAT IS OUR OPPORTUNITY THEN TO ADVANCE OURSELVES.
**Q.** SPEAKING FROM YOUR PERSONAL KNOWLEDGE, WHAT, IF ANY, HAVE BEEN YOUR EXPERIENCES OR OBSERVATIONS OF RACIAL INEQUITY IN EMPLOYMENT OPPORTUNITIES IN YOUR COMMUNITY?
**A.** WE DON'T HAVE A LOT OF JOBS IN OUR COMMUNITY. SO EITHER YOU -- IF YOU HAVE AN EDUCATION, YOU'RE EITHER GOING TO BE A TEACHER PROBABLY WORKING AT ONE OF THE LOCAL SCHOOLS, WORK IN

09:43 LOCAL GOVERNMENT, OR POSSIBLY AT A BIG BOX STORE, OR YOU'VE GOT TO GO ELSEWHERE TO FIND WORK.

SO EVEN ME MOVING BACK TO NAPOLEONVILLE, IT WAS LIKE, "WELL, WHAT AM I GOING TO DO WITH MYSELF? HOW CAN I FIND A JOB HERE?" AND THE BEST THING THAT I COULD DO WAS FIGURE OUT, OKAY, LET ME START A BUSINESS SO THAT I CAN CREATE JOBS FOR OTHERS, ESPECIALLY PEOPLE WHO HAVE FELONY CONVICTIONS AND DON'T HAVE A LOT OF EDUCATION. AND I'VE SEEN HOW DIFFICULT THAT'S BEEN FOR ME.

AND I CAN TELL YOU THAT BASED UPON MY RACE, GOING TO DIFFERENT SECTORS TO TRY TO GET FUNDING, TO TRY TO GET GOING, I'VE HAD PEOPLE TELL ME EVERYTHING BUT YES. "OH, BUT YOU'RE NOT AN ENGINEER. OH, BUT YOU DON'T HAVE EXPERIENCE DOING THAT." BUT THEN I'VE SEEN YOUNG, WHITE KIDS DOING THE SAME THING, SAME THING, WITH MUCH LESS EXPERIENCE OR EDUCATION THAN I HAVE AND SOMEHOW THEY GOT IT DONE.

SO WHAT CAN I BLAME THAT ON? AM I BROKEN? AND, YOU KNOW, PEOPLE EVEN ASKING ME A QUESTION LIKE THAT, "WELL, WHAT'S WRONG WITH YOU? THEY GOT IT DONE. WHAT'S WRONG WITH YOU?" IS SOMETHING WRONG WITH ME? NO.

**Q.** WHAT, IF ANY, HAS BEEN YOUR EXPERIENCES OR OBSERVATIONS OF RACIAL INEQUITY IN HOUSING ACCESS IN YOUR COMMUNITY?

**A.** SO IT'S VERY RELATED. SO IF YOU HAVE -- IF YOU'RE UNEMPLOYED OR INFORMALLY EMPLOYED, HOW ARE YOU GOING TO GET A LOAN SO THAT YOU CAN FIX UP YOUR HOME, SO THAT YOU CAN BUY A

09:44 NEW TRAILER, OR PUT A DIFFERENT KIND OF STRUCTURE ON THE PROPERTY THAT MAYBE YOU OWN.

SO EVEN IN MY OWN SITUATION, WE'VE GOT WHAT'S CALLED AN "HEIR'S PROPERTY." AND I KNOW A NUMBER OF AFRICAN AMERICANS HAVE THAT WHERE THE PROPERTY WAS PASSED DOWN TO YOU, BUT IT'S NOT IN YOUR NAME, IT'S IN THE NAME OF SOMEBODY WHO'S DECEASED. THERE'S NO -- YOU CAN'T GET ANY FUNDING FOR THAT. YOU CAN'T GET HELP TO REPAIR YOUR ROOF FOR THAT.

I SAT ON THE PHONE FOR, I DON'T KNOW, TWO HOURS TRYING TO GET ONTO THE RESTORE LOUISIANA LIST SO THAT I COULD GET A GRANT TO FIX MY ROOF. BUT I LIVE IN AN HEIR PROPERTY, SO THAT MEANS THERE'S NO HELP FOR MY HOME. AND SO IF THAT'S MY SITUATION, I SEE ALL OF THOSE PEOPLE WHO STILL HAVE TARPS ON THEIR HOMES, THEY ALSO LIVE IN HEIR PROPERTIES. SO IT'S TOUGH. IT'S REALLY TOUGH.

**Q.** WHAT HAPPENED TO YOUR ROOF?

**A.** THAT OLD IDA THAT CAME THROUGH LEFT A NUMBER OF HOLES IN MY ROOF. AND SO WE JUST -- YOU KNOW, WE JUST ENDURE. SO I'VE GOT HOLES IN MY ROOF IN THREE PLACES, AND WHEN IT RAINS, IT RAINS INSIDE. SO UNTIL I'VE GOT THE MONEY TO FIX THAT ROOF, IT'S ON ME. AND IT'S ME AND THE ELEMENTS LIVING TOGETHER SIDE BY SIDE.

**Q.** WHAT, IF ANY, HAVE BEEN YOUR EXPERIENCES OR OBSERVATIONS OF RACIAL INEQUITY IN HEALTHCARE ACCESS IN YOUR COMMUNITY?

**A.** HEALTHCARE IS ALSO A STICKY SITUATION BECAUSE WE LIVE AT

09:46 THE MOUTH OF CANCER ALLEY. SO THE NUMBER OF PEOPLE THAT I KNOW SINCE I'VE LIVED IN LOUISIANA, FOR THIS VERY SHORT TIME, WHO'VE EITHER BEEN SICK AND DIED, INCLUDING ONE OF MY DEAREST FRIENDS WHO LIVED ACROSS THE STREET. SHE DIDN'T HAVE HEALTHCARE OR INSURANCE. SO SHE HAD A PAIN IN HER SIDE. SHE ENDURED. SHE ENDURED. SHE ENDURED. SHE FINALLY WENT TO GET A MAMMOGRAM, SHE HAD STAGE 4 CANCER. I DON'T THINK SHE LIVED FOR SIX MONTHS AFTER THAT.

SO THOSE STORIES HAPPEN SO OFTEN. I CAN'T TELL YOU HOW MANY FUNERALS I'VE BEEN TO, ALMOST EVERY SATURDAY. NOT WEDDINGS, BUT FUNERALS.

**Q.** WHAT, IF ANY, HAVE BEEN YOUR EXPERIENCES OF RACIAL INEQUITY OR OBSERVATIONS IN CRIMINAL LAW ENFORCEMENT IN YOUR COMMUNITY?

**A.** SAME THING THERE WITH HOW WE ARE OVER POLICED. I LIVE IN A RURAL AREA. YET, I CAN PROBABLY GIVE YOU THREE EXAMPLES OF -- IN MY LITTLE AREA OR EVEN ON MY PROPERTY WHEN SOMEBODY DRIVES UP AND THEN YOU SEE THE FLASHING LIGHTS BEHIND THEM. TWO OR THREE POLICE CARS FROM ASSUMPTION PARISH PULLING UP BEHIND THEM AND MAKING -- THERE WAS A NEIGHBOR THAT I HAD WHO PULLED UP INTO MY DRIVEWAY, AND THEY MADE THIS MAN WALK. THE POLICE MADE THIS MAN WALK UP AND DOWN HOW MANY TIMES TO GET HIM ON A DUI, WHICH THEY FINALLY DID. AND SO HIS CAR STAYED THERE FOR A COUPLE OF DAYS, AND I NEVER SAW HIM AGAIN.

**Q.** I'D LIKE TO PIVOT TO TALKING ABOUT YOUR OBSERVATIONS OF

09:47 POLITICAL CAMPAIGNS AND RHETORIC. HAVE YOU OBSERVED ANY RACIAL UNDERTONES IN POLITICAL CAMPAIGN ADVERTISEMENTS WHILE LIVING IN YOUR COMMUNITY?

**A.** YES, I HAVE.

**Q.** AND CAN YOU PLEASE DESCRIBE THOSE?

**A.** I CAN GIVE YOU THE EXAMPLE OF SENATOR KENNEDY, WHO WON, AND IF YOU WATCHED HIS TELEVISION AD, IN THE BACKGROUND HE HAD BLACK LIVES MATTER PROTESTS AND TALKING ABOUT, YOU KNOW, WOKE POLITICS AND, YOU KNOW, "NEXT TIME YOU CALL THE POLICE, CALL A CRACKHEAD."

AND, YOU KNOW, I GREW UP IN THE 80S AND "CRACKHEAD" WAS DEFINITELY CODE FOR BLACK PERSON. SO THAT TO ME WAS ALARMING, AND IT MADE ME FEEL BELITTLED.

**Q.** ANY EXAMPLES FROM RECENT CAMPAIGNS THIS YEAR?

**A.** AND, IN ADDITION, I DO REMEMBER HEARING THE WOKE. YOU KNOW, AND BLACK PEOPLE USE TO SAY IT, "ALL RIGHT. STAY WOKE. STAY WOKE." AND SO NOW IT'S BEEN TURNED AROUND WHERE WOKE IS DEFINITELY SOMETHING LIKE WOKE POLITICS. YOU KNOW, WE DON'T WANT THAT.

SO I HEARD THAT QUITE A BIT DURING THIS ELECTION SEASON, AND IT STINGS. IT STINGS BECAUSE IF WE ARE HERE FIGHTING FOR OUR RIGHTS AND THEN SOMEBODY IS MOCKING THAT AND MIMICKING THAT, THEN HOW ARE WE SUPPOSED TO FEEL ABOUT THAT.

**Q.** AND TO CONFIRM: WHAT -- WHO ARE YOU HEARING THESE THINGS FROM?

09:49 **A.** I THINK THAT WAS THE GOVERNOR ELECT'S CAMPAIGN, IF I REMEMBER.
**Q.** AND WHAT RACE IS SENATOR KENNEDY?
**A.** WHITE.
**Q.** AND WHAT RACE IS THE GOVERNOR ELECT?
**A.** WHITE.
**Q.** HAVE YOU OBSERVED TROPES OR STEREOTYPES IN THE DEPICTION OF BLACK CANDIDATES IN POLITICAL ADVERTISING?
**A.** I HAVE. I AM -- I CAN RECALL DEVANTE LEWIS, AND THEY HAD A LITTLE ANIMATION OF HIM. HE RAN FOR THE PUBLIC SERVICE COMMISSIONER SEAT. AND THEY HAD A LITTLE ANIMATION OF HIM WITH PUPPET STRINGS. AND HE WAS -- YOU KNOW, HE'S THE PUPPET FOR BIG, LIBERAL BUSINESS. YOU KNOW, SO IT'S LIKE HE CAN THINK ON HIS OWN. THIS IS AN INTELLIGENT MAN.
SO IT JUST RINGS, AND IT RESONATES DEEPLY FOR ME TO HEAR THOSE KIND OF TROPES THAT, YOU KNOW, WE CAN'T THINK FOR OURSELVES HERE IN LOUISIANA, WE, BLACK PEOPLE. SO -- BUT, YES, WE CAN. WE HAVE SOLUTIONS, AND WE KNOW WHAT WE WANT, AND WE WANT TO THRIVE, JUST LIKE EVERYBODY ELSE HERE IN LOUISIANA. WE WANT OUR FAIR SHOT.
**Q.** HAVE YOU SEEN SIMILAR DEPICTIONS AGAINST ANY OTHER BLACK CANDIDATES?
**A.** I REMEMBER SOME AGAINST SHAWN WILSON ALSO DURING THE PAST ELECTION SEASON.
**Q.** AND WHAT WAS HE RUNNING FOR?

09:50 1 **A.** HE WAS RUNNING FOR GOVERNOR.
2 **Q.** AND WHAT RACE IS HE?
3 **A.** BLACK.
4 **Q.** HOW DID THESE SORTS OF DEPICTIONS OF BLACK CANDIDATES MAKE
5 YOU FEEL AS A BLACK WOMAN IN LOUISIANA?
6 **A.** IT MAKES ME FEEL LIKE I NEED TO GET ON THE NEXT BUS --
7 ONE-WAY TICKET OUT BECAUSE I JUST DON'T SEE THE TRANSFORMATION
8 OR THE CHANGE, AND IT FEELS LIKE IT'S NEVER, EVER GOING TO
9 HAPPEN.
10 SO I HAVE JOINED THE MASSES OF BLACK PEOPLE FEELING
11 LIKE, YOU KNOW, I'M IN DESPAIR. I'VE HAD A YEAR OF A LOT OF
12 DEPRESSION ACTUALLY, BECAUSE IT'S JUST SO HARD LIVING HERE AND
13 BEING BLACK, AND THEN HAVING CONVERSATIONS WITH PEOPLE, THE
14 NEIGHBORS AND FRIENDS AND FAMILY EVEN -- WHO ARE JUST LIKE,
15 "YOU KNOW, WELL, THAT'S HOW IT IS. THAT'S HOW IT'S GONNA BE.
16 AIN'T NEVER GONNA CHANGE." I DON'T WANT TO LIVE IN A PLACE
17 WHERE IT'S NEVER GOING TO CHANGE OR, YOU KNOW, WHERE BLACK
18 PEOPLE ARE JUST POOR, AND THAT'S JUST THE WAY IT IS. I DON'T
19 WANT TO LIVE HERE LIKE THAT.
20 **Q.** BUT HAVE YOU BOUGHT THAT BUS TICKET?
21 **A.** IT'S ON LAYAWAY.
22 **Q.** AND WHY HAVEN'T YOU BOUGHT IT YET?
23 **A.** NO, I HAVEN'T. I SEE HOPE. I MEAN, LOOK AT THIS ROOM
24 HERE, THIS OPPORTUNITY TO TRANSFORM OUR COMMUNITY, AND THAT'S
25 SOMETHING THAT EVERYBODY SHOULD WANT.

09:51 IF WE'RE A THIRD OF THE POPULATION, WHEN BLACK PEOPLE ARE DOING BETTER, EVERYBODY'S GONNA DO BETTER. SO I JUST WANT TO UNDERSTAND HOW WE CAN BE TOGETHER ON, YOU KNOW, WATCHING THE SAINTS. WE'RE TOGETHER DURING PARADES, BUT WE'RE NOT TOGETHER WITH WANTING BLACK PEOPLE TO HAVE FULL -- A FULL LIFE HERE IN LOUISIANA.

**Q.** HOW DO NEGATIVE CAMPAIGN DEPICTIONS ABOUT BLACK CANDIDATES MAKE YOU FEEL ABOUT BLACK PEOPLES' ACCESS TO POLITICAL POWER IN THIS STATE?

**A.** IT MAKES ME FEEL LIKE, YOU KNOW, JUST A LAUGHING MATTER, LIKE IT'S NOT REALLY TAKEN SERIOUSLY.

**Q.** BEYOND THESE ADS IN YOUR COMMUNITY, HAVE YOU OBSERVED ANY CHALLENGES THAT BLACK CANDIDATES FACE IN GETTING ELECTED?

**A.** WE SURE HAVE A HARD TIME RAISING THE FUNDING, AND THEN JUST EVEN GETTING PEOPLE TO BELIEVE THAT CHANGE IS POSSIBLE. SO PEOPLE DON'T TAKE THE ELECTION PROCESS SERIOUSLY BECAUSE IT'S LIKE, "WELL, THINGS AREN'T GOING TO CHANGE." YOU KNOW, AND IF WE BELIEVE THAT THINGS AREN'T GOING TO CHANGE BECAUSE THEY HAVEN'T CHANGED, THEN THEY WON'T CHANGE.

SO SOMEHOW SOMETHING HAS TO HAPPEN WHERE THAT GLIMMER OF HOPE IS THERE, BUT IT'S NOT HERE RIGHT NOW. AND I'M EVEN FEELING IT. I DIDN'T COME HERE TO FEEL LIKE -- YOU KNOW, I DIDN'T WANT TO JOIN THE MASSES OF, YOU KNOW, FRUSTRATED PEOPLE IN DESPAIR. THAT'S NOT WHY I MOVED HERE. YOU KNOW, I WANT SUNSHINE IN MY LIFE. I WANT PROSPERITY IN MY LIFE AND THE

09:53 LIVES OF OTHERS, BECAUSE THEN WE WON'T HAVE SO MUCH CRIME. WE WON'T HAVE PEOPLE WHO ARE, YOU KNOW, ACTING OUT OR PEOPLE WHO ARE JUST ANGRY AND, YOU KNOW, FEELING BITTER.

**Q.** AND DO YOU SEE MANY OF YOUR BLACK NEIGHBORS SIGNING UP TO RUN FOR OFFICE?

**A.** NO. PEOPLE FEEL LIKE IT'S TOO MUCH OF AN UPHILL BATTLE, AND, YOU KNOW, WE DON'T DO HILLS IN SOUTHERN LOUISIANA. SO IT'S REALLY, REALLY DIFFICULT TO NAVIGATE BECAUSE, YOU KNOW, PEOPLE JUST THINK THAT'S THE WAY IS. YOU KNOW, YOU FIND YOUR JOY ON SUNDAY, AND THAT'S IT. BUT I WANT SOME JOY HERE AND NOW. MY MOTHER USED TO SAY NO CROSS, NO CROWN. SO I DON'T WANT TO WAIT TO GET TO HEAVEN FOR SOME JUSTICE.

**Q.** OTHER THAN SENATOR ED PRICE WHO YOU MENTIONED BEFORE, ARE YOU REPRESENTED BY ANY BLACK ELECTED OFFICIAL COMING FROM LOUISIANA CURRENTLY?

**A.** NOT ONE.

**Q.** NOT IN LOCAL OFFICES LIKE YOUR POLICE JURY?

**A.** EVEN MY POLICE JUROR WHO IS WHITE.

**Q.** HOW ABOUT STATE LEVEL OFFICES YOU VOTE FOR?

**A.** ALL WHITE.

**Q.** AND FEDERAL SEATS ELECTED FROM LOUISIANA?

**A.** WELL, WE DO HAVE KAMALA HARRIS.

**Q.** THERE YOU GO.

DR. NAIRNE, FROM YOUR EXPERIENCE WHAT IMPACT, IN YOUR PERCEPTION, WOULD A NEW LEGISLATIVE MAP HAVE ON YOUR BROADER

09:54 COMMUNITY?
**A.** A NEW MAP WOULD GIVE US THAT LEVEL OF HOPE THAT ALL OF THIS WORK THAT WE'RE DOING, ALL OF THE LITTLE SIDEBARS THAT PEOPLE ARE HAVING, WOULD ABSOLUTELY BE WORTH IT AND THAT WE WOULD HAVE SOME JUSTICE AND SOME PROSPERITY IN LOUISIANA, EVEN IN THE BLACK COMMUNITY, EVEN THESE RURAL AREAS.
**Q.** AND FINALLY, DR. NAIRNE, ON A PERSONAL LEVEL, WHAT WOULD "RELIEF" MEAN TO YOU IN THIS CASE?
**A.** IT WOULD MEAN I'M STAYING HERE AND WORKING TO BRING PROSPERITY, TO BRING A SENSE OF PEACE, AND JUST A SENSE OF THE ABILITY TO MAKE CHANGE THAT IS GOOD FOR EVERYBODY. SO I JUST WANT PEOPLE TO SEE THAT, AND I WANT TO SEE IT, TOO.
**Q.** THANK YOU, DR. NAIRNE. NO FURTHER QUESTIONS.
**A.** THANK YOU.
**THE COURT:** CROSS.
**MR. CONINE:** JOHN CONINE ON BEHALF OF THE SECRETARY OF STATE.

**CROSS-EXAMINATION**

**BY MR. CONINE:**
**Q.** GOOD MORNING, DR. NAIRNE.
**A.** GOOD MORNING.
**Q.** IS IT *NAIRNE* OR *NAIRNE*?
**A.** NAIRNE.
**Q.** NAIRNE.
**A.** BUT, YOU KNOW, JUST DON'T CALL ME LATE FOR DINNER.

09:56 **Q.** I'VE GOT A HARD LAST NAME TO PRONOUNCE, TOO. I KNOW YOUR PAIN.

YOU SAID -- WHAT IS YOUR CURRENT ADDRESS?

**A.** 3651 --

**THE COURT REPORTER:** NO ADDRESSES.

**MR. CONINE:** OH. I'M SORRY. I DIDN'T KNOW.

**THE COURT:** NO PERSONALLY IDENTIFYING INFORMATION.

**MR. CONINE:** OKAY.

**THE COURT:** NAPOLEONVILLE IS ENOUGH.

**MR. CONINE:** ALL RIGHT.

**BY MR. CONINE:**

**Q.** AND HOW LONG HAVE YOU LIVED IN NAPOLEONVILLE?

**A.** I HAVE LIVED THERE SINCE 2016, SO WE CAN DO THE MATH TOGETHER.

**Q.** AND WHAT IS THAT? I'LL PUT YOU TO THE TEST.

**A.** OH, IS IT NINE YEARS?

**Q.** AND SO YOU REGISTERED TO VOTE IN SEPTEMBER OF 2018. ISN'T THAT RIGHT?

**A.** 2017.

**Q.** YOU REGISTERED TO VOTE IN 2017?

**A.** I THINK SO.

**Q.** OKAY. I'M GOING TO SHOW YOU YOUR -- THESE ARE YOUR DISCOVERY RESPONSES.

IS THE ELMO ON?

IT TAKES A LITTLE WHILE TO HEAT UP, I BELIEVE.

09:57 **A.** OKAY.
**Q.** DO YOU RECOGNIZE THIS DOCUMENT, DR. NAIRNE?
**A.** YES. YES.
**Q.** OKAY. DO YOU RECOGNIZE THIS TO BE YOUR DISCOVERY RESPONSES IN THIS MATTER?
**A.** CAN YOU SCROLL A LITTLE, PLEASE? IT LOOKS FAMILIAR.
**Q.** AND THIS FIRST INTERROGATORY RIGHT HERE, CAN YOU READ THAT WHERE IT SAYS "INTERROGATORY NO. 1"?
**A.** "FOR EACH OF THE INDIVIDUAL PLAINTIFFS, PLEASE STATE OR IDENTIFY."
**Q.** AND THEN JUST "B" FOR ME.
**A.** "THE DATE YOU BECAME REGISTERED TO VOTE IN LOUISIANA."
**Q.** ALL RIGHT. AND THEN DO YOU SEE WHERE IT SAYS "RESPONSE"?
**MS. WENGER:** OBJECTION TO THE EXTENT THAT THIS IS NOT REDACTED AND HAS HER ADDRESS ON IT.
**MR. CONINE:** OH. SORRY. CAN WE TURN IT OFF?
**BY THE WITNESS:**
**A.** AND MY YEAR OF BIRTH.
**Q.** AND THE --
**THE COURT:** JUST A MINUTE, MA'AM. WHEN THERE'S AN OBJECTION ON THE TABLE, THE COURT HAS TO RULE ON THE OBJECTION.
IT'S AN UNREDACTED COPY. DON'T REFER -- IS THAT -- YOU'RE GOING TO -- IF YOU OFFER IT INTO EVIDENCE, IT NEEDS TO BE REDACTED.
**MR. CONINE:** I'M NOT GOING TO OFFER IT HERE, JUDGE.

09:58 I WAS JUST GOING TO SHOW IT TO HER TO REFLECT HER -- TO RECALL --

**THE COURT:** THE PROBLEM IS I HAVE A PACKED COURTROOM.

**MR. CONINE:** CAN WE NOT -- JUST SHOW IT ON THE MONITORS AND JUST --

**THE COURT:** YES.

**MR. CONINE:** -- SHOW ON HER MONITOR.

**THE COURT:** PUT IT JUST TO THE WITNESS AND COUNSEL, PLEASE.

**MR. CONINE:** THANK YOU.

**BY MR. CONINE:**

**Q.** CAN YOU SEE IT, DOCTOR?

**A.** NO.

**Q.** OKAY.

**THE COURT:** JUST A SECOND. YOU SHOULD HAVE IT NOW.

**THE WITNESS:** NOT YET.

**THE COURT:** YOU DON'T HAVE IT, MA'AM?

**THE WITNESS:** YES, IT'S HERE.

**THE COURT:** OKAY.

**BY MR. CONINE:**

**Q.** AND, DOCTOR, DO YOU SEE WHERE IT SAYS "RESPONSE" THERE?

**A.** (NODDED HEAD.)

**Q.** AND DO YOU SEE "B," THE RESPONSE THAT I'VE CIRCLED THERE?

**A.** I SEE IT.

**Q.** CAN YOU READ THAT SENTENCE FOR ME?

09:59 **A.** "TO THE BEST OF THE PLAINTIFF'S RECOLLECTION, PLAINTIFF REGISTERED TO VOTE ON 9/28/2018."
**Q.** OKAY. SO YOU MOVED INTO LOUISIANA IN 2016. CORRECT?
**A.** YES.
**Q.** AND YOU REGISTERED TO VOTE IN SEPTEMBER OF 2018. ISN'T THAT RIGHT?
**A.** POSSIBLY.
**Q.** OKAY. HOW OLD WOULD YOU HAVE BEEN IN 2018?
**MS. WENGER:** OBJECTION TO THE EXTENT THAT THAT REVEALS PERSONALLY IDENTIFYING INFORMATION.
**THE COURT:** YOU'RE GOING TO HAVE TO SPEAK UP. OBJECTION, BECAUSE IT CALLS FOR PERSONALLY IDENTIFYING INFORMATION?
**MS. WENGER:** CORRECT. YES, YOUR HONOR. APOLOGIES.
**THE COURT:** I DON'T THINK ANYBODY'S GOING TO BE ABLE TO IDENTIFY HER FROM HER AGE. OBJECTION OVERRULED.
HOW OLD WERE YOU IN WHAT YEAR?
**MR. CONINE:** 2018.
**THE COURT:** APPROXIMATELY.
**THE WITNESS:** SOMEWHERE IN THE 50S.
**BY MR. CONINE:**
**Q.** OKAY. AND, DR. NAIRNE, DO YOU RECALL TESTIFYING IN THE *ROBINSON* PRELIMINARY INJUNCTION HEARING?
**A.** YES.
**Q.** AND YOU'RE A PLAINTIFF IN THAT CASE AS WELL?

10:00 1 **A.** YES.
2 **Q.** OKAY. AND DO YOU RECALL TESTIFYING THAT YOU DIDN'T VOTE
3 THREE TIMES SINCE 2018?
4 **A.** YES.
5 **Q.** OKAY. AND YOU TESTIFIED EARLIER THAT YOU'RE A REGULAR
6 VOTER. ISN'T THAT RIGHT?
7 **A.** YES.
8 **Q.** OKAY.
9 **A.** CAN I SAY SOMETHING?
10 **THE COURT:** NO, MA'AM. YOU HAVE TO WAIT UNTIL
11 THERE'S A QUESTION.
12 **THE WITNESS:** OH, OKAY.
13 **THE COURT:** YOUR LAWYER WILL HAVE ANOTHER CHANCE.
14 **BY MR. CONINE:**
15 **Q.** AND I BELIEVE EARLIER YOU TESTIFIED THAT YOU DIDN'T KNOW
16 WHERE TO VOTE. ISN'T THAT RIGHT?
17 **A.** YES.
18 **Q.** OKAY. ARE YOU AWARE OF THE SECRETARY OF STATE'S APP
19 GEAUXVOTE?
20 **A.** YES, I AM.
21 **Q.** OKAY. AND YOU'RE AWARE THAT THAT SHOWS YOUR VOTING
22 LOCATION?
23 **A.** (NODDED HEAD.)
24 **Q.** IS THAT A YES?
25 **THE COURT:** YOU HAVE TO ANSWER EITHER "YES" OR "NO."

10:01 **BY THE WITNESS:**
**A.** OH, YES. YES.
**Q.** OKAY.
**THE COURT:** OKAY.
**BY MR. CONINE:**
**Q.** AND --
**THE COURT:** WE ARE TAKING A RECORD. AND SO WHILE THIS MAY SEEM -- AND NOT FOR THE BENEFIT OF EVERYBODY, THIS MAY SEEM SAY LIKE DIALOGUE. BUT YOU HAVE TO SAY EITHER "YES" OR "NO" SO THAT THESE NICE PEOPLE OUT HERE DON'T HAVE TO FIGHT OVER WHAT YOU SAID LATER.
**THE WITNESS:** OH, THANK YOU.
**MR. CONINE:** WELL SAID.
**BY MR. CONINE:**
**Q.** AND DO YOU RECALL TESTIFYING THAT SAME -- ABOUT THE SAME THING IN THAT CASE, THAT YOU DIDN'T KNOW WHERE TO VOTE?
**A.** YES.
**Q.** AND DO YOU RECALL WHEN THAT TESTIMONY WAS?
**A.** NO.
**Q.** AND IF I WERE TO REPRESENT TO YOU THAT IT WAS OVER A YEAR AGO, WOULD YOU HAVE ANY REASON TO DISPUTE THAT?
**A.** NO, I WOULDN'T.
**Q.** OKAY. AND THEN YOU TESTIFIED EARLIER ABOUT DEVANTE LEWIS. RIGHT?
**A.** YES.

10:02 **Q.** AND HE WAS RUNNING FOR THE PUBLIC SERVICE COMMISSION?
**A.** YES.
**Q.** OKAY. AND HE RAN AGAINST AN AFRICAN AMERICAN. ISN'T THAT RIGHT?
**A.** YES.
**Q.** OKAY. AND WHAT WAS THAT MAN'S NAME?
**A.** LAMBERT?
**Q.** THAT'S CORRECT, YES.
OKAY. AND WERE YOU AWARE THAT LEWIS BEAT THE INCUMBENT, WHO'S ALSO AFRICAN AMERICAN. RIGHT?
**A.** YES.
**Q.** OKAY. LET' SEE. AND YOU'RE A REGISTERED DEMOCRAT. RIGHT, DOCTOR?
**A.** YES.
**Q.** OKAY. AND YOUR CURRENT REPRESENTATIVE IS ALSO A DEMOCRAT. RIGHT?
**A.** YES.
**MR. CONINE:** MAY I HAVE A MOMENT, JUDGE?
**THE COURT:** YOU MAY.
**MR. CONINE:** NO FURTHER QUESTIONS.
**THE COURT:** ANY REDIRECT?
**MS. WENGER:** NO REDIRECT, YOUR HONOR.
**THE COURT:** OKAY, MA'AM, THANK YOU. YOU MAY STEP DOWN.
**THE WITNESS:** THANK YOU.

10:03 **THE COURT:** I'M GOING TO HAVE THE CLOCK RESET AT THE BREAK. IT'S FIVE MINUTES AFTER 10:00.

CALL YOUR NEXT WITNESS.

WE'LL TAKE A BREAK AT 10:30.

**THE DEPUTY CLERK:** WHO IS THE NEXT WITNESS?

**MR. CAMPBELL-HARRIS:** GOOD MORNING, YOUR HONOR.

MY NAME IS DAYTON CAMPBELL-HARRIS.

PLAINTIFFS ARE GOING TO BE CALLING REVEREND LOWE TO THE STAND.

**CLEE EARNEST LOWE,**

**HAVING BEEN DULY SWORN, TESTIFIED AS FOLLOWS:**

**THE COURT:** GO AHEAD.

**DIRECT EXAMINATION**

**BY MR. CAMPBELL-HARRIS:**

**Q.** GOOD MORNING.

CAN YOU PLEASE STATE YOUR NAME FOR THE RECORD.

**A.** CLEE EARNEST LOWE.

**Q.** THANK YOU.

ARE YOU A NAMED PLAINTIFF IN THIS CASE?

**A.** YES, I AM.

**Q.** AND WHERE DID YOU GROW UP?

**A.** I GREW UP IN NORTH LOUISIANA, NORTH CENTRAL UNION PARISH, A LITTLE SMALL RURAL TOWN CALLED SPEARSVILLE, LOUISIANA.

**Q.** AND DID YOU GO TO COLLEGE?

**A.** YES, I DID.

10:05 1 **Q.** AND WHERE DID YOU GO TO COLLEGE?
2 **A.** LOUISIANA TECH UNIVERSITY.
3 **Q.** DID YOU PARTICIPATE IN ANY SPORTS OR STUDENT ORGANIZATIONS
4 IN COLLEGE?
5 **A.** YES, I DID.
6 **Q.** AND WHAT WERE THEY?
7 **A.** FOOTBALL AND SOUL TECH.
8 **THE COURT:** I DIDN'T HEAR THE LAST PART. FOOTBALL
9 AND WHAT?
10 **THE WITNESS:** FOOTBALL AND SOUL TECH.
11 **THE COURT:** OKAY.
12 **THE WITNESS:** THERE WAS A STUDENT ORGANIZATION FOR
13 BLACK STUDENTS IN THE LATE 60S.
14 **BY MR. CAMPBELL-HARRIS:**
15 **Q.** OKAY. AND WHAT DO YOU DO FOR WORK TODAY?
16 **A.** I AM A PASTOR OF A LOCAL CONGREGATION.
17 **Q.** CAN YOU WALK US THROUGH SOME OF YOUR DUTIES AS A PASTOR?
18 **A.** WELL, SOME OF MY SASA DOULA DUTIES ARE TO ACTUALLY DO
19 THE -- BE THE WORSHIP LEADER. I PREACH SERMONS. I TEACH BIBLE
20 STUDY. I PERFORM MARRIAGES. I CONDUCT FUNERAL SERVICES, BABY
21 DEDICATIONS. I VISIT THE SICK. I VISIT INDIVIDUALS THAT ARE
22 INCARCERATED. I PERFORM SPIRITUAL COUNSELING, MARITAL
23 COUNSELING, AND THAT'S JUST A SHORT LIST.
24 **Q.** AND DO YOU HAVE A CHURCH?
25 **A.** YES, I DO.

10:06 1 **Q.** AND WHERE IS YOUR CHURCH LOCATED?
2 **A.** THE CHURCH IS LOCATED IN THE COMMUNITY OF SCOTLANDVILLE,
3 WHICH IS IN NORTH BATON ROUGE.
4 **Q.** IS THAT WHERE YOU LIVE AS WELL?
5 **A.** NO, I DO NOT.
6 **Q.** AND WHERE DO YOU LIVE?
7 **A.** I LIVE IN SOUTHEAST BATON ROUGE.
8 **Q.** ARE YOU GENERALLY AWARE OF THE DEMOGRAPHICS OF
9 SCOTLANDVILLE?
10 **A.** YES, I AM.
11 **Q.** AND WHAT ARE THEY?
12 **A.** IT IS PREDOMINATELY AFRICAN AMERICAN.
13 **Q.** LET'S CIRCLE BACK TO YOUR CHURCH A LITTLE BIT. DO YOU
14 KNOW HOW MANY MEMBERS OF YOUR CHURCH THERE ARE?
15 **A.** YES. WE HAVE APPROXIMATELY 325 MEMBERS.
16 **Q.** AND HOW DO MOST OF YOUR CHURCH MEMBERS IDENTIFY RACIALLY?
17 **A.** AS AFRICAN AMERICAN.
18 **Q.** AND ARE YOU AWARE OF WHERE MOST OF YOUR CONGREGATION
19 GENERALLY RESIDES?
20 **A.** YES, I DO.
21 **Q.** AND WHERE WOULD THEY BE?
22 **A.** THEY RESIDE IN SCOTLANDVILLE AND IN THE SUBURB AREA OF
23 BAKER AND IN ZACHARY, LOUISIANA, MAJORITY.
24 **Q.** THANK YOU.
25 DOES YOUR CHURCH DO COMMUNITY WORK?

10:07 1 **A.** YES, WE DO.
2 **Q.** CAN YOU EXPLAIN TO THE COURT WHAT TYPES OF COMMUNITY WORK
3 YOUR CHURCH DOES?
4 **A.** WE DO OUTREACH, HOPEFULLY TO FEED THE HOMELESS, AND ALSO
5 WE CLOTHE THOSE THAT NEED CLOTHING, AND WE PROVIDE SOME
6 AFTER-CARE EDUCATION FOR STUDENTS TO HELP THEM WITH THEIR
7 REMEDIAL EDUCATION.
8 **Q.** DOES YOUR CHURCH ENGAGE IN ELECTION WORK AS WELL?
9 **A.** YES. IT IS VERY LIMITED, THOUGH.
10 **Q.** AND WHAT TYPE OF ELECTION WORK DOES YOUR CHURCH ENGAGE IN?
11 **A.** WELL, WE WILL HOST CANDIDATE FORUMS. WE WILL TRY TO
12 EDUCATE OUR COMMUNITY AND THE CONGREGATION ABOUT -- THROUGH
13 VOTER EDUCATION, TO LOOK AT THE ISSUES, OKAY, LOOK AT THE
14 CANDIDATES THAT ARE RUNNING FOR ELECTED OFFICE.
15 **Q.** WHAT ARE THE ELECTION ISSUES THAT YOU SPEAK ABOUT WITH
16 YOUR CONGREGATION?
17 **A.** BASICALLY IT'S GOING TO BE FOR AFFORDABLE HOUSING. IT'S
18 GOING TO BE INCREASED PAY FOR LIVING WAGES, HOPEFUL TO GET OUR
19 TEACHERS A PAY INCREASE OR A SALARY INCREASE. WE ALSO TALK
20 ABOUT ACCESS TO BETTER HEALTH, ET CETERA.
21 **Q.** YOU MENTIONED SOME SOCIAL ISSUES. ARE THERE OTHER SOCIAL
22 ISSUES THAT YOU SPEAK ABOUT WITH YOUR CONGREGATION?
23 **A.** WELL, SOCIOECONOMIC OPPORTUNITY, JOB RELATED, GETTING MORE
24 JOBS INTO THE SCOTLANDVILLE AREA, GETTING VIABLE BUSINESSES
25 THERE.

10:08 IF I COULD GIVE YOU AN EXAMPLE, SOME OF THE THINGS THAT WE LOOK AT IN THE SCOTLANDVILLE AREA IS TRYING TO GET A SUPERMARKET THERE. THERE IS A FOOD DESERT THERE THAT'S LOCATED IN SCOTLANDVILLE AND IN NORTH BATON ROUGE, AND THEN THERE ARE OTHER THINGS THAT WE ARE TRYING TO GET.

WE ARE AN EMPOWERMENT ZONE, BUT WE FIND OUT THAT THE EMPOWERMENT DOLLARS THAT HAVE BEEN EARMARKED FOR NORTH BATON ROUGE/SCOTLANDVILLE COMMUNITY, FOR SOME REASON OR ANOTHER, THEY MAKE THEIR WAY TO SOUTHEAST BATON ROUGE AND THE SOUTHEAST BORDER OF THE PARISH.

**Q.** THANK YOU.

DO YOU INCORPORATE THESE ISSUES AND OTHERS IMPACTING THE COMMUNITY INTO YOUR SERMONS?

**A.** I HAVE, YES. WHEN IT COMES TO -- TO ANSWER THAT QUESTION, YES, I DO.

**Q.** AND WHAT ISSUES DO YOU INCORPORATE INTO YOUR SERMONS?

**A.** BASICALLY HOW TO BECOME SELF-SUFFICIENT; HOW TO BECOME ENTREPRENEURS, BECAUSE HAVING FAITH IN GOD MEANS THAT YOU CAN TRUST AND RELY ON GOD, AND YOU CAN DO THINGS FOR YOURSELF.

**Q.** WHAT INSPIRED YOU TO ENGAGE IN CHURCH WORK INITIALLY?

**A.** I COME FROM A LONG LINE OF PREACHERS AND EDUCATORS. I AM AN ONLY CHILD. MY PARENTS WERE BOTH EDUCATORS, AND THIS IS A SPIRITUAL CALLING. I'VE BEEN IN THIS NOW FOR 54 YEARS THIS PAST MAY. I'M 72 YEARS OF AGE NOW, AND I'VE SEEN A LOT OF THINGS THAT GO ON IN THIS STATE THAT HAVE DISPLEASED ME.

10:10 1 BUT I'VE BEEN IN THIS BECAUSE, AS I JUST STATED, AS A
2 SPIRITUAL CALLING, AND I BELIEVE THAT WE, AS HUMANS, WE ARE OUR
3 BROTHER'S KEEPERS. AND I TRULY BELIEVE THAT ALL OF US ARE
4 CREATED TO HELP ONE ANOTHER, AND IT MAY BE THROUGH THE --
5 SOCIALLY, EDUCATIONALLY, ECONOMICALLY, POLITICALLY. WE MUST
6 ALL HELP ONE ANOTHER BECAUSE WE ARE IN THIS TOGETHER. AND I
7 FIND THAT I SERVE IN A UNIQUE POSITION. MY JOB, MY SOLE JOB
8 PRIMARILY IS TO HELP GET SOULS TO REACH HEAVEN.
9 **Q.** WHAT ARE SOME OF THE ISSUES THAT YOU'RE DISPLEASED WITH
10 THAT YOU'VE SEEN?
11 **A.** I'M DISPLEASED WITH -- PARTICULARLY, IN OUR COMMUNITY AND
12 THROUGHOUT THE STATE OF LOUISIANA IN THE AFRICAN-AMERICAN
13 COMMUNITY, IT'S A LACK OF AFFORDABLE HOUSING, A LACK OF JUST
14 AND FAIR REPRESENTATION IN THE POLITICAL PROCESS. ALSO, THE
15 HIGH-CRIME RATE, HIGH -- WHERE A HIGH NUMBER OF AFRICAN
16 AMERICANS ARE BEING INCARCERATED DUE TO BAD LAWS THAT WE HAVE,
17 AND ALSO TO GET GOOD ECONOMIC OPPORTUNITIES IN OUR
18 AFRICAN-AMERICAN COMMUNITIES.
19 **Q.** WERE THERE OTHER EXPERIENCES GROWING UP IN LOUISIANA THAT
20 MOTIVATED YOU TO BECOME MORE ENGAGED IN THE COMMUNITY?
21 **A.** IF I REFLECT BACK ON THAT, GROWING UP IN NORTH
22 LOUISIANA -- LOUISIANA IS A POOR, RURAL AGRICULTURAL STATE.
23 GROWING UP IN RURAL AREAS, WE WERE ALWAYS THE LAST TO GET
24 ANYTHING IN OUR COMMUNITY: PAVED ROADS, NATURAL GAS, RUNNING
25 WATER.

10:11 EVEN ON THE EDUCATIONAL SIDE, WE -- I AM A PRODUCT OF USED SCHOOL TEXTBOOKS, USED BAND UNIFORMS, A LESS THAN IDEAL ACADEMIC CURRICULUM.

FOR INSTANCE, IN MY HIGH SCHOOL WE HAD MORE THINGS -- LESSONS ABOUT AGRICULTURE, AS OPPOSED TO THE INDUSTRIAL ARTS. WE CRAVED FOR THOSE TYPES OF SUBJECTS: PLUMBING, ELECTRICITY, CARPENTRY, DEALING WITH THE TRADES. BUT I COULD TELL YOU HOW TO CASTRATE MANY FARM ANIMALS. I CAN TELL YOU A WHOLE LOT ABOUT CROP ROTATIONS. BUT WE NEVER HAD ONE SINGLE LESSON ON HOW TO DO CARPENTRY, HOW TO DO ELECTRICAL WORK, HOW TO DO MASONRY WORK, ET CETERA. AND SO THOSE CURRICULUMS WERE LESS THAN WHAT OUR COUNTERPARTS WOULD HAVE.

**Q.** THANK YOU FOR SHARING YOUR EXPERIENCE, REVEREND.

I'D LIKE TO TALK TO YOU A LITTLE BIT ABOUT YOUR EXPERIENCE VOTING. DO YOU VOTE?

**A.** YES, I DO.

**Q.** AND HOW LONG HAVE YOU BEEN A REGISTERED VOTER?

**A.** IN THE STATE OF LOUISIANA -- I RELOCATED HERE IN 2005, FROM THE CITY OF CHICAGO, BECAME A REGISTERED VOTER, THEN I ACCEPTED A CALL TO PASTOR A CONGREGATION IN NORTH LOUISIANA AND RETURNED IN 2007, AND I REREGISTERED IN THIS PARISH. SO SINCE JULY OF 2007, I'VE BEEN A REGISTERED VOTER.

**Q.** AND DO YOU GENERALLY VOTE REGULARLY?

**A.** YES, I DO.

**Q.** DO YOU KNOW WHAT YOUR CURRENT HOUSE DISTRICT IS?

10:13 1 **A.** YES, I DO.
2 **Q.** IN THE STATE LEGISLATURE, WHAT IS YOUR CURRENT HOUSE
3 DISTRICT?
4 **A.** HOUSE DISTRICT NO. 66.
5 **Q.** AND DO YOU KNOW WHO YOUR CURRENT REPRESENTATIVE IS FOR
6 THAT HOUSE DISTRICT?
7 **A.** AT THIS TIME IT IS RICK EDMONDS. HE LOST HIS ELECTION,
8 THANK GOD. AND WE NOW HAVE EMILY CHENEVERT.
9 **Q.** THANK YOU.
10 CAN YOU EXPLAIN TO THE COURT WHY VOTING MATTERS TO
11 YOU?
12 **A.** VOTING MATTERS TO ME BECAUSE IT IS THE LAW. I HAVE A DEEP
13 APPRECIATION FOR LAW. LAW IS WHAT GOVERNS US. LAW IS WHAT
14 WILL PROTECT US. GOOD POLICY, GOOD LAWS EMANATING FROM OUR
15 LEGISLATURE AND FROM CONGRESS AND FROM OUR LOCAL MUNICIPALITIES
16 AFFECT ALL OF OUR LIVES. SO IT'S IMPORTANT THAT WE HAVE PEOPLE
17 THAT ARE GOING TO BE ELECTED THAT IS GOING TO REPRESENT MY
18 INTERESTS, THE INTERESTS OF MY COMMUNITY, AND THE PEOPLE THAT
19 LIVE THEREIN. AND IT SEEMS AS THOUGH THAT'S NOT WORKING OUT
20 RIGHT NOW.
21 **Q.** YOU MENTIONED THIS A LITTLE BIT ALREADY, BUT WHAT ARE THE
22 SPECIFIC ISSUES IN YOUR COMMUNITY THAT MOTIVATE YOU TO VOTE?
23 **A.** WELL, IN MY COMMUNITY IT'S GOING TO BE SOMEONE THAT REALLY
24 TRULY CARES ABOUT MY ISSUES. MY ISSUES ARE DEFINITELY GOING TO
25 BE PUBLIC EDUCATION. IT'S GOING TO BE PUBLIC SAFETY. IT'S

10:15 GOING TO ALSO BE ECONOMIC OPPORTUNITY, AND ALL OF THE OTHER SOCIOECONOMIC THINGS THAT TIE INTO IMPROVING MY COMMUNITY TO MAKE MY COMMUNITY A GOOD PLACE TO LIVE.

**Q.** LET'S TALK ABOUT YOUR LEGISLATIVE DISTRICT A LITTLE BIT MORE. HOW LONG HAVE YOU RESIDED IN HOUSE DISTRICT 66?

**A.** I'VE BEEN THERE, WHAT, 16, 15 YEARS NOW, I BELIEVE, 15 YEARS.

**Q.** AND ARE YOU AWARE WHETHER AN AFRICAN-AMERICAN REPRESENTATIVE HAS EVER BEEN ELECTED TO THAT SEAT?

**A.** NONE. NONE.

**Q.** YOU ALSO MENTIONED SOME ISSUES THAT MOTIVATE YOU TO VOTE. HAVE YOU OBSERVED ANY BARRIERS TO POLITICAL PARTICIPATION IN YOUR COMMUNITY?

**A.** THERE HAVE BEEN A FEW IN TERMS OF TRYING TO MAKE SURE THAT INDIVIDUALS KNOW WHERE TO VOTE, GETTING THAT INFORMATION OUT, AND PARTICULARLY IN MY COMMUNITY WHERE I LIVE -- IS THAT YOUR QUESTION WHERE I LIVE?

**Q.** YES.

**A.** IN MY COMMUNITY WE HAVE A DIVERSE COMMUNITY. IT IS GROWING. WE ARE HAVING AN INCREASE IN MINORITIES, AFRICAN AMERICANS, AND HISPANICS IN THIS AREA. AND THERE HAS BEEN VERY LITTLE, I THINK, WORK DONE FROM THE STATUS QUO. WHEN I SAY "THE STATUS QUO," ELECTED OFFICIALS, TO REACH OUT TO THE AFRICAN AMERICANS AND THE BROWN PEOPLE, HISPANICS, THAT ARE IN THOSE DISTRICTS RIGHT THERE.

10:16 **Q.** WE'LL TALK ABOUT OUTREACH IN A MOMENT.
DO YOU PERCEIVE -- OR WHAT DO YOU PERCEIVE THE SENTIMENTS TO BE ABOUT VOTING IN YOUR COMMUNITY?
**A.** THERE'S A GREAT DEAL OF APATHY BECAUSE PEOPLE VOTE -- ARE NOT VOTING BECAUSE THEY FEEL AS THOUGH THEIR VOTE IS NOT GOING TO COUNT. WE DON'T SEE THESE ELECTED OFFICIALS IN THAT COMMUNITY, ALL RIGHT, AND IT PAINS MY HEART TO SAY THIS BUT I HAVE TO SAY IT, THEY BELIEVE THAT WE DON'T EVEN EXIST. BUT WE ARE HERE. WE ARE NOT GOING ANYWHERE.
I JUST BELIEVE IN MY HEART THAT OUR ELECTED OFFICIALS OUGHT TO SEE US AS HUMAN BEINGS. WE BREATHE, WE LIVE, WE HAVE CHILDREN, WE HAVE FAMILIES. WHO DOES NOT WANT THEIR CHILDREN TO RECEIVE A GOOD EDUCATION? WHO DOES NOT WANT THEIR CHILDREN TO GO TO A SECONDARY UNIVERSITY OR COLLEGE? WHO DOES NOT WANT TO EARN A DECENT LIVING?
THE OTHER THING THAT PAINS MY HEART IS THAT WE HAVE ELECTED FOLKS THAT DO NOT WANT TO GIVE EDUCATORS A RAISE, NOR DO THEY WANT TO GIVE WORKING PEOPLE OF THIS STATE A LIVING WAGE. WHO CAN LIVE ON $7.25 AN HOUR? EVEN WHEN WE'VE GOT INFLATION AS HIGH AS IT IS -- IT PAINS MY HEART. WHAT MAKES OTHER FOLKS THINK THAT PEOPLE OF COLOR DON'T WANT TO LIVE, HAVE A GOOD DECENT LIFE? BUT UNTIL WE CAN CHANGE THAT DYNAMIC, CHANGE THAT SCENARIO, WE WILL ALWAYS BE IN THE SAME BOAT THAT WE ARE IN RIGHT NOW. IT PAINS MY HEART.
IT PAINS MY HEART TO SEE THAT I'VE GOT YOUNG MOTHERS

10:18 HAVING TO COME TO MY CHURCH SEEKING BENEVOLENCE OR FINANCIAL AID TO HELP MEET RENT, HELP PAY UTILITIES, HELP TO PAY FOR SOME PRESCRIPTIONS. IT PAINS MY HEART. BUT IF WE HAD ELECTED OFFICIALS WHO WOULD COME TO US, TALK TO US. DON'T BE AFRAID OF US.

EVEN WHEN YOU -- WHEN THEY CAMPAIGN, THE ONLY TIME YOU WILL SEE THEM IS DURING A CAMPAIGN, BUT ONCE THEY GET ELECTED, YOU DON'T SEE THEM ANYMORE. THAT HAS BEEN AGE OLD, AND IT HASN'T CHANGED AND IT WILL NOT CHANGE UNTIL WE ELECT PEOPLE OF OUR CHOICE, MAYBE EVEN PEOPLE THAT LOOK LIKE ME AND OTHERS, FEMALES.

AS LONG AS WE CONTINUE TO HAVE MALE-DOMINATED CAUCASIANS MAKING ALL THE RULES, MAKING ALL OF THE POLICIES, NOTHING WILL CHANGE. WE WILL FOREVER BE A POOR, RURAL AGRICULTURAL STATE, STANDING STILL WITH TIME GOING BACK TO RECONSTRUCTION, GOING BACK TO PRE-CIVIL WAR TIMES. LOUISIANA HAS STOOD STILL WITH THE TIMES. WE HAVE MADE SOME PROGRESS, BUT WE HAVE STOOD STILL WITH TIME.

I DON'T KNOW -- I DON'T WANT TO GET ON A SOAPBOX HERE. BUT I HAVE DISCOVERED AND FOUND WHEN YOU'VE GOT A MOTHER OR A SINGLE PARENT HOUSEHOLD WITH THREE OR FOUR CHILDREN MAKING $7.25 AN HOUR, WHAT KIND OF LIFE DOES HER CHILDREN EXPECT TO HAVE?

**Q.** IS THIS STAGNATION PART OF THE SOURCE OF VOTER APATHY?

**A.** IT IS.

10:20 1 **Q.** ARE THERE OTHER SOURCES OF VOTER APATHY?
2 **A.** YES, IT IS.
3 **Q.** WHAT ARE THOSE SOURCES OF VOTER APATHY?
4 **A.** WELL, WHEN I SEE AND HEAR OUR ELECTED OFFICIALS
5 CAMPAIGNING AND SAYING "I'M TOUGH ON CRIME," WE ALL KNOW WHAT
6 THAT MEANS. IT'S TOUGH ON AFRICAN-AMERICAN MALES, AND THAT
7 AFRICAN-AMERICAN MALE MANY TIMES IS INCARCERATED.
8 WHEN WE LOOK AT OUR STATE PRISON POPULATION, OVER 85,
9 90 PERCENT OF THEM ARE AFRICAN-AMERICAN MALES AND BROWN PEOPLE
10 IN OUR STATE PENITENTIARY SYSTEM. YOU HAVE ABSENTEE FATHERS,
11 AND THESE FATHERS ARE NOT THERE TO REAR THEIR CHILDREN. AND
12 THAT IS A SAD COMMENTARY TO MAKE HERE. WE NEED TO CHANGE THOSE
13 LAWS. EVERYBODY THAT COMMITS A CRIME, DEPENDING ON THE CRIME,
14 DOES NOT NECESSARILY MEAN THEY HAVE TO BE INCARCERATED FOR LONG
15 PERIODS OF TIME.
16 **Q.** YOU MENTIONED RACIAL UNDERTONES AND MESSAGING. HAVE YOU
17 OBSERVED THAT IN LOUISIANA?
18 **A.** I HAVE. AND MOST RECENTLY DURING THIS LAST ELECTION CYCLE
19 IN SOME OF THE ADVERTISEMENTS, PUSH CARDS THAT COME OUT -- AND
20 I RECEIVE THEM ALL THE TIME. AND WHEN YOU HEAR THINGS LIKE,
21 "PRO-LIFE," WHEN YOU HEAR THINGS LIKE "PRO-SECOND AMENDMENT,
22 REDUCING GOVERNMENT SPENDING," FOR ME, THOSE ARE ALL DOG
23 WHISTLES, ALL RIGHT. WE ALL KNOW WHAT THOSE MEAN IN OUR
24 COMMUNITY.
25 **Q.** AND WHY IS REDUCING GOVERNMENT FUNDING OR SPENDING A DOG

10:21 1 WHISTLE?
2 **A.** BECAUSE WE LOOK AT SOCIAL PROGRAMS THAT ARE DESIGNED TO
3 HELP PEOPLE TO COME UP. BECAUSE WHEN YOU ARE MAKING, LIKE I
4 SAY, $7.25 AN HOUR, THERE'S VERY LITTLE THAT YOU CAN AFFORD.
5 BUT THERE ARE SOCIAL PROGRAMS THAT ARE THERE TO HELP FAMILIES
6 AND INDIVIDUALS, TO HELP THE ELDERLY.
7 AND SO WHEN YOU START TALKING ABOUT CUTTING
8 GOVERNMENT SPENDING, ONE OF THE BIG THINGS IS, BUZZ WORDS HAS
9 BEEN -- NOT ON THIS, ALSO ON THE NATIONAL LEVEL IS TO CUT
10 MEDICARE, CUT SOCIAL SECURITY. WHO CAN AFFORD TO HAVE THAT
11 CUT? THERE ARE GROUPS THAT ARE TRYING TO DO THAT, TO CUT BACK
12 ON ALL OF THOSE THINGS THAT WE NEED ON SOCIAL PROGRAMS.
13 **Q.** HAVE YOU HEARD THIS RACIAL UNDERTONE MESSAGING FROM YOUR
14 CURRENT REPRESENTATIVES?
15 **A.** YES, I HAVE. JUST THIS LAST ELECTION CYCLE, ALL RIGHT.
16 AS I JUST AFORESTATED, THOSE LITTLE DOG WHISTLES THAT ARE OUT
17 THERE, THAT LET'S US KNOW WHAT RACE THEY ARE TALKING ABOUT, WHO
18 THEY ARE.
19 **Q.** AND HOW DO THOSE MESSAGES MAKE YOU FEEL?
20 **A.** WELL, IT MAKES ME WANT TO DIG MY HEELS IN AND NOT VOTE FOR
21 THAT PERSON, NO. 1. IT HELPS ME TO -- WANTS ME TO GET THE
22 MESSAGE OUT TO THOSE THAT I CAN REACH, SAY THIS PERSON IS NOT
23 GOING TO REPRESENT OUR INTERESTS AND WHAT WE LOOK FOR IN AN
24 ELECTED OFFICIAL.
25 AND THE OTHER PART ABOUT THIS, AS I JUST AFORESTATED,

10:23 1 THE ONLY TIME YOU WILL SEE THEM IS IF THEY COME TO YOUR DOOR
2 RINGING YOUR DOORBELL, PUTTING PUSH CARDS OUT THERE IS ABOUT
3 THE ONLY TIME THAT YOU WILL SEE THEM.
4 AND YOU TAKE LIKE WHERE MY CHURCH IS LOCATED,
5 PREDOMINATELY IN THE AFRICAN-AMERICAN COMMUNITY, THEY MAY
6 CAMPAIGN THERE A LITTLE BIT. AFTER THE ELECTION IS OVER, AFTER
7 THEY HAVE BEEN ELECTED, YOU DON'T SEE THEM ANYMORE.
8 **Q.** DO YOU FEEL REPRESENTED BY YOUR CURRENT REPRESENTATIVE IN
9 THE HOUSE DISTRICT?
10 **A.** NO, I DO NOT.
11 **Q.** AND WHY NOT?
12 **A.** BECAUSE HE ESPOUSES ALL OF THE ISSUES THAT I HAVE TO WORK
13 AGAINST. THE THINGS THAT I SUPPORT COMMUNITY-WISE FOR PEOPLE
14 OF COLOR, HE IS AGAINST THAT.
15 **Q.** TO THE BEST OF YOUR RECOLLECTION, DO YOU KNOW WHETHER THE
16 CURRENT REPRESENTATIVE IN YOUR HOUSE DISTRICT SUPPORTS MEDICARE
17 EXPANSION IN LOUISIANA?
18 **A.** HE DID NOT.
19 **Q.** WHAT ABOUT INCREASING EDUCATION FUNDING?
20 **A.** DID NOT.
21 **Q.** HOW ABOUT BUILDING MORE AFFORDABLE HOUSING?
22 **A.** DID NOT.
23 **Q.** THANK YOU.
24 DO YOU RECALL TESTIFYING A LITTLE BIT EARLIER ABOUT
25 CANDIDATE FORUMS AND CANDIDATES COMING TO YOUR CHURCH?

10:24 1 **A.** REPEAT THAT AGAIN.
2 **Q.** DO YOU RECALL TESTIFYING EARLIER TODAY ABOUT CANDIDATE
3 FORUMS AND CANDIDATES COMING TO SPEAK AT YOUR CHURCH?
4 **A.** YES.
5 **Q.** CAN YOU RECALL A TIME WHEN ONE OF YOUR REPRESENTATIVES IN
6 THE STATE LEGISLATIVE IN YOUR HOUSE DISTRICT CAME TO SPEAK TO
7 YOUR CONGREGANTS?
8 **A.** NOT AT MY CONGREGATION, NO, NOT IN MINE.
9 **Q.** AND WHAT ABOUT AT THE CANDIDATE FORUMS?
10 **A.** CANDIDATE FORUMS? YES. THAT WAS A STATEWIDE FORUM THAT
11 WAS HELD IN THE COMMUNITY ON THE CAMPUS OF SOUTHERN UNIVERSITY.
12 ALL OF THE GUBINATORIAL CANDIDATES WERE INVITED. MANY OF THE
13 OTHER STATE CONSTITUTIONAL OFFICES, THEY WERE INVITED, AND SOME
14 DID NOT SHOW UP AT ALL.
15 **Q.** AND CAN YOU, JUST FOR THE RECORD, EXPLAIN WHAT A CANDIDATE
16 FORUM IS?
17 **A.** A CANDIDATE FORUM IS -- WHEREBY THE CANDIDATES RUNNING FOR
18 AN ELECTED OFFICE CAN COME MEET THE PERSONS OR PEOPLE IN THE
19 COMMUNITY, AND THEY CAN STATE THEIR PLATFORMS. AND THEY -- WE
20 HAVE A PRESET OF QUESTIONS COMING FROM THE COMMUNITY THAT IS
21 PRESENTED TO EACH CANDIDATE AND THEY ARE ALLOWED TO RESPOND OR
22 ANSWER THE QUESTIONS.
23 **Q.** AND WHEN YOU SAY "WE," WHO DO YOU MEAN?
24 **A.** A FAITH-BASED COMMUNITY, PEOPLE, PEOPLE THAT LIVE -- A
25 FAITH-BASED LEADER, SHOULD I SAY, AND PEOPLE THAT ARE IN THE --

10:25 1 MEMBERS OF THE CONGREGANT'S CHURCHES AND EVERYDAY LAY PEOPLE
2 THAT LIVE IN THOSE DISTRICTS THERE.
3 **Q.** HAVE ANY OF THE CANDIDATES WHO SPOKE AT THESE CANDIDATE
4 FORUMS EVER BEEN WHITE?
5 **A.** YES.
6 **Q.** AT THE CANDIDATE FORUMS THAT YOU HELPED ORGANIZE, WERE ANY
7 ONE OF THOSE CANDIDATES WHITE?
8 **A.** YES, JUST A HANDFUL.
9 **Q.** OKAY. ONE MORE QUESTION, REVEREND LOWE.
10 WHY DOES -- WELL, WHAT DO YOU HOPE TO ACHIEVE WITH
11 THIS LAWSUIT?
12 **A.** THAT THIS HONORABLE COURT WILL RULE IN OUR FAVOR TO
13 UNDERSTAND THE NECESSITY, THE NEED, AND THE IMPORTANCE, HOW
14 CRITICAL IT IS TO HAVE PEOPLE LIKE ME ELECTED TO OFFICE. IT IS
15 IMPORTANT THAT WE WILL HAVE PEOPLE THERE WHO WILL BE ABLE TO
16 CHAMPION THE ISSUES AND THE CAUSES THAT ARE DEAR TO US. AND
17 WHEN WE HAVE PEOPLE THAT ARE ELECTED -- IT IS IN MY HEART -- IT
18 IS MY HEARTFELT BELIEF THAT WHEN WE HAVE PEOPLE THAT ARE
19 ELECTED LIKE THAT, THEY WILL BE CONCERNED ABOUT EVERYBODY.
20 THEY WILL NOT LEAVE ANYBODY BEHIND. WHAT'S GOOD FOR ME IS
21 GOING TO BE GOOD FOR EVERYBODY, IT REALLY WILL BE.
22 **Q.** THANK YOU, REVEREND.
23 **MR. CAMPBELL-HARRIS:** ONE MOMENT, YOUR HONOR, WHILE I
24 CONFER WITH COUNSEL.
25 **THE COURT:** YOU MAY.

10:27 1 **BY MR. CAMPBELL-HARRIS:**
2 **Q.** JUST ONE MORE CLARIFYING QUESTION, REVEREND LOWE. YOUR
3 CURRENT REPRESENTATIVE, ARE YOU AWARE OF HOW THEY IDENTIFY
4 RACIALLY?
5 **A.** YES, I DO.
6 **Q.** AND HOW DO THEY IDENTIFY?
7 **A.** WHITE.
8 **Q.** OKAY. THANK YOU.
9 **MR. CAMPBELL-HARRIS:** NO MORE QUESTIONS, YOUR HONOR.
10 I PASS THE WITNESS.
11 **THE COURT:** CROSS?
12 **MR. CONINE:** NO QUESTIONS, YOUR HONOR.
13 **THE COURT:** ALL RIGHT. YOU MAY STEP DOWN. THANK
14 YOU, SIR.
15 **THE WITNESS:** REALLY?
16 **THE COURT:** YES, SIR.
17 **THE WITNESS:** THAT'S ALL?
18 **THE COURT:** THAT'S ALL. SORRY TO DISAPPOINT.
19 OKAY. IT'S 10:28, LET'S TAKE A 15-MINUTE
20 RECESS.
21 **THE LAW CLERK:** ALL RISE.
22 COURT IS IN RECESS.
23 **(WHEREUPON, THE COURT WAS IN RECESS.)**
24 **THE COURT:** OKAY. SORRY FOR THE FALSE ALARM.
25 BE SEATED.

10:44 NEXT WITNESS, PLEASE.

**MS. BAHN:** GOOD MORNING, YOUR HONOR.

THE PLAINTIFFS CALL PASTOR STEVEN HARRIS.

**THE COURT REPORTER:** WHAT IS YOUR NAME?

**MS. BAHN:** APOLOGIES. JOSEPHINE BAHN ON BEHALF OF PLAINTIFFS.

**THE COURT REPORTER:** JOSEPHINE WHAT?

**MS. BAHN:** BAHN. B-A-H-N.

**STEVEN R. HARRIS, SR.,**

**HAVING BEEN DULY SWORN, TESTIFIED AS FOLLOWS:**

**DIRECT EXAMINATION**

**BY MS. BAHN:**

**Q.** GOOD MORNING, PASTOR HARRIS.

**A.** GOOD MORNING.

**Q.** CAN YOU PLEASE STATE YOUR NAME FOR THE RECORD.

**A.** STEVEN R., INITIAL, HARRIS, SENIOR.

**Q.** THANK YOU, PASTOR HARRIS.

ARE YOU A NAMED PLAINTIFF IN THIS CASE?

**A.** I AM.

**Q.** AND JUST SO THE RECORD'S CLEAR, WHAT RACE DO YOU IDENTIFY AS?

**A.** BLACK.

**Q.** I'M GOING TO START BY ASKING YOU A COUPLE OF BACKGROUND QUESTIONS.

WHERE DID YOU GROW UP?

10:46 1 **A.** NATCHITOCHES, LOUISIANA, NATCHITOCHES PARISH IN A LITTLE
2 PLACE CALLED READHIMER, LOUISIANA, BY WAY OF STRANGE ROAD IN A
3 PLACE CALLED GREEN GROVE. THAT'S ALL OBSCURE, BUT THAT'S WHERE
4 I GREW UP AT AND WENT TO SCHOOL IN A LITTLE PLACE CALLED
5 GOLDONNA, WHICH IS A -- PROBABLY 99.9 PERCENT WHITE AREA.
6 **Q.** AND DID YOU GRADUATE FROM HIGH SCHOOL THERE?
7 **A.** I DIDN'T. WE HAD INTEGRATION AND WE MERGED THE SCHOOLS
8 TOGETHER. AND SO I GRADUATED FROM A PLACE CALLED CAMTI.
9 **Q.** AND THEN AFTER HIGH SCHOOL, WHERE DID YOU GO?
10 **A.** GRAMBLING STATE UNIVERSITY, AND FROM GRAMBLING STATE
11 UNIVERSITY, I WAS CALLED INTO THE MINISTRY AND WENT TO SCHOOL
12 AT VICTORY FELLOWSHIP.
13 **THE COURT:** YOU HAD A BAD WEEKEND. HUH? SORRY.
14 **MS. BAHN:** WELL, YOUR HONOR, YOU JUST TOOK MY JOKE
15 OUT OF MY OUTLINE. SO I GUESS I'LL MOVE ON.
16 **BY MS. BAHN:**
17 **Q.** BUT, PASTOR HARRIS, DID YOU PARTICIPATE IN ANY SPORTS OR
18 STUDENT ORGANIZATIONS WHILE YOU WERE AT GRAMBLING?
19 **A.** IN BSU, BAPTIST STUDENT UNION, WHICH IS A CHOIR. AND SO
20 WE -- I PARTICIPATED IN THAT GROUP.
21 **Q.** AND WHAT DID YOU DO AFTER COLLEGE?
22 **A.** WENT INTO THE MINISTRY AND TRAVELED INTO NEW ORLEANS. AND
23 FROM NEW ORLEANS BACK TO NATCHITOCHES, LOUISIANA, WHERE MY
24 BROTHER AND I BEGAN PASTORING, WHICH I'VE BEEN PREACHING NOW
25 FOR 35 YEARS. WE BEGAN -- A LITTLE BLACK AREA BY THE NAME OF

10:48 SHADY GROVE, AND I BECAME THE ASSISTANT PASTOR AND HE WAS THE SENIOR PASTOR THERE.
**Q.** PASTOR, AS YOU SAID YOU'VE BEEN PASTORING FOR ABOUT 35 YEARS; IS THAT WHAT YOU DO FOR WORK TODAY?
**A.** FULL-TIME PASTOR.
**Q.** DO YOU DO ANYTHING ELSE FOR WORK?
**A.** NO.
**Q.** DO YOU WEAR ANY OTHER HATS IN YOUR COMMUNITY?
**A.** I'M A SCHOOL BOARD MEMBER FOR THE NATCHITOCHES PARISH SCHOOL BOARD. I SERVE ON A LOT OF BOARDS AND THINGS. ONE IS A JURY BOARD COMMISSION. I'M A MEMBER OF THE NAACP, I'M A MEMBER OF VOTERS & CIVIC LEAGUE. I SERVE IN A LOT OF CAPACITIES.
**Q.** CAN YOU WALK ME THROUGH SOME OF YOUR DUTIES AS A PASTOR?
**A.** FIRST OF ALL, FIRST AND FOREMOST, PREACHING THE GOSPEL, SERVING THE PEOPLE IN GOING TO COURT WITH MEMBERS, GOING TO HOSPITALS, SERVING IN PERFORMING MARRIAGES, BABY DEDICATIONS, JUST A PLETHORA OF THINGS THAT WE DO. AND THEN SOME THINGS THAT WE'RE DEFINITELY NOT PROBABLY QUALIFIED TO DO, BUT THEY THINK WE ARE.
**Q.** PASTOR HARRIS, YOU HAVE A CONGREGATION THAT YOU OVERSEE?
**A.** I DO. ABUNDANT LIFE INTERNATIONAL, WHICH IS RIGHT IN THE COMMUNITY IN WHICH I LIVE. AND THE OTHER ONE IS ST. MATTHEWS, WHICH IS A HISTORICAL BLACK COMMUNITY JUST EAST OF NATCHITOCHES PARISH. BUT IT'S STILL IN NATCHITOCHES PARISH, BOTH OF THEM. AND WE'VE MERGED SINCE COVID.

10:50 SO POST-COVID WE MERGED TOGETHER, AND WE'RE REBUILDING ONE OF THE MINISTRIES, THE ONE THAT'S RIGHT IN TOWN.

**Q.** JUST SO I HAVE IT, YOU WORK AND LIVE IN NATCHITOCHES PARISH?

**A.** I DO.

**Q.** AND YOU'LL FORGIVE MY NORTHERN ACCENT ON SOME OF THESE WORDS, PASTOR HARRIS, BUT I JUST -- WOULD YOU SAY THAT YOU'RE GENERALLY AWARE OF YOUR COMMUNITY'S DEMOGRAPHICS IN NATCHITOCHES?

**A.** YES, MA'AM.

**Q.** CAN YOU DESCRIBE THEM FOR ME?

**A.** THE AREA THAT I LIVE IN IS PROBABLY 95 PERCENT BLACK. THE OTHER -- WE JUST HAD TO -- SOME -- I'M NOT SURE WHETHER THEY ARE FROM ISRAEL OR FROM PAKISTAN. BUT THEY'VE MOVED INTO OUR COMMUNITY.

IN THE ST. MATTHEWS AREA, IT'S PREDOMINANTLY BLACK, PROBABLY ANOTHER 95 PERCENT BLACK. AND IT'S AN AREA THAT'S VERY CHALLENGING BECAUSE OF THE ECONOMIC AND THE EDUCATIONAL SITUATIONS THAT WE DEAL WITH.

**Q.** AND JUST SO I KNOW, CIRCLING BACK TO YOUR CONGREGATIONS, WHAT'S THE RACIAL MAKEUP OF YOUR CONGREGATION?

**A.** PROBABLY 99 PERCENT BLACK.

**Q.** AND WHERE DO MOST OF YOUR CONGREGANTS RESIDE?

**A.** AROUND -- IN THAT AREA FROM THE GRAND ECORE, WHICH IS IN THE PAYNE SUBDIVISION AREA, WHICH MANY PROBABLY DON'T KNOW, TO

10:52 CROSSING OVER BLACK LAKE INTO THE ST. MATTHEWS COMMUNITY.
**Q.** A MOMENT AGO YOU TESTIFIED THAT IT WAS CHALLENGING BECAUSE OF ECONOMIC AND SOCIAL ACTIVITIES. CAN YOU WALK ME THROUGH WHAT THAT MEANT?
**A.** YEAH. MOST OF THE PEOPLE -- THERE'S NO REAL JOBS FOR THEM, SO WE HAVE A LOW POVERTY -- I MEAN, A HIGH-POVERTY AREA, A LOT OF PEOPLE NEEDING GOVERNMENTAL ASSISTANCE.
THE EDUCATIONAL SYSTEM FOR OUR BLACKS, BECAUSE DURING THE AREA -- DURING THE ERA WHERE THEY CONSOLIDATED THE SCHOOLS, EVERY BLACK SCHOOL WAS CLOSED, EVERY LAST ONE OF THEM, WHICH IS PRETTY SAD. BUT EVERY LAST ONE OF THEM WAS CLOSED. AND THE KIDS HAD TO BE BUSSED INTO THE DIFFERENT AREAS.
SO ECONOMICALLY WE ARE CHALLENGED IN THE FACT THAT THEY CAN'T REALLY FIND JOBS, AND THEN MANY OF THEM HAVE TO LEAVE OUR AREAS TO FIND JOBS.
AND AS I COME BACK TO THE EDUCATIONAL PART, THAT A LOT OF THEM ARE DROPPING OUT OF SCHOOL.
**Q.** IN YOUR LAST ANSWER YOU SAID MOST OF THE PEOPLE IN "OUR," WHO DID YOU MEAN BY THAT?
**A.** THE PEOPLE I SERVE IN THE COMMUNITY, WHICH IS, AGAIN, 90-SOME PERCENT BLACK.
**Q.** EARLIER YOU TESTIFIED THAT YOUR CHURCH DOES SOME COMMUNITY WORK. CAN YOU WALK ME THROUGH WHAT THAT IS?
**A.** YES. WE HAVE A SOCIAL SERVICE MINISTRY WITHIN OUR CHURCH WHERE WE PARTNER WITH PEOPLE LIKE THE WOMEN'S RESOURCE CENTER,

10:54 THE HOMELESS COALITION, AND OTHER DIFFERENT SOCIAL SERVICE MINISTRIES WITHIN OUR CHURCH. WE EDUCATE OUR PEOPLE IN THINGS LIKE VOTING, EDUCATION, JUST A PLETHORA OF SOCIAL MINISTRIES WITHIN OUR CHURCH.

**Q.** DO YOU SPEAK WITH YOUR CONGREGANTS ABOUT SOCIAL ISSUES?

**A.** ALL THE TIME.

**Q.** CAN YOU WALK ME THROUGH WHAT THAT LOOKS LIKE?

**A.** DEALING WITH THE LACK OF EDUCATION, WHICH ULTIMATELY CAUSES OUR CONGREGANTS NOT TO BE ABLE TO FIND JOBS. SO WE KIND OF STEER THEM IN THE DIRECTIONS OF PLACES THAT ARE HIRING AND THINGS LIKE THAT.

SOCIAL SERVICES WITH OUR WOMEN, GETTING ADEQUATE CARE AS FAR AS IF THERE IS PREGNANCY OR SOMETHING LIKE THAT. JUST A NUMBER OF SOCIAL ISSUES THAT WE DEAL WITH.

VOTING, IF WE HAVE -- THROUGH THE VOTER'S CIVIC LEAGUE, WE DO VOTER'S EDUCATION AS WELL AS FORUMS, AS WELL.

**Q.** DO YOU EVER SPEAK WITH YOUR CONGREGANTS ABOUT ELECTION ISSUES?

**A.** YES.

**Q.** EARLIER I ASKED YOU WHAT SOME OF THE JOBS ARE AS A PASTOR, AND THE FIRST ONE THAT YOU SAID WAS TO PREACH THE GOSPEL. DO YOU DO THAT THROUGH -- HOW DO YOU KNOW THAT?

**A.** THROUGH TALKING ABOUT JESUS DEALING WITH SOCIAL INJUSTICES AND ALLOWING -- LETTING THEM KNOW IT'S ALL RIGHT TO GET INVOLVED WITH SOCIAL ILLS THAT WE DEAL WITH IN OUR COMMUNITIES.

10:57 1 **Q.** AS --
2 **A.** AND THAT IT IS IMPORTANT, TOO, THAT THEY GO OUT AND VOTE,
3 THEY GO OUT AND EXERCISE THEIR RIGHT TO VOTE, WHICH HAS BEEN
4 CHALLENGING LATELY.
5 **Q.** CAN YOU TELL ME WHY IT'S BEEN CHALLENGING, PASTOR HARRIS?
6 **A.** PEOPLE FEEL HOPELESS BECAUSE IT SEEMS LIKE EVERY TIME WE
7 GET AHEAD, WE ARE KNOCKED BACK BY THE DIFFERENT THINGS THAT
8 TAKES PLACE THROUGH VOTING.
9 EVEN HAVING MY OWN CHILDREN QUESTION THE SYSTEM,
10 WHETHER IT'S WORKING FOR THEM. AND I THINK THAT I HAVE DONE A
11 GREAT JOB IN REARING MY CHILDREN, BUT YET THEY ARE QUESTIONING,
12 "IT WORKED FOR YOU, MAYBE, BUT IT'S NOT WORKING FOR US." AND
13 MANY LIKE THEM FROM AGE 20. I GOT FROM AGE 21 TO AGE 38 YEARS
14 OLD, AND I HAVE TO LITERALLY BEG THEM TO GO OUT AND VOTE.
15 **Q.** YOU JUST SAID THAT PEOPLE FEEL HOPELESS. WHO ARE THE
16 PEOPLE YOU ARE REFERRING TO?
17 **A.** AGAIN, THE PEOPLE THAT I'M SERVING IN THE BLACK COMMUNITY.
18 **Q.** THANK YOU FOR SHARING, PASTOR HARRIS.
19 CAN YOU TELL ME WHAT INITIALLY INSPIRED YOU TO WORK
20 IN THE CHURCH?
21 **A.** MY CALLING, A DIVINE CALLING FROM GOD, 'CAUSE I'VE BEEN IN
22 CHURCH ALL MY LIFE. MY DAD'S THE OLDEST ACTIVE PASTOR IN THE
23 STATE OF LOUISIANA. HE'S BEEN PREACHING FOR 87 YEARS, EVER
24 SINCE HE WAS SEVEN YEARS OLD. HE'S 90 YEARS OLD NOW. WE HAVE
25 A -- JUST A PLETHORA OF -- MY BROTHERS, ALL MY BROTHERS ARE

10:59 PREACHERS. AND MOST OF ALL, THE DIVINE CALL TO SERVE, AND THAT'S WHAT LEAD ME TO JUST BE A SERVANT.

**Q.** AND THINKING ABOUT YOUR FAMILIAL HISTORY AND YOUR COMMUNITY, DO PASTORS RELY ON ONE ANOTHER AT ANY POINT IN YOUR COMMUNITY?

**A.** FROM ALL ACROSS THE STATE, YOU KNOW, BUT ESPECIALLY IN THE AREAS THAT WE SERVE. I'VE PASTORED IN THE NATCHITOCHES AREA, I'VE PASTORED IN THE RED RIVER AREA. MY DAD'S STILL PASTORING, WHEN I SOMETIMES GO AND HELP HIM IN THE MANSFIELD AREA. SO WE ALL HAVE THAT CONNECTION, ONE WITH ANOTHER. SO WE SERVE WHETHER IT'S A FUNERAL THAT WE ALL MEET UP AT, ALL THE OTHER DIFFERENT THINGS THAT MAY TAKE PLACE, AN ANNIVERSARY, A CHURCH ANNIVERSARY, A PASTOR'S ANNIVERSARY. WE ALL SEE ONE ANOTHER IN PASSING. SO, YEAH, WE SERVE WITH ONE ANOTHER.

**Q.** YOU MENTIONED IN YOUR LAST ANSWER RED RIVER. IS IT SAFE TO SAY THAT RED RIVER AND NATCHITOCHES ARE CLOSE COMMUNITIES?

**A.** VERY MUCH CLOSE, LIKE FAMILY.

**Q.** GROWING UP IN LOUISIANA, WERE THERE ANY OTHER EXPERIENCES THAT MOTIVATED YOU TO BECOME ACTIVE IN YOUR COMMUNITY?

**A.** IN 2010 I WAS STILL -- I JUST MOVED INTO THE AREA THAT I CURRENTLY RESIDE. AND THERE WAS A BIG ISSUE IN THAT BLACK COMMUNITY DEALING WITH OUR INFRASTRUCTURE, OUR SEWAGE, AND OUR WATER. I DIDN'T KNOW THAT THE SITUATION WAS AS BAD AS IT WAS. I HEARD FOR YEARS THAT IT WAS A BAD SITUATION, AND NO ONE SEEMED TO CARE ABOUT THE SITUATION. BUT THE ROADS WERE IN

11:01 DISARRAY, NOT BEING TENDED TO.

BUT IN 2010 WHEN I GOT THERE, FOR THE LAST MAYBE TWO OR THREE YEARS, WE HAD BEEN TRYING TO GET HELP IN GETTING THOSE ROADS FIXED. AND SO THAT'S ONE OF THE THINGS THAT INSPIRED ME TO GET INVOLVED, BECAUSE A LOT OF PEOPLE, BECAUSE THEY KNEW ME FROM -- I HAD A RADIO SHOW THAT I DID CALLED NATCHITOCHES BLESSING, AND -- FOR EIGHT -- ABOUT EIGHT YEARS I WAS ON THAT RADIO SHOW, AND THE PEOPLE TRUSTED THAT I WOULD TRY AND HELP AND I DID.

AND WE GOT TOGETHER AND WE -- AT THAT PARTICULAR TIME, THE 23RD DISTRICT -- I THINK THEY MADE THAT DISTRICT INTO AN ALL BLACK DISTRICT. AND THE YOUNG MAN WHO I KNEW FROM IN THAT AREA RAN FOR THAT POSITION AND HE WON. AND I ASKED HIM IF WE ELECTED HIM, CAN HE PROMISE TO GET PAYNE SUBDIVISION FIXED, BECAUSE THE PEOPLE FOR 30 YEARS HADN'T HAD ANYONE TO EVEN COME OUT AND LOOK AT THEIR ROAD AND THEY DID. THEY CAME AND THEY FIXED THE ROAD.

**Q.** YOU JUST TESTIFIED THAT IN 2010, IT SEEMED THAT NO ONE CARED ABOUT THE SITUATION IN PAYNE SUBDIVISION. WHAT DID YOU MEAN BY THAT?

**A.** THE POLITICIANS THAT HAD BEEN THERE BEFORE, I KNEW OF THEM. BUT ELECTION TIME THEY WOULD COME AND MAKE A WHOLE LOT OF PROMISES, BUT IT'D NEVER GET DONE. BUT WHEN OUR CURRENT REPRESENTATIVE, WHO AGAIN OUR FAMILY KNOWS THEM. WE KNOW ONE ANOTHER IN PASSING, DIFFERENT CHURCHES, DIFFERENT EVENTS THAT

11:04 GO ON, WE -- AS A MATTER OF FACT, I CAME DOWN HERE MANY TIMES TO MAKE SURE THAT WE GET THOSE ROADS AND THE PEOPLE -- I'VE REALLY -- I REALLY LOST A LOT -- I LOST A LOT OF FRIENDS BECAUSE THEY DIDN'T BELIEVE THAT THAT ROAD WAS GONNA GET FIXED. BUT THROUGH PRAYER AND THROUGH WORKING WITH OUR LEGISLATURE -- I'M NOT SURE EXACTLY WHEN IT WAS THEY BROKE GROUND, BUT WHEN THEY BROKE GROUND, EVERYBODY BEGAN TO BELIEVE AGAIN THAT THE PROCESS WORKS.

**Q.** AND WE'LL COME BACK TO THE PAYNE SUBDIVISION EXAMPLE IN A MINUTE HERE. AND I WANT TO THANK YOU, PASTOR HARRIS, FOR SHARING YOUR EXPERIENCES.

I WANT TO PIVOT A LITTLE BIT TO TALKING ABOUT YOUR PERSONAL VOTING HISTORY. DO YOU VOTE?

**A.** EVERY ELECTION THAT I CAN.

**Q.** HOW LONG HAVE YOU BEEN A REGISTERED VOTER?

**A.** I THINK MAYBE ABOUT 28 YEARS.

**Q.** ARE YOU CURRENTLY REGISTERED TO VOTE?

**A.** I AM.

**Q.** AND DO YOU KNOW WHAT YOUR CURRENT HOUSE DISTRICT IS?

**A.** TWENTY-THREE.

**Q.** I THINK WE'VE TALKED A LITTLE BIT ABOUT IT SO FAR.

DO YOU KNOW WHO YOUR REPRESENTATIVE IS RIGHT NOW?

**A.** KENNY COX.

**Q.** AND CAN YOU WALK ME THROUGH, IF YOU KNOW, WHEN MR. COX BECAME YOUR REPRESENTATIVE?

11:05 1 **A.** MUST HAVE BEEN AROUND '12 OR '14, ONE OF THEM.
2 **Q.** YOU MEAN 2012 OR 2014?
3 **A.** '12 OR '14, YES.
4 **Q.** SO ABOUT A DECADE. IS THAT SAFE TO SAY?
5 **A.** RIGHT, ABOUT THE TIME THAT WE REALLY GOT INVOLVED IN
6 TALKING ABOUT GETTING THINGS DONE IN OUR COMMUNITY.
7 **Q.** AND IS MR. COX THE REPRESENTATIVE YOU WERE TALKING ABOUT
8 IN YOUR PAYNE SUBDIVISION EXAMPLE?
9 **A.** HE IS.
10 **Q.** CAN YOU WALK ME THROUGH WHAT MR. COX DID IN THAT SCENARIO?
11 **A.** WELL, FIRST OF ALL, HE KEPT IT IN FRONT OF THE OTHER
12 LEGISLATORS, LETTING THEM KNOW HOW IMPORTANT IT WAS. WE ALSO
13 WORKED WITH ANOTHER YOUNG MAN THAT WAS ON THE COUNCIL IN
14 NATCHITOCHES PARISH, MR. PAGE, WHICH IS A BLACK YOUNG MAN IN
15 OUR COMMUNITY THAT ALSO WORKED HARD AND TIRELESSLY AND
16 TENACIOUSLY TO MAKE SURE THAT IT STAYED IN FRONT OF OUR
17 LEGISLATORS.
18 SO WITH ALL OF THEIR HELP IN MAKING SURE THAT IT WAS
19 IMPORTANT TO US, THAT IT PAINED US TO SEE WHAT WAS GOING ON
20 WITH ONE OF THE FEW BLACK COMMUNITIES. AND I SERVED IN BOTH OF
21 THOSE BLACK COMMUNITIES, BOTH IN SHADY GROVE AS WELL AS IN
22 PAYNE SUBDIVISION.
23 **Q.** ARE THERE ANY SPECIFIC ISSUES IN YOUR COMMUNITY THAT
24 MOTIVATE YOU TO VOTE?
25 **A.** YES.

11:07 1 **Q.** WHAT ARE THEY?
2 **A.** EDUCATION, ECONOMIC DISADVANTAGES, A LOT OF SOCIAL
3 ABNORMALITIES THAT TRULY WAKES ME UP AT NIGHT EVEN. SO WHEN
4 IT'S TIME FOR ME TO TRY TO MAKE A DIFFERENCE, I STILL BELIEVE
5 THAT GOING TO THE POLLS CAN MAKE A DIFFERENCE.
6 **Q.** SO I WANT TO TAKE EACH OF THEM IN TURN, STARTING WITH
7 EDUCATION. HOW DOES EDUCATION IN YOUR COMMUNITY MOTIVATE YOU
8 TO VOTE?
9 **A.** WHEN I ULTIMATELY DECIDED TO RUN FOR SCHOOL BOARD, MY
10 WIFE -- I WAS COMPLAINING ABOUT THE FACT THAT I HAVE -- THREE
11 OF MY YOUNGER CHILDREN, FIVE ALTOGETHER, BUT THREE OF MY
12 YOUNGER CHILDREN WERE AFFORDED SOME OF THE BEST EDUCATION IN
13 THAT THEY GO TO ONE OF THE BETTER SCHOOLS IN THE PARISH. AND I
14 SAW THAT, AND I SAW HOW IT GAVE MY CHILDREN AN ADVANTAGE OVER
15 SOME OF THE OTHER CHILDREN WHO DID NOT HAVE THAT TYPE OF
16 OPPORTUNITY TO GO TO A BETTER SCHOOL. AND I WAS JUST
17 COMPLAINING ABOUT IT AND MY WIFE SAYS TO ME, SHE SAID, "RATHER
18 THAN COMPLAINING ABOUT IT, WHY DON'T YOU DO SOMETHING ABOUT
19 IT."
20 AND I KIND OF TOLD HER, "I WILL. I'M GONNA CONTINUE
21 TO FUSS."
22 SHE SAYS, "NO. WHY DON'T YOU GO WHERE YOU CAN MAKE A
23 DIFFERENCE," AND SO I DID. I RAN AND WON AGAINST ANOTHER BLACK
24 GUY, WHO I THOUGHT WAS NOT DOING ALL THAT HE COULD DO FOR OUR
25 COMMUNITY.

11:10 AND SINCE THAT TIME, I'VE BEEN PUSHING, TRYING TO MAKE SURE THAT ALL OF OUR SCHOOLS CAN AFFORD OUR STUDENTS A BETTER OPPORTUNITY TO BE SUCCESSFUL IN LIFE, BECAUSE IF THEY ARE NOT ALL GIVEN THE SAME OPPORTUNITY, I CAN'T SAY THAT ONE IS SMARTER THAN THE OTHER, IF ECONOMICS OR THEM BEING IN A GEOGRAPHICAL SETTING, A GEOGRAPHICAL AREA, PREVENTED THEM FROM GOING TO A BETTER SCHOOL.

**Q.** YOU ALSO MENTIONED THAT ECONOMIC DISADVANTAGE IN YOUR COMMUNITY MOTIVATES YOU TO VOTE. WHAT DID YOU MEAN BY THAT?

**A.** IT GOES BACK TO EDUCATION AGAIN. THE KIDS THAT I SERVE ARE NOT ABLE TO GET UP AND DRIVE AND GO OUT OF STATE AND GO TO SOMEWHERE ELSE AND TAKE UP ROOTS THERE FOR A BETTER SITUATION. THEY ARE STUCK WHERE THEY ARE AT. AND SO FINANCIALLY THEY CAN'T AFFORD TO LEAVE IN MY AREA. SO THAT'S THE ECONOMIC PROBLEM THAT WE HAVE WITH IT.

**Q.** AND YOU ALSO MENTIONED THAT THERE ARE SOCIAL ABNORMALITIES THAT WAKE YOU UP AT NIGHT. WHAT DID YOU MEAN BY THAT?

**A.** DURING COVID-TIME MY SISTER WHO WAS NOT ABLE TO BE -- I GUESS TO AFFORD THE INSURANCE THAT SHE NEEDED TO GET THE TYPE OF HEALTHCARE THAT SHE NEEDED, SHE WIND UP HAVING TO LEAVE NATCHITOCHES AND GO TO A PLACE CALLED LEESVILLE AND GET TREATED BECAUSE OF, I GUESS, THEY WOULD TAKE WHATEVER TYPE OF INSURANCE THAT SHE DID HAVE. AND ULTIMATELY SHE WINDED UP IN TULANE WHERE SHE HAD A PROCEDURE DONE.

AND AT THAT PARTICULAR TIME, THEY WERE NOT COGNIZANT

11:12 OF COVID. AND IT HIT AND NOBODY EVEN KNEW WHAT IT WAS THAT SHE HAD, AND I LOST MY OLDEST SISTER BECAUSE I DON'T THINK SHE WAS ABLE TO GET THE TYPE OF HEALTHCARE THAT SHE COULD HAVE BEEN ABLE TO GET IF WE HAD PASSED OR EXTENDED THE AFFORDABLE CARE ACT EVEN.

**Q.** THANKS, PASTOR HARRIS.

I WANT TO CIRCLE BACK TO ASKING A COUPLE OF QUESTIONS ABOUT YOUR STATE HOUSE REPRESENTATIVE THAT YOU'VE MENTIONED UP UNTIL NOW AS REPRESENTATIVE COX. CAN YOU TELL ME IF YOU FEEL REPRESENTED BY HIM?

**A.** I DO.

**Q.** AND CAN YOU TELL ME WHAT HIS RACE IS?

**A.** HE'S BLACK.

**Q.** CAN YOU DESCRIBE FOR ME THE SIGNIFICANCE OF HAVING A BLACK MAN AS YOUR REPRESENTATIVE?

**A.** I GUESS IT'S LIKE A MOTHER THAT IS TIED TO AN UMBILICAL CORD TO THE CHILD AND YOU TELL THE MOTHER THAT JUNIOR IS BAD AND JUNIOR IS THIS, THAT, AND THE OTHER. BUT TO MAMA, BECAUSE SHE DEALT WITH THE PERILS AND THE PAIN AND THE PROBLEMS THAT PUSHED TO GET HIM THERE, SHE COULD IDENTIFY WITH IT, IS THE REASON SHE HOLDS ON TO JUNIOR NO MATTER WHAT.

I THINK THAT'S THE SITUATION WITH HAVING COX OR SOMEONE WHO CAN IDENTIFY WITH MY PERILS AND PAIN AND PROBLEMS THAT WE ACTUALLY GO THROUGH. IT'S NOT JUST A THEORY. THEY ACTUALLY COME IN THE COMMUNITY, WALK IN THE COMMUNITY, IDENTIFY

11:14 1 WITH OTHERS IN THE COMMUNITY. AND MANY TIMES THE ONLY TIME I
2 SEE SOME OF THE OTHER ELECTED OFFICIALS IS WHEN -- EVERY FOUR
3 YEARS.
4 **Q.** AND YOU TESTIFIED THAT REPRESENTATIVE COX UNDERSTANDS
5 THE -- OR YOUR ANALOGY THAT HE UNDERSTANDS THE PERILS, PAIN,
6 AND PROBLEMS, AND COULD IDENTIFY WITH YOU. WHY DO YOU THINK
7 THAT'S SO?
8 **A.** 'CAUSE HE'S BEEN THERE.
9 **Q.** WHEN YOU SAY "HE'S BEEN THERE," WHAT DO YOU MEAN?
10 **A.** HE'S BEEN IN THE COMMUNITY. HE'S SEEN WHAT WE'VE GONE
11 THROUGH. HE'S BEEN THROUGH SOME OF THE SAME THINGS. HE
12 IDENTIFIES WITH THE PLIGHT OF THE COMMUNITY.
13 **Q.** WHEN YOU SAY "THE PLIGHT OF THE COMMUNITY," DO YOU MEAN
14 THE BLACK COMMUNITY?
15 **A.** THE BLACK COMMUNITY.
16 **Q.** IN DISTRICT 23?
17 **A.** YES.
18 **Q.** DO YOU KNOW IF REPRESENTATIVE COX IS STILL YOUR
19 REPRESENTATIVE?
20 **A.** HE MAY BE RIGHT NOW, BUT I DON'T THINK HE'S GONNA BE LONG.
21 **Q.** AND WHY IS THAT?
22 **A.** I THINK THEY REDREW THE LINES. SO --
23 **Q.** DO YOU KNOW -- I'M SORRY. CONTINUE.
24 **A.** AND SO WITH ME WORKING ON THE SCHOOL BOARD TO MAKE SURE
25 THAT WE HAVE REPRESENTATION, YOU KNOW, I THINK THAT HE WON'T BE

11:16 1 REPRESENTING US.
2 **Q.** DO YOU KNOW IF DISTRICT 23, AS REPRESENTATIVE COX HAS
3 SERVED AS THE REPRESENTATIVE, IS MAJORITY BLACK?
4 **A.** RESTATE THE QUESTION.
5 **Q.** DO YOU KNOW, BASED ON YOUR PERSONAL KNOWLEDGE, IF DISTRICT
6 23 AS REPRESENTATIVE COX SERVED AS THE REPRESENTATIVE --
7 **A.** YES.
8 **Q.** -- WAS A MAJORITY-BLACK DISTRICT?
9 **A.** YES.
10 **Q.** DO YOU KNOW IF IN THE NEW REDRAWN DISTRICT, IF IT IS
11 MAJORITY BLACK?
12 **A.** I DON'T THINK SO.
13 **MS. BAHN:** YOUR HONOR, IF I COULD JUST HAVE A MINUTE
14 TO CONFER?
15 **THE COURT:** YES.
16 **MS. BAHN:** THANK YOU, YOUR HONOR.
17 **BY MS. BAHN:**
18 **Q.** I JUST HAVE A FEW MORE QUESTIONS, PASTOR HARRIS.
19 **A.** ALL RIGHT.
20 **Q.** THE FIRST IS, IN DISTRICT 23, IN YOUR COMMUNITY, YOU
21 MENTIONED RED RIVER AND NATCHITOCHES. ARE THERE ANY OTHER --
22 STRIKE THAT.
23 IN YOUR COMMUNITY YOU'VE MENTIONED NATCHITOCHES AND
24 RED RIVER ARE TIGHTLY KNIT EARLIER IN YOUR TESTIMONY. CAN YOU
25 WALK ME THROUGH DISTRICT 23 AND HOW EACH OF THOSE COMMUNITIES

11:18 1 OR ANY OTHER COMMUNITIES WORK TOGETHER?
2 **A.** FROM A PASTORAL --
3 **MR. CONINE:** YOUR HONOR, I'M GOING TO HAVE TO OBJECT
4 HERE, 701. YOU KNOW, WE APPRECIATE HIM, YOU KNOW, GIVING HIS
5 EXPERIENCES AND THAT, BUT WE WANTED TO MAKE SURE IT DOESN'T GO
6 BEYOND THE -- INTO OPINION TESTIMONY.
7 **THE COURT:** DO YOU WANT TO RESPOND? HE'S OBJECTING
8 TO THE LAY OPINION TESTIMONY OR OPINION TESTIMONY.
9 **MS. BAHN:** I THINK HE'S TESTIFIED FAIRLY
10 SIGNIFICANTLY THROUGHOUT THE TESTIMONY, YOUR HONOR, THAT EACH
11 OF THOSE AREAS ARE COHESIVE, AND HE'S JUST GOING TO OFFER THAT
12 IN HIS NEXT ANSWER.
13 **THE COURT:** GIVE ME THE EXACT QUESTION AGAIN.
14 **MS. BAHN:** I WOULD LIKE --
15 **THE COURT:** ASK THE QUESTION AGAIN AND LET ME HEAR
16 WHAT YOUR QUESTION IS.
17 **BY MS. BAHN:**
18 **Q.** PASTOR HARRIS, BASED ON YOUR TESTIMONY TODAY, CAN YOU TELL
19 ME HOW NATCHITOCHES, DESOTO, AND RED RIVER COMMUNITIES WORK
20 TOGETHER?
21 **THE COURT:** IS THAT THE SAME OBJECTION?
22 **MR. CONINE:** YES. I'D LIKE TO LODGE AN OBJECTION
23 AGAIN. HE HASN'T MENTIONED ANYTHING ABOUT DESOTO PARISH.
24 **BY THE WITNESS:**
25 **A.** MY --

11:19 **THE COURT:** JUST A MOMENT, SIR. THERE'S AN OBJECTION ON THE -- WE HAVE TO LET THE LAWYERS ARGUE THIS.

**MR. CONINE:** I MEAN, HE'S GETTING INTO --

**THE COURT:** HE HASN'T TALKED ABOUT DESOTO PARISH.

**MS. BAHN:** I CAN ASK IT WITHOUT THAT, YOUR HONOR.

**THE COURT:** SO THE QUESTION IS GOING TO BE RED RIVER AND NATCHITOCHES PARISH, HOW DO THEY WORK TOGETHER?

**MS. BAHN:** YES, YOUR HONOR.

**THE COURT:** OKAY. YOUR OBJECTION IS IN PART SUSTAINED. I WILL ALLOW THAT QUESTION.

**MR. CONINE:** THANK YOU, YOUR HONOR.

**BY MS. BAHN:**

**Q.** YOU CAN ANSWER.

**A.** OKAY. AS BEING A PASTOR IN BOTH RED RIVER AND I PASTORED FORMALLY IN RED RIVER, AND I PASTOR NOW IN NATCHITOCHES PARISH, WE ALL FELLOWSHIP ONE WITH ANOTHER. WE HAVE DIFFERENT ENGAGEMENTS THAT WE ALLOW ONE ANOTHER TO COME AND PREACH AND, YOU KNOW, THAT'S HOW WE ARE CONNECTED ONE WITH ANOTHER. IT --

**Q.** I APOLOGIZE. YOU CAN FINISH YOUR ANSWER.

**A.** OKAY. WELL, THAT'S ALL I WAS GONNA SAY.

**Q.** PASTOR HARRIS, DO YOU HAVE ANY PERSONAL EXPERIENCES WITH ANY OTHER COMMUNITIES IN DISTRICT 23?

**A.** YEAH. MY DAD PASTORS IN DESOTO PARISH AND HAS BEEN THERE FOR THE LAST 50-SOME YEARS. I HAVE A -- MY OLDEST SON IS FROM MANSFIELD, DESOTO PARISH. SO WE ALL -- WE ALL ARE CONNECTED IN

11:21 1 THAT AREA AND IN THAT SENSE.
2 **Q.** YOU'LL --
3 **A.** BUT I THOUGHT I STATED THAT EARLIER.
4 **Q.** YOU'LL FORGIVE MY LACK OF UNDERSTANDING OF LOUISIANA
5 GEOGRAPHY TO KNOW THAT MANSFIELD IS IN DESOTO.
6 BUT IF YOU COULD JUST WALK ME THROUGH IF THERE'S ANY
7 CONNECTION BETWEEN DESOTO, NATCHITOCHES, AND RED RIVER
8 COMMUNITIES?
9 **A.** WE ALL JUST JOIN TOGETHER, ALMOST LIKE KIN. WE HAVE
10 RELATIVES ONE WITH ANOTHER. CAN'T WE FELLOWSHIP THROUGH -- OUR
11 CONGREGATIONS KNOW ONE ANOTHER.
12 AS A MATTER OF FACT, JUST LAST WEEK WE HAD A FUNERAL
13 IN COUSHATTA, WHICH IS IN RED RIVER, AND THERE WERE MANY PEOPLE
14 FROM BOTH NATCHITOCHES PARISH AS WELL AS IN DESOTO PARISH WHO
15 WERE THERE.
16 AND IN OUR COMMUNITY WE CALL ONE ANOTHER "KIN FOLK."
17 THAT MAY NOT BE NO KIN WHATSOEVER, BUT THAT'S WHAT WE CALL ONE
18 ANOTHER IN OUR COMMUNITY.
19 **Q.** PASTOR HARRIS, IF YOU COULD JUST -- ONE MORE QUESTION.
20 WHAT DO YOU HOPE TO ACHIEVE IN THIS LAWSUIT?
21 **A.** THAT WE HAVE REPRESENTATION, THAT WE HAVE EQUAL
22 REPRESENTATION, THAT OUR PEOPLE FEEL EMPOWERED. AND BECAUSE IF
23 THEY DON'T FEEL EMPOWERED, THEY FEEL DESPAIRED, AND THEY ACT AS
24 SUCH. WHEN YOU DON'T -- AS I SPOKE EARLIER TODAY ABOUT GETTING
25 THE PEOPLE IN OUR COMMUNITY TO GET OUT TO VOTE. THEY REALLY

11:23 1 DIDN'T FEEL IT THIS LAST ELECTION CYCLE. THEY FELT THAT IT
2 DIDN'T MATTER.
3 **Q.** WHEN YOU SAY "WE," AND "OUR PEOPLE," WHO DID YOU MEAN?
4 **A.** THE PEOPLE IN MY BLACK COMMUNITY THAT I SPEAK WITH EVERY
5 SUNDAY AS WELL AS SPEAKING TO THEM IN OTHER VENUES AND THINGS
6 LIKE THAT.
7 **Q.** THANK YOU, PASTOR HARRIS.
8 **MS. BAHN:** YOUR HONOR, I HAVE NO FURTHER QUESTIONS.
9 **THE COURT:** CROSS.
10 **MR. CONINE:** JUST BRIEFLY, JUDGE.
11 JOHN CONINE FOR THE SECRETARY OF STATE.
12 **CROSS-EXAMINATION**
13 **BY MR. CONINE:**
14 **Q.** GOOD MORNING, REVEREND HARRIS.
15 **A.** GOOD MORNING.
16 **Q.** HOW LONG HAVE YOU LIVED AT YOUR CURRENT ADDRESS?
17 **A.** ABOUT 14 YEARS.
18 **Q.** IS THAT WITHIN THE CITY LIMITS OF NATCHITOCHES?
19 **A.** NO. THAT'S OUT OF THE CITY LIMITS OF NATCHITOCHES.
20 **Q.** SO THE POLICE JURY WOULD BE IN CHARGE OF THOSE ROADS?
21 **A.** THE POLICE JURY IS.
22 **Q.** OKAY. AND WHAT'S THE MAKEUP OF THE POLICE JURY, THE
23 DEMOGRAPHICS?
24 **A.** I THINK IT'S FIVE JURORS; TWO OF THEM ARE BLACK AND FIVE
25 WHITE -- I MEAN, THREE WHITES.

11:24 1 **Q.** OKAY. AND THE MAYOR OF NATCHITOCHES IS AN AFRICAN
2 AMERICAN. ISN'T THAT RIGHT?
3 **A.** HE IS.
4 **Q.** OKAY. AND A DEMOCRAT?
5 **A.** YES.
6 **Q.** AND HE BEAT OUT A WHITE INCUMBENT. ISN'T THAT CORRECT?
7 **A.** YES.
8 **Q.** OKAY. AND YOU MENTIONED EARLIER ABOUT RED RIVER PARISH
9 AND NATCHITOCHES PARISH AND DESOTO PARISH, AS WELL, BEING CLOSE
10 FAMILIES. RED RIVER PARISH IS MORE RURAL. CORRECT?
11 **A.** SAME AS NATCHITOCHES.
12 **Q.** WOULD YOU SAY THAT COUSHATTA IS SMALLER THAN NATCHITOCHES?
13 **A.** IT IS.
14 **Q.** OKAY. AND WOULD YOU SAY THERE'S LESS POPULATION IN RED
15 RIVER PARISH THAN THERE IS IN NATCHITOCHES PARISH?
16 **A.** IT IS.
17 **Q.** AND DOES THAT GO FOR DESOTO PARISH AS WELL?
18 **A.** YES.
19 **Q.** AND MANSFIELD IS THE SEAT OF DESOTO PARISH. IS THAT
20 RIGHT?
21 **A.** YES.
22 **Q.** AND MANSFIELD IS SMALLER THAN NATCHITOCHES?
23 **A.** YES.
24 **Q.** OKAY. ARE YOU AWARE THAT REPRESENTATIVE COX WAS TERM
25 LIMITED?

11:25 1 **A.** YES.
2 **Q.** OKAY. LET'S SEE IF I'LL HAVE ONE MORE.
3 AND WHAT YEAR DID YOU REGISTER TO VOTE?
4 **A.** I THINK MAYBE '95, SOMETHING LIKE THAT.
5 **Q.** AND THAT WAS IN --
6 **A.** I THINK ABOUT 28 YEARS.
7 **Q.** SORRY. I DIDN'T MEAN TO CUT YOU OFF.
8 COULD YOU REPEAT THAT?
9 **A.** I THINK ABOUT 28 YEARS, SOMETHING LIKE THAT.
10 **Q.** OKAY. WAS THAT IN NATCHITOCHES PARISH?
11 **A.** I THINK IT STARTED IN NATCHITOCHES PARISH, I THINK.
12 **Q.** YES, SIR. OKAY.
13 **MR. CONINE:** JUDGE, MAY I HAVE ONE MOMENT?
14 **THE COURT:** YOU MAY.
15 **MR. CONINE:** NO FURTHER QUESTIONS.
16 **THE COURT:** OKAY. REDIRECT?
17 **MS. BAHN:** NO, YOUR HONOR.
18 **THE COURT:** YOU MAY STEP DOWN.
19 THANK YOU, SIR.
20 NEXT WITNESS, PLEASE.
21 **MS. WENGER:** HELLO AGAIN, YOUR HONOR.
22 VICTORIA WENGER, WITH THE LEGAL DEFENSE FUND.
23 PLAINTIFFS CALLS DR. ALICE WASHINGTON.
24 AND, YOUR HONOR, MAY I APPROACH TO OFFER HER
25 WATER?

11:26 1 **THE COURT:** YOU MAY.
2 **MS. WENGER:** THANK YOU.
3 **THE COURT:** BUT IT LOOKS LIKE SHE MAY HAVE BROUGHT
4 HER WATER.
5 **ALICE FRANCES WASHINGTON, PH.D.,**
6 **HAVING BEEN DULY SWORN, TESTIFIED AS FOLLOWS:**
7 **DIRECT EXAMINATION**
8 **BY MS. WENGER:**
9 **Q.** HELLO, DR. WASHINGTON.
10 **A.** HELLO.
11 **Q.** CAN YOU PLEASE STATE YOUR FULL NAME FOR THE RECORD.
12 **A.** ALICE FRANCES WASHINGTON.
13 **Q.** AND HOW ARE YOU INVOLVED IN THIS CASE?
14 **A.** I AM ONE OF THE PLAINTIFFS IN THE CASE.
15 **Q.** WHAT RACE DO YOU IDENTIFY AS, DR. WASHINGTON?
16 **A.** BLACK AND AFRICAN AMERICAN.
17 **Q.** WHAT IS YOUR EDUCATIONAL BACKGROUND?
18 **A.** I HAVE A B.S. DEGREE IN PSYCHOLOGY, A MASTER'S DEGREE IN
19 SOCIAL WORK, AND A DOCTORATE DEGREE IN SOCIAL WORK.
20 **Q.** CAN YOU SHARE SOME OF YOUR PROFESSIONAL BACKGROUND?
21 **A.** YES. I HAVE ENGAGED IN THE PRACTICE OF SOCIAL WORK WITH
22 INDIVIDUALS, FAMILIES, AND SMALL GROUPS, AND COMMUNITIES, AND
23 POST-DOCTORATE. I HAVE ENGAGED IN TEACHING AT THE MASTER'S
24 LEVEL, GRADUATE STUDENTS, CONSULTATION WITH INSTITUTIONS SUCH
25 AS THE NATIONAL INSTITUTE ON DRUG ABUSE, NATIONAL INSTITUTE ON

11:28 1 MENTAL HEALTH, D.C. MENTAL HEALTH ASSOCIATION, WOMEN'S
2 COMPREHENSIVE HEALTH CENTER OF WASHINGTON, D.C., AND FAMILY AND
3 MEDICAL COUNSELING SERVICES OF WASHINGTON, D.C., AND I'M
4 ENGAGED AS A PROFESSOR OF SOCIAL WORK AT THE UNIVERSITY OF
5 VIRGINIA COMMONWEALTH.
6 **Q.** AND ARE YOU CURRENTLY WORKING OR RETIRED?
7 **A.** I AM RETIRED.
8 **Q.** WHERE DID YOU GROW UP, DR. WASHINGTON?
9 **A.** I GREW UP IN TENSAS PARISH, BORN AT A LOCUST WOOD
10 PLANTATION IN THE LATE 40'S BY MIDWIFE. MY FAMILY MOVED TO THE
11 TOWNSHIP OF ST. JOSEPH, LOUISIANA, AT -- WHEN I WAS ABOUT TEN
12 YEARS OLD, WHERE I THEN ATTENDED THE HIGH -- THE JUNIOR HIGH
13 SCHOOL AND HIGH SCHOOL IN ST. JOSEPH, LOUISIANA.
14 **Q.** AND WHERE DO YOU LIVE NOW?
15 **A.** I CURRENTLY RESIDE IN EAST BATON ROUGE PARISH,
16 BATON ROUGE, LOUISIANA.
17 **Q.** WHEN DID YOU FIRST MOVE TO BATON ROUGE?
18 **A.** I FIRST MOVED TO BATON ROUGE IN 1965.
19 **Q.** AND FOR WHAT PURPOSE?
20 **A.** TO ATTEND SOUTHERN UNIVERSITY IN BATON ROUGE.
21 **Q.** FOR ABOUT HOW LONG DID YOU STAY?
22 **A.** I WAS AT SOUTHERN UNIVERSITY FROM SEPTEMBER OF 1965 TO MAY
23 OF 1969, WHEN I LEFT THE CITY.
24 **Q.** AND FOR HOW LONG HAVE YOU LIVED AT YOUR CURRENT HOME HERE
25 IN BATON ROUGE?

11:29 1 **A.** I'VE CURRENTLY RESIDED AT MY CURRENT HOME SINCE
2 OCTOBER 9TH, 2015.
3 **Q.** AND WHAT BROUGHT YOU BACK TO BATON ROUGE?
4 **A.** FAMILY. IT WAS NEVER MY FAMILY'S INTENTION THAT I WOULD
5 GO AWAY TO SCHOOL AND NOT RETURN. IT WAS ALWAYS MY INTENT TO
6 RETURN TO LOUISIANA TO LIVE.
7 **Q.** DO YOU FORESEE YOURSELF STAYING IN LOUISIANA IN THE
8 FUTURE?
9 **A.** YES, I DO.
10 **Q.** ARE YOU INVOLVED IN ANY VOLUNTEER ORGANIZATIONS HERE IN
11 YOUR COMMUNITY?
12 **A.** YES, I AM.
13 **Q.** AND WHAT MADE YOU CHOOSE TO VOLUNTEER?
14 **A.** I CHOOSE TO VOLUNTEER TO COME TO SOME UNDERSTANDING OF THE
15 COMMUNITY IN WHICH I RESIDE. THE BEST WAY TO GET TO KNOW A
16 COMMUNITY IS TO GET VERY INVOLVED VERY DIRECTLY. SO I
17 VOLUNTEER TO GET TO KNOW WHAT IS GOING ON IN MY CITY AND WHAT I
18 MIGHT BE ABLE TO DO AND OFFER MY SERVICES TO HELP MAKE THINGS
19 BETTER.
20 **Q.** AND IS IT IMPORTANT TO YOU TO VOLUNTEER IN YOUR COMMUNITY?
21 **A.** YES, IT IS, VERY MUCH SO.
22 **Q.** CAN YOU DESCRIBE TO ME SOME OF THE ORGANIZATIONS THAT YOU
23 WORK WITH?
24 **A.** CURRENTLY I AM INVOLVED WITH A GLOBAL TECHNOLOGY TRAINING
25 TASK FORCE. WE ARE PROVIDING TRAINING, TECHNOLOGY TRAINING,

11:30 1 FOR STUDENTS IN TENSAS PARISH. I AM -- AND THAT, OF COURSE, IS
2 MY HOMETOWN HIGH SCHOOL. I'M DOING THAT WORK WITH SOME OTHER
3 CLASSMATES FROM MY HIGH SCHOOL IN ST. JOSEPH.
4 I AM ALSO INVOLVED WITH TOGETHER BATON ROUGE, A
5 FAITH-BASED CIVIC AND OTHER ASSOCIATION ORGANIZATIONS WHERE WE
6 ARE WORKING TOGETHER ACROSS LINES TO BUILD LEADERSHIP, DEVELOP
7 LEADERS, BUILD POWER, AND WORK TOWARD CHANGING SOME OF THE
8 THINGS, THE ISSUES AND PROBLEMS THAT WE SEE IN THIS AREA.
9 I'M A MEMBER OF TOGETHER LOUISIANA. WE ARE DOING THE
10 SAME THINGS WITH INSTITUTIONS ACROSS THE STATE OF LOUISIANA TO
11 MAKE CHANGES TO CHANGE THE CULTURE, TO CHANGE THE ISSUES, AND
12 TO MAKE THINGS BETTER FOR THE STATE.
13 AND I'M A MEMBER OF THE NATIONAL ASSOCIATION OF
14 SOCIAL WORKERS AND THE NATIONAL ASSOCIATION OF SOCIAL WORKERS
15 LOCAL CHAPTER IN LOUISIANA.
16 **Q.** CAN YOU DESCRIBE ANY OF THE CIVIC ENGAGEMENT TACTICS THAT
17 TOGETHER BATON ROUGE OR TOGETHER LOUISIANA ENGAGE IN?
18 **A.** WE ARE ENGAGING IN THE PRACTICES OF LOOKING AT SOME OF THE
19 MAJOR ISSUES THAT FACE OUR PARISH, EAST BATON ROUGE PARISH, AND
20 THAT FACE OUR STATE. WE FOCUS ON SOME KEY AREAS, LIKE TAX
21 POLICY. AND SPECIFICALLY I'M INVOLVED WITH ISSUES LIKE TAX
22 POLICY, CRIMINAL JUSTICE POLICIES, SOCIAL WELFARE POLICIES,
23 INFRASTRUCTURE, TRANSPORTATION, HEALTHY FOOD, HEALTHY HOUSING,
24 CRIMINAL JUSTICE. THE LIST IS LONG.
25 **Q.** DOES TOGETHER BATON ROUGE ENGAGE WITH ELECTED OFFICIALS OR

11:32 1 CANDIDATES FOR OFFICE AT ALL?
2 **A.** YES, WE DO.
3 **Q.** HOW SO?
4 **A.** ONE OF THE PRIMARY THINGS WE DO IS WE ESTABLISH
5 ACCOUNTABILITY SESSIONS, FORUMS, WHERE THOSE WHO ARE RUNNING
6 FOR OFFICE ARE INVITED AND THEY COME AND THEY MEET THE MEMBERS
7 OF THE COMMUNITY WHERE THE COMMUNITY HAS THE OPPORTUNITY TO
8 ENGAGE THEM, TO INQUIRE OF THEIR PLANS, THEIR CONCERNS ABOUT
9 OUR CITY AND OUR PARISH, WHAT THEY PLAN TO DO ABOUT SOME OF THE
10 ISSUES THAT WE FACE, AND WILL THEY BE WILLING TO WORK WITH US
11 IN THE FUTURE.
12 **Q.** IS TOGETHER BATON ROUGE OR TOGETHER LOUISIANA, ARE THOSE
13 PARTISAN OR NON-PARTISAN ORGANIZATIONS?
14 **A.** NON-PARTISAN, NO PERMANENT FRIENDS AND NO PERMANENT
15 ENEMIES.
16 **Q.** AND ARE CANDIDATES FROM ANY POLITICAL PARTY INVITED TO THE
17 EVENTS HOSTED BY THESE ORGANIZATIONS?
18 **A.** YES, INDEED.
19 **Q.** HAVE YOU VOLUNTEERED WITH ANY POLITICAL CAMPAIGNS IN
20 LOUISIANA?
21 **A.** YES, I HAVE. MY VERY FIRST POLITICAL CAMPAIGN WAS IN
22 1968. I WAS A STUDENT AT SOUTHERN UNIVERSITY, AND IT WAS THE
23 PRESIDENTIAL ELECTION, THE HUMPHREY-MUSKIE CAMPAIGN.
24 **Q.** HOW ABOUT MORE RECENTLY?
25 **A.** MORE RECENTLY I'VE BEEN ENGAGED WITH THE MAYOR SHARON

11:34 WESTON BROOME'S FIRST CAMPAIGN AND FOR HER SECOND RUN. AND I ALSO DID PHONE BANKING AND SOME VOLUNTEER WORK WITH GOVERNOR JOHN BEL EDWARDS' CAMPAIGN.

**Q.** WHY DO YOU CHOOSE TO VOLUNTEER FOR THOSE CAMPAIGNS?

**A.** WELL, THOSE PEOPLE -- WELL, FIRST OF ALL, I -- WHEN I MET THE MAYOR, MAYOR BROOME THE FIRST TIME, MY VERY FIRST QUESTION TO HER WAS "WILL YOU BE INCLUDING THE CLERGY AND THE CHURCH COMMUNITY IN YOUR CAMPAIGN AND IN YOUR WORK IF YOU ARE ELECTED?" AND HER RESPONSE WAS TREMENDOUS.

SHE IMMEDIATELY RESPONDED, "OH, YES, INDEED. THEY ARE ALREADY WORKING WITH ME, AND I ANTICIPATE WORKING WITH THEM OVER THE DURATION OF MY OFFICE." AND I WAS IMMEDIATELY STRUCK BY THAT, AND I IMMEDIATELY DECIDED THAT DAY THAT I WANTED TO WORK WITH HER CAMPAIGN.

AND, OF COURSE, THOSE THREE CAMPAIGNS -- WELL, EACH OF THOSE THREE CANDIDATES REPRESENTED VIEWS AND VALUES THAT I HOLD, AND I IDENTIFIED WITH EACH OF THE CANDIDATES IN ALL THREE OF THOSE CAMPAIGNS. AND THERE HAVE BEEN MANY OTHER CAMPAIGNS I'VE WORKED IN OVER THE YEARS. BUT IN THOSE THREE ESPECIALLY, I FELT THAT THEY REPRESENTED VALUES AND CONCERNS THAT I HELD AND THAT MORE THAN LIKELY WE'D BE ABLE TO GET SOME THINGS ACCOMPLISHED IN THIS AREA.

**Q.** DID THEIR PLATFORMS ON RACIAL JUSTICE ISSUES MATTER TO YOU?

**A.** THEY DID.

11:35 **Q.** WOULD YOU DESCRIBE YOURSELF AS BEING ACTIVE IN YOUR COMMUNITY?
**A.** OH, YES, INDEED.
**Q.** WOULD YOU SAY YOU'RE FAMILIAR WITH THE NEEDS OF YOUR COMMUNITY HERE IN BATON ROUGE?
**A.** I AM.
**Q.** BASED ON YOUR EXPERIENCE LIVING HERE, WHAT IS YOUR PERCEPTION OF THE STATE POLICY ISSUES THAT IMPACT QUALITY OF LIFE IN BATON ROUGE?
**A.** SOME OF THE POLICY ISSUES HERE I FOUND WHEN I ARRIVED HERE -- BACK HERE ARE RATHER REGRESSIVE POLICIES. THEY ARE HOLDING TO AGO-OLD PREMISES AND TENETS THAT WILL NOT ALLOW OUR STATE TO MOVE FORWARD AS I BELIEVE IT CAN.
FOR EXAMPLE, I THINK OUR TAX POLICIES ARE VERY AGGRESSIVE. THEY FALL ON -- THE PRESSURE FROM THOSE POLICIES FALL ON THE BACKS OF POORER PEOPLE, PEOPLE OF LESS MEANS. I BELIEVE THAT THE CRIMINAL JUSTICE POLICIES ARE VERY DATED. WE ARE HOLDING PEOPLE UNDER CONDITIONS THAT ARE JUST NOT EVEN NECESSARY TODAY. WE ARE -- I WON'T GO INTO THE DETAILS OF THESE POLICIES, MAYBE WE WILL LATER.
BUT THE SOCIAL WELFARE POLICIES ARE NOT ALWAYS UP TO PAR. PEOPLE'S NEEDS ARE NOT BEING ADDRESSED. HEALTHCARE IS A PROBLEM. I WAS VERY MUCH CONCERNED ABOUT MEDICARE POLICIES IN RECENT TIMES AND WHETHER OR NOT WE WOULD BE EXPANDING OR DROPPING IT. WE HAVE TO ALWAYS WORRY ABOUT ARE WE GOING TO

11:37 1 LOSE SOME OF THE SERVICES THAT ARE OUR PEOPLE DESPERATELY NEED.
2 **Q.** IN YOUR OBSERVATIONS HOW, IF AT ALL, DO THESE POLICIES
3 IMPACT OPPORTUNITY FOR MEMBERS OF THE BLACK COMMUNITY HERE IN
4 BATON ROUGE?
5 **A.** I HAVE DISCOVERED THAT THE BLACK COMMUNITY IS ALWAYS
6 DISPROPORTIONATELY ADVERSELY AFFECTED BY THOSE CONDITIONS THAT
7 PREVAIL IN OUR SOCIETY AND TO A GREATER EXTENT THAN OTHER
8 GROUPS OF PEOPLE, AND THAT WE HAVE TO FOREVER BE CONCERNED
9 ABOUT HOW A POLICY IS GOING TO AFFECT THE LIVELIHOOD AND THE
10 CONDITIONS OF BLACK PEOPLE TO A GREATER EXTENT THAN OTHER
11 GROUPS.
12 **Q.** ARE YOU REGISTERED TO VOTE AT YOUR CURRENT HOME HERE IN
13 BATON ROUGE?
14 **A.** YES, INDEED.
15 **Q.** HAVE YOU BEEN REGISTERED TO VOTE SINCE AROUND WHEN YOU
16 BECAME OF VOTING AGE?
17 **A.** YES, I HAVE.
18 **Q.** WOULD YOU DESCRIBE YOURSELF AS A FREQUENT VOTER?
19 **A.** I AM A FREQUENT VOTER.
20 **Q.** IS IT IMPORTANT TO YOU TO BE A FREQUENT VOTER?
21 **A.** IT IS VERY IMPORTANT TO BE A FREQUENT VOTER.
22 **Q.** AND WHY IS THAT?
23 **A.** ON TWO LEVELS. AT LEAST, FIRST OF ALL, IF WE TALK ABOUT
24 CHANGE, THE WAY OUR SYSTEM, THE AMERICAN SYSTEM, IS SETUP AND
25 ORGANIZED, IT IS THE LEGISLATIVE, JUDICIAL, EXECUTIVE PROCESS.

11:39 AND IF YOU ARE GOING TO GET INVOLVED IN CHANGE, YOU'VE GOT TO GET INVOLVED AT THAT LEVEL. AND THE ONLY WAY TO DO THAT IS TO VOTE AND GET THOSE IN OFFICE WHO ARE GOING TO WORK TOWARDS THE CHANGES THAT YOU'RE SEEKING.

BUT THERE IS ANOTHER DEEPER REASON, PERHAPS A LITTLE MORE PROFOUND REASON THAT I HAVE FOR VOTING. YOU KNOW, MY FATHER WAS BORN IN 1890. NOW, THE 15TH AMENDMENT HAS BEEN ON THE BOOKS SINCE 1870, BUT THAT DID NOT STOP THE ISSUES THAT FACE PEOPLE THAT PREVENT VOTING, THAT LOWERS THE NUMBERS OF VOTERS FOR ALL KINDS OF REASONS.

SO EVEN THOUGH THE LAWS HAVE BEEN ON THE BOOKS, THE 15TH AMENDMENT, THE WOMEN'S SUFFRAGE IN 1920, THEN ON THE BOOKS, WOMEN HAVE NOT VOTED. BLACK MEN HAVE NOT VOTED. THEY COULD HAVE VOTED SINCE 1870. SO WE -- THERE'S WORK THAT WE HAVE TO DO TO ASSURE THAT ALL ARE VOTING, AND THAT'S MY -- THAT'S THE SECOND REASON WHY I VOTE.

I NEED TO BE A MODEL FOR THE PERSON -- ANYONE THAT I WANT TO VOTE, I NEED TO MODEL THAT BY GOING TO THE POLLS AND VOTE, AND THAT'S MY DEEPER REASON. SURE, I WANT TO GET PEOPLE INTO OFFICE THAT I HOPE WILL CHANGE THINGS, WILL MAKE A DIFFERENCE, WILL HOLD MY VALUES, WILL WANT TO SEE WHAT I WANT TO SEE. BUT I ALSO KNOW THAT FOR THOSE WHO FOUGHT FOR THE AMENDMENT TO MANIFEST IN 1870, AND WHO DIED FOR THAT TO HAPPEN AND WHO WERE PREVENTED FROM VOTING FOR THAT TO HAPPEN, I NEED TO REPRESENT THAT SIDE AS WELL.

11:40 1 **Q.** DID YOU VOTE IN THE RECENT PRIMARY ELECTIONS HELD ON
2 OCTOBER 14TH?
3 **A.** I DID.
4 **Q.** AND HOW ABOUT THE GENERAL ELECTIONS ON NOVEMBER 18TH?
5 **A.** I DID.
6 **Q.** DO YOU PLAN TO VOTE IN FUTURE ELECTIONS?
7 **A.** I DO.
8 **Q.** DO YOU TEND TO VOTE IN PERSON OR ABSENTEE BY MAIL?
9 **A.** FOR YEARS I VOTED IN PERSON. BUT MORE RECENTLY I HAVE THE
10 OPPORTUNITY OR I SHOULD SAY THE PRIVILEGE TO VOTE IN ABSENTIA.
11 SO IN THE LAST FEW ELECTIONS, I HAVE VOTED IN ABSENTIA.
12 **Q.** AND YOU MENTIONED THAT PRIVILEGE. DO YOU HAVE TO QUALIFY
13 TO VOTE ABSENTEE BY MAIL IN LOUISIANA?
14 **A.** OH, YES YOU DO.
15 **Q.** AND HOW DO YOU QUALIFY?
16 **A.** I QUALIFY BY AGE. I'M CONSIDERED A SENIOR CITIZEN IN
17 LOUISIANA.
18 **Q.** CAN YOU DESCRIBE YOUR MOST RECENT EXPERIENCE VOTING
19 ABSENTEE BY MAIL?
20 **A.** YES. I HAD AN INTERESTING RECENT EXPERIENCE. FOR THE
21 FIRST TIME, THERE WAS A PROBLEM WITH MY BALLOT. I RECEIVED A
22 TEXT MESSAGE ABOUT THE PROBLEM. AND I VOTED IN THE WEEK BEFORE
23 THE ELECTION, SO LIKE FIVE DAYS BEFORE. AND THE MESSAGE SAID,
24 "THERE'S A PROBLEM," AND THEN I GOT A SECOND TEXT, A SERIES OF
25 TEXT MESSAGES.

11:42 AND THE FINAL MESSAGE SAID "THERE IS A PROBLEM WITH THE VOTER" -- "WITH THE FLAPPER ON YOUR BALLOT AND YOU NEED TO VISIT THE VOTER REGISTRATION OFFICE," OR SOME OTHER OFFICE IT SAID. IT WAS A SECOND OFFICE. BUT I IMMEDIATELY KNEW I NEEDED TO VISIT THE VOTER -- I WAS GOING TO THE VOTER REGISTRATION OFFICE.

SO I HAD TO GO AND FIX THAT PROBLEM. THAT WAS THE ONLY PROBLEM I'VE EVER HAD WITH VOTING.

**Q.** AND WHEN DID YOU GET THAT TEXT MESSAGE?

**A.** I RECEIVED THAT TEXT MESSAGE ON THURSDAY OR FRIDAY BEFORE ELECTION DAY.

**Q.** WHEN WAS ELECTION DAY?

**A.** SATURDAY THE 18TH OR WHATEVER. MY RECENT MEMORY IS VERY BAD, BUT IT WAS THE NEXT DAY. ELECTION DAY WAS THE NEXT DAY AFTER I RECEIVED THE TEXT MESSAGE. SO I JUMPED UP AND RUSHED TO THE VOTER REGISTRATION OFFICE.

**Q.** AND WHEN YOU GOT TO THE VOTER REGISTRATION OFFICE, WHAT HAPPENED?

**A.** THAT IS A PROBLEM. WELL, FIRST OF ALL, WHEN I DROVE DOWN GOVERNMENT STREET AND MADE THE RIGHT TURN -- THE VOTER REGISTRATION OFFICE IS AT THE CITY HALL. AND I MADE THE RIGHT TURN ON ST. LOUIS STREET. THERE WAS SOMETHING GOING ON WITH THE THOSE TWO -- THERE ARE TWO GARAGES: ONE ON THE LEFT; ONE ON THE RIGHT. AND THEY DIDN'T SEEM IMMEDIATELY AVAILABLE. THEY JUST WERE DIFFERENT THAN WHAT I HAD EXPERIENCED. AND I GO

11:44 1 TO THAT AREA OFTEN ENOUGH.
2 BUT AS DROVE ALONG ST. LOUIS STREET AND ONCE I PASSED
3 CITY HALL, I COULD SEE THAT THERE WAS NOWHERE TO PARK. SO THEN
4 I DECIDED I NEED TO GO BACK AND TRY TO GET INTO ONE OF THOSE
5 GARAGES, WHICH I DID, AND THAT'S WHEN I EXPERIENCED MY FIRST
6 PROBLEM OF TRYING TO FIX THIS PROBLEM WITH MY VOTER
7 REGISTRATION.
8 I WAS ASKED IF I WAS A JUROR, AND I WAS TOLD THAT
9 THIS GARAGE IS FOR JURORS. IT IS NOW FOR JURORS. AND I SAID,
10 "WELL, NO, I'M NOT A JUROR. BUT I'VE GOT TO GET TO THE VOTER
11 REGISTRATION OFFICE BECAUSE THERE'S A PROBLEM WITH MY BALLOT.
12 AND THIS IS THE LAST DAY BEFORE ELECTION DAY."
13 SO -- AND SHE SAID, "WELL, NO, YOU CAN'T JUST COME
14 INTO THIS GARAGE IF YOU'RE NOT A JUROR. YOU NEED TO GIVE ME
15 YOUR CREDIT CARD. IT'S GOING TO COST YOU $10."
16 AND SO THEN I SAID, "WELL, I WILL ASK THE MAYOR'S
17 OFFICE TO STAMP MY TICKET."
18 SHE SAID, "WELL, NO, YOU CAN'T DO THAT. WE CAN'T DO
19 IT THAT WAY."
20 AND SO I'M JUST KIND OF -- I WAS SHOCKED BECAUSE I'VE
21 BEEN GOING TO THAT GARAGE FOR A FEW YEARS NOW AND IT HAD NEVER
22 OCCURRED. BUT THIS IS SOMETHING NEW.
23 SO THEN SHE SAID "OKAY. I'LL GIVE YOU A TICKET THIS
24 TIME. BUT DO REMEMBER THAT YOU CANNOT JUST COME AND PARK IN
25 THIS GARAGE. YOU HAVE TO BE A JUROR." SO SHE GAVE ME A

11:45 TICKET, AND I WAS ABLE TO THEN GO TO THE VOTER REGISTRATION OFFICE FROM THAT POINT.

**Q.** AND WHERE WAS THE VOTER REGISTRATION OFFICE COMPARED TO THE GARAGE?

**A.** ABOUT TWO AND A HALF, THREE MAYBE, WALKING BLOCKS FROM THE GARAGE.

**Q.** ALL RIGHT. AND WHEN YOU GET TO CITY HALL, HOW DO YOU ACCESS THE REGISTRAR VOTER'S OFFICE?

**A.** YOU TAKE THAT ELEVATOR -- TAKE THE ELEVATOR TO THE SECOND FLOOR AND THAT'S ANOTHER PROBLEM, I THINK.

**Q.** HOW SO?

**A.** WELL, WHEN YOU COME OFF THE ELEVATOR, TO YOUR LEFT -- AND TO YOUR RIGHT THERE IS THE SHERIFF'S OFFICE IN ONE DIRECTION AND THERE IS THE VOTER REGISTRATION OFFICE IN THE OTHER DIRECTION.

AND, YOU KNOW, I WORKED IN CRIMINAL JUSTICE FOR YEARS AND I WORKED WITH PEOPLE IN THE CRIMINAL JUSTICE SYSTEM. AND WHEN I -- IMMEDIATELY WHEN I SAW THE SHERIFF'S OFFICE AND I THOUGHT, "GEE, IF I WORKING AS A SOCIAL WORKER TODAY AND I SENT MY CLIENTS TO THIS" -- I WOULD SUGGEST THAT THEY GO TO THE VOTER REGISTRATION OFFICE TO FIX A PROBLEM AND THEY WERE PEOPLE IN THE CRIMINAL JUSTICE SYSTEM AND THEY HAD MAYBE SOME OUTSTANDING TICKETS OR MAYBE THERE WAS A WARRANT FOR THEIR ARREST OR WHATEVER THEY MIGHT FACE."

AND IF YOU'VE WORKED IN THE SYSTEM LIKE I HAD, THEY

11:47 FACE ALL KINDS OF LEGAL MATTERS. THEY WOULD SAY -- THEY MAY NOT EVEN SAY IT TO ME. THEY WOULD PROBABLY THINK "I'M NOT GOING WITHIN TEN OR A THOUSAND FEET OF THAT BUILDING, 'CAUSE I MIGHT BE ARRESTED ON THE SPOT FOR, SAY, SOME OUTSTANDING TICKETS OR SOME OUTSTANDING WARRANT OR SOMETHING."

AND I THOUGHT THAT WOULD BE A PROBLEM BECAUSE WE HAVE SCORES OF PEOPLE IN THE CRIMINAL JUSTICE SYSTEM WHO CAN NOW VOTE. YOU KNOW, THEY ARE OUT. THEY ARE IN AFTERCARE AND PROGRAMS THAT WE -- OUT HERE IN THE COMMUNITY. AND THEY WOULD NOT GO AND FIX THEIR PROBLEM AND THEIR VOTE WOULD NOT BE COUNTED. AND THAT'S A VOTE LOST BECAUSE THERE ARE SCORES OF PEOPLE WHO JUST WOULD NOT GO NEAR THE VOTER REGISTRATION OFFICE IF THE SHERIFF'S OFFICE IS RIGHT THERE ON THE SAME FLOOR. IT'S LIKE THEY ARE TWO PEAS IN A POD.

**Q.** SO WHEN YOU GOT TO THE REGISTRAR'S OFFICE, DID THEY INFORM YOU WHAT THE ISSUE WAS WITH THE BALLOT, THE ENVELOPE FLAP?

**A.** WELL, YES, THEY DID. THE AGENT AT THE DESK -- I GAVE HER MY DRIVER'S LICENSE AND SHE PULLED MY BALLOT AND SHE SHOWED ME THAT I HAD NOT LISTED MY MOTHER'S MAIDEN NAME ON THE BALLOT. AND IT'S AMAZING I HAD NOT. I DID NOT RECALL THAT I HAD EVER LISTED IT. I JUST -- I MEAN, MY RECENT MEMORY IS NOT IDEAL THESE DAYS. BUT I JUST DID NOT NOTICE THAT I HAD MISSED THAT. AND IT'S NOT IMMEDIATELY OBVIOUS ON THE BALLOT THAT THERE IS A PLACE THAT THE MOTHER'S MAIDEN NAME MUST BE LISTED IN ORDER FOR THAT BALLOT TO BE LEGITIMATE AND TO BE COUNTED. SO I GOT THAT

11:48 1 DONE. I PUT HER NAME ON THE BALLOT. I THEN WAS TOLD THAT MY
2 BALLOT WAS NOW GOOD AND IT WOULD BE COUNTED.
3 **Q.** AND DID HAVING TO GO FIX THAT OMISSION CHANGE ANY OF YOUR
4 FRIDAY PLANS?
5 **A.** OH, YES IT DID.
6 **Q.** HOW SO?
7 **A.** MY DAUGHTER IS VISITING FROM VIRIGINA, FAIRFAX COUNTY, AND
8 WE HAD PLANS. I HAD A MEETING THAT MORNING, AND WE HAD PLANS
9 FOR THE -- WHEN I FINISHED MY MEETING. BUT ONCE I -- AND THAT
10 TOOK SOME TIME TO GET ALL THAT DONE, TO GET -- IT JUST TOOK
11 TIME TO DO THAT AND IT TOOK SO MUCH TIME THAT OUR WHOLE PLAN
12 FOR THAT -- AFTER THE MEETING WAS JUST -- HAD TO BE REDONE. SO
13 IT DID CHANGE MY -- BUT IT'S WORTH IT. I WOULD CHANGE MY PLANS
14 IF IT MEANT THAT MY VOTE WOULD BE COUNTED AND THAT'S WHAT I
15 DID.
16 **Q.** DO ANY ELEMENTS OF YOUR EXPERIENCE CORRECTING THE OMISSION
17 ON YOUR ABSENTEE BALLOT ENVELOPE RAISE CONCERNS FOR YOU ABOUT
18 ACCESS TO THE VOTING PROCESS?
19 **A.** IT DID.
20 **Q.** HOW SO?
21 **A.** THE FIRST THOUGHT I HAD AS I WAS WALKING FROM THE GARAGE,
22 I THOUGHT ABOUT MY 93-YEAR-OLD SISTER HERE IN BATON ROUGE, AND
23 I JUST WONDERED, "WELL, HOW WOULD THAT WORK FOR HER." WE WOULD
24 HAVE TO HELP HER GET -- OBVIOUSLY. BUT THAT WOULD TAKE SOME
25 EFFORT TO HELP PEOPLE WITH HANDICAPS AND CONDITIONS, OTHER

11:50 1 PROBLEMS, MOBILE PROBLEMS, GETTING AROUND, THAT WOULD BE
2 DIFFICULT. THAT WOULD TAKE SOME EFFORT AND TIME AND IT MIGHT
3 BE A DETERRENT. SOME PEOPLE WOULD NOT WANT TO INVEST THAT KIND
4 OF TIME AND ENERGY TO MAKE SURE THAT THEIR VOTE IS COUNTED. SO
5 THAT WAS TROUBLING FOR ME.
6 **Q.** WERE THERE ANY RESERVED SPACES FOR VOTERS THAT NEED TO
7 ACCESS THE REGISTRAR OF VOTER'S OFFICE?
8 **A.** THERE WERE NO RESERVED SPACES THERE FOR ANYTHING EXCEPT
9 JURORS. IT WAS ALL FOR JURORS.
10 **Q.** HOW DOES YOUR EXPERIENCE AND FORM, IF AT ALL, YOUR
11 PERCEPTIONS ON HOW ACCESS IS PROVIDED TO BLACK VOTERS IN YOUR
12 COMMUNITY SPECIFICALLY?
13 **A.** THAT IS AN EVEN BIGGER PROBLEM BECAUSE WHAT I DISCOVERED
14 HERE IN EAST BATON ROUGE IS THAT MANY BLACK PEOPLE DON'T HAVE
15 CARS. PUBLIC TRANSPORTATION IS NOT IDEAL HERE. I'VE TRIED IT
16 MYSELF AND WAITED AND WAITED AND FINALLY GAVE UP WAITING FOR A
17 PUBLIC BUS WHEN MY CAR WAS IN DISSERVICE. SO FOR A NUMBER
18 OF -- FOR SCORES OF BLACK PEOPLE, THEY WOULDN'T -- AND THEN THE
19 OTHER ISSUE IS YOU'VE GOT TO HAVE YOUR PHONE. YOUR PHONE HAS
20 TO BE ON, HAS TO BE WORKING 'CAUSE YOU'VE GOT TO GET A TEXT
21 MESSAGE. THEN YOU GOT TO GET TO THE VOTER REGISTRATION OFFICE.
22 SO YOU'VE GOT TO EITHER DRIVE THERE OR YOU'VE GOT TO GET
23 SOMEONE TO TAKE YOU THERE OR YOU'RE GONNA TAKE PUBLIC
24 TRANSPORTATION. AND NONE OF THOSE THINGS COULD WORK.
25 AND SO I FEEL THAT'S GOING TO BE, ONCE AGAIN,

11:51 1 DISPROPORTIONATELY AFFECTED, BLACK PEOPLE ARE GOING TO BE
2 DISPROPORTIONATELY AFFECTED WITH THIS PROBLEM BECAUSE OF THE
3 LACK OF THEIR OWN TRANSPORTATION OR THE LACK OF REALLY GOOD
4 QUALITY STRONG PUBLIC TRANSPORTATION.
5 **Q.** LET'S TALK ABOUT POLITICAL REPRESENTATION IN YOUR
6 COMMUNITY. DO YOU KNOW WHAT HOUSE DISTRICT YOU LIVE IN
7 CURRENTLY?
8 **A.** YES, I DO, 66.
9 **Q.** AND WHO IS YOUR REPRESENTATIVE IN DISTRICT 66 FROM THIS
10 MOST RECENT TERM?
11 **A.** MR. EDMONDS.
12 **Q.** DO YOU FEEL LIKE REPRESENTATIVE EDMONDS HAS REPRESENTED
13 YOUR INTERESTS?
14 **A.** NO, NOT AT ALL.
15 **Q.** AND WHY NOT?
16 **A.** I SAY THINGS LIKE I DON'T THINK WE'RE ON MR. EDMONDS'
17 RADAR. AND WHAT DOES THAT MEAN? MR. EDMONDS HAS NOT STOOD FOR
18 THE ISSUES THAT I'VE BEEN WORKING ON TIRELESSLY SINCE I'VE
19 BEEN BACK HERE IN BATON ROUGE. HE'S NOT STANDING FOR MEDICARE
20 EXPANSION. HE'S JUST -- SO, NO, HE JUST -- HE DOES NOT
21 REPRESENT MY VIEWS AND MY VALUES.
22 **Q.** DO YOU PAY ATTENTION TO VOTES THAT HE TAKES ON ISSUES THAT
23 YOU CARE ABOUT OR TOGETHER BATON ROUGE ORGANIZES AROUND?
24 **A.** I HAVE LEARNED OF HIS STANCES ON SOME OF THE ISSUES AND
25 IT'S JUST -- THEY ARE JUST NOT ON HIS RADAR. HE'S NOT FOCUSED

11:53 1 ON THOSE THINGS.
2 **Q.** HAS HE ATTENDED ANY EVENTS WITH TOGETHER BATON ROUGE, TO
3 YOUR KNOWLEDGE?
4 **A.** NOT TO MY KNOWLEDGE.
5 **Q.** DO YOU BELIEVE REPRESENTATIVE EDMONDS HAS BEEN RESPONSIVE
6 TO THE PARTICULARIZED NEEDS OF THE BLACK COMMUNITY HERE IN
7 BATON ROUGE?
8 **A.** NO.
9 **Q.** AND WHY NOT?
10 **A.** ONCE AGAIN, THE BLACK COMMUNITY IS NOT ON HIS RADAR,
11 THAT'S NOT WHERE HIS THINKING IS. HE'S NOT FOCUSED ON THE
12 BLACK COMMUNITY. AND THE STANCES THAT HE TAKES SAYS THAT HE'S
13 NOT FOCUSED ON THE NEEDS THAT MASSES OF PEOPLE IN THE BLACK
14 COMMUNITY HAVE.
15 **Q.** IS IT YOUR UNDERSTANDING THAT THE CURRENT CONFIGURATION OF
16 DISTRICT 66 IS MAJORITY WHITE OR MAJORITY BLACK?
17 **A.** MAJORITY WHITE.
18 **Q.** DURING THE STATE LEGISLATIVE ELECTIONS THIS OCTOBER AND
19 NOVEMBER -- FIRST, DID ANY DEMOCRAT EVEN APPEAR ON THE BALLOT
20 IN DISTRICT 66 THIS YEAR?
21 **A.** NO.
22 **Q.** DID ANY BLACK CANDIDATE APPEAR ON THE BALLOT IN DISTRICT
23 66 THIS YEAR?
24 **A.** NO.
25 **Q.** HOW ABOUT IN THE PRIMARY ELECTIONS IN OCTOBER?

11:54 1 **A.** EITHER WAS -- I THINK THERE WAS ONE BLACK CANDIDATE. NO,
2 THERE WAS ONE BLACK CANDIDATE ON THE PRIMARY BALLOT.
3 **Q.** AND WERE THEY SUCCESSFUL? DID THEY MAKE THE RUNOFF?
4 **A.** NOT AT ALL. THEY WEREN'T EVEN IN THE RUNNING.
5 **Q.** ARE YOU FAMILIAR WITH WHICH DISTRICT YOU WOULD LIVE IN
6 UNDER THE PLAINTIFFS' PROPOSED MAP?
7 **A.** YES.
8 **Q.** DO YOU KNOW WHICH ONE?
9 **A.** 101.
10 **Q.** AND IS DISTRICT 101 MAJORITY BLACK OR MAJORITY WHITE?
11 **A.** MAJORITY BLACK.
12 **Q.** DO YOU FEEL LIKE YOU ARE MORE OR LESS FAMILIAR WITH
13 MEMBERS OF THE BATON ROUGE DELEGATION WHO ARE ELECTED FROM
14 MAJORITY-BLACK DISTRICTS THAN YOUR OWN REPRESENTATIVE IN
15 DISTRICT 66?
16 **A.** I AM.
17 **Q.** WHY IS THAT?
18 **A.** I THINK IT'S BECAUSE THERE IS THE NETWORK AND -- A
19 COMMUNICATION NETWORK AMONG BLACK CANDIDATES WHERE BLACK PEOPLE
20 GET THEIR PLATFORMS AND HEAR FROM THEM EVEN WHEN WE ARE NOT IN
21 THEIR DISTRICTS. THEY TELL US WHAT THEY ARE DOING IN THE
22 DISTRICTS THEY ARE WORKING IN.
23 **Q.** AND DOES THAT INCLUDE REPRESENTATIVES WHO HAVE BEEN
24 ELECTED FROM DISTRICT 101?
25 **A.** YES.

11:55 1 **Q.** DR. WASHINGTON, WHAT WOULD IT MEAN FOR YOUR EFFORTS AS AN
2 ACTIVE MEMBER IN YOUR COMMUNITY, A MEMBER OF TOGETHER BATON
3 ROUGE AND OTHER ORGANIZATIONS, TO HAVE MORE MAJORITY-BLACK
4 DISTRICTS HERE IN YOUR HOME PARISH OF BATON ROUGE?
5 **A.** OH, I THINK IT WOULD MAKE MY ORGANIZING A LOT EASIER. I
6 THINK IT WOULD BE REPRESENTATIVE OF THE -- A GREATER
7 REPRESENTATION OF MY VALUES, MY CONCERNS. I THINK THERE WOULD
8 BE MORE PEOPLE RUNNING, MORE MINORITIES RUNNING FOR OFFICE, AND
9 MORE OPPORTUNITIES TO WIN AN ELECTION. AND I THINK THERE WOULD
10 BE -- IT WOULD INSPIRE MORE HOPE, MORE EXCITEMENT, MORE
11 ENTHUSIASM, AND I THINK A BETTER LIFE FOR ALL, BECAUSE I THINK
12 AS I RISE, OTHERS RISE.
13 **Q.** HOW WOULD IT INFORM YOUR EFFORTS TO TURN OUT VOTERS IN
14 EAST BATON ROUGE?
15 **A.** OH, I THINK VOTERS WOULD BE ENCOURAGED TO TURN OUT IF THEY
16 WERE IN A DISTRICT AS SO DESCRIBED.
17 **Q.** AND FINALLY, WHAT WOULD IT MEAN TO YOU ON A PERSONAL LEVEL
18 TO BE ABLE TO ELECT YOUR CANDIDATE OF CHOICE?
19 **A.** I WOULD BE SO INSPIRED BY THAT, HAVING BEEN BORN HERE IN
20 THIS STATE AND BEING ABLE TO OPERATE IN AN AREA WHERE THE
21 REPRESENTATION IS THERE REPRESENTING MY INTERESTS AND MY
22 VALUES. PERSONALLY, I WOULD FEEL I HAVE ARRIVED.
23 **MS. WENGER:** PASS THE WITNESS.
24 **THE COURT:** CROSS.
25 **MR. CONINE:** JOHN CONINE ON BEHALF OF THE SECRETARY

11:57 1 OF STATE.
2 **CROSS-EXAMINATION**
3 **BY MR. CONINE:**
4 **Q.** GOOD AFTERNOON, DR. WASHINGTON.
5 **A.** GOOD AFTERNOON.
6 **Q.** EARLIER YOU MENTIONED A VOTING ISSUE. SO YOU DID GET YOUR
7 VOTE CASTED. IS THAT CORRECT?
8 **A.** YES, I DID.
9 **Q.** OKAY. AND THEN YOU TALKED ABOUT SOME REPRESENTATION AND
10 YOUR PREVIOUS REPRESENTATIVES. DOES A REPRESENTATIVE NEED TO
11 BE BLACK TO REPRESENT YOUR INTERESTS?
12 **A.** A REPRESENTATIVE NEEDS TO HOLD SOME CERTAIN BASIC VALUES
13 AND BELIEFS ABOUT HUMANITY. I THINK IT'S AT A DEEPER LEVEL
14 THAT INDIVIDUALS OPERATE THAT HOLD CERTAIN VALUES AND CERTAIN
15 BELIEFS AND CERTAIN THOUGHTS ABOUT OTHER HUMAN BEINGS, AND
16 THAT'S THE LEVEL. IT'S NOT SKIN COLOR SO MUCH AS IT IS WHAT'S
17 INSIDE. SO WHENEVER I LOOK AT A CANDIDATE, I TRY TO GET TO
18 KNOW WHAT IS THAT PERSON REALLY LIKE INSIDE. AND I JUST KIND
19 OF LOOK PAST THE COLOR AT FIRST. AND ONCE I SEE WHAT'S INSIDE,
20 I SOMETIMES COME BACK TO COLOR AND I'M THINKING, "GEE, IT'S
21 AMAZING HOW I COME BACK TO COLOR FOR A LOT OF PEOPLE." IT'S
22 INTERESTING.
23 **Q.** THANK YOU.
24 **MR. CONINE:** JUDGE, ONE MOMENT. I COULD PERHAPS GET
25 US TO LUNCH PRETTY FAST.

11:59 NO FURTHER QUESTIONS.

**THE COURT:** ANY REDIRECT?

**MS. WENGER:** NO REDIRECT.

**THE COURT:** ALL RIGHT. YOU MAY STEP DOWN.

THANK YOU, MA'AM.

**THE WITNESS:** THANK YOU, JUDGE.

**THE COURT:** OKAY. THIS IS A PERFECT TIME FOR A LUNCH BREAK. WE WILL BE IN RECESS UNTIL 1:00 P.M.

**THE LAW CLERK:** ALL RISE.

COURT IS IN RECESS.

**(WHEREUPON, THE COURT WAS IN RECESS.)**

**THE COURT:** BE SEATED.

OKAY. ARE YOU READY WITH YOUR NEXT WITNESS, PLEASE?

**MS. ROHANI:** GOOD AFTERNOON, YOUR HONOR.

SARA ROHANI ON BEHALF OF THE PLAINTIFFS.

THE PLAINTIFFS CALL MR. MICHAEL MCCLANAHAN.

**MICHAEL MCCLANAHAN,**

**HAVING BEEN DULY SWORN, TESTIFIED AS FOLLOWS:**

**THE DEPUTY CLERK:** JUST SIT RIGHT HERE.

**THE WITNESS:** OKAY.

**DIRECT EXAMINATION**

**BY MS. ROHANI:**

**Q.** GOOD AFTERNOON, MR. MCCLANAHAN.

**A.** GOOD AFTERNOON.

01:02 1 **Q.** CAN YOU PLEASE SPELL AND STATE YOUR NAME FOR THE RECORD.
2 **A.** IT'S MICHAEL MCCLANAHAN. M-I-C-H-A-E-L. MCCLANAHAN,
3 M-C-C-L-A-N-A-H-A-N.
4 **Q.** THANK YOU.
5 AND HOW LONG HAVE YOU LIVED IN LOUISIANA?
6 **A.** ALL MY LIFE.
7 **Q.** AND WHERE IN LOUISIANA DO YOU LIVE?
8 **A.** I LIVE IN BATON ROUGE.
9 **Q.** MR. MCCLANAHAN, WHAT IS YOUR ROLE IN THIS CASE?
10 **A.** I REPRESENT THE NAACP.
11 **Q.** AND WHAT IS YOUR ROLE IN THE NAACP?
12 **A.** I'M THE STATE PRESIDENT.
13 **Q.** THANK YOU.
14 **A.** I ALSO SERVE ON THE NATIONAL BOARD.
15 **Q.** THANK YOU.
16 IF I REFER TO THE LOUISIANA STATE CONFERENCE OF THE
17 NAACP AS THE LOUISIANA NAACP OR THE STATE CONFERENCE FOR SHORT,
18 WOULD YOU UNDERSTAND WHAT I'M REFERRING TO?
19 **A.** I WOULD.
20 **Q.** THANK YOU.
21 AND IS THE LOUISIANA NAACP A PLAINTIFF IN THIS CASE?
22 **A.** YES.
23 **Q.** HOW LONG HAVE YOU BEEN PRESIDENT OF THE LOUISIANA NAACP?
24 **A.** IF YOU USE DOG YEARS, IT'LL PROBABLY BE A LONG TIME. I
25 THINK ABOUT SIX, SEVEN YEARS, SOMETHING LIKE THAT.

01:03 1 **Q.** AND YOU SAID YOU WERE ALSO A MEMBER OF THE NATIONAL NAACP.
2 HOW LONG HAVE YOU BEEN A MEMBER OF THE NATIONAL NAACP?
3 **A.** I SERVE ON THE NATIONAL BOARD OF DIRECTORS. I'VE BEEN --
4 I WAS JUST REELECTED I THINK FOUR YEARS, GIVE OR TAKE, I GUESS.
5 **Q.** AND IF ONE SERVES ON THE NATIONAL BOARD OF DIRECTORS, IS
6 ONE A MEMBER OF THE NAACP AS WELL?
7 **A.** FOR THE PARTICULAR SEAT THAT I HOLD, YES.
8 **Q.** THANK YOU.
9 NOW, PRESIDENT MCCLANAHAN, WHAT IS THE LOUISIANA
10 NAACP?
11 **A.** IT IS A -- IT IS A ORGANIZATION OF THE PARENT -- THE
12 ASSOCIATION OF THE PARENT, WHICH IS THE NATIONAL NAACP AND THE
13 STATE CONFERENCES ARE JUST AN OFFSHOOT, FOR LACK OF BETTER TERM
14 OF THE PARENT ORGANIZATION.
15 **Q.** CAN YOU EXPLAIN THAT RELATIONSHIP A LITTLE BIT FURTHER?
16 **A.** OKAY. THE STATE OF -- SOME OF -- SOME OF THE STATES HAVE
17 A STATE CONFERENCE, AND FOR US WE ARE MADE UP OF -- ADULT
18 BRANCHES IN YOUTH AND COLLEGE CHAPTERS MAKE UP THE STATE
19 CONFERENCE.
20 **Q.** AND CAN YOU EXPLAIN THE RELATIONSHIP BETWEEN THE STATE
21 CONFERENCE AND THE NATIONAL NAACP?
22 **A.** OKAY. SO WE ACTUALLY -- WE ARE THE FIELD, THE ARM, THE
23 EXTENSION OF THE NATIONAL OFFICE. SO EVERYTHING THAT THE
24 NATIONAL OFFICE -- THE VISION, THE MISSION IS CARRIED OUT
25 THROUGH ITS STATE CONFERENCES AND ULTIMATELY THROUGH THE

01:05 1 BRANCHES IN THE YOUTH AND COLLEGE CHAPTERS.
2 **Q.** THANK YOU.
3 WHAT IS THE LOUISIANA NAACP'S MISSION?
4 **A.** TO ROOT OUT RACISM, DISCRIMINATION, AND TO ENCOURAGE
5 PERSONS TO PARTICIPATE IN THE DEMOCRATIC PROCESS THROUGH
6 VOTING.
7 **Q.** AND HOW DOES THE STATE CONFERENCE ACCOMPLISH THAT MISSION?
8 **A.** WE ACCOMPLISH THAT IN A VARIETY OF WAYS. WE HOST TOWN
9 HALLS, MEMBERSHIP DRIVES. WE PARTICIPATE IN A LOT OF THE
10 COMMUNITY ACTIVITIES THAT GO ON. WE HOST STATE CONVENTIONS IN
11 WHICH WE INVITE THE COMMUNITY AND OTHER BRANCHES AND WHAT HAVE
12 YOU. WE DO FREEDOM FUND BANQUETS, STUFF LIKE THAT THERE.
13 **Q.** CAN YOU DESCRIBE SOME OF THE LOUISIANA NAACP'S ACTIVITIES
14 RELATED TO VOTING?
15 **A.** OKAY. WE DO GET OUT THE VOTE, GOTV, GET-OUT-THE-VOTE
16 CAMPAIGNS, IN WHICH WE ENCOURAGE ALL OF OUR BRANCHES AND YOUTH
17 AND COLLEGE CHAPTERS TO GET ON THE RADIO, DO ADVERTISEMENTS
18 DEALING WITH VOTING, DO PHONE BANKING. WE DO -- THE YOUTH AND
19 COLLEGE HAVE SOMETHING WITH THEIR CELL PHONES CALLED HUSTLE GET
20 OUT THE VOTE. THEY CAN TEXT PERSONS, 200 OR 300 PEOPLE AT ONE
21 TIME ABOUT VOTING. WE DO ALL KINDS OF CAMPAIGNS. WE BE ON
22 COLLEGES. WE BE ON THE STREET CORNERS, YOU KNOW, RIDE AROUND
23 WITH FLOATS TALKING ABOUT VOTING.
24 BUT I WEAR A VOTING SHIRT EVERYDAY EXCEPT FOR -- THIS
25 MIGHT BE THE SECOND TIME I DIDN'T WEAR ONE IN THIS WHOLE YEAR.

01:06 I WORE ONE TO THE FOOTBALL GAME.
**Q.** THANK YOU, PRESIDENT.
NOW, HOW IS THE LOUISIANA NAACP FUNDED?
**A.** WELL, WE ARE FUNDED THROUGH OUR FREEDOM FUND BANQUETS. ALL UNITS ARE REQUIRED TO HAVE -- HOST A FREEDOM FUND BANQUET, AND THAT'S HOW THEY ARE FUNDED. BUT ALSO, WE HAVE PARTNERS THAT SPONSOR A LOT OF ACTIVITIES THAT WE DO, AND THEN WE GET -- WE GENERATE FUNDS LIKE THAT. AND ALSO THROUGH MEMBERSHIPS. WE GET A PORTION OF THAT MEMBERSHIP DUES, THE NATIONAL OFFICE GETS A PORTION AND THE LOCAL UNITS GET A PORTION TOO.
**Q.** PRESIDENT, WHEN DID THE STATE CONFERENCE BECOME INVOLVED IN REDISTRICTING WORK IN LOUISIANA?
**A.** RIGHT BEFORE -- RIGHT BEFORE THE CENSUS STARTED.
**Q.** AND CAN YOU TELL ME ABOUT YOUR EFFORTS DURING THE CENSUS?
**A.** WELL, WE KNEW AND UNDERSTOOD THAT IN ORDER FOR US TO GET TO WHERE THE LINES WOULD BE PROPERLY DRAWN, THAT WE KNEW THAT EVERYBODY IN THE STATE HAD TO BE COUNTED. AND SO WE WERE REQUIRING -- YOU KNOW, TALKING TO PEOPLE ABOUT DON'T WE -- WHEN YOU GET A KNOCK ON DOOR AND SOMEBODY SAY "CENSUS," YOU KNOW, YOU CAN TALK TO THEM. YOU AIN'T GOTTA SAY "AIN'T NOBODY HOME." I WANT YOU TO GO AHEAD AND TALK TO THE PEOPLE SO THEY GET YOUR INFORMATION. IF THEY CALL YOU, WE WOULD WANT YOU TO GO AHEAD AND ANSWER THE QUESTIONS SO THAT YOU AND YOUR FAMILY CAN BE COUNTED IN THE CENSUS.
**Q.** AND HAS THE LOUISIANA NAACP BEEN INVOLVED IN THE PROCESS

01:08 RELATING TO THE LOUISIANA STATE HOUSE AND STATE SENATE MAPS
DURING THE LAST REDISTRICTING CYCLE?
**A.** VERY MUCH SO.
**Q.** AND WHY DID THE LOUISIANA NAACP DECIDE TO GET INVOLVED IN
THAT REDISTRICTING PROCESS?
**A.** WE KNOW THAT THE CORNERSTONE OF DEMOCRACY IS
REPRESENTATION, AND WE WANTED TO ENSURE THAT PERSONS THAT
NORMALLY WOULD NOT HAVE A VOICE HAD ADEQUATE REPRESENTATION.
AND SO WE -- AFTER THE CENSUS WE JUMPED RIGHT INTO THE
REDISTRICTING ASPECT OF IT.
**Q.** AND CAN YOU TELL ME ABOUT SOME OF THE LOUISIANA NAACP
EFFORTS DURING THAT REDISTRICT PROCESS?
**A.** OKAY. SO THE LEGISLATURE HAD TOWN HALL MEETINGS. THEY
HAD THE ROADSHOW. I THINK IT'S CALLED A -- I THINK IT WAS
CALLED A REDISTRICTING ROADSHOW. AND WE WERE -- I HAVE MEMBERS
-- BRANCHES ALL OVER THE STATE. AND WHEREVER THOSE ROADSHOWS
WERE, I REQUIRED THAT WE SEND TEAMS THERE TO HELP CREATE --
BUILD A RECORD OF WHAT THE COMMUNITY WAS ASKING FOR, WHAT THE
COMMUNITY WANTED. AND SO WE WAS DOING -- ALSO, WE WAS, YOU
KNOW, TEXTING OUR LEGISLATURES TELLING THEM "DON'T FORGET US"
-- YOU KNOW, THOSE THAT WERE PART OF THAT ROADSHOW -- AS WELL
AS OTHERS THAT WAS GONNA PARTICIPATE IN DRAWING THE LINES AND
THE LEG- -- EXCUSE ME -- IN THE COMMUNITY PROCESS, JUST TALKING
TO THEM, YOU KNOW, LETTING THEM UNDERSTAND THAT EVERYTHING IS
FINE. BUT WE WANT IT TO STAY RIGHT, STAY GOOD.

01:10 1 **Q.** CAN YOU TELL ME WHAT THE LOUISIANA NAACP WAS SEEKING TO
2 ACCOMPLISH BY ENGAGING IN THE RESTRICTING PROCESS?
3 **A.** WELL, WE WANTED TO GIVE A VOICE TO THE VOICELESS; WE
4 WANTED TO GIVE HOPE TO THE HOPELESS. I'VE BEEN IN LOUISIANA A
5 LONG TIME AND LOUISIANA POLITICS IS, YOU KNOW, REAL DIRTY. YOU
6 KNOW, FOR YEARS PERSONS HAVE BEEN PUT ASIDE. THEY HAVE NOT
7 BEEN GIVEN AN OPPORTUNITY TO HAVE THEIR WANTS AND NEEDS MET.
8 AND I KNEW THROUGH THIS PROCESS THAT WE COULD. WE COULD TURN
9 THE CORNER. WE COULD BRING LOUISIANA UP TO THE NOWADAYS AND
10 LET EVERYBODY THAT HAS -- THAT WANTS TO BE HEARD, BE HEARD.
11 **Q.** COULD YOU JUST EXPLAIN A LITTLE FURTHER ABOUT WHAT THE
12 STATE CONFERENCE WAS SEEKING TO ACCOMPLISH BY ENGAGING IN THE
13 REDISTRICTING PROCESS WITH REGARDS TO THE STATE HOUSE AND STATE
14 SENATE MAPS?
15 **A.** WANTED THE STATE HOUSE TO DRAW MAPS THAT ADEQUATELY
16 REFLECT -- EXCUSE ME -- AS WELL AS ADEQUATELY REFLECT THE
17 MAKEUP OF THE BLACK FOLKS THAT MAKEUP THE STATE OF LOUISIANA.
18 YOU KNOW, I'M NOT -- PROBABLY MY CHILDREN WOULD TELL ME I'M NOT
19 A GOOD MATHEMATICIAN. BUT I DO KNOW A THIRD IS A THIRD. AND
20 FOR YEARS SOMEBODY ELSE'S MATH WASN'T MATHING. AND SO I WANTED
21 TO MAKE SURE THAT THOSE THAT UNDERSTOOD WHAT A THIRD WAS
22 REFLECTED IT IN THE HOUSE, THE MAKEUP OF THE HOUSE AS WELL AS
23 IN THE MAKEUP OF THE SENATE.
24 **Q.** SO, PRESIDENT, WAS A MAP ULTIMATELY PASSED?
25 **A.** IT WAS.

01:11 1 **Q.** AND HOW DOES THAT MAP AFFECT BLACK VOTERS INCLUDING
2 MEMBERS OF THE LOUISIANA NAACP?
3 **A.** IT CLEARLY DILUTES THE BLACK VOICE. IT CLEARLY DILUTES
4 THE STRENGTH OF BLACK PEOPLE IN THE STATE OF LOUISIANA. IT
5 ELIMINATES BLACK LEGISLATORS BECAUSE EITHER IT ERASED THEIR
6 DISTRICT OR IT DIDN'T CREATE AN ADDITIONAL DISTRICT THAT IT
7 COULD HAVE.
8 **Q.** AND CAN YOU TELL ME AFTER THE MAPS BECAME LAW, HOW DID
9 THEY AFFECT THE NAACP'S WORK IN LOUISIANA?
10 **A.** WELL, YOU KNOW, WE KNOW THE PROCESS. WE KNOW THAT ONCE
11 THE LEGISLATURE PASSED -- ENACTED THOSE MAPS THAT IT HAD TO GO
12 THROUGH THE GOVERNOR. AND SO WE STARTED GALVANIZING. I WAS
13 PULLING -- FOR LACK OF A BETTER -- TO USE AN ARMY TERM, I WAS
14 PULLING MEMBERS FROM EVERY -- SAY, "LOOK, WE NEED TO MAKE SURE
15 YOU'RE HERE IN BATON ROUGE. WE'RE GOING TO TALK TO THE
16 GOVERNOR."
17 ONE THING THAT'S ON MY MIND WAS GETTING HIS
18 ATTENTION. REMINDING HIM THAT THE NAACP AND OTHERS HELPED GET
19 HIM REELECTED. AND SO WE WANTED TO MAKE SURE THAT HE
20 UNDERSTOOD THAT BLACK PEOPLE AT THAT POINT IN TIME NEED TO BE
21 HEARD, AND HE NEEDED TO VETO THOSE MAPS.
22 **Q.** SO DID THOSE MAPS HAVE AN IMPACT ON VOTER SENTIMENT IN THE
23 COMMUNITIES?
24 **A.** I'M A NATIVE LOUISIANAN. THIS CITY HAS ALWAYS BEEN
25 POLITICS AS USUAL. WE DON'T HAVE A VOICE. THEY GONNA DO WHAT

01:13 1 THEY WANT TO DO. YOU KNOW, IT'S DISCOURAGING. IT'S
2 DISCOURAGING. IT'S DEHUMANIZING, DEGRADING WHEN YOU SEE WHAT
3 REALITY IS, BUT PEOPLE LOOK -- BUT LOOK THE OTHER WAY IN DOING
4 WHAT'S RIGHT TO CONTINUE TO DO WHAT'S WRONG. AND SO THAT MEANS
5 THAT WE ARE FIGHTERS. WE FIGHT INJUSTICES. THAT WAS AN
6 INJUSTICE THAT WE WAS WILLING TO FIGHT AND WE STILL WILLING TO
7 FIGHT.
8 **Q.** SO YOU MENTIONED EARLIER THAT THE STATE CONFERENCE DOES
9 VOTER EDUCATION, VOTER ENGAGEMENT EFFORTS. DID THE MAPS IMPACT
10 THOSE EFFORTS?
11 **A.** OH, YES, INDEED. BECAUSE IF YOU LOOK AT AN AREA THAT
12 THINK THEY GONNA HAVE A REPRESENTATIVE. YOU KNOW, SO TALK
13 ABOUT NORTHEAST LOUISIANA, THE AREA BETWEEN SHREVEPORT -- IT'S
14 CADDO, DESOTO, AND SABINE. WE HAD SENT TO -- BECAUSE WHAT
15 WE'RE DOING NOW IS WE'RE TARGETING -- WE'RE TARGETING
16 GET-OUT-THE-VOTE. WE TARGETING AREAS NOW WHERE, YOU KNOW, WE
17 WOULD TEAM UP WITH URBAN -- THE URBAN LEAGUE; WE WOULD TEAM UP
18 BLACK VOTERS MATTER; TOGETHER LOUISIANA TO, YOU KNOW, TO GET
19 PEOPLE EXCITED ABOUT VOTING.
20 SO NOW WHEN YOU SEE THAT -- WHEN YOU THOUGHT YOU HAD
21 A REPRESENTATIVE, YOU DON'T. YOU'RE LIKE, "WELL, I AIN'T GONNA
22 GO OUT TO VOTE. THEY GONNA DO WHAT THEY WANT TO DO ANYWAY."
23 THAT'S WHAT IT'S BEEN FOR YEARS.
24 I'VE BEEN IN -- I'M A NATIVE LOUISIANAN. I'VE SEEN
25 THAT MOVIE PLAY OUT. IT'S ALWAYS BEEN THAT WAY. WE HAD AN

01:14 1 OPPORTUNITY TO CHANGE THAT. WE DIDN'T. THE LEGISLATURE LOOKED
2 BEYOND WHAT WAS RIGHT AND SAID "WE GONNA DO WHAT WE'VE ALWAYS
3 DONE," THAT LOW-DOWN WRONG STUFF.
4 **Q.** AND SO DID THOSE EFFORTS TAKE AWAY FROM THE LOUISIANA
5 NAACP'S OTHER CORE ENGAGEMENT WORK?
6 **A.** WELL, YOU KNOW, EDUCATION. YOU KNOW, WE SEND -- WE HAVE
7 COMMITTEES AND WORKERS THAT WILLINGLY -- BECAUSE THIS IS A
8 VOLUNTEER ORGANIZATION, LET ME SAY THAT, THAT VOLUNTEER TO GO
9 AND SPEND THEIR OWN RESOURCES IN DIFFERENT AREAS. BUT NOW WE
10 HAD TO HAVE ALL HANDS ON DECK BECAUSE WE KNEW THAT THE GOVERNOR
11 WAS REELECTED OUT OF SHREVEPORT, MONROE, ALEXANDRIA, BATON
12 ROUGE, AND NEW ORLEANS TO NAME THE CORE. AND WE WANTED TO GET
13 PEOPLE THERE, GET THE VOTE OUT.
14 **Q.** PRESIDENT MCCLANAHAN, DOES THE STATE CONFERENCE HAVE
15 BRANCHES IN LOUISIANA?
16 **A.** YES.
17 **Q.** HOW MANY?
18 **A.** ABOUT 40.
19 **THE COURT:** SORRY. FORTY, SIR?
20 **THE WITNESS:** FORTY.
21 **BY MS. ROHANI:**
22 **Q.** AND WHERE ARE THEY LOCATED?
23 **A.** ALL OVER THE STATE OF LOUISIANA. FROM NORTH, SOUTH, EAST,
24 WEST, AND ALL POINTS IN BETWEEN.
25 **Q.** AND CAN YOU TELL ME WHAT ARE THE REQUIREMENTS TO BECOME A

01:15 1 MEMBER OF THE NAACP?
2 **A.** PAY YOUR DUES, ANNUAL DUES, AND YOU'RE READY TO
3 PARTICIPATE.
4 **Q.** AND WHEN AN INDIVIDUAL JOINS THE NAACP, DO THEY BECOME A
5 MEMBER OF A BRANCH?
6 **A.** THEY PAY THEIR DUES, THEY BECOME A MEMBER OF THE BRANCH
7 THEY LIVE OR WORK CLOSE TO A BRANCH.
8 **Q.** SO, PRESIDENT MCCLANAHAN, I'M GOING --
9 **MS. ROHANI:** OR, YOUR HONOR, MAY I SHOW THE WITNESS A
10 DOCUMENT ON THE ELMO? IT IS THE DOCUMENT THAT WE WILL BE
11 RE-UPLOADING TO JERS.
12 **THE COURT:** AND SO YOU ARE GOING TO REQUEST THAT IT
13 BE REDACTED OR SEALED?
14 **MS. ROHANI:** NO, NOT THIS TIME.
15 **THE COURT:** OKAY. YES.
16 HAS YOUR OPPOSING COUNSEL SEEN IT?
17 **MS. ROHANI:** YES. IT IS THE BYLAWS.
18 **BY MS. ROHANI:**
19 **Q.** SO, PRESIDENT MCCLANAHAN, DO YOU RECOGNIZE -- ARE YOU
20 FAMILIAR WITH THIS DOCUMENT?
21 **A.** YES, I AM.
22 **Q.** AND CAN YOU TELL ME WHAT IT IS?
23 **A.** IT IS THE BYLAWS FOR UNITS OF THE NAACP.
24 **Q.** AND IS THIS A DOCUMENT THAT THE STATE CONFERENCE KEEPS IN
25 ITS ORDINARY COURSE OF BUSINESS?

01:17 1 **A.** YES, IT IS.
2 **MS. ROHANI:** AND WE'LL BE MOVING THIS INTO EVIDENCE.
3 SO I'LL JUST REMOVE IT FROM THE ELMO RIGHT NOW.
4 **THE COURT:** OKAY. I CAN'T -- I MEAN, YOU ARE VERY
5 SOFT SPOKEN.
6 **MS. ROHANI:** OH, MY APOLOGIES.
7 **THE COURT:** YOU NEED TO USE THE MIC.
8 YOU ARE NOT GOING TO INTRODUCE IT INTO EVIDENCE?
9 **MS. ROHANI:** YEAH. WE WILL MOVE IT INTO EVIDENCE.
10 WE ARE JUST GOING TO BE UPLOADING IT FOLLOWING THIS.
11 **THE COURT:** OKAY.
12 **THE DEPUTY CLERK:** WHAT IS IT?
13 **MS. ROHANI:** IT'S EXHIBIT 214.
14 **THE DEPUTY CLERK:** P-214?
15 **MS. ROHANI:** PL-214, YES. AND THEN IT IS THE BYLAWS.
16 THANK YOU.
17 **MS. MCKNIGHT:** AND, YOUR HONOR, WE DO OBJECT BASED ON
18 AUTHENTICITY AND COMPLETENESS AND FOUNDATION.
19 **THE COURT:** OKAY. RESPOND TO THE OBJECTION.
20 **MS. ROHANI:** YOUR HONOR, THESE ARE BEING OFFERED TO
21 THE EXTENT -- THEY ARE BEING OFFERED TO PROVE MEMBERSHIP
22 STRUCTURE OF THE NAACP. THEY HAVE AN INDEPENDENT LEGAL
23 SIGNIFICANCE. THEY --
24 **THE COURT:** AUTHENTICITY AND FOUNDATION.
25 **MS. ROHANI:** I AM TRYING TO LAY THE FOUNDATION TO ASK

01:18 1 HIM ABOUT THE STRUCTURE OF THE ORGANIZATION.
2 **THE COURT:** SHE OBJECTS TO THE INTRODUCTION OF THE
3 BYLAWS ON THE GROUNDS THAT YOU HAVE NOT LAID -- THAT YOU HAVE
4 NOT SATISFIED THE AUTHENTICATION REQUIREMENTS AND YOU HAVE NOT
5 LAID A FOUNDATION FOR THE DOCUMENT.
6 **MS. ROHANI:** THANK YOU, YOUR HONOR.
7 **THE COURT:** I'M GOING TO SUSTAIN THE OBJECTION. YOU
8 CAN CONTINUE AND TRY TO DO WHAT YOU CAN DO.
9 **MS. ROHANI:** PRESIDENT MCCLANAHAN DID STATE THAT HE
10 KEEPS IT AS A BUSINESS RECORD.
11 **THE COURT:** THAT'S AN HEARSAY OBJECTION.
12 **MS. ROHANI:** OKAY. THANK YOU.
13 **THE COURT:** SHE QUESTIONS ITS AUTHENTICITY. IS IT
14 WHAT IT SAYS IT IS? IS IT A TRUE COPY OF WHAT IT SAYS IT IS?
15 YOU HAVE NOT DONE THAT. THAT'S WHAT SHE OBJECTED TO.
16 **MS. ROHANI:** PRESIDENT MCCLANAHAN DID TESTIFY THAT
17 IT'S TRUE AND CORRECT COPY.
18 **THE COURT:** OKAY.
19 **MS. ROHANI:** AND I CAN SHOW HIM THE WHOLE DOCUMENT
20 AND GO THROUGH IT.
21 **THE COURT:** OKAY. PLEASE DO SO.
22 **MS. ROHANI:** IT IS A BIT LONG.
23 **THE COURT:** WALK IT OVER TO HIM AND SHOW HIM THE
24 DOCUMENT.
25 DO YOU WANT TO ASK THE AUTHENTICITY QUESTIONS,

01:19 PLEASE?
**BY MS. ROHANI:**
**Q.** PRESIDENT MCCLANAHAN, DO YOU RECOGNIZE THIS DOCUMENT?
**A.** YES, I DO.
**Q.** AND WHAT IS IT?
**A.** IT IS THE COPY OF THE BYLAWS FOR UNITS.
**Q.** AND ARE YOU FAMILIAR WITH THIS DOCUMENT?
**A.** YES, I AM.
**Q.** CAN YOU CONFIRM THAT IT'S A TRUE AND CORRECT COPY OF THE BYLAWS?
**A.** YES, IT IS.
**THE COURT:** DOES THAT RESOLVE YOUR AUTHENTICITY OBJECTION?
**MS. MCKNIGHT:** YOUR HONOR, IT DOES NOT. HERE'S WHY: AS YOU CAN SEE FROM THE FACE OF IT, THERE ARE INCOMPLETE PORTIONS OF IT, THERE ARE BLANKS. IF YOU FLIP THROUGH IT, THERE ARE HANDWRITTEN NOTES THROUGHOUT. WE ARE NOT SURE WHETHER IT'S A DRAFT OR NOT. WE DON'T KNOW WHO MAINTAINED IT. IT'S NOT SIGNED, AND THERE IS NO SECRETARY CERTIFICATE, WHICH IS SOMETHING YOU WOULD EXPECT TO SEE IN BYLAWS.
**THE COURT:** DO YOU WANT TO RESPOND TO THAT? IT IS A COMPLETE COPY? I MEAN, IS IT SIGNED? DOES IT HAVE INTERLINEATIONS? DOES IT HAVE BLANKS?
**MS. ROHANI:** IT IS NOT SIGNED. WE DO BELIEVE IT'S A COMPLETE COPY.

01:20 **THE COURT:** OBJECTION SUSTAINED.
**MS. ROHANI:** OKAY.
**BY MS. ROHANI:**
**Q.** PRESIDENT MCCLANAHAN, CAN YOU TELL ME HOW THE OFFICERS OF THE STATE CONFERENCE ARE ELECTED?
**A.** THE BRANCHES -- THE BRANCHES ELECT DELEGATES FROM THEIR UNIT AND THEY SEND THEM TO EITHER THE STATE CONVENTION WHERE THEY ARE ELECT THE OFFICERS AT THAT POINT.
**Q.** AND CAN YOU CLARIFY WHAT THE MAKEUP OF THE UNITS ARE?
**A.** UNITS ARE MADE UP OF THE MEMBERS, NAACP MEMBERS, THAT PAY THEIR DUES.
**Q.** THANK YOU.
AND WHEN ARE THE OFFICERS OF THE STATE CONFERENCE ELECTED?
**A.** EVERY -- WELL, YOU'RE SAYING ELECTION. EVERY ODD NUMBER OF YEARS THE OFFICERS OF THE STATE CONVENTION ARE ELECTED.
**Q.** AND WHO VOTES FOR THOSE OFFICERS?
**A.** THE DELEGATES THAT ARE ELECTED FROM THE MEMBERSHIP OF THE BRANCHES.
**Q.** CAN YOU JUST REPEAT HOW THE DELEGATES ARE SELECTED?
**A.** THE DELEGATES ARE -- THEY ARE -- ACTUALLY -- ACTUALLY THEY ARE ELECTED FROM THE BRANCH. THERE'S A BRANCH MEETING AND THOSE WHO WANT TO RUN FOR A DELEGATE -- SO THE MEMBERS WITHIN ELECT THEM AND SEND THEM TO THE STATE CONVENTION AND THEY ELECT MEMBERS OF -- THEY ELECT ME, AS WELL AS ALL THE OFFICERS

01:22 1 FROM -- THAT MAKEUP THE STATE CONVENTION OFFICE STAFF.
2 **Q.** AND DOES THE LOUISIANA NAACP HAVE COMMITTEES?
3 **A.** YES.
4 **Q.** AND CAN YOU TELL ME ABOUT THOSE COMMITTEES?
5 **A.** WE HAVE 12-PLUS COMMITTEES. SOME ARE HEALTH COMMITTEE,
6 EDUCATION COMMITTEE, COME TO JUSTICE COMMITTEE, WOMEN IN THE
7 NAACP COMMITTEE, LEGAL REDRESS COMMITTEE.
8 **THE COURT:** I MISSED THE LAST ONE. WHAT WAS IT, SIR?
9 **THE WITNESS:** I SAID LEGAL REDRESS COMMITTEE. YOU
10 GOT THAT ONE? LEGAL REDRESS.
11 **THE COURT:** OKAY.
12 **BY THE WITNESS:**
13 **A.** AND SOME OTHERS.
14 **Q.** AND DO THOSE COMMITTEES HAVE A CHAIR?
15 **A.** YES, THEY HAVE A CHAIR.
16 **Q.** AND HOW IS THE CHAIR OF THE COMMITTEE APPOINTED?
17 **A.** OKAY. I ASKED THE STATE PRESIDENT TO LOOK AROUND AND SEE
18 WHO I WANTED TO BE A CHAIR, AND I HOLD THOSE PERSONS OUT TO
19 THE -- TO THE MEMBERSHIP TO RATIFY THE PERSON I HAVE SELECTED
20 TO BE THE COMMITTEE CHAIR.
21 **Q.** AND CAN YOU JUST TELL ME WHO PARTICIPATES IN THOSE
22 COMMITTEES?
23 **A.** ANYBODY THROUGHOUT THE WHOLE STATE THAT'S A NAACP MEMBER
24 THAT WANTS TO PARTICIPATE.
25 **Q.** AND CAN YOU TELL ME SOME OF THE OTHER WAYS THAT MEMBERS

01:23 PARTICIPATE IN ACTIVITIES FOR THE STATE CONFERENCE?
**A.** WELL, MEMBERS ARE THE LIFE BLOOD OF THE NAACP. AND SO THEY DO A PLETHORA OF STUFF, YOU KNOW. NOT ONLY THAT, BUT ALSO THEY -- THEY SEND DELEGATES TO THE NATIONAL CONVENTION. AND SO TO VOTE FOR -- VOTE FOR OUR BOARD MEMBERS COMES FROM THE MEMBERSHIP. THOSE THAT HAVE BEEN ELECTED AS DELEGATES TO THE NATIONAL CONVENTION IS HOW THEY ELECT THOSE PERSONS THERE.
**Q.** ARE THERE ANY REGULAR OCCASIONS WHERE YOU AND THE MEMBERS GET TOGETHER?
**A.** OH, YEAH. WE DO -- OVER THE LAST THREE YEARS, I DO WHAT YOU CALL -- I HAVE A MONDAY NIGHT CALL, AND IT'S ABOUT 60 TO 70 MEMBERS FROM THROUGHOUT THE STATE GET ON THE CALL. WE STARTED THAT CALL BECAUSE OF COVID, AND WE JUST DO IT EVERY MONDAY. WE HAVE ONE TONIGHT.
**Q.** AND ARE THOSE CALLS OPEN TO ALL MEMBERS?
**A.** ALL MEMBERS.
**Q.** AND WHAT ARE SOME OF THE THINGS THAT HAVE COME OUT OF THE MONDAY NIGHT CALLS?
**A.** WELL, WHEN THE -- AS A MATTER OF FACT, WHEN THE LEGISLATURE PASSED THOSE ILLEGAL MAPS AND WE WANTED GOVERNOR JOHN BEL TO VETO THOSE MAPS, THE ACTION THAT WE TOOK CAME OUT OF THAT CALL. WE DID EMAILS; WE DID PHONE CALLS; AND WE HAD A PROTEST RALLY. THOSE THINGS COME OUT OF THE MONDAY NIGHT CALLS. THEY HAVE TO DECIDE -- WHATEVER THEY DECIDE, I'M FINE WITH.

01:25 1 **Q.** PRESIDENT MCCLANAHAN, CAN YOU JUST TELL ME WHY RELIEF IN
2 THIS CASE IS IMPORTANT TO THE LOUISIANA NAACP?
3 **A.** WELL, WE FINALLY BELIEVE THAT WE HAVE AN OPPORTUNITY TO
4 THE TURN THE PAGE IN THE HISTORY OF LOUISIANA. AND WE HAVE AN
5 OPPORTUNITY IN 2023 TO HAVE DONE RIGHT -- 2022 BY PASSING MAPS
6 THAT GAVE -- BLACK PEOPLE MAKEUP A THIRD OF THE POPULATION --
7 AN OPPORTUNITY WITH VOICE -- WITH A VOICE. AND WITH THIS
8 LAWSUIT, WE ARE LOOKING TO CORRECT SOMETHING THAT WAS ILLEGALLY
9 DONE THROUGH THE STATE -- THE STATE LEGISLATURE.
10 **Q.** AND CAN YOU JUST TELL ME WHY RELIEF IS IMPORTANT TO YOU
11 INDIVIDUALLY AS A BLACK VOTER?
12 **A.** WELL, YOU KNOW, IT'S IMPORTANT TO ME AS A BLACK VOTER
13 BECAUSE FOR YEARS WE BELIEVED THAT NOTHING IS GONNA CHANGE.
14 AND WHEN PEOPLE SEE ME AS A BLACK MAN EXCITED ABOUT THE
15 PROCESS, THAT GIVES OTHERS HOPE, 'CAUSE, YOU KNOW, I WALK
16 AROUND PEOPLE WATCHING ME ALL THE TIME. YOU KNOW, IT'S --
17 THAT'S WHO I AM. BUT I'M FINE WITH THAT. THAT'S WHY I WEAR A
18 SHIRT. I WEAR A VOTING SHIRT BECAUSE I DON'T WANT THEM TO SEE
19 MIKE MCCLANAHAN. I WANT THEM TO SEE VOTE AND OPPORTUNITY.
20 THERE'S THE OPPORTUNITY TO VOTE. AND WHEN THEY VOTE FOR THE
21 CANDIDATE OF THEIR CHOICE, THAT'S THEIR WAY OF PARTICIPATING.
22 I TELL THEM "DON'T CALL ME COMPLAINING, VOTE." IF THEY HAVE A
23 CANDIDATE OF THEIR CHOICE, THEY'RE DOING WHAT THEY -- THEY'RE
24 DOING WHAT THE PROCESS SAYS THEY CAN DO. ELECT SOMEBODY THAT
25 UNDERSTANDS THEIR PLIGHT, UNDERSTANDS THEIR COMMUNITY, THEIR

01:26 1 ISSUES, WHAT MATTERS AND AFFECTS THEM.
2 **MS. ROHANI:** AND, YOUR HONOR, WE ARE PLANNING TO NOW
3 BEGIN TESTIMONY THAT'S GOING TO INVOLVE NAMING INDIVIDUAL NAACP
4 MEMBERS, BUT PRIOR TO, I WOULD LIKE TO JUST CONFER WITH MY
5 COLLEAGUES FOR A MOMENT.
6 **THE COURT:** OKAY.
7 **MS. ROHANI:** THANK YOU.
8 **BY MS. ROHANI:**
9 **Q.** JUST ONE MORE QUESTION. SO PRESIDENT MCCLANAHAN, I JUST
10 WANT TO GO BACK TO THE LOUISIANA NAACP'S EFFORTS FOLLOWING
11 PASSAGE OF THE MAPS. SO DID THE MAPS IMPACT ANY -- DID THE
12 MAPS HAVE ANY IMPACT ON THE WAY THAT CANDIDATES AND PARTIES
13 ENGAGED WITH VOTERS?
14 **A.** REPEAT THAT QUESTION.
15 **Q.** DID THE MAPS THAT WERE PASSED HAVE ANY IMPACT ON -- WELL,
16 YOU STATED YOU KNOW THAT FOLKS -- OR MEMBERS DO GOTV EFFORTS.
17 AND SO I AM ASKING, DID THE MAPS HAVE ANY IMPACT ON THE WAY
18 THAT CANDIDATES OR PARTIES ENGAGED WITH BLACK VOTERS?
19 **A.** I CAN TELL YOU THIS, WHEN THE MAPS WERE PASSED IT SEEMS AS
20 THOUGH THE BLACK ELECTED OFFICIALS KIND OF CONCEDED THAT THE
21 MAPS WERE THERE; THEY WERE AT A DISADVANTAGE. AND SO MY
22 MEMBERS START CALLING THEM TOO. YOU KNOW, WE DON'T -- WE DON'T
23 CONCEDE, ESPECIALLY WHEN WE KNOW THAT WE ARE IN THE RIGHT. AND
24 SO THEY CONCEDED. WE JUST DOUBLED DOWN, SENT MORE RESOURCES,
25 WE MADE MORE CALLS.

01:28 BUT, YOU KNOW, NOT ONLY DID THE CANDIDATES -- THE CANDIDATES THAT WERE RUNNING AS THOUGH THEY FELT -- THEY WOULD CALL ME AND SAY, "MAN, WHAT'S GOING ON? IT DOESN'T FEEL LIKE AN ELECTION." THIS PAST ELECTION DIDN'T FEEL LIKE AN ELECTION.

YOU KNOW, WHEN CANDIDATES ARE EXCITED ABOUT RUNNING, THE VOTERS GET EXCITED. THERE WAS NO EXCITEMENT IN THE PROCESS FROM THE CANDIDATES TO THE BALLOT. THAT'S WHY THERE WAS -- IN MY VIEW, THAT'S WHY PEOPLE DIDN'T GO TO THE POLLS LIKE THEY NORMALLY DO. AND WE -- IT'S NOT -- AND WE PUT AS MANY -- AS MUCH EFFORT AS WE COULD WITH THE -- WITH THE LIMITED RESOURCES THAT WE HAD.

**Q.** CAN YOU JUST EXPLAIN A LITTLE BIT ABOUT WHAT YOU MEAN BY "PUT MORE RESOURCES AND MADE MORE CALLS"?

**A.** OKAY. IN 2022 -- 2022 ELECTION -- NOT 2022, BUT THE LAST ELECTION CYCLE, WHENEVER IT WAS, WHEN THE GOVERNOR JOHN BEL RAN, EVERYBODY WAS EXCITED. WE HAD RESOURCES. ORGANIZATIONS WAS CALLING US TO GIVE US THE MONEY TO HELP GET THE VOTE OUT, GET THE VOTE OUT, GET THE VOTE OUT. AND MONEY FLOWED AND WE GOT THE VOTE OUT. WE WERE ABLE TO EMPLOY DIFFERENT METHODS. LIKE WE DID A RELATIONAL VOTING. WE SENT CARDS. THE NATIONAL OFFICE SENT CARDS TO CERTAIN AREAS WITH YOUR NEIGHBORS' NAME, ADDRESS, AND PHONE NUMBER. YOU DIDN'T HAVE TO GO KNOCK ON THE DOOR. YOU COULD JUST PICK UP THAT CARD AND CALL.

WE HAD COLLEGE STUDENTS EXCITED ABOUT WORKING THEIR PHONES TO GET PEOPLE TO THE -- EXCITED ABOUT -- TO THE POLLS --

01:30 EXCITED ABOUT GOING TO THE POLLS TO VOTE.

I WAS UP IN NORTH LOUISIANA. WE HAD -- I WAS -- WE WAS WITH BLACK VOTERS MATTER. WE HAD A TRAIN. EVERYBODY WAS EXCITED.

THIS YEAR IT'S LIKE WE WERE GOING TO A FUNERAL. YOU'D CALL AND ASK FOR RESOURCES, "OH, MAN, YOU KNOW, THE -- THE -- WE JUST DON'T HAVE IT THIS YEAR. OH, MAN, THE LEGISLATURE ALREADY HAVE A SUPER MAJORITY. THEY'RE GONNA BEAT US. WE JUST GOT TO SAVE GRACE."

I'M LIKE, "COME ON, MAN."

**Q.** AND DID YOU HAVE TO DO ANY FURTHER EFFORTS TO COUNTER THAT SORT OF -- THAT VOTER SENTIMENT?

**A.** SO WHAT WE DO IS -- WHEN I'D TALK TO YOU AND YOU SAY -- AND YOU WERE EXCITED LIKE IN -- WHEN THE GOVERNOR -- THE GOVERNOR JOHN BEL WAS REELECTED, YOU WAS LIKE, "YEAH, MAN, I'M WITH YOU." BUT NOW YOU SEE THEM UNEXCITED. YOU LIKE I GOT TO SIT THERE AND TALK TO YOU LONGER. NOW I GOT TO TALK TO YOU, YOUR MAMA, YOUR DADDY, YOUR LITTLE SISTER, YOUR LITTLE BROTHER, ALL ABOUT -- BEFORE THEN, I TALKED TO YOU. YOU SPREAD THAT EXCITEMENT THROUGH YOUR WHOLE HOUSE. NOW, WE STAY IN THESE TOWNS LONGER BECAUSE PEOPLE DON'T BELIEVE IN THE PROCESS. WE WOULD STAY IN TOWNS -- NOW, I UNDERSTAND HOW LOUISIANA IS. SO MOST OF THE TIME I'D TRY TO GET IN AND GET OUT IN THE SAME DAY. I DRIVE UP, COME BACK WHILE IT'S STILL LIGHT, NOT DARK.

THIS TIME WE WAS LIKE, ALL RIGHT, NOW I'M PULLING --

01:31 I'M PULLING MEMBERS FROM CLOSE BY. MANSFIELD, I NEED YOU TO GO OVER TO JONESVILLE. I NEED YOU TO GO HERE. YOU MIGHT BE CLOSER. LET'S SEE CAN WE ORGANIZE SOMETHING, BECAUSE I'M NOT GONNA TO BE ABLE TO MAKE IT UP THERE. I GOT -- I'M GOING TO LAKE CHARLES. I'M ABOUT TO GO TO ALEXANDRIA. I NEED Y'ALL -- I NEED ALL HANDS ON DECK NOW. LET'S MAKE THIS WORK. WE HAVE LIMITED RESOURCES. I'VE GOT TO MAKE EVERY DOLLAR COUNT.

**Q.** AND DID THAT IMPACT THE LOUISIANA NAACP'S OTHER WORK?

**A.** WELL, YOU KNOW, WHEN YOU HAVE TO PULL PEOPLE FROM DOING HEALTH, WHEN YOU GOTTA PULL PEOPLE BACK FROM DOING EDUCATION, YOU KNOW. LEGAL REDRESS IS WHERE COMPLAINTS COME IN. SO, YOU KNOW, YOU GUYS ARE LIKE "WE GONNA DEAL WITH THAT IN A MINUTE. WE'VE GOT TO GET THESE VOTERS EXCITED. WE'VE GOT TO GO TALK TO THESE PEOPLE."

SO A LOT OF TIMES, I HAVE TO PULL BACK AND WHERE I NORMALLY HAVE TWO OR THREE PEOPLE WORKING ON A PROJECT, I MIGHT HAVE ONE. WHERE YOU MIGHT SEND SOMEBODY, YOU CAN'T SEND THEM NOW. LET'S SAVE THAT FOR SHREVEPORT. LET'S SAVE THAT FOR MONROE. LET'S SAVE THAT FOR ALEXANDRIA, LAFAYETTE. LET'S SAVE THAT FOR HOUMA AND TERREBONNE. LET'S SAVE IT FOR LAKE CHARLES.

**Q.** THANK YOU, PRESIDENT.

**MS. ROHANI:** SO, YOUR HONOR, JUST ONE LAST MOMENT TO CONFER WITH MY COLLEAGUES. IS THAT --

**THE COURT:** YES.

**MS. ROHANI:** SO, YOUR HONOR, WE ARE NOW GOING TO

01:32 1 BEGIN TESTIMONY REGARDING THE NAMED INDIVIDUAL NAACP MEMBERS.
2 SO WE -- IT'S INFORMATION PROTECTED BY THEIR FIRST AMENDMENT
3 PRIVILEGE. AND WE'D JUST ASK -- WE WOULD LIKE TO MOVE TO HAVE
4 THE TESTIMONY DELIVERED UNDER SEAL.
5 **THE COURT:** OKAY. YOU WANT THE -- OBVIOUSLY THAT
6 MEANS YOU WANT THE COURTROOM CLEARED?
7 **MS. ROHANI:** CORRECT. WE HAVE TWO INDIVIDUALS,
8 MR. COOPER AND MR. NAJARIAN, WHO HAVE SIGNED A PROTECTIVE ORDER
9 AND WILL BE PRESENT DURING THAT TESTIMONY.
10 **THE COURT:** MR. COOPER AND MISTER?
11 **MS. ROHANI:** NAJARIAN, MR. STEPHEN NAJARIAN.
12 **THE COURT:** OKAY. ALL RIGHT. IS THERE ANY OBJECTION
13 TO THAT, COUNSEL?
14 **MS. MCKNIGHT:** NO, YOUR HONOR.
15 **THE COURT:** OKAY, LADIES AND GENTLEMAN. THE
16 FOLLOWING TESTIMONY -- OR FOR A FEW MINUTES THE TESTIMONY IS
17 GOING TO BE MAINTAINED UNDER SEAL. SO I AM GOING TO HAVE TO
18 ASK EVERYONE THAT'S NOT DIRECTLY AFFILIATED WITH THIS CASE --
19 THAT MEANS YOU ARE NOT ONE OF PARTIES THAT SHE JUST MENTIONED
20 WHO SIGNED A PROTECTIVE ORDER OR YOU ARE NOT A LAWYER IN THE
21 CASE OR A PARTY, YOU MUST LEAVE THE COURTROOM. AND WE WILL LET
22 YOU KNOW WHEN YOU CAN COME BACK IN. I DON'T ANTICIPATE THAT IT
23 WILL BE A LONG TIME. AND THEN I WILL ASK THE COURT SECURITY
24 OFFICER ONCE -- ONCE YOU-ALL HAVE MADE IT OUT TO THE HALLWAY, I
25 AM GOING TO ASK THE COURT SECURITY OFFICER TO SEAL THE

01:34 1 COURTROOM.
2 **(WHEREUPON, THIS PORTION OF THE TRANSCRIPT WAS ORDERED SEALED**
3 **BY THE COURT AND IS FILED IN A SEPARATE TRANSCRIPT. AFTER**
4 **WHICH THE PROCEEDINGS RESUMED AS FOLLOWS.)**
5 **THE COURT:** YOU MAY TAKE THE PODIUM, MS. MCKNIGHT.
6 YOUR WITNESS. YOU MAY PROCEED.
7 **MS. MCKNIGHT:** THANK YOU VERY MUCH, YOUR HONOR.
8 **CROSS-EXAMINATION**
9 **BY MS. MCKNIGHT:**
10 **Q.** GOOD AFTERNOON, MR. MCCLANAHAN.
11 **A.** GOOD AFTERNOON.
12 **Q.** KATE MCKNIGHT ON BEHALF OF PRESIDENT CORTEZ AND SPEAKER
13 SCHEXNAYDER. NICE TO MEET YOU.
14 **A.** PLEASURE IS ALL MINE.
15 **Q.** I UNDERSTAND YOU'RE THE PRESIDENT OF THE LOUISIANA STATE
16 CONFERENCE OF THE NAACP. CORRECT?
17 **A.** CORRECT.
18 **Q.** AND THE LOUISIANA STATE CONFERENCE OF THE NAACP IS A
19 PLAINTIFF IN THIS MATTER. CORRECT?
20 **A.** CORRECT.
21 **Q.** AND THE LOUISIANA STATE CONFERENCE OF THE NAACP DOES NOT
22 HAVE ANY INDIVIDUAL MEMBERS. CORRECT?
23 **MS. ROHANI:** OBJECTION, YOUR HONOR. PRESIDENT
24 MCCLANAHAN DISCUSSED THAT THERE ARE INDIVIDUAL --
25 **THE DEPUTY CLERK:** MA'AM, YOU NEED TO SPEAK INTO THE

02:08 MICROPHONE.

**MS. ROHANI:** OBJECTION, YOUR HONOR. PRESIDENT MCCLANAHAN DID DISCUSS THAT THERE ARE MEMBERS OF THE BRANCHES.

**THE COURT:** OKAY, MA'AM. THAT'S A SPEAKING OBJECTION. YOU'RE COACHING YOUR WITNESS AND THE COURT IS NOT GOING TO HAVE IT.

**MS. ROHANI:** APOLOGIES. IT'S BEYOND THE SCOPE OF THE DIRECT EXAMINATION.

**THE COURT:** NO, IT'S NOT. OVERRULED.

YOU MAY PROCEED, MS. MCKNIGHT.

**BY MS. MCKNIGHT:**

**Q.** WOULD YOU LIKE ME TO ASK THE QUESTION AGAIN?

**A.** ASK IT AGAIN. THANK YOU.

**Q.** SURE.

THE LOUISIANA STATE CONFERENCE OF THE NAACP DOES NOT HAVE ANY INDIVIDUAL MEMBERS. CORRECT?

**A.** CORRECT.

**Q.** THE MEMBERS OF THE LOUISIANA STATE CONFERENCE OF THE NAACP ARE BRANCHES. CORRECT?

**A.** SAY THAT AGAIN.

**Q.** SURE.

THE MEMBERS OF THE LOUISIANA STATE CONFERENCE OF THE NAACP ARE BRANCHES?

**A.** CORRECT.

**Q.** YOU ARE NOT THE PRESIDENT OF ANY NAACP BRANCH. CORRECT?

02:09 **A.** NO.
**Q.** AND, IN FACT, THESE BRANCHES HAVE SEPARATE OFFICERS TO THE STATEWIDE NAACP. IS THAT CORRECT?
**A.** CORRECT.
**Q.** AND THE BRANCHES ARE UNDERSTOOD TO BE SEPARATE ENTITIES. IS THAT CORRECT?
**A.** CORRECT.
**Q.** I UNDERSTOOD FROM YOUR DEPOSITION THAT YOU DON'T ALWAYS PREFER THE SAME CANDIDATES AS MEMBERS OF YOUR FAMILY. IS THAT RIGHT?
**A.** SOMETIMES, RIGHT.
**Q.** OKAY. AND YOU WOULD AGREE WITH ME THAT A CANDIDATE DOES NOT NEED TO BE BLACK TO GAIN THE SUPPORT OF THE NAACP?
**A.** THAT'S CORRECT.
**Q.** OKAY. AND WOULD YOU AGREE WITH ME THEN THAT A REPRESENTATIVE DOES NOT NEED TO BE BLACK IN ORDER TO REPRESENT THE INTEREST OF BLACK VOTERS?
**A.** HE DOES NOT PER SE.
**THE COURT:** HE OR SHE.
**BY THE WITNESS:**
**A.** YEAH, HE OR SHE DOES NOT NEED TO BE PER SE.
**Q.** WHAT DO YOU MEAN BY "PER SE"?
**A.** IN ORDER TO EFFECTIVELY REPRESENT ME, YOU HAVE TO UNDERSTAND AND FEEL MY PAIN. YOU HAVE TO KNOW AND WALK IN MY SHOES. YOU HAVE TO BE IN MY NEIGHBORHOOD WHEN THE LIGHTS GO

02:10 OFF, WHEN THE STREETLIGHTS COME ON AND YELLING STARTS HAPPENING, "COME ON HOME." YOU GOT KNOW THAT. IF YOU DON'T, THEN YOU ONLY -- YOU ONLY REPRESENT ME JUST AS YOU REPRESENT ANYBODY. BUT IF YOU REALLY WANT TO REPRESENT ME AND MY INTERESTS, YOU GOT TO KNOW WHAT HAPPENS IN MY NEIGHBORHOOD ALL THE TIME. YOU'VE GOT TO UNDERSTAND AS A SINGLE MOTHER HOW SINGLE MOTHERS RAISE BOYS TO BECOME STATE PRESIDENTS, SERVE ON NATIONAL BOARDS, YOU HAVE TO KNOW SMALL TOWNS ARE SMALL TOWN VERSUS, YOU KNOW, CITIES, YOU KNOW, THAT BLACK PEOPLE LIVE IN. YOU GOT TO BE ABLE TO UNDERSTAND IF A KID GOES TO SCHOOL AND IS ACTING UP AT -- IN THE FIRST GRADE, YOU DON'T EXPEL THEM FOR LIFE. YOU'VE GOT TO UNDERSTAND THAT THERE'S SOME STUFF THAT HAPPENS AT HOME THAT NEEDS TO BE TAKEN CARE OF. SO TO REPRESENT ME, YOU GOT TO UNDERSTAND AT LEAST SOME OF THAT, BUT NOT ALL OF THAT.

**Q.** THANK YOU.

AND THE NAACP HAS SUPPORTED CANDIDATES WHO ARE WHITE IN THE PAST. ISN'T THAT RIGHT?

**A.** IF WE DON'T HAVE ANY OTHER CANDIDATE, YES. BUT IF WE HAVE A BLACK CANDIDATE --

**Q.** OKAY. AND IF YOU HAVE TWO BLACK CANDIDATES?

**A.** WELL, WE COULD CHOOSE SOMEBODY BLACK.

**Q.** OKAY. THANK YOU VERY MUCH. NO FURTHER QUESTIONS.

**A.** THANK YOU.

**THE COURT:** IS THERE ANY REDIRECT?

02:11 **MS. ROHANI:** NO REDIRECT, YOUR HONOR.
**THE COURT:** OKAY. THANK YOU, SIR. YOU MAY STEP DOWN.
**THE WITNESS:** THANK YOU, YOUR HONOR.
**THE COURT:** OKAY. NEXT WITNESS, PLEASE.
**MS. KEENAN:** YOUR HONOR, THE PLAINTIFFS CALL REP CEDRIC GLOVER.
**THE COURT:** WHAT'S GOING ON?
**(WHEREUPON, THERE WAS AN OFF-RECORD DISCUSSION.)**
**MS. KEENAN:** THANK YOU FOR ACCOMMODATING. WE CAN BE SURE TO ZOOM IN ON THE BIG SCREEN, AS NEEDED, TO ACCOMMODATE THE WITNESS'S VIEWING.
**THE DEPUTY CLERK:** I NEED TO SWEAR YOU IN.
**THE COURT:** CAN YOU STAND UP, SIR, SO SHE CAN SWEAR YOU IN, PLEASE?

**CEDRIC BRADFORD GLOVER,**
**HAVING BEEN DULY SWORN, TESTIFIED AS FOLLOWS:**

**DIRECT EXAMINATION**

**BY MS. KEENAN:**
**Q.** GOOD AFTERNOON, SIR.
COULD YOU PLEASE STATE AND SPELL YOUR NAME FOR THE RECORD.
**A.** CEDRIC BRADFORD GLOVER. C-E-D-R-I-C, B-R-A-D-F-O-R-D, G-L-O-V-E-R.
**Q.** THANK YOU, SIR.

02:13 WHERE DO YOU LIVE, REP GLOVER?
**A.** SHREVEPORT, LOUISIANA.
**Q.** AND WHAT IS YOUR CURRENT TITLE?
**A.** STATE REPRESENTATIVE FOR THE FOURTH REPRESENTATIVE DISTRICT.
**Q.** CAN YOU TELL ME WHERE YOU FIRST RAN FOR OFFICE?
**A.** NOVEMBER OF 1990, SHREVEPORT CITY COUNCIL.
**Q.** OKAY. CAN YOU WALK THROUGH THE OFFICES THAT YOU'VE HELD SINCE THEN?
**A.** I WAS REELECTED TO THE CITY COUNSEL IN 1994. I RAN FOR AN OPEN SEAT IN THE LOUISIANA HOUSE OF REPRESENTATIVES IN OCTOBER OF '95, TOOK THAT OFFICE IN JANUARY OF 1996. SERVED UNTIL NOVEMBER OF 2006, WHEN I BECAME MAYOR OF THE CITY OF SHREVEPORT. I SERVED THERE UNTIL TERM LIMITS IN DECEMBER OF 2014. RETURNED TO THE HOUSE OF REPRESENTATIVES IN JANUARY OF 2016, AND THAT SERVICE WILL END ON JANUARY 8TH OF NEXT YEAR.
**THE COURT:** SIR, I'M GOING TO ASK THAT YOU HOLD THE MIC TO YOUR -- WE ARE MAKING A RECORD AND I WANT TO MAKE SURE THAT WHAT YOU HAVE TO SAY IS ON THE RECORD. I ALSO WANT TO MAKE SURE THAT EVERYONE INCLUDING THE COURT AND THE OPPOSING COUNSEL CAN HEAR YOU.
**THE WITNESS:** UNDERSTOOD.
**THE COURT:** YOU MAY PROCEED.
**MS. KEENAN:** THANK YOU, YOUR HONOR.

02:15 1 **BY MS. KEENAN:**
2 **Q.** CAN YOU TELL ME WHAT INSPIRED YOU TO RUN FOR PUBLIC OFFICE
3 IN THE FIRST INSTANCE?
4 **A.** A DESIRE TO SERVE MY COMMUNITY. TO HELP TO ADDRESS THE
5 HISTORICAL DISCREPANCIES THAT LARGELY WERE A RESULT OF
6 OBVIOUSLY, SLAVERY, JIM CROW, AND THEN AFTER THAT DECADES OF NO
7 DIRECT REPRESENTATION AT ANY LEVEL OF GOVERNMENT UNTIL THE
8 PASSAGE OF THE VOTING RIGHTS ACT IN 1965.
9 **Q.** SO I WANT TO TALK ABOUT YOUR WORK AS A STATE REP. DID YOU
10 HAVE ANY INVOLVEMENT IN THE REDISTRICTING PROCESS INVOLVING
11 LOUISIANA STATE HOUSE AND SENATE IN THE LAST REDISTRICTING
12 CYCLE?
13 **A.** I DID.
14 **Q.** DID YOU INTRODUCE ANY BILLS OR AMENDMENTS DURING THAT
15 PROCESS?
16 **A.** I DID.
17 **Q.** AND WOULD YOU RECOGNIZE THOSE BILLS OR AMENDMENTS IF YOU
18 SAW THEM HERE IN COURT TODAY?
19 **A.** I BELIEVE I WOULD.
20 **Q.** OKAY. I'M NOW GOING TO PULL UP ON THE SCREEN WHAT'S BEEN
21 ADMITTED AS JOINT EXHIBIT 42. THIS WAS ADMITTED AT THE START
22 OF TRIAL.
23 REP GLOVER, DO YOU RECOGNIZE THIS DOCUMENT ON THE
24 SCREEN UP THERE?
25 **A.** YES.

02:16 1 **Q.** OKAY. AND WHAT IS THIS ON THE SCREEN HERE?
2 **A.** THAT IS ONE OF THE THREE BILLS THAT I BELIEVE I INTRODUCED
3 THAT OFFERED AN ALTERNATIVE REDISTRICTING PLAN TO THE ONE THAT
4 WAS BEING ADVANCED BY THE SPEAKER IN HOUSE BILL 14.
5 **Q.** AND CAN YOU READ THE HOUSE BILL NUMBER AT ISSUE AND WHAT'S
6 ON THE SCREEN HERE?
7 **A.** HOUSE BILL NO. 21.
8 **Q.** OKAY. IF WE COULD TURN TO PAGE 20 OF THIS DOCUMENT.
9 REP GLOVER, ARE YOU ABLE READ THE COLUMN THAT SAYS
10 "VAP BLACK" AT THE TOP OF THE SCREEN HERE?
11 **A.** I CANNOT.
12 **Q.** OKAY. I THINK WE CAN ZOOM HERE.
13 IF THE TECH PEOPLE COULD ZOOM ON THE COLUMN THAT SAYS
14 "VAP BLACK."
15 ARE YOU ABLE TO SEE THAT ON THE SCREEN NOW?
16 **A.** I CAN.
17 **Q.** OKAY. AND I THINK WE'RE GOING TO ABLE TO ZOOM AND
18 HIGHLIGHT A BIT.
19 COULD YOU PLEASE READ INTO THE RECORD THE "VAP BLACK"
20 PERCENTAGE FOR HOUSE DISTRICTS 2, 3, 4, AND 5 ON THE SCREEN IN
21 FRONT OF YOU?
22 **A.** I NEED YOU TO GO OVER JUST A LITTLE BIT FURTHER TO THE
23 LEFT, IF YOU CAN, IN TERMS OF EXPANDING IT.
24 AND BLACK IS 64.116 PERCENT FOR HOUSE DISTRICT 2;
25 57.5703 [SIC] FOR 3; AND 56.769 FOR HOUSE DISTRICT 4; AND

02:17 1 62.683 PERCENT FOR HOUSE DISTRICT 5.
2 **Q.** THANKS, REP GLOVER.
3 DO YOU RECALL WHETHER YOU INTRODUCED THIS SAME BILL
4 IN THE FORM OF AN AMENDMENT TO HB 14 AS WELL?
5 **A.** YES, I DID.
6 **Q.** AND WOULD YOU RECOGNIZE THAT AMENDMENT IF YOU SAW IT HERE
7 IN COURT TODAY?
8 **A.** I BELIEVE I WOULD.
9 **Q.** I'M NOW SHOWING THE WITNESS WHAT'S BEEN PREADMITTED AS
10 JOINT EXHIBIT 40.
11 REP GLOVER, DO YOU RECOGNIZE THIS DOCUMENT?
12 **A.** YES, I DO.
13 **Q.** AND UP IN THE TOP CORNER OF THE DOCUMENT, ARE YOU ABLE TO
14 SEE THE NUMBER OF THIS AMENDMENT?
15 **A.** YES, I CAN.
16 **Q.** WHAT NUMBER IS IT?
17 **A.** 47490.
18 **Q.** IF WE FLIP AHEAD TO PAGE 7 OF THIS DOCUMENT, ARE YOU ABLE
19 TO SEE THAT THERE'S ALSO A "VAP BLACK" COLUMN HERE?
20 **A.** YES, I THINK I'LL RECOGNIZE IT APPROPRIATELY THIS TIME.
21 **Q.** OKAY. AND IF YOU'RE ABLE TO READ THOSE NUMBERS, IF YOU
22 COULD JUST READ THEM TO YOURSELF. DO YOU RECALL IF THEY'RE THE
23 SAME NUMBERS THAT WE JUST REVIEWED OUT LOUD WITH THE COURT?
24 **A.** COULD YOU MAKE IT A LITTLE BIT BIGGER, PLEASE?
25 YES, I BELIEVE THOSE ARE THE SAME NUMBERS.

02:18 1 **Q.** OKAY. I'M NOW GOING TO SHOW THE WITNESS WHAT'S BEEN
2 ADMITTED AS JOINT EXHIBIT 45.
3 REP GLOVER, DO YOU RECOGNIZE THIS DOCUMENT?
4 **A.** YES, THAT WOULD BE ONE OF THE OTHER OF THE THREE BILLS
5 THAT I BELIEVE I INTRODUCED.
6 **Q.** AND WHICH BILL NUMBER IS THIS? CAN YOU SEE AT THE TOP?
7 **A.** HOUSE BILL NO. 23 OF THE FIRST EXTRAORDINARY SESSION OF
8 2022.
9 **Q.** OKAY. WE'RE GOING TO DO THE SAME PROCESS WITH THIS BILL.
10 IF WE COULD TURN TO PAGE 20.
11 AND IF YOU COULD READ THE "VAP BLACK" COLUMN. THIS
12 TIME FOR HOUSE DISTRICT 1, 2, 3, AND 4 THAT ARE HIGHLIGHTED ON
13 THE SCREEN.
14 **A.** 60.493 FOR 1; 63.205 FOR DISTRICT 2; 57.066 FOR DISTRICT
15 3; 57.643 FOR DISTRICT 4.
16 **Q.** OKAY. AND DO YOU RECALL WHETHER YOU INTRODUCED THIS SAME
17 BILL IN THE FORM OF AN AMENDMENT TO HB 14 AS WELL?
18 **A.** YES, I DID.
19 **Q.** WOULD YOU RECOGNIZE THAT AMENDMENT IF YOU SAW IT?
20 **A.** YES, I WOULD.
21 **Q.** ALL RIGHT. I'M NOW SHOWING THE WITNESS WHAT HAS BEEN
22 PREADMITTED AS JOINT EXHIBIT 39.
23 REP GLOVER, COULD YOU TELL US WHETHER YOU RECOGNIZE
24 THIS DOCUMENT?
25 **A.** YES, I DO.

02:20 1 **Q.** ALL RIGHT. AND COULD YOU READ THE AMENDMENT NUMBER AT THE
2 TOP OF THIS DOCUMENT?
3 **A.** AMENDMENT 62 -- 362.02 [SIC].
4 **Q.** OKAY. WE'RE GOING TO FLIP AHEAD TO PAGE 7 OF THIS
5 DOCUMENT.
6 AND COULD YOU ONCE AGAIN TAKE A LOOK AND LET ME KNOW
7 IF THE "VAP BLACK" PERCENTAGE IS THE SAME AS THE NUMBERS YOU
8 JUST READ FOR THE CORRESPONDING BILL?
9 **A.** YES, THEY ARE.
10 **Q.** OKAY. NEXT WE'RE GOING TO SHOW THE WITNESS WHAT'S BEEN
11 ADMITTED AS JOINT EXHIBIT 47.
12 REP GLOVER, DO YOU RECOGNIZE THIS DOCUMENT?
13 **A.** YES, I DO.
14 **Q.** AND WHICH -- CAN YOU TELL US WHAT IT IS?
15 **A.** HOUSE BILL NO. 24 OF THE FIRST EXTRAORDINARY SESSION OF
16 2022.
17 **Q.** OKAY. AND JUST TO TAKE A STEP BACK. HAVE WE NOW REVIEWED
18 EACH OF THE THREE BILLS THAT YOU INTRODUCED RELATED TO THE
19 HOUSE PLAN IN THE 2022 REDISTRICTING CYCLE?
20 **A.** YES, WE HAVE.
21 **Q.** OKAY. I'M GOING TO ASK THE TECH TO FLIP AHEAD TO PAGE 20
22 OF THIS DOCUMENT AGAIN AND FOR YOU TO READ THE "VAP BLACK"
23 COLUMN AS IT RELATES TO -- I'M SORRY.
24 TO THE TECH, IT'S ACTUALLY GOING TO BE 1, 2, 3, AND 4
25 AGAIN. I THINK ONLY 1, 2, AND 3 ARE HIGHLIGHTED.

02:21 **A.** OKAY.
**Q.** THERE WE GO.
SO IF YOU COULD READ THE "VAP BLACK" PERCENTAGE FOR HOUSE DISTRICTS 1, 2, 3, AND 4 IN HB 24?
**A.** HOUSE DISTRICT 1 WOULD BE 56.697 PERCENT; HOUSE DISTRICT 2 WOULD BE 69.153 PERCENT; HOUSE DISTRICT 4 WOULD BE -- LET ME MAKE SURE --
**Q.** I THINK IT'S NOT ALIGNED. I THINK 3 --
**A.** IS IT 2, 3, 4, AND 5, I BELIEVE?
**Q.** NO, SORRY. IT'S 1, 2, 3, AND 4 SO THAT --
**A.** OKAY.
**Q.** -- THE LEFT SIDE PANEL NEEDS TO BE PULLED DOWN A BIT SO THAT IT CORRESPONDS.
**A.** GOT IT.
**Q.** THERE WE GO. THANK YOU.
**A.** ALL RIGHT. SO TO BE CLEAR: HOUSE DISTRICT 1 WOULD BE 56.597; HOUSE DISTRICT 2 WOULD BE 69.153; HOUSE DISTRICT 3 WOULD BE 54.906; HOUSE DISTRICT 4 WOULD BE 57.751.
**Q.** THANK YOU.
AND DID YOU INTRODUCE THIS SAME BILL IN THE FORM OF AN AMENDMENT TO HB 14?
**A.** YES, I DID.
**Q.** THANK YOU.
WOULD YOU RECOGNIZE THAT AMENDMENT IF YOU SAW IT HERE?

02:22 1 **A.** YES, I WOULD.
2 **Q.** I'M NOW SHOWING THE WITNESS WHAT'S BEEN ADMITTED AS JOINT
3 EXHIBIT 41.
4 REP GLOVER, CAN YOU TELL US WHAT THIS DOCUMENT IS?
5 **A.** AMENDMENT 474 113.
6 **Q.** OKAY. AND WE'RE GOING TO TURN TO PAGE 7 OF THIS DOCUMENT.
7 CAN YOU TAKE A LOOK AT THE "VAP BLACK" COLUMN AND LET
8 US KNOW IF THOSE ARE SAME NUMBERS WE JUST READ FOR HB 24?
9 **A.** YES, THEY ARE.
10 **Q.** OKAY. SO WE'VE NOW GONE THROUGH THE BILLS AND THE
11 AMENDMENTS YOU INTRODUCED ON THE HOUSE SIDE. DO YOU RECALL
12 WHETHER YOU HAD ANY PARTICIPATION AS IT RELATED TO SENATE BILL
13 1, THE SENATE MAP THAT WAS INTRODUCED IN THE 2022 REDISTRICTING
14 CYCLE?
15 **A.** I DID HAVE AN AMENDMENT FOR THAT LEGISLATION AS WELL.
16 **Q.** OKAY. AND HOW DID YOU DECIDE WHAT AMENDMENT TO INTRODUCE
17 ON THE SENATE SIDE?
18 **A.** I BASED IT ON THE ACTUAL LEGISLATION FOR SENATE MAPS THAT
19 WAS DRAFTED AND ADVANCED BY SENATOR ED PRICE.
20 **Q.** WOULD YOU RECOGNIZE THAT BILL THAT SENATOR PRICE ADVANCED
21 IF YOU SAW IT HERE TODAY?
22 **A.** I BELIEVE THAT I WOULD, YES.
23 **Q.** OKAY. I'M NOW GOING TO SHOW THE WITNESS WHAT'S BEEN
24 ADMITTED AS JOINT EXHIBIT 37.
25

02:23 AND DO YOU RECOGNIZE THE DOCUMENT YOU SEE HERE?
**A.** YES.
**Q.** WHAT IS THIS?
**A.** SENATE BILL NO. 17 OF THE FIRST EXTRAORDINARY SESSION OF 2022.
**Q.** CAN YOU READ THE FIRST SENATOR WHO IS LISTED AS THE SPONSOR OF THIS BILL?
**A.** SENATOR PRICE.
**Q.** OKAY. SO IS THIS THE BILL THAT YOU WERE DISCUSSING JUST A MOMENT AGO?
**A.** THAT IS CORRECT.
**Q.** DID YOU INTRODUCE THIS SAME BILL IN THE FORM OF AN AMENDMENT TO SB 1?
**A.** WHEN SENATE BILL 1 MADE ITS WAY TO THE HOUSE, I REQUESTED THAT AN AMENDMENT BE DRAFTED THAT WOULD ESSENTIALLY PUT IT INTO THE FORM OF SENATE BILL 17 AS INTRODUCED AND ADVANCED BY SENATOR PRICE.
**Q.** OKAY. AND WOULD YOU RECOGNIZE THAT AMENDMENT IF YOU SAW IT HERE TODAY?
**A.** YES, I WOULD.
**Q.** I'M NOW SHOWING THE WITNESS WHAT'S BEEN ADMITTED AS JOINT EXHIBIT 49.
DO YOU RECOGNIZE THIS DOCUMENT?
**A.** YES, I DO.
**Q.** AND CAN YOU READ THE AMENDMENT NUMBER UP AT THE TOP OF THE

02:24 1 CORNER OF THE DOCUMENT?
2 **A.** AMENDMENT NO. 4144 155.
3 **Q.** OKAY. AND IF WE SCROLL AHEAD TO PAGE 16 OF THIS DOCUMENT
4 -- OH, SORRY -- PAGE 13 OF THIS DOCUMENT, EXCUSE ME. WE HAVE
5 THAT SAME "VAP BLACK" COLUMN, AND I'M WONDERING IF YOU COULD
6 READ THE "VAP BLACK" PERCENTAGE FOR SENATE DISTRICT 37.
7 **A.** 54.404 PERCENT.
8 **Q.** OKAY. AND THEN WE'LL GO AHEAD TO THE NEXT PAGE, PAGE 14
9 OF THIS DOCUMENT.
10 CAN YOU ALSO READ THE "VAP BLACK" PERCENTAGE FOR
11 DISTRICT -- SENATE DISTRICT 39?
12 **A.** 55.094 PERCENT.
13 **Q.** OKAY. THANK YOU.
14 THE TECH CAN TAKE THE EXHIBIT DOWN.
15 I KNOW THAT WAS A LOT OF NUMBERS. I WANT TO GET BACK
16 TO BASICS. CAN YOU TELL ME WHAT THE OBJECTIVES OF THOSE BILLS
17 AND AMENDMENTS WE JUST TALKED ABOUT WAS?
18 **A.** AS I HAD OBSERVED THE PROCESS, STARTING BACK TO THE
19 ROADSHOW THAT CAME TO SHREVEPORT AND THE OTHER INPUT THAT I'D
20 SEEN FROM VARIOUS GROUPS AND INDIVIDUALS ACROSS THE STATE AND
21 HAVING OBSERVED THE REDISTRICTING SPECIAL SESSION UP TO THAT
22 POINT, IT BECAME APPARENT TO ME THAT WE WERE NOT ACTUALLY DOING
23 THAT WHICH I BELIEVE THE PROCESS IS INTENDED TO DO. AND THAT
24 IS TO OFFER A SET OF MAPS THAT IS ACTUALLY REFLECTIVE OF THE
25 DEMOGRAPHICS OF THE STATE AS THE VOTING RIGHTS ACT WOULD COMPEL

02:26 1 US TO DO. KNOWING THAT THE IDEA OF TRYING TO DO THAT IN TOTAL,
2 ESPECIALLY WITH REGARD TO THE HOUSE, SINCE THAT'S THE BODY I'M
3 A MEMBER OF, WOULD BE DIFFICULT TO DO.
4 WITH REGARD TO ATTEMPTING TO DEMONSTRATE THAT IN
5 OTHER AREAS OUTSIDE OF SHREVEPORT, THE ONE THING THAT I WAS
6 COMFORTABLE IN BEING ABLE TO EFFECTIVELY ADVANCE WAS THAT IT
7 WAS POSSIBLE TO SHOW AND DEMONSTRATE THAT AN INCREASED NUMBER
8 OF A MAJORITY-BLACK DISTRICT WAS POSSIBLE RATHER EASILY BY
9 SIMPLY UNPACKING THE DISTRICTS IN SHREVEPORT.
10 **Q.** OKAY. SO I WANT TO BREAK THAT ANSWER DOWN A LITTLE BIT.
11 YOU MENTION THE ROADSHOW HEARINGS THAT SORT OF SPREAD YOUR WORK
12 HERE. CAN YOU TALK ABOUT WHAT THE ROADSHOW HEARINGS ARE?
13 **A.** THE ROADSHOW HEARINGS ARE THE PROCESS BY WHICH THE
14 LEGISLATURE IN THE JOINT GOVERNMENTAL COMMITTEES BETWEEN THE
15 HOUSE AND THE SENATE IN AN EFFORT TO TRY AND ENSURE THAT THEY
16 ARE ENGAGING IN A PROCESS THAT ALLOWS THE CITIZENS OF THE STATE
17 TO BE ABLE OFFER INPUT WITH REGARD TO ALL LEVELS OF
18 REDISTRICTING FROM CONGRESSIONAL TO LEGISLATIVE TO PSC AND WHAT
19 HAVE YOU.
20 VARIOUS SECTIONS OF THE STATE ARE VISITED BY THE
21 JOINT COMMITTEE. INTEREST GROUPS FROM THROUGHOUT THAT REGION
22 ARE INVITED TO COME AND LISTEN TO A PRESENTATION ON WHAT
23 CHANGES HAVE OCCURRED DEMOGRAPHICALLY WITH REGARD TO THE LAST
24 TIME THE LEGISLATURE ENGAGED IN THAT PROCESS, AND AT THAT POINT
25 OFFER ANY THOUGHTS, IDEAS, CONCERNS, PRIORITIES THAT THEY WOULD

02:27 1 HAVE INDIVIDUALLY OR AS GROUPS OR WHAT HAVE YOU IN TERMS OF
2 WHAT THEY WOULD LIKE TO SEE THE LEGISLATURE ADDRESS ONCE THEY
3 CONVENE TO GO THROUGH THE PROCESS.
4 **Q.** AND DID YOU ATTEND ANY OF THOSE ROADSHOW HEARINGS AS IT
5 RELATES TO THE 2022 REDISTRICTING PROCESS?
6 **A.** YES, I DID.
7 **Q.** WHICH ONES DID YOU ATTEND?
8 **A.** THE ONE IN SHREVEPORT.
9 **Q.** AND WHAT --
10 **A.** WATCHED SOME OF THE OTHERS ONLINE, BUT ATTENDED THE ONE IN
11 SHREVEPORT.
12 **Q.** AND WHAT ABOUT THE ROADSHOW HEARING THAT YOU ATTENDED IN
13 SHREVEPORT INSPIRED YOU TO INTRODUCE NEW MAPS?
14 **A.** WELL, IT AFFIRMED WHAT I HAD OBSERVED OVER THE COURSE OF
15 THE YEARS I'VE BEEN IN ELECTED OFFICE AND DIRECTLY ENGAGED IN
16 REDISTRICTING PROCESSES MYSELF AND WHAT I UNDERSTOOD IN KNOWING
17 THE HISTORY OF THE VOTING RIGHTS ACT AND HOW WE ACTUALLY ENDED
18 UP WITH MORE REPRESENTATIVE BODIES. I HEARD FOLKS ASKING FOR
19 FAIR MAPS, THAT THEY REPRESENT THE ACTUAL DEMOGRAPHICS OF THE
20 STATE AND ADHERE TO THE PROVISIONS OF THE VOTING RIGHTS ACT.
21 **Q.** NOW, YOU MENTIONED THAT YOU FOCUSED YOUR BILL ON THE
22 SHREVEPORT AREA. CAN YOU EXPLAIN WHY YOU FOCUSED YOUR BILLS
23 AND AMENDMENTS ON THAT AREA IN PARTICULAR?
24 **A.** WELL, BECAUSE, ONE, FROM A PRACTICAL STANDPOINT, I KNEW
25 THAT, AGAIN, WE WERE ALREADY INTO THE SESSION, WHILE IT HAD

02:28 1 TAKEN SOME TIME FOR THE ACTUAL SPEAKERS PLAN TO COME FORWARD.
2 I KNEW THAT THE IDEA OF GOING IN AND ATTEMPTING TO SAY TO
3 REPRESENTATIVES IN BATON ROUGE OR NEW ORLEANS OR LAFAYETTE OR
4 MONROE OR OTHER AREAS THAT I'M NOT A CITIZEN OF AND DID NOT
5 REPRESENT WOULD BE A DIFFICULT PROPOSITION.
6 WHAT I DID HAVE STANDING TO BE ABLE TO DO WOULD BE
7 ABLE TO SPEAK SPECIFICALLY ABOUT THE AREA AND THE REGION THAT I
8 REPRESENT AND THE FACT THAT IN TERMS OF THAT PARTICULAR AREA,
9 IF YOU TOOK JUST SIMPLY THE DISTRICTS 1 THROUGH 6, 1 THROUGH 7
10 WITHIN CADDO PARISH AND UNPACK THOSE DISTRICTS BECAUSE I THINK
11 THEY WERE ALL APPROACHING 70 PERCENT OR MORE, EITHER BLACK OR
12 WHITE, IF YOU JUST SIMPLY UNPACK THOSE DISTRICTS. AND WHAT
13 HAPPENED IS ONE OF THOSE DISTRICTS WENT FROM BEING MAJORITY
14 WHITE TO BEING MAJORITY BLACK AS A CLEAR DEMONSTRATION THAT AN
15 EXPANDED NUMBER OF MAJORITY-BLACK DISTRICTS WAS READILY
16 POSSIBLE WITHIN AT LEAST THIS PARTICULAR REGION OF THE STATE
17 AND WAS LIKELY POSSIBLE IN THE REST OF THE STATE AS WELL, AND
18 THAT THAT SHOULD SERVE AS A BASIS FOR US TO PAUSE AND
19 RECONSIDER WHAT IT IS THAT WE ARE DOING AND POSSIBLY LOOK AT A
20 LARGER, MORE EXPANSIVE APPROACH TO THE REDISTRICTING THAT WE
21 ARE IN THE MIDST OF.
22 **Q.** AS AN ELECTED OFFICIAL AND A LOUISIANA RESIDENT, WHY ARE
23 ADDITIONAL MAJORITY-BLACK DISTRICTS IMPORTANT TO YOU?
24 **A.** BECAUSE THEY HAVE THE ABILITY TO ENSURE THAT A
25 HISTORICALLY UNDERREPRESENTED, UNHEARD COMMUNITY OF FOLKS HAVE

02:30 1 THE ABILITY TO BE ABLE TO EFFECTIVELY REPRESENT THEIR
2 INTERESTS, THEIR CONCERNS, THEIR PRIORITIES WITHIN OUR
3 POLITICAL PROCESS.
4 **Q.** NOW, REP GLOVER, IN YOUR TIME IN THE LOUISIANA POLITICS
5 HOW OFTEN HAVE YOU OBSERVED BLACK CANDIDATES SUCCEEDING AND
6 RUNNING FOR PUBLIC OFFICE AT THE STATEWIDE LEVEL?
7 **A.** I'VE YET TO SEE THAT SUCCESS.
8 **Q.** WHAT ABOUT IN DISTRICTS THAT ARE NOT MAJORITY BLACK, HOW
9 OFTEN HAVE YOU OBSERVED BLACK CANDIDATES SUCCEEDING AND RUNNING
10 FOR PUBLIC OFFICE IN THOSE DISTRICTS?
11 **A.** VERY SELDOM.
12 **Q.** IN YOUR TIME HOLDING PUBLIC OFFICE, HAVE YOU EVER OBSERVED
13 ANY DISCRIMINATION AGAINST BLACK LOUISIANANS IN EDUCATION?
14 **A.** YES, I HAVE.
15 **Q.** COULD YOU EXPLAIN OR PROVIDE SOME EXAMPLES OF THAT
16 DISCRIMINATION YOU'VE OBSERVED?
17 **A.** I THINK IF YOU LOOK AT THE HISTORICAL FUNDING THAT'S BEEN
18 APPROPRIATED FOR HISTORICALLY BLACK COLLEAGUES AND UNIVERSITIES
19 INSIDE THE STATE, I THINK IF YOU LOOK AT THE LOCAL LEVEL, AT
20 LEVEL OF FUNDING, RESOURCES PROVIDED AT THE ELEMENTARY AND
21 SECONDARY LEVEL, I THINK IT'S EVIDENT THAT THE ISSUES AND
22 CONCERNS AND PRIORITIES OF THE BLACK COMMUNITY HAVE NOT
23 NECESSARILY BEEN ALWAYS EFFECTIVELY REPRESENTED.
24 **Q.** IN YOUR TIME HOLDING PUBLIC OFFICE AND LIVING IN
25 LOUISIANA, HOW WOULD YOU DESCRIBE WHETHER THE LEGISLATURE HAS

02:31 1 BEEN RESPONSIVE TO BLACK LOUISIANANS' NEEDS?
2 **A.** FAR LESS THAN IDEAL.
3 **Q.** AND HOW WOULD YOU DESCRIBE WHETHER THE LEGISLATURE HAS
4 BEEN RESPONSIVE TO BLACK LOUISIANANS' NEEDS IN THE VOTING
5 RIGHTS CONTEXT IN PARTICULAR?
6 **A.** VERY FAR LESS THAN IDEAL. I DON'T THINK THAT THERE'S BEEN
7 ANY SIGNIFICANT ADVANCEMENT WITH REGARD TO VOTING RIGHTS, THE
8 EXPANSION OF REPRESENTATION THAT DID NOT COME AT THE TIP OF A
9 FEDERAL SPEAR, WHETHER THAT WAS THE CIVIL WAR OR THE CIVIL
10 RIGHTS ACT OR THE VOTING RIGHTS ACT OR SECTION 5 OR SECTION 2
11 OR ANY OF THE OTHER PROVISIONS THAT HAVE BEEN NECESSARY OVER
12 THE YEARS IN ORDER TO ENSURE THAT WE END UP HAVING BASIC
13 REPRESENTATION. HOUSE REPRESENTATIVES UP UNTIL 1968 WERE MADE
14 UP OF 100 MEMBERS.
15 IT WAS 1968 BEFORE IT HAD ITS FIRST BLACK MEMBER
16 POST-RECONSTRUCTION. IT TOOK A SPECIAL MASTER AFTER NUMEROUS
17 ATTEMPTS BY THE LEGISLATURE IN THE LATE '60S AND THE EARLY '70S
18 COMING UP WITH A REAPPORTIONMENT REDISTRICTING PLAN THAT DID
19 NOT MEET THE MUSTER OF THE COURTS. IT TOOK A SPECIAL MASTER AS
20 OPPOSED TO THE LEGISLATURE ITSELF TO DRAW A SET OF MAPS AND
21 DISTRICTS THAT ENDED UP MAKING IT POSSIBLE FOR A STATE THAT WAS
22 ONE-THIRD BLACK AT THAT TIME TO END UP I THINK WITH IT'S FIRST
23 SIX OR SEVEN MEMBERS OF THE HOUSE OF REPRESENTATIVES. IT TOOK
24 YEARS AFTER THAT TO GET THE FIRST SENATOR, AND IT'S A PROCESS I
25 THINK THAT WE'RE STILL TRYING TO GET RIGHT WHICH ACCOUNTS FOR

02:33 WHY WE'RE HERE TODAY.
**Q.** THANK YOU, REP GLOVER.
**MS. KEENAN:** I HAVE NO FURTHER QUESTIONS FOR THE WITNESS.
**THE COURT:** IS THERE ANY CROSS-EXAMINATION?
**MR. TUCKER:** YES, YOUR HONOR. I DON'T KNOW IF YOUR HONOR WANTS TO TAKE A BREAK BEFORE CROSS-EXAMINATION. IT MIGHT GIVE ME AN OPPORTUNITY TO ACTUALLY CUT SOME OF THE CROSS-EXAMINATION DOWN GIVEN THE SCOPE OF DIRECT OR IF NOT I'M HAPPY TO MOVE FORWARD NOW.
**THE COURT:** MOVE FORWARD, PLEASE.
**MR. TUCKER:** SURE.

**CROSS-EXAMINATION**

**BY MR. TUCKER:**
**Q.** GOOD AFTERNOON, REPRESENTATIVE GLOVER.
**A.** GOOD AFTERNOON, SIR.
**Q.** MY NAME IS RALPH TUCKER, AND I AM COUNSEL FOR SPEAKER SCHEXNAYDER AND PRESIDENT CORTEZ IN THIS CASE.
I UNDERSTOOD FROM YOUR DIRECT TESTIMONY THAT YOU WERE ELECTED THE MAYOR OF SHREVEPORT IN 2006. IS THAT CORRECT?
**A.** THAT IS CORRECT.
**Q.** AND I BELIEVE I SAW SOME REFERENCES IN THE LEGISLATIVE RECORD TO THE FACT THAT AT THAT TIME SHREVEPORT WAS MAJORITY WHITE. IS THAT CORRECT?
**A.** IT STILL WAS, YES.

02:34 1 **Q.** AND YOU WERE UP AGAINST A WHITE REPUBLICAN CANDIDATE IN
2 THAT RACE?
3 **A.** YES, I WAS.
4 **Q.** AND YOU WON?
5 **A.** YES, I DID.
6 **Q.** TURNING TO THE 2022 REDISTRICTING PROCESS, YOU MET WITH
7 CHAIRMAN STEFANSKI DURING THAT PROCESS. CORRECT?
8 **A.** YES, I DID.
9 **Q.** IN FACT, YOU RECOGNIZE AT THAT TIME THAT THE COMMITTEE AND
10 THE CHAIRMAN PUT A LOT OF WORK INTO COMING UP WITH HOUSE BILL
11 14?
12 **A.** ARE YOU ASKING ME TO AGREE WITH THAT STATEMENT?
13 **Q.** YEAH. DID YOU RECOGNIZE AT THAT TIME THAT THE CHAIRMAN
14 AND THE COMMITTEE PUT A LOT OF WORK INTO COMING UP WITH HOUSE
15 BILL 14?
16 **A.** I THINK A LOT OF TIME WAS SPENT --
17 **MS. KEENAN:** OBJECTION. I THINK IT CALLS FOR
18 SPECULATION FOR HIM TO SAY WHAT THE CHAIRMAN DID OR DIDN'T PUT
19 WORK INTO.
20 **MR. TUCKER:** I'M NOT ASKING HIM. I'M ASKING HIM WHAT
21 HE STATED PREVIOUSLY ON THE RECORD IN THE LEGISLATIVE PROCESS.
22 **THE COURT:** I'M GOING TO ALLOW THE QUESTION.
23 **BY THE WITNESS:**
24 **A.** I THINK A LOT OF TIME WAS EXPENDED.
25 **Q.** AND THAT CHAIRMAN STEFANSKI MET WITH MANY MEMBERS.

02:35 1 CORRECT?
2 **A.** YES.
3 **Q.** NOW, AS I UNDERSTOOD YOUR TESTIMONY, YOU BELIEVED THAT THE
4 PERCENTAGE OF THE MAJORITY-BLACK DISTRICT SHOULD REFLECT THE
5 STATEWIDE BLACK VOTING-AGE POPULATION. IS THAT CORRECT?
6 **A.** I BELIEVE THAT THE NUMBER OF DISTRICTS SHOULD FAIRLY
7 REPRESENT THE DEMOGRAPHICS OF THE STATE, YES.
8 **Q.** AND YOU WERE CONCERNED THAT HOUSE BILL 14 CREATED SOME 70
9 PLUS PERCENT EITHER BLACK DISTRICTS OR WHITE DISTRICTS.
10 CORRECT?
11 **A.** I WAS CONCERNED THAT HOUSE BILL 14 IN TERMS OF SHREVEPORT
12 PACKED BLACKS INTO DISTRICTS AND PACKED WHITES INTO DISTRICTS.
13 **Q.** BUT EVEN IN YOUR HOUSE BILL 21 AND EVEN IN THE SHREVEPORT
14 AREA, AT LEAST ONE OF DISTRICTS WAS OVER 70 PERCENT WHITE
15 VOTING-AGE POPULATION. ISN'T THAT CORRECT?
16 **A.** THERE WAS NOTHING PERFECT ABOUT WHAT I OFFERED.
17 **Q.** SO IS THAT A "YES"?
18 **A.** I WOULD SAY IT WAS NOTHING PERFECT. I WOULD HAVE TO GO
19 AND LOOK AT THE DATA TO KNOW SPECIFICALLY WHAT YOU'RE MAKING
20 REFERENCE TO.
21 **Q.** AND I THINK I'VE HEARD YOU REFER TO THERE ARE 11 DISTRICTS
22 IN THE NORTHWEST LOUISIANA AREA?
23 **A.** WELL, THERE'S SEVEN THAT ARE ALL OR PARTIALLY WITHIN CADDO
24 PARISH, THEN DISTRICTS 8, 9 AND 10 ARE OVER INTO BOSSIER AND TO
25 WEBSTER. AND THEN 11 WOULD INCLUDE PARTS OF HOMER AND

02:36 1 CLAIBORNE PARISH OR WHAT HAVE YOU. SO, YES, YOU GET TO 12 BY
2 THE TIME YOU GET TO RUSTON.
3 **Q.** BUT OUT OF THOSE 11 DISTRICTS, I THINK YOU HAD REFERRED TO
4 DURING THE LEGISLATIVE PROCESS, UNDER YOUR HOUSE BILLS FOUR OF
5 THOSE DISTRICTS WOULD BE MAJORITY BLACK. IS THAT RIGHT?
6 **A.** FOUR OF THE SEVEN IN CADDO PARISH WOULD BE MAJORITY BLACK.
7 **Q.** AND THAT'S SIGNIFICANTLY MORE THAN THE 31 PERCENT BLACK
8 VOTING-AGE POPULATION IN THE STATE, ISN'T IT?
9 **A.** I WOULD HAVE TO DO THAT CALCULATION. AGAIN, MY INTENTION
10 WAS TO AVOID PACKING BLACKS OR WHITES AT PERCENTAGES OF UPWARDS
11 OF 70 PERCENT OR MORE INTO DISTRICTS BECAUSE I THINK THAT'S
12 CONTRARY TO EFFECTIVE REPRESENTATIVE DEMOCRACY.
13 **Q.** YOU FIRST INTRODUCED HOUSE BILL 21 ON FEBRUARY 8TH, 2002
14 -- OR 2022, EXCUSE ME. DOES THAT SOUND ABOUT RIGHT?
15 **A.** SOUNDS ABOUT RIGHT.
16 **Q.** AND I THINK ACCORDING TO YOUR PRIOR STATEMENTS, YOU LEFT
17 ABOUT -- WELL, STRIKE THAT.
18 I THINK YOU TESTIFIED EARLIER YOU STARTED WITH HOUSE
19 BILL 14 IN DRAWING YOUR HOUSE BILL 21 PLAN. CORRECT?
20 **A.** ALL MY BILLS AND AMENDMENTS WERE BASED UPON ACCEPTING THE
21 SPEAKER'S PLAN AND ATTEMPTING TO MAKE AN ADJUSTMENT WITH REGARD
22 TO THE SHREVEPORT AREA AND LEAVING THE REST OF -- TO THE EXTENT
23 POSSIBLE, AS IT IS, TO AVOID THE OBJECTION FROM OTHER MEMBERS
24 OF BEING ABLE TO SAY NOW YOU'RE COMING IN AND DISRUPTING THINGS
25 THAT WE'VE ALREADY WORKED OUT AND AGREED TO AMONGST OURSELVES

02:38 AND WITH THE LEADERSHIP.
**Q.** AND YOU BELIEVE THAT ADDING THIS ADDITIONAL MAJORITY-BLACK DISTRICT IN THE SHREVEPORT AREA WOULD AT LEAST DEMONSTRATE A GOOD-FAITH EFFORT TO COMPLY WITH THE VOTING RIGHTS ACT. CORRECT?
**A.** I THINK IT WOULD DEMONSTRATE THE FACT THAT THE PROCESS ITSELF WAS PROBABLY LESS THAN WHAT IS EXPECTED AND CALLED FOR BY THE VOTING RIGHTS ACT, BECAUSE I THINK THE SAME THING COULD BE DONE IF WE WERE TO GO INTO THOSE OTHER POPULATION CENTERS AND UNPACK THOSE DISTRICTS AS WELL.
**Q.** AND HAD HOUSE BILL 21 BEEN CALLED FOR A VOTE, YOU WOULD HAVE VOTED FOR IT. CORRECT?
**A.** BASED UPON THE FACT THAT IT WOULD HAVE REPRESENTED AN IMPROVEMENT OVER HOUSE BILL 14 AS IT WAS, YES. IN TERMS OF REPRESENTING THE BEST OF WHAT IT IS THAT WE SHOULD BE ASPIRING TO ACHIEVE AS LEGISLATORS, NO.
**Q.** BUT YOU WOULD HAVE VOTED FOR IT?
**A.** YES.
**Q.** AND YOU WOULD HAVE ENCOURAGED OTHERS TO VOTE FOR IT?
**A.** YES.
**Q.** AND YOU WOULD ENCOURAGE OTHERS TO VOTE FOR A BILL YOU BELIEVED TO BE ILLEGAL, WOULD YOU?
**A.** SAY AGAIN.
**MS. KEENAN:** OBJECTION.

02:39 1 **BY MR. TUCKER:**
2 **Q.** YOU WOULDN'T ENCOURAGE OTHERS TO VOTE FOR A BILL YOU
3 BELIEVED TO BE ILLEGAL, WOULD YOU?
4 **THE COURT:** JUST A MOMENT, SIR.
5 YES, WHAT'S YOUR OBJECTION?
6 **MS. KEENAN:** I THINK IT CALLS FOR HIM TO PROVIDE A
7 LEGAL CONCLUSION ABOUT WHAT KIND OF ADVICE HE WOULD GIVE TO
8 OTHER LEGISLATORS.
9 **THE COURT:** OVERRULED. I THINK HE'S ASKING IT MORE
10 AS AN ART FORM.
11 **MS. KEENAN:** OKAY.
12 **THE COURT:** OVERRULED.
13 YOU MAY ANSWER.
14 **BY THE WITNESS:**
15 **A.** ARE YOU -- TO MAKE SURE I'M TRYING TO -- ARE YOU SAYING
16 THAT BECAUSE MY BILLS WOULD NOT HAVE FULLY AFFECTED ALL OF THE
17 CHANGES THAT NEEDED TO BE PUT IN PLACE, THAT BY VOTING FOR IT
18 AND ADVOCATING FOR OTHER MEMBERS TO VOTE FOR IT AS WELL, I
19 WOULD BE ASKING FOR THEM TO VOTE FOR AN ILLEGAL BILL?
20 **Q.** NO, I'M ACTUALLY ASKING THE INVERSE. BY THE FACT THAT
21 YOU'D BE ASKING OTHERS TO VOTE FOR IT, WOULD ASSUME THAT YOU
22 DID NOT BELIEVE YOUR BILL WAS ILLEGAL. CORRECT?
23 **A.** WELL, NO.
24 **MS. KEENAN:** OBJECTION. IT MISCHARACTERIZES THE
25 WITNESS'S TESTIMONY.

02:40 **THE COURT:** THAT DOES CALL FOR A LEGAL CONCLUSION. SUSTAINED.

**BY MR. TUCKER:**

**Q.** NOW, YOUR HOUSE BILL 21, LIKE HOUSE BILL 14, MOVED EXISTING HOUSE DISTRICT 23 FROM THE NATCHITOCHES AREA INTO A DIFFERENT PART OF THE STATE. CORRECT?

**A.** IT LEFT EVERYTHING INTACT WITH THE EXCEPTION OF THE SHREVEPORT DISTRICTS.

**Q.** CORRECT.

BUT I GUESS TO CLARIFY, WHEN YOU SAY LEFT IT INTACT, IT LEFT IT INTACT AS IT EXISTED IN HOUSE BILL 14?

**A.** THE BASIS OF ALL OF MY LEGISLATION IS HOUSE BILL 14.

**Q.** AND HOUSE BILL 14 MOVED HOUSE DISTRICT 23 AS IT EXISTED UNDER THE PRIOR PLAN IN NATCHITOCHES TO A DIFFERENT PART OF THE STATE?

**A.** WHICH I VEHEMENTLY DISAGREED WITH, BUT UNDERSTOOD THE POLITICAL REALITY IN TERMS OF TRYING TO COME UP WITH A VEHICLE THAT WOULD ADDRESS THE POINT AND THE ISSUES THAT I WAS TRYING TO REPRESENT. BUT ALSO THAT IS A REPRESENTATIVE OF WHAT WAS WRONG AND IS WRONG WITH THE ENTIRETY OF HOUSE BILL 14.

**Q.** BUT DIDN'T YOU ALSO PREVIOUSLY STATE DURING THE LEGISLATIVE PROCESS THAT YOU BELIEVED IT WAS A GOOD THING BECAUSE YOU WERE CONCERNED THAT FAILING TO MOVE HOUSE DISTRICT 23 MIGHT RESULT IN A LOSS IN A DISTRICT UP IN THE NORTHWEST PART OF THE STATE?

02:41 1 **A.** SAY AGAIN.
2 **Q.** DIDN'T YOU ALSO TESTIFY DURING THE LEGISLATIVE PROCESS
3 THAT FAILING TO MOVE HOUSE DISTRICT 23 INTO A DIFFERENT PART OF
4 THE STATE MIGHT HAVE RESULTED IN A LOSS OF A HOUSE DISTRICT IN
5 THE NORTHWEST PART OF THE STATE?
6 **A.** HOUSE DISTRICT 23 IS IN THE NORTH -- OR WAS IN THE
7 NORTHWEST PART OF THE STATE.
8 **Q.** LET ME BE MORE SPECIFIC. A HOUSE DISTRICT IN THE
9 SHREVEPORT AREA?
10 **A.** IF THERE WAS GOING TO BE A DISTRICT THAT WAS MOVED AND HAD
11 TO BE MOVED, NOT THAT I WOULD AGREE WITH OR SUPPORT IT, I WOULD
12 HAVE PREFERRED FOR IT NOT TO COME FROM THE SHREVEPORT AREA.
13 BUT I THINK ACCORDING TO THE DICTATES OF THE VOTING RIGHTS ACT,
14 HOUSE DISTRICT 23, JUST LIKE SENATE DISTRICT 37, BOTH SHOULD
15 HAVE STAYED IN THE NORTHWEST LOUISIANA AREA.
16 **Q.** YOU TESTIFIED EARLIER THAT -- YOU SAID YOU VERY SELDOM SEE
17 BLACK CANDIDATES ELECTED WITHOUT BEING IN A MAJORITY-BLACK
18 DISTRICT. DO YOU RECALL THAT?
19 **A.** YES.
20 **Q.** BUT DID YOU PERFORM ANY STUDIES OR ANALYSES ON THAT?
21 **A.** JUST 30 YEARS OF OBSERVATION.
22 **Q.** NOW, YOU TALKED ABOUT SEVERAL OF THE AMENDMENTS THAT YOU
23 PROPOSED TO HOUSE BILL 14. CORRECT?
24 **A.** YES.
25 **Q.** AND THOSE WERE SIMILAR TO THE THREE SEPARATE HOUSE BILLS

02:42 THAT YOU PROPOSED?
**A.** YES.
**Q.** BUT IT'S TRUE THAT SEVERAL MEMBERS TESTIFIED IN OPPOSITION TO YOUR AMENDMENTS BECAUSE THEY MAY IMPACT COMMUNITIES OF INTEREST. CORRECT?
**A.** I'M NOT RECOLLECTING.
**Q.** YOU DON'T RECALL OTHER MEMBERS OPPOSING YOUR AMENDMENTS?
**A.** ON THE FLOOR OR IN COMMITTEE OR --
**Q.** IN THE HOUSE COMMITTEE.
**A.** I MEAN, I'M SURE THERE ARE PEOPLE WHO SPOKE AGAINST MY BILLS BOTH IN COMMITTEE. AND IF MEMORY SERVES, THE BILLS THEMSELVES ARE HEARD IN THE COMMITTEE BEFORE THE AMENDMENTS WERE OFFERED ON THE FLOOR. AND SO I THINK THERE WAS OPPOSITION AND SUPPORT THAT WAS PROBABLY OFFERED IN BOTH OF THOSE VENUES.
**Q.** SO YOU RECOGNIZE THAT REPRESENTATIVE JENKINS ALSO PROPOSED A BILL FOR THE HOUSE PLAN. CORRECT?
**MS. KEENAN:** OBJECTION. IT'S OUTSIDE OF THE SCOPE OF THE WITNESS'S DIRECT TO TALK ABOUT THE OTHER LEGISLATORS' BILLS.
**THE COURT:** DO YOU WANT TO RESPOND TO THE OBJECTION?
**MR. TUCKER:** IT GOES INTO HIS PARTICIPATION IN THE ENTIRE REDISTRICTING PROCESS.
**THE COURT:** WHAT'S THE RELEVANCE OF IT?
**MR. TUCKER:** BECAUSE HE MADE STATEMENTS ABOUT THIS HOUSE BILL THAT RELATE TO CHANGING OF DISTRICTS IN THE

02:44 SHREVEPORT AREA THAT HE'S ALREADY TESTIFIED ABOUT.

**THE COURT:** THEN CALL HIM BACK IN YOUR CASE-IN-CHIEF, BUT OBJECTION SUSTAINED.

**MR. TUCKER:** OKAY.

**BY MR. TUCKER:**

**Q.** REPRESENTATIVE GLOVER, YOU AGREE THAT YOU DON'T NEED TO HAVE A MAJORITY-BLACK POPULATION TO ELECT A BLACK REPRESENTATIVE. CORRECT?

**A.** I THINK THERE ARE EXCEPTIONS TO MOST RULES, BUT THOSE EXCEPTIONS SHOULD NOT BE MISCONSTRUED AS BEING THE RULE.

**Q.** AND YOU AGREE THAT SOMETIMES PROTECTED GROUPS LIKE BLACK VOTERS MAY SELECT SOMEONE OTHER THAN THEIR RACE TO REPRESENT THEM?

**A.** IF THAT INDIVIDUAL WHO HAPPENS TO BE OF THEIR RACE HAPPENS TO ENGAGE IN ACTIVITIES OR ESPOUSES VIEWPOINTS AND TAKES POSITIONS OR HAS A DOCUMENTED HISTORY OF POSITIONS AND POSTURES THAT ARE COUNTER TO THOSE THINGS THAT REPRESENT THE BEST INTEREST OF THE BLACK COMMUNITY, THEN, YES, I THINK THAT THAT CERTAINLY IS POSSIBLE. SENATOR LUNEAU PROBABLY WOULD BE A LIVING EXAMPLE OF THAT.

**Q.** REPRESENTATIVE GLOVER, ARE YOU AWARE OF ANY OTHER MEMBER OFFERING ANY BILL OR AMENDMENT THAT CREATED MORE THAN 30 MAJORITY-BLACK DISTRICTS IN THE HOUSE?

**A.** NO.

**MR. TUCKER:** JUST ONE MINUTE TO CONFER WITH MY

02:46 COLLEAGUES.

**BY MR. TUCKER:**

**Q.** THANK YOU VERY MUCH, REPRESENTATIVE GLOVER, FOR YOUR TIME.

**A.** THANK YOU, SIR.

**MR. TUCKER:** NO FURTHER QUESTIONS, YOUR HONOR.

**THE COURT:** IS THERE ANY REDIRECT?

**MS. KEENAN:** NO, YOUR HONOR.

**THE COURT:** OKAY. THANK YOU, REPRESENTATIVE GLOVER.

WE WILL TAKE A 15-MINUTE RECESS.

**THE LAW CLERK:** ALL RISE.

COURT IS IN RECESS.

**(WHEREUPON, THE COURT WAS IN RECESS.)**

**THE COURT:** BE SEATED.

NEXT WITNESS, PLEASE.

**MS. KEENAN:** PLAINTIFFS CALL OMARI HO-SANG.

03:12 1 **OMARI HO-SANG,**
2 **HAVING BEEN DULY SWORN, TESTIFIED AS FOLLOWS:**
3 **THE COURT:** YOU MAY PROCEED.
4 **MS. KEENAN:** THANK YOU.
5 **DIRECT EXAMINATION**
6 **BY MS. KEENAN:**
7 **Q.** GOOD AFTERNOON.
8 COULD YOU PLEASE STATE AND YOUR SPELL YOUR NAME FOR
9 THE RECORD.
10 **A.** OMARI HO-SANG. O-M-A-R-I, H-O-S-A-N-G.
11 **Q.** AND WHERE DO YOU LIVE, MS. HO-SANG?
12 **A.** I LIVE IN BOSSIER CITY, LOUISIANA.
13 **Q.** WHERE DO YOU WORK?
14 **A.** I WORK FOR THE BVM CAPACITY BUILDING INSTITUTE.
15 **Q.** AND IS IT OKAY IF WE GO AHEAD AND CALL THAT BVM FOR SHORT
16 TODAY?
17 **A.** YES.
18 **Q.** OKAY. WHAT'S YOUR TITLE AT BVM?
19 **A.** I AM THE SENIOR STATE ORGANIZING MANAGER.
20 **Q.** AND HOW LONG HAVE YOU WORKED WITH BVM?
21 **A.** FOR ABOUT THREE YEARS. SINCE APRIL 2020.
22 **Q.** WHAT DO YOU KNOW ABOUT BVM'S ROLE IN THIS CASE?
23 **A.** BVM IS A PLAINTIFF IN THE CASE.
24 **Q.** AND COULD YOU EXPLAIN FOR THE COURT WHAT "BVM" IS?
25 **A.** BLACK VOTERS MATTER IS A NONPROFIT ORGANIZATION THAT OUR

03:13 1 MISSION IS TO INCREASE BLACK CIVIC ENGAGEMENT THROUGH VOTING
2 AND BUILDING THE CAPACITY OF OUR PARTNERS TO ADDRESS OTHER
3 ISSUES IN THEIR COMMUNITY.
4 **Q.** AND SO HOW DOES BVM EFFECTUATE THAT MISSION YOU JUST TOLD
5 US ABOUT?
6 **A.** AND SO WE DO IT IN A VARIETY OF WAYS. THE FIRST WAY IS
7 THROUGH OUR CAPACITY BUILDING, WORK WITH OUR PARTNERS, HELPING
8 THEM TO ADDRESS THE ISSUES, BUT ALSO HELPING THEM -- SUPPORTING
9 THEIR EFFORTS AROUND ELECTIONS, HELPING THEM TO BOLSTER THEIR
10 GOTV OR GET-OUT-THE-VOTE EFFORTS.
11 AND WE ALSO CONVENE OUR PARTNERS, WE PROVIDE
12 TRAINING, AS WELL AS A ONCE MONTHLY SPACE WHERE PARTNERS CAN
13 COME TOGETHER, TALK ABOUT THE ISSUES AND CHALLENGES OF THEIR
14 WORK. AND WE USUALLY TRY TO PROVIDE SOME TYPE OF TRAINING OR A
15 GUEST SPEAKER DURING THOSE TIMES AS WELL.
16 **Q.** SO YOU TOLD US ABOUT HOW BVM WORKS WITH THOSE PARTNERS.
17 DOES BVM DO ANY WORK WITH INDIVIDUALS IN LOUISIANA?
18 **A.** THROUGH THE COURSE OF OUR WORK, YES, WE DO WORK WITH
19 INDIVIDUALS. IT'S INEVITABLE IN MANY WAYS. BUT IN TERMS OF
20 OUR CAPACITY BUILDING WORK, WE REALLY TRY TO CHANNEL THAT
21 THROUGH OUR PARTNERS.
22 **Q.** OKAY. WHERE IN THE STATE IS BVM'S WORK CONCENTRATED?
23 **A.** SO WE HAVE OUR TARGET PARISH AREAS THAT ARE ALL ACROSS THE
24 STATE. SO WOULD YOU LIKE TO KNOW THE TARGET PARISHES
25 SPECIFICALLY OR --

03:15 1 **Q.** SURE. IF YOU KNOW THEM, BUT YEAH.
2 **A.** YEAH. SO WE FOCUS ON ABOUT NINE DIFFERENT PARISHES:
3 CADDO, BOSSIER, EAST BATON ROUGE, ORLEANS PARISH, CALCASIEU,
4 WHERE LAKE CHARLES IS, RAPIDES, AND A FEW OTHERS THAT I MAY NOT
5 REMEMBER RIGHT NOW.
6 **Q.** AND ARE THOSE TARGET PARISHES THE ONLY PLACE THAT BVM
7 WORKS IN THE STATE?
8 **A.** NO.
9 **Q.** IS BVM'S WORK LIMITED TO A SPECIFIC REGION OF THE STATE?
10 **A.** NO.
11 **Q.** OKAY. HOW MANY PARTNERS IS BVM BUILDING CAPACITY IN
12 WITHIN LOUISIANA?
13 **A.** WE HAVE ABOUT 50-PLUS GRASS ROOTS AND ALLIED ORGANIZATIONS
14 THAT WE WORK WITH.
15 **Q.** WAS BVM INVOLVED IN THE REDISTRICTING PROCESS RELATED TO
16 THE LOUISIANA STATE HOUSE AND SENATE MAPS DURING THIS LAST
17 REDISTRICTING CYCLE?
18 **A.** YES.
19 **Q.** AND WHEN DID BVM FIRST BECOME INVOLVED IN REDISTRICTING
20 WORK IN LOUISIANA?
21 **A.** SO WE FIRST BECAME INVOLVED AROUND THE END OF 2020, 2021
22 EARLY. WE STARTED WITH BEING INVOLVED IN TRAININGS,
23 PARTICIPATING IN TRAININGS AND REALLY LEARNING ABOUT THE
24 PROCESS.
25 **Q.** AND WHY DID BVM DECIDE TO GET INVOLVED IN THE

03:16 1 REDISTRICTING PROCESS?
2 **A.** WE FELT FROM LISTENING TO OUR PARTNERS THAT IT WAS REALLY
3 IMPORTANT TO GIVE VOICE TO THE COMMUNITIES THAT OUR PARTNERS
4 REPRESENT. IT IS A CRITICAL PROCESS THAT, OF COURSE, IMPACTS
5 THE WAY THAT BLACK VOTERS ENGAGE IN THE PROCESS. AND SO, YOU
6 KNOW, BASED ON OUR PARTNERS' CONCERNS, BASED ON THE NEEDS, WE
7 GOT INVOLVED.
8 **Q.** SO WHAT WORK WAS BVM DOING ON REDISTRICTING IN THE FALL OF
9 2021?
10 **A.** THE FALL OF 2021, TO MY UNDERSTANDING WAS THE
11 REDISTRICTING ROADSHOW. AND SO WE WERE ENGAGING WITH OUR
12 PARTNERS. WE WERE HAVING TRAINING SESSIONS. WE WOULD ALSO
13 HAVE GATHERINGS PRIOR TO THE ROADSHOW HEARINGS AS WELL AS
14 ENGAGING AND INVITING OUR PARTNERS TO PARTICIPATE IN THOSE
15 ROADSHOWS.
16 **Q.** YOU TALKED ABOUT ROADSHOW HEARINGS. COULD YOU EXPLAIN
17 WHAT THOSE ARE?
18 **A.** THE REDISTRICTING ROADSHOW HEARINGS WERE SESSIONS THAT
19 WERE HOSTED BY THE REDISTRICTING COMMITTEE OF THE LEGISLATURE.
20 AND THEY WERE HELD IN VARIOUS CITIES ACROSS THE STATE TO GIVE
21 COMMUNITY MEMBERS AN OPPORTUNITY TO LEARN ABOUT THE
22 REDISTRICTING PROCESS AS WELL AS ENGAGE IN AND PROVIDE
23 TESTIMONY.
24 **Q.** AND WHAT, IF ANY, ROLE DID BVM PLAY IN THOSE ROADSHOWS?
25 **A.** WE PARTICIPATED, WE ATTENDED, BUT WE ALSO MOBILIZED,

03:17 1 TRAINED AND PREPARED OUR PARTNERS TO ATTEND AS WELL. WE WORKED
2 WITH ALLIED PARTNERS TO REALLY INCREASE AWARENESS AROUND THE
3 ROADSHOWS. WE TESTIFIED AS WELL.
4 **Q.** DID YOU ATTEND ANY OF THOSE ROADSHOWS THAT YOU'VE JUST
5 DISCUSSED?
6 **A.** YES.
7 **Q.** AND DID YOU TESTIFY AT ANY OF THEM?
8 **A.** YES, I DID.
9 **Q.** WHAT WAS THE CORE REASON THAT YOU TESTIFIED AT THE
10 ROADSHOWS HEARINGS?
11 **A.** THE CORE REASON WAS TO REPRESENT MYSELF AS A VOTER, BUT
12 ALSO TO REPRESENT THE ORGANIZATION AND OUR PARTNERS TO REALLY,
13 AGAIN, ADD TO THE VOICES AROUND OUR INTERESTS AND WHAT WE
14 NEEDED FROM THIS PROCESS.
15 **Q.** AND WHAT MESSAGE DID YOU WANT TO CONVEY TO THE LEGISLATURE
16 ABOUT WHAT YOU AND YOUR PARTNERS NEEDED IN THIS PROCESS?
17 **A.** TO LISTEN AND TO HEED THE MANY CONCERNS THAT WERE COMING
18 UP FOR OUR COMMUNITIES AND TO BE RESPONSIVE TO THOSE NEEDS.
19 **Q.** AND WHEN YOU SAY "OUR COMMUNITIES," CAN YOU BE SPECIFIC
20 ABOUT WHICH COMMUNITIES YOU MEAN?
21 **A.** THE BLACK COMMUNITY.
22 **Q.** NOW, WE'VE TALKED ABOUT BVM'S REDISTRICTING WORK IN THE
23 FALL OF 2021. WAS BVM WORKING ON ANY OTHER INITIATIVES DURING
24 THE FALL OF 2021?
25 **A.** IN THE FALL OF 2021, WE WERE PREPARING FOR AN UPCOMING

03:19 1 ELECTION. SO RAMPING UP GOTV EFFORTS AND, OF COURSE, JUST
2 RESPONDING TO COMMUNITY ISSUES THAT OUR PARTNERS BROUGHT FORTH.
3 **Q.** IF BVM HAD NOT BEEN DEVOTING STAFF TIME TOWARD COMMUNITY
4 TRAININGS, REDISTRICTING, ROADSHOWS AND THE THINGS YOU JUST
5 TALKED ABOUT, WHAT WOULD THAT STAFF TIME AND ATTENTION HAD BEEN
6 DEVOTED TOWARD?
7 **A.** WE WOULD MOST CERTAINLY BE CAPACITY BUILDING, PREPARING
8 FOR -- DEEPENING OR PREPARATION FOR GOTV, WHETHER THAT BE, YOU
9 KNOW, GETTING LISTS, DATA TO OUR PARTNERS, PROVIDING TRAINING
10 SO OUR PARTNERS CAN HAVE CONFIDENCE IN ENGAGING IN THEIR GOTV
11 WORK. YOU KNOW, PROVIDING SUPPORT SO OUR PARTNERS CAN BE
12 RESPONSIVE TO THEIR COMMUNITY ISSUES.
13 BUT, YOU KNOW, OUR MAIN FOCUS IS CAPACITY BUILDING.
14 SO OUR PARTNERS CAN BE PREPARED TO DO THE WORK. SO THAT'S WHAT
15 WE WOULD HAVE BEEN DOING.
16 **Q.** SO YOU MENTIONED THE BVM'S ENGAGEMENT IN THE REDISTRICTING
17 PROCESS STARTED IN 2021. DID BVM STOP WORKING ON THE
18 REDISTRICTING PROCESS AT THAT POINT?
19 **A.** NO, WE DID NOT.
20 **Q.** OKAY. SO LET'S TURN TO 2022 THEN. IN EARLY 2022 WHAT DID
21 BVM'S WORK ON REDISTRICTING LOOK LIKE AT THAT POINT?
22 **A.** SO IN 2022 THE -- OUR PARTNERS' DESIRE TO WANT TO GIVE
23 VOICE TO THEIR CONCERNS REALLY DEEPENED, ESPECIALLY AFTER THE
24 ROADSHOW HEARING, SOME OF OUR PARTNERS EXPRESSED CONCERN THAT
25 THEY WERE NOT ABLE TO TESTIFY OR THAT THE ROADSHOW DID NOT COME

03:20 TO THEIR COMMUNITY. AND SO WE WANTED TO MAKE SURE THAT, YOU KNOW, AS THE PROCESS TRANSITIONED TO THE SESSION THAT OUR PARTNERS WERE PREPARED TO TESTIFY. SO WE CONTINUED TRAININGS, AND WE ALSO BEGAN THE PLANNING FOR OUR REDISTRICTING TAKEOVER EVENT.

**Q.** AND WHAT IS THAT REDISTRICTING TAKEOVER EVENT THAT YOU JUST MENTIONED?

**A.** SO THE REDISTRICTING TAKEOVER HAD A COUPLE OF DIFFERENT COMPONENTS TO IT. THE FIRST COMPONENT WAS OUR CARAVAN. SO WE CARAVANED FROM THE NORTHERN PART OF THE STATE DOWN TO BATON ROGUE AND FROM THE SOUTH UP. AND WE HAD A RALLY HERE IN BATON ROUGE WHERE WE BROUGHT IN -- I THINK IT WAS THE MCKINLEY HIGH SCHOOL BAND AND OTHER PARTNERS ATTENDED TO JUST REALLY CREATE AN EXCITEMENT AND PREPARE FOR A DAY OF TESTIMONY. AND THEN THE LAST COMPONENT OF IT WAS THE ACTUAL TESTIMONY THAT TOOK PLACE DURING THE SESSION.

**Q.** BEFORE WE GET INTO THE RESOURCES EXPENDED TOWARD THAT REDISTRICTING TAKEOVER, YOU MENTIONED A MOMENT AGO THAT SOME OF THE COMMUNITIES YOU WORKED WITH FELT THEY WEREN'T REPRESENTED IN THE ROADSHOWS OR THAT ROADSHOWS HADN'T COME TO THEIR COMMUNITIES. ARE THERE ANY PARTICULAR COMMUNITIES WHERE YOU REMEMBER THAT BEING A CONCERN?

**A.** YES. THE ONE THAT I REMEMBER MOST CLEARLY IS JEFFERSON PARISH.

**Q.** OKAY.

03:21 **A.** THEY ARE PROBABLY SOME OTHERS, BUT THAT'S THE ONE I REMEMBER MOST CLEARLY.

**Q.** AND HOW ABOUT THE COMMUNITIES WHERE THE ROADSHOWS DID TAKE PLACE, DID YOUR PARTNERS EXPRESS ANY CONCERN ABOUT WHETHER THEIR MESSAGES TO THE REDISTRICTING -- OR TO THE COMMITTEE WERE BEING HEARD?

**A.** YES, THEY WERE DEFINITELY CONCERNS ABOUT THAT. AND THERE WAS ALSO CONCERNS ABOUT AWARENESS. LIKE, JUST KNOWING ABOUT THE ROADSHOW AND BEING ABLE TO ATTEND IN THEIR CITY.

**Q.** ARE THERE ANY PARTICULAR CONCERNS THAT COME TO MIND IN TERMS OF FOLKS BEING IGNORED OR NOT LISTENED TO AT THE RESTRICTING ROADSHOWS FROM YOUR RECOLLECTION?

**A.** FROM MY MEMORY, I KNOW THERE WERE SOME CONCERNS OUT OF ONE OF OUR REGIONS IN SHREVEPORT. EVEN THOUGH THAT WAS A HIGHLY ATTENDED SESSION, THERE WERE A LOT OF -- AND ESPECIALLY WITH ME LIVING NEAR THAT LOCATION, THERE WERE A LOT OF CONCERNS AROUND JUST BEING IGNORED, YOU KNOW. WE HAD A LOT OF TESTIMONY -- AS WELL AS IN LAFAYETTE WHICH IS AN AREA WHERE WE HAD A PRE-MEETING EVENT AND PEOPLE WERE ABLE TO EXPRESS THEIR CONCERNS PRIOR TO TESTIFYING -- WERE ABLE TO ATTEND AND TESTIFY AND EXPRESS CONCERNS AFTERWARDS.

SO THOSE ARE TWO THAT I REMEMBER. BUT DURING OUR GATHERINGS THAT WE HAVE, OUR ONCE MONTHLY CALLS, THERE WAS A LOT OF CONCERN AND TALK AROUND JUST IN GENERAL NOT BEING HEARD DURING THE REDISTRICTING PROCESS AND REALLY WANTING TO FIGURE

03:23 1 OUT HOW COULD THEY BE HEARD AND HOW THEY COULD RECEIVE A
2 RESPONSE FOR THEIR TESTIMONY OR THEIR CONCERNS.
3 **Q.** AND SO WHAT RESOURCES DID BVM POUR INTO HELPING PREPARE
4 FOR THAT REDISTRICTING TAKEOVER WHERE FOLKS COULD TESTIFY IN
5 FRONT OF THE LEGISLATURE AGAIN?
6 **A.** SO ONE OF THE -- THE FIRST MOST TANGIBLE RESOURCES WE
7 PROVIDE WAS OUR MINI GRANT. FOR THOSE ORGANIZATIONS THAT
8 PARTICIPATED IN THE TAKEOVER, WE PROVIDED MINI GRANTS ON
9 AVERAGE ABOUT $2,500 OR MORE SO THAT OUR PARTNERS COULD BE ABLE
10 TO TRAVEL IN THE CARAVAN AND ATTEND AS WELL AS BRING THEIR
11 MEMBERS WITH THEM.
12 WE ALSO PROVIDED TRAININGS, BOTH FROM OUR NATIONAL
13 TEAM AS WELL AS THROUGH OUR ALLIED PARTNERS. AND WE ALSO
14 UTILIZED ASSETS. AND SO, YOU KNOW, PRESS RELEASES, MEDIA
15 ADVISORIES, TEXT CAMPAIGNS, MARKETING FLYERS.
16 AND THEN ONE OF OUR BIGGEST ASSETS THAT WE USE IS OUR
17 BUS, WHICH IS AN ASSET THAT IS VERY EXPENSIVE TO BRING INTO THE
18 STATE. AND IT TRAVELED WITH US ON THE CARAVAN AND REMAINED IN
19 BATON ROUGE DURING THE SESSION.
20 **Q.** AND SO IF BVM HAD NOT BEEN DEVOTING ALL THE STAFF TIME AND
21 FINANCIAL RESOURCES THAT YOU JUST MENTIONED TOWARD THE
22 REDISTRICTING TAKEOVER, WHAT WOULD THOSE RESOURCES HAVE BEEN
23 DEVOTED TOWARD INSTEAD?
24 **A.** AGAIN, CAPACITY BUILDING AND GETTING OUT THE VOTE BECAUSE
25 WE BELIEVE THAT VOTING IS NOT THE ONLY WAY, BUT IT IS A VERY

03:24 CRITICAL WAY. AND WITH BVM'S FOCUS ON INCREASING BLACK VOTER ADVOCACY, YOU KNOW, WE WANT TO MAKE SURE THAT OUR PARTNERS HAVE THE TOOLS AND ARE CONFIDENT IN USING THOSE TOOLS.

AND FOR MANY OF OUR PARTNERS, THEY -- THESE TOOLS ARE NEW. AND SO WE WANT TO SPEND AS MUCH TIME AS POSSIBLE IN MAKING SURE OUR PARTNERS ARE PREPARED TO GET OUT THE VOTE AND ALSO HAVE THE CAPACITY TO DO SO.

**Q.** SO AFTER THE REDISTRICTING TAKEOVER, HOW DID THE LEGISLATURE RESPOND TO THE TESTIMONY AND THE TAKEOVER PROCESS THAT YOU ORGANIZED?

**A.** IN GENERAL OR DURING OUR -- DURING THE SESSION?

**Q.** AFTER THE REDISTRICTING TAKEOVER WAS COMPLETED.

**A.** SO FROM OUR VIEW, THERE WAS REALLY NO RESPONSE TO OUR REQUEST. THERE MAY HAVE BEEN SOME COMMENTS FROM LEGISLATORS, BUT, YOU KNOW, ON THE WHOLE, THERE WAS NOT A RESPONSE.

**Q.** AND DO YOU RECALL WHETHER THE LEGISLATURE PASSED MAPS FOLLOWING THE REDISTRICTING TAKEOVER?

**A.** YES.

**Q.** ABOUT WHEN, TO YOUR RECOLLECTION, DID THEY PASS THOSE MAPS?

**A.** MARCH OF 2022.

**Q.** HOW DID THOSE MAPS COMPARE TO THE MAPS THAT BVM AND ITS PARTNERS WERE FIGHTING FOR?

**A.** THEY WERE COMPLETELY CONTRARY TO WHAT OUR PARTNERS WANTED OR REQUESTED.

03:25 1 **Q.** AND HOW SO?
2 **A.** THEY DID NOT INCLUDE THE OPPORTUNITY DISTRICTS THAT WERE
3 REQUESTED FROM OUR PARTNERS.
4 **Q.** AS A LOUISIANA RESIDENT AND AS AN ORGANIZING MANAGER WITH
5 BVM, WHAT WOULD FAIR MAPS MEAN TO YOU?
6 **A.** FAIR MAPS MEAN FAIR REPRESENTATION.
7 **Q.** YES.
8 **A.** ADEQUATE REPRESENTATION. FAIR MAPS HAVE SO MANY
9 IMPLICATIONS AND RAMIFICATIONS FOR THE EVERYDAY LIFE OF OUR
10 COMMUNITY MEMBERS. AND I THINK WE'VE SEEN THROUGHOUT THE
11 COURSE OF HISTORY, OR EVEN THE SHORT TIME THAT I'VE BEEN WITH
12 BLACK VOTERS MATTER, THAT UNFAIR MAPS AND A LACK OF
13 REPRESENTATION CAN HAVE LIFE OR DEATH CONSEQUENCES. AND I
14 COULD GO ON AND ON. BUT, YOU KNOW, JUST ON THE WHOLE, FAIR
15 MAPS MEANS A CHANCE FOR MY COMMUNITY, MY CHILDREN TO HAVE A
16 FAIR CHANCE AT LIFE.
17 **Q.** AND SO I WANT TO TALK SOME MORE ABOUT THAT. HOW HAVE THE
18 STATE HOUSE AND SENATE MAPS HARMED BVM, ITS PARTNERS AND ITS
19 CONSTITUENTS?
20 **A.** IT'S JUST TAKEN AWAY FROM OUR ABILITY TO BUILD CAPACITY
21 WITH OUR PARTNERS IN A WAY THAT IS NECESSARY TO INCREASE BLACK
22 VOTER ENGAGEMENT, BLACK CIVIC ENGAGEMENT. YOU KNOW, SPECIFIC
23 THINGS THAT I CAN REMEMBER IN TERMS OF THIS PERIOD OF TIME, WE
24 HAVE -- WE HAVE A PROJECT THAT WE CALL ISSUE MINING THAT GIVES
25 US AN OPPORTUNITY TO REACH OUT TO OUR COMMUNITY TO BETTER

03:27 UNDERSTAND WHAT ARE THE ISSUES THAT ARE IMPORTANT TO THEM. AND DURING THE TIME WHERE WE HAD RESPOND TO THE UNFAIR MAPS, WE HAD TO DIVERT OUR ATTENTION AWAY FROM THAT. AND OUR PARTNERS HAD A DESIRE TO ISSUE MINE. BUT, YOU KNOW -- AND WE WANTED TO SUPPORT THEM. WE WERE ABLE TO SUPPORT THEM EVENTUALLY, BUT THERE WAS A DELAY IN OUR ABILITY TO DO SO.

THERE IS ALSO THE CHALLENGE THAT WE EXPERIENCED EVEN BEFORE REDISTRICTING, BUT EVEN MORE SO NOW, OF CONTENDING WITH THIS IDEA THAT PEOPLE IN OUR COMMUNITY, THAT THEIR VOTE DOESN'T MATTER AND THAT, YOU KNOW, EVEN IF THEY DID VOTE, THEY WOULD NOT BE ABLE TO GET SOMEBODY WHO THEY FEEL REPRESENTS THEM, WHO UNDERSTANDS THEM, WHO WOULD EVEN COME TAKE THE TIME OR EVEN BOTHER TO COME TO THEIR COMMUNITY, BOTHER TO COME TO A COMMUNITY FORUM. AND SO THESE INSTANCES MAKES IT A LITTLE BIT MORE CHALLENGING FOR US TO HAVE THE CONVERSATION AND URGE BLACK PEOPLE TO JUST GO AND VOTE ANYWAY, ENGAGE IN THIS PROCESS ANYWAY. SO, YOU KNOW, THAT IS A HARM. THOSE ARE THE THREE.

**Q.** SO I WANT TO -- I WANT TO TALK ABOUT A COUPLE OF THOSE IN MORE DETAIL. YOU MENTIONED ISSUE MINING. CAN YOU TALK ABOUT WHY ISSUE MINING, WHY THE TIMING OF ISSUE MINING IS IMPORTANT?

**A.** THE TIMING IS IMPORTANT BECAUSE IT HELPS US TO HAVE A RESPONSIVE MESSAGE WHEN WE'RE GETTING OUT THE VOTE. YOU KNOW, JUST KIND OF AS FOLLOW-UP TO THE CHALLENGES THAT WE EXPERIENCE IN THE FIELD WHEN WE WERE TALKING TO BLACK VOTERS. YOU KNOW, A PART OF OVERCOMING SOME OF THOSE OBJECTIONS IS REALLY

03:29 1 UNDERSTANDING WHAT PEOPLE CARE ABOUT. YOU KNOW, I COULD FEEL
2 THAT, YOU KNOW, EDUCATION IS REALLY IMPORTANT IN MY COMMUNITY.
3 BUT SOMEONE WHO I'M TALKING TO, IT MIGHT BE THE MASS
4 INCARCERATION ISSUE THAT LOUISIANA IS EXPERIENCING. AND SO
5 IT'S IMPORTANT FOR US TO HAVE A DATA DRIVEN UNDERSTANDING
6 THAT'S DOCUMENTED TO REALLY FORMULATE OUR CONVERSATIONS IN A
7 WAY THAT'S MEANINGFUL WITHIN OUR COMMUNITY. AND THEN FURTHER
8 WE UTILIZE THAT MESSAGING IN OUR -- IN OUR COMMUNICATIONS. WE
9 INCORPORATE THAT WHEN WE'RE TALKING IN TERMS OF OUR DIGITAL
10 COMMUNICATIONS AS WELL. AND SO IT'S IMPORTANT THAT THESE
11 CONVERSATIONS TAKE PLACE PRIOR TO THE ELECTION CYCLE SO THAT WE
12 CAN INCORPORATE THAT INTO OUR GOTV STRATEGY.
13 **Q.** AND SO HOW DOES A DELAY IN ISSUE MINING AFFECT BVM'S
14 ABILITY TO BUILD CAPACITY IN ITS PARTNER AND ITS WORK?
15 **A.** IT JUST -- IT MAKES IT A LITTLE BIT MORE DIFFICULT TO HAVE
16 A RESPONSIVE CONVERSATION WITH PEOPLE, A CONVERSATION THAT IS
17 RELEVANT BECAUSE, AGAIN, I -- YOU KNOW, WE CAN SAY, "HEY, IT'S
18 IMPORTANT TO GET OUT TO VOTE BECAUSE OUR ANCESTORS DIED FOR
19 IT." BUT FOR SOME VOTERS THAT DOESN'T REALLY RESONATE. AGAIN,
20 FOR SOME VOTERS IT'S OUR ECONOMIC SITUATION, FOR SOME VOTERS
21 THEY NEED A JOB. FOR OTHERS THEY WANT A GROCERY STORE WITHIN
22 THEIR COMMUNITY, RIGHT. AND SO THE NEEDS, THE CONCERNS ARE
23 DIVERSE AS OUR PEOPLE. THERE IS NO ONE SINGLE CONCERN FOR
24 BLACK VOTERS, AND SO THAT GIVE US THE ABILITY TO BE RESPONSIVE
25 AND TO REALLY MOVE PEOPLE IN A WAY THAT IS MEANINGFUL AND

03:30 SUBSTANTIVE.
**Q.** AND SO WHEN YOU SAY YOUR ISSUE MINING WORK WAS DELAYED AS A RESULT OF THE MAPS, CAN YOU TALK ABOUT WHAT ISSUES YOU WERE WORKING ON IN THE REDISTRICTING CONTEXT THAT PUSHED OUT YOUR ISSUE MINING IN 2022?
**A.** SO IN 2022, LIKE, AFTER MARCH SPECIFICALLY WHEN THE MAPS WERE VOTED ON INSTEAD OF, YOU KNOW, FOCUSING ON ISSUE MINING, WE LIFTED UP A CAMPAIGN ALONG SIDE OUR PARTNERS WITH THE NAACP TO VETO THE MAPS AND TO GET OUR COMMUNITY TO ENGAGE IN THAT WORK. SO WHETHER THAT WAS EMAILING, PHONE CALLING, OR SHOWING UP TO THE GOVERNOR'S MANSION FOR THE RALLY.
AND THEN WE ALSO HAD A CAMPAIGN CALLED *POINT THEM OUT* WHERE WE SPECIFICALLY ENGAGED COMMUNITY MEMBERS AND OUR PARTNERS IN CALLING LEGISLATORS WHO VOTED AGAINST THE FAIR MAPS AND JUST CALLING AND QUESTIONING WHY DID YOU VOTE AGAINST FAIR MAPS. SO THERE WAS A LOT OF ENERGY, THERE WAS A LOT OF TIME AND THERE WAS A FINANCIAL INVESTMENT IN TERMS OF LIFTING THAT CAMPAIGN UP AND THEN ENGAGING OUR PARTNERS TO IN TURN ENGAGE THEIR COMMUNITIES IN THAT WORK.
**Q.** NOW, WHY WAS THE *POINT THEM OUT* CAMPAIGN SOMETHING THAT WAS IMPORTANT TO BVM?
**A.** IT IS IMPORTANT FOR THERE TO BE ACCOUNTABILITY WHEN DECISIONS ARE MADE, ESPECIALLY WHEN THOSE DECISIONS IMPACT OUR PARTNERS AND OUR COMMUNITIES. AND SO WE WANTED TO -- AND, AGAIN, IT WAS KIND OF A PART OF AN ONGOING EFFORT ALSO TO

03:32 EDUCATE OUR COMMUNITY ABOUT WHAT WAS GOING ON WITHIN THE REDISTRICTING PROCESS. SO WHEN THE -- WHEN THE UNFAIR MAPS WERE PRODUCED, IT WAS IMPORTANT FOR THE LEGISLATORS WHO VOTED AGAINST THE FAIR MAPS TO HEAR FROM OUR COMMUNITY MEMBERS AND TO HEAR FROM OUR PARTNERS AND FOR OUR COMMUNITY TO HEAR SOME ANSWERS AND GET SOME RESPONSE, BECAUSE I THINK THAT'S A PART OF OUR CHALLENGE IS THAT A LOT OF OUR COMMUNITY MEMBERS FEEL THAT THEY ARE NOT BEING RESPONDED TO AND THAT THEY ARE BEING IGNORED. AND WE TRY PREEMPT THAT, AND WE TRY TO CREATE A SENSE OF ENGAGEMENT. NOT A SENSE OF IT, BUT ACTUAL ENGAGEMENT IN THE PROCESS.

**Q.** AND SO WHEN YOU STARTED DOING THAT WORK TO HOLD LEGISLATORS ACCOUNTABLE FOLLOWING THE REDISTRICTING MAP, ARE THERE ANY OTHER EXAMPLES OF HOW YOU'VE ENGAGED IN ACCOUNTABILITY WORK SINCE THE MAPS WERE PASSED?

**A.** YES. OUR -- THAT CAMPAIGN HAS KIND OF MORPHED INTO AN ONGOING PROGRAM THAT WE INFORMALLY REFERRED TO AS ACCOUNTABILITY SEASON BECAUSE WE BELIEVE THAT, AGAIN, VOTING IS AN IMPORTANT PART OF CIVIC ENGAGEMENT AND IT IS AN IMPORTANT PART OF BUILDING POWER IN OUR COMMUNITY, BUT IT IS NOT THE ONLY WAY. AFTER A VOTE IS CAST, AFTER SOMEONE IS ELECTED AND DECISIONS ARE MADE, IT IS ALSO IMPORTANT FOR OUR COMMUNITY TO BUILD THE MUSCLE AND FLEX THE MUSCLE OF HEARING FROM THEIR LEGISLATORS, WHETHER, YOU KNOW, IT BE ON A STATE LEVEL OR ANY OTHER LEVEL. AND SO WE ARE CONTINUING TO TRAIN OUR PARTNERS

03:33 1 AND HOLD CONVERSATIONS WITH OUR PARTNERS ABOUT WHAT DOES
2 ACCOUNTABILITY LOOK LIKE IN THIS ENVIRONMENT AND WHAT ARE THE
3 VARIOUS TOOLS THAT WE CAN USE TO HOLD OUR LEGISLATORS AND OUR
4 ELECTED OFFICIALS ACCOUNTABLE.
5 **Q.** AND WHAT DO THOSE TOOLS TO HOLD FOLKS ACCOUNTABLE LOOK
6 LIKE SINCE THE STATE HOUSE AND SENATE MAPS WERE PASSED BY THE
7 LEGISLATURE?
8 **A.** SO WE -- THIS YEAR WE'VE HAD OR LAUNCHED OUR VIRTUAL
9 FREEDOM SCHOOL AS WELL AS OUR IN-PERSON FREEDOM SCHOOL TOUR.
10 AND THIS -- YOU KNOW, CALLING ON THE LEGACY OF FREEDOM SCHOOLS
11 WHICH WERE STOOD UP AS A RESPONSE TO SIMILAR ISSUES THAT WE'RE
12 EXPERIENCING NOW. WE'VE GATHERED OUR PARTNERS TO EDUCATE THEM
13 AND ENGAGE THEM IN THE WORK OF BUILDING POWER THROUGH THE
14 ELECTORAL PROCESS AND OTHERWISE AS WELL AS BUILDING. BECAUSE,
15 AGAIN, WE'RE A CAPACITY BUILDING ORGANIZATION. SO WE WORK WITH
16 PARTNERS SO THAT WHEN WE'RE NOT HERE ANYMORE, THEY HAVE THE
17 TOOLS NECESSARY, WHETHER IT'S ACCOUNTABILITY, WHETHER IT'S
18 GETTING OUT THE VOTE. AND SO WE'VE INCORPORATED THAT INTO OUR
19 VIRTUAL FREEDOM SCHOOL AND IN-PERSON FREEDOM SCHOOL TRAINING.
20 **Q.** YOU ALSO MENTIONED THAT SINCE THE MAPS HAVE BEEN PASSED,
21 YOU HAVE WORKED WITH VOTERS WHO FEEL LIKE THEIR VOTES DON'T
22 MATTER. HOW HAVE YOU OBSERVED THAT TREND WITH VOTERS IN YOUR
23 MORE RECENT WORK WITH THIS LAST ELECTION?
24 **A.** IT'S ONLY GOTTEN WORSE.
25 **Q.** AND CAN YOU EXPLAIN WHAT TRENDS YOU'VE OBSERVED WITH

03:35 1 RESPECT TO VOTERS FEEL LIKE THEIR VOTES DON'T MATTER IN THE
2 COMMUNITIES YOU WORK IN?
3 **A.** SO, AGAIN, IT WAS ALREADY A CHALLENGE. NOW IT'S -- IT IS
4 EXTREMELY DIFFICULT. IT IS ALMOST LIKE WE'RE PULLING TEETH,
5 YOU KNOW, TO GET FOLKS TO UNDERSTAND VOTING. AND NOW
6 INDIVIDUALS ARE BRINGING UP SPECIFIC INSTANCES, MORE NOW, WHERE
7 THEY VOTED AND NOTHING IN THEIR COMMUNITY CHANGED. AND THIS IS
8 ACROSS AGE GROUPS. IT'S NOT JUST YOUNG VOTERS. IT'S -- YOU
9 KNOW, THIS IS AN INTERGENERATIONAL ISSUE THAT WE'RE DEALING
10 WITH, AGAIN, BECAUSE OF A LACK OF RESPONSIVENESS, A LACK OF
11 REPRESENTATION.
12 YOU KNOW, ONE OF THE CONCERNS THAT I HEARD IN THIS
13 MOST RECENT ELECTION IS THAT, YOU KNOW, ONE OF THE CANDIDATES
14 DIDN'T EVEN BOTHER TO SHOW UP IN THEIR COMMUNITY. AND IT IS
15 HARD, IT IS A CHALLENGE TO PUSH BACK AGAINST THAT BECAUSE IT'S
16 THE TRUTH. SO, YOU KNOW, WE -- YOU KNOW, THAT'S WHY IT'S
17 IMPORTANT TO ISSUE MINE. THAT'S WHY IT'S IMPORTANT TO REALLY
18 UNDERSTAND WHAT ARE THE ISSUES THAT ARE GOING TO MOVE PEOPLE TO
19 ACTUALLY GO VOTE, WHAT ARE SOME STRATEGIES THAT WE CAN USE TO
20 REALLY GET PEOPLE TO REGAIN TRUST IN THIS PROCESS. SO, YEAH.
21 **Q.** AND BASED ON YOUR EXPERIENCE IN ORGANIZING IN THESE
22 COMMUNITIES AND WITH YOUR PARTNERS, HOW HAVE THE STATE HOUSE
23 AND SENATE MAPS PASSED IN 2022 AFFECTED THAT VOTER DISILLUSION
24 APATHY?
25 **A.** MY BELIEF IS THAT IT HAS CREATED A LOT OF VOTER APATHY AND

03:36 1 THAT IT IS KIND OF A CASE IN POINT FOR A LOT OF PEOPLE WHO FEEL
2 THAT THEY ARE NOT BEING REPRESENTED. SEE, LOOK WHAT HAPPEN
3 WITH THIS LAST SESSION, FOR THOSE WHO KNOW ABOUT IT, FOR THOSE
4 WHO ARE AWARE, IT HAS JUST REALLY DEEPENED THE APATHY BECAUSE
5 IT'S A PART OF THIS LONG LEGACY OF, YOU KNOW, THEY SAW OUR BUS,
6 YOU KNOW. THEY SAW THE REDISTRICTING TAKEOVER. THEY KNOW THAT
7 WE'RE OUT PUSHING PEOPLE OUT TO VOTE, BUT YET AND STILL, THE
8 MAPS THAT WERE PASSED WERE STILL UNFAIR. SO IT'S ALSO CREATED
9 A LOT OF FRUSTRATION IN THE COMMUNITY. AND, AGAIN, I WON'T SAY
10 CREATE. I'LL SAY DEEPENED. THE VALLEY HAS TURNED INTO A
11 CHASM. AND SO WE'RE JUST PLAYING -- WE'RE CONSTANTLY PLAYING
12 CATCH-UP TO MAKE SURE THAT OUR COMMUNITIES ARE REPRESENTED AND
13 THAT OUR PEOPLE BELIEVE IN THE PROCESS ENOUGH TO ACTUALLY GO
14 AND CAST THEIR BALLOT.
15 **Q.** AND I THINK YOU STARTED TO ANSWER THIS WITH YOUR LAST
16 ANSWER ABOUT PLAYING CATCH-UP. BUT HOW HAS THAT VOTER APATHY
17 SINCE THESE MAPS HAVE BEEN PASSED AFFECTED BVM'S WORK IN THESE
18 COMMUNITIES?
19 **A.** IT'S JUST MORE OF AN EXPENDITURE OF TIME AND INVESTMENT IN
20 SPECIFIC COMMUNITIES. IT IS TRYING TO FIGURE OUT INNOVATIVE
21 AND NEW STRATEGIES THAT DON'T EXIST ALREADY. THE TRIED AND
22 TRUE, YOU KNOW, TRADITIONAL STRATEGIES OF GETTING OUT THE VOTE,
23 WHICH, OF COURSE, INCLUDES PHONE BANKING AND CANVASING. YOU
24 KNOW, WE HAVE TO GO DEEPER, AND WE HAVE TO HAVE A 365-DAY
25 APPROACH TO THE WORK BECAUSE, YOU KNOW, JUST DURING THE

03:38 ELECTION SEASON IS NOT ENOUGH. THERE HAS TO BE ONGOING CONVERSATIONS. AND, AGAIN, WE DON'T WANT TO BE THE ORGANIZATION -- WE DON'T WANT TO BE THE PERSON THAT GOES INTO A COMMUNITY ONCE AND NEVER COMES BACK. WE WANT TO BUILD RELATIONSHIP AND BUILD TRUST BECAUSE TRUST HAS BEEN BROKEN. AND SO HOW DO WE AS A ORGANIZATION REBUILD THE TRUST, AT LEAST IN US, TO BELIEVE THAT WE HAVE THE INTEREST, YOU KNOW, IN MIND OF YOUR COMMUNITY FOR THEM TO ENGAGE. AND IT'S NOT JUST IN VOTING, JUST TO ENGAGE IN GENERAL IN THE CIVIC PROCESS.

**Q.** AND HOW DOES THAT 365-DAY PROCESS AFFECT BVM'S CAPACITY BUILDING AND ITS OTHER WORK APART FROM ITS WORK IN RESPONSE TO THE MAPS?

**A.** SO OUR PREFERENCE, OUR -- THE CORE OF WHAT WE DO IS ENGAGING OUR PARTNERS IN CIVIC ENGAGEMENT. WE DO BUS TOURS. WE HAVE OUR ONCE-MONTHLY CALLS. BUT, AGAIN, BECAUSE THE ENVIRONMENT IN LOUISIANA IS SO DIFFICULT AND SO CHALLENGING, WE ARE RECOGNIZING THAT WE HAVE TO CHANGE UP OUR APPROACH AND WE NEED TO SPEND MORE TIME IN COMMUNITY WITH BLACK VOTERS TO NOT ONLY GET THEM TO REGISTER, BECAUSE WE HAVE A LOT OF REGISTERED BLACK VOTERS IN LOUISIANA, BUT ALSO JUST TO LIKE BUILD THE TRUST.

AND SO SOMETIMES BUILDING TRUST IN COMMUNITY MEANS GOING INTO A COMMUNITY AND NOT TALKING ABOUT VOTING AT ALL, JUST TALKING ABOUT THE CONCERNS THAT OUR COMMUNITY MEMBERS HAVE AND THAT IS -- THAT IS NOT A TRANSACTIONAL PROCESS. THAT'S A

03:40 TRANSFORMATIONAL PROCESS THAT TAKES TIME, IT TAKES ENERGY, IT TAKES INVESTMENT. IT REQUIRES BVM ASSETS MORE OFTEN THAN WOULD BE -- THAT HAS BEEN TYPICAL IN THE PAST. SO THOSE ARE SOME WAYS THAT -- YOU KNOW, THAT HAS IMPACTED US AND HAS CREATED MORE EXPENDITURE THAN WE WOULD NORMALLY HAVE.

**Q.** SO I WANT TO WALK THROUGH A COUPLE OF CONCRETE EXAMPLES ABOUT HOW BVM STAFF TIME WAS DIVERTED TOWARD REDISTRICTING.

**A.** OKAY.

**Q.** DID BVM CREATE ANY LETTERS OR PRESS RELEASES RELATING TO THE REDISTRICTING PROCESS?

**A.** YES.

**Q.** I'M NOW SHOWING THE WITNESS WHAT HAS BEEN PREMARKED AS PLAINTIFFS' EXHIBIT 184.

MS. HO-SANG, DO YOU RECOGNIZE THIS DOCUMENT?

**A.** YES.

**Q.** AND WHAT IS IT?

**A.** THIS IS A LETTER THAT WAS SENT TO GOVERNOR EDWARDS ON FEBRUARY 18, 2022.

**Q.** WHAT DATE WAS IT SENT? OH, SORRY, YOU JUST SAID THAT.

ON PAGE 15 OF THIS DOCUMENT, DO YOU SEE YOUR SIGNATURE AT THE BOTTOM?

**A.** YES.

**MS. KEENAN:** YOUR HONOR, WE MOVE TO ADMIT PLAINTIFFS' EXHIBIT 184.

**MS. HOLT:** NO OBJECTION, YOUR HONOR.

03:41 **THE COURT:** ADMITTED.
**BY MS. KEENAN:**
**Q.** SO I'M NOW SHOWING THE WITNESS WHAT'S BEEN PREMARKED AS PLAINTIFFS' EXHIBIT 185.
MS. HO-SANG, DO YOU RECOGNIZE THIS DOCUMENT?
**A.** YES.
**Q.** AND WHAT IS IT?
**A.** THIS IS A LETTER THAT WAS SENT TO THE HOUSE AND GOVERNMENTAL AFFAIRS COMMITTEE ON JANUARY 19TH OF 2022.
**Q.** OKAY. AND FLIPPING AHEAD TO PAGE 14, DO YOU SEE YOUR SIGNATURE ON THIS DOCUMENT IN THE MIDDLE?
**A.** YES.
**Q.** OKAY.
**MS. KEENAN:** WE MOVE TO ADMIT PLAINTIFFS' EXHIBIT 185.
**MS. HOLT:** NO OBJECTION, YOUR HONOR.
**THE COURT:** ADMITTED.
**BY MS. KEENAN:**
**Q.** I'M NOW SHOWING THE WITNESS WHAT'S BEEN PREMARKED AS PLAINTIFFS' EXHIBIT 187.
MS. HO-SANG, DO YOU RECOGNIZE THIS DOCUMENT?
**A.** YES.
**Q.** AND WHAT IS IT?
**A.** THIS IS A PRESS RELEASE.
**Q.** AND WHEN WAS IT CIRCULATED?

03:41 **A.** ON FEBRUARY 22ND, 2022.

**MS. KEENAN:** AT THIS POINT WE'D MOVE TO ADMIT PLAINTIFFS' EXHIBIT 187.

**MS. HOLT:** NO OBJECTION, YOUR HONOR.

**THE COURT:** ADMITTED.

**BY MS. KEENAN:**

**Q.** OKAY. I'M NOW SHOWING THE WITNESS WHAT'S BEEN PREMARKED AS PLAINTIFFS' EXHIBIT 201.

MS. HO-SANG, DO YOU RECOGNIZE THIS DOCUMENT?

**A.** YES.

**Q.** AND WHAT IS IT?

**A.** THIS IS ALSO A PRESS RELEASE.

**Q.** AND WHAT DATE WAS IT CIRCULATED?

**A.** FEBRUARY 9TH, 2022.

**MS. KEENAN:** WE MOVE TO ADMIT PLAINTIFFS' EXHIBIT 201.

**MS. HOLT:** NO OBJECTION.

**THE COURT:** ADMITTED.

**BY MS. KEENAN:**

**Q.** MS. HO-SANG, DID YOU ALSO SEND OR RECEIVE ANY EMAILS WITH INTERNAL STAFF ABOUT REDISTRICTING AND BVM'S WORK?

**A.** YES.

**Q.** WHAT ABOUT WITH BVM'S PARTNERS?

**A.** YES.

**Q.** AND WHAT ABOUT WITH BVM'S CONSTITUENCY.

03:42 **A.** YES. WELL, WE CONSIDER OUR PARTNERS OUR CONSTITUENTS. SO, YES.
**Q.** OKAY. I'M NOW SHOWING THE WITNESS WHAT'S BEEN PREMARKED AS PLAINTIFFS' EXHIBIT 186.
MS. HO-SANG, DO YOU RECOGNIZE THIS DOCUMENT?
**A.** YES.
**Q.** AND WHAT IS IT?
**A.** THIS IS AN EMAIL THAT WAS SENT REGARDING THE RALLY AT THE GOVERNOR'S MANSION.
**Q.** DO YOU SEE WHEN IT WAS SENT?
**A.** YES. FEBRUARY 22ND, 2022.
**Q.** AND DO YOU RECALL RECEIVING THIS EMAIL?
**A.** YES, I DO.
**MS. KEENAN:** WE MOVE TO ADMIT PLAINTIFFS' EXHIBIT 186.
**MS. HOLT:** NO OBJECTION.
**THE COURT:** 186 IS ADMITTED.
**BY MS. KEENAN:**
**Q.** I'M NOW SHOWING THE WITNESS WHAT'S BEEN PREMARKED AS PLAINTIFFS' EXHIBIT 188.
I UNDERSTAND THE FIRST PAGE IS A BUNCH OF EMAILS.
SO ON THE SECOND PAGE, ARE YOU ABLE TO RECOGNIZE THIS DOCUMENT?
**A.** YES.
**Q.** AND WHAT IS IT?

03:43 **A.** THIS IS AN EMAIL THAT I SENT TO OUR PARTNERS.
**Q.** AND ON WHAT DATE DID YOU SEND IT?
**A.** ON SEPTEMBER 22ND, 2021.
**MS. KEENAN:** WE MOVE TO ADMIT PLAINTIFFS' EXHIBIT 188.
**MS. HOLT:** NO OBJECTION.
**THE COURT:** COUNSEL, DO YOU WANT -- IS THERE ANY PERSONAL IDENTIFYING INFORMATION IN THOSE EMAIL ADDRESSES THAT NEEDS TO BE REDACTED? IT WAS A BUNCH OF THEM. I'M GOING TO JUST ASK THAT YOU TAKE A LOOK AT WHATEVER EXHIBIT THAT WAS, P-186 I THINK IT WAS, AND MAKE SURE THERE'S NOT REDACTIONS THAT NEED TO BE MADE IN THAT EMAIL LIST.
**MS. KEENAN:** THANK YOU, YOUR HONOR, OF COURSE. JUST TO PREVIEW, THERE ARE A NUMBER OF ADDITIONAL EMAILS WE'RE ABOUT TO MOVE THROUGH, ALL OF WHICH ARE IN JERS. IF IT'S EASIER I CAN CONFER BRIEFLY WITH OPPOSING COUNSEL, SEE IF THERE ARE ANY EXHIBITS AND WE CAN JUST MOVE TO ADMIT THOSE WITHOUT SHOWING THE EMAIL ADDRESSES IN COURT.
**THE COURT:** WHY DON'T YOU -- WHY DON'T THE TWO OF TALK AND SEE IF YOU CAN'T DO AN IN GLOBO ADMISSION, AND THEN YOU CAN REDACT ANY PERSONALLY IDENTIFYING INFORMATION SUBSEQUENTLY.
**MS. KEENAN:** THANK YOU, YOUR HONOR. WE'LL BE SURE TO DO THAT. I'LL CONFER WITH COUNSEL BRIEFLY.
**THE COURT:** ALL RIGHT. TAKE A MINUTE.

03:44 1 **(WHEREUPON, THERE WAS AN OFF-RECORD DISCUSSION BETWEEN**
2 **COUNSEL.)**
3 **MS. KEENAN:** SO, YOUR HONOR, IT SOUNDS LIKE THERE'S
4 NO ISSUE WITH ADMITTING EACH OF THE DOCUMENTS, AND I CAN READ
5 OUT THE STRING, EXCEPT COUNSEL HAS ASKED IF WE'RE GOING TO
6 SPEND ANY ADDITIONAL TIME SPEAKING ABOUT THESE EXHIBITS -- OUR
7 POSITION IS THAT WE'VE ACTUALLY ALREADY ASKED MS. HO-SANG ABOUT
8 EACH OF THE EVENTS THAT ARE DESCRIBED IN THIS EMAIL. WE DON'T
9 WANT HER TO TRY TO BRING IN THE CONTENT OF THESE EMAILS FOR THE
10 TRUTH OF THE MATTER ASSERTED. WE'RE ADMITTING THEM AS CONCRETE
11 EXAMPLES OF BVM DIVERTING ITS STAFF TIME AND ATTENTION TOWARD
12 THE REDISTRICTING PROCESS. SO WE'RE NOT OFFERING THEM FOR THE
13 TRUTH OF THE MATTER. WE WERE PLANNING TO JUST PUT THEM INTO
14 THE RECORD, AND THEN MOVE ON WITH THE TESTIMONY TO AVOID BEING
15 CUMULATIVE.
16 **THE COURT:** TO SHOW THE USE OF THEIR ASSETS DURING
17 THE TIME PERIOD IN QUESTION?
18 **MS. KEENAN:** THAT'S RIGHT, YOUR HONOR.
19 **THE COURT:** OKAY. WHAT ARE YOUR EXHIBIT NUMBERS?
20 **MS. KEENAN:** OKAY. SO I THINK WE HAD MADE IT
21 THROUGH -- STEPHEN, DO YOU HAVE THE LAST NUMBER THAT WE WERE
22 ON? OKAY. SO WE HAD MADE IT THROUGH 188. I HAVE 191 -- IT'S
23 A STRING. 191, 192, 193, 199, 203, 205, 206, 207, 195, 194,
24 196, 200, 204, AND 208.
25 **THE COURT:** OKAY. THOSE EXHIBITS THAT HAVE BEEN

03:48 1 IDENTIFIED BY PLAINTIFFS' COUNSEL WILL BE ADMITTED WITHOUT
2 OBJECTION. IS THAT CORRECT?
3 **MS. HOLT:** BASED ON OUR UNDERSTANDING OF WHAT WE JUST
4 SAID, YES, YOUR HONOR.
5 **THE COURT:** BASED ON THAT, WE'RE NOT GOING TO HAVE A
6 LOT OF WITNESS TESTIMONY ABOUT IT. THEY ARE BEING OFFERED TO
7 SHOW DEPLOYMENT OF RESOURCES DURING THE TIME PERIODS INDICATED
8 IN THE DOCUMENTS?
9 **MS. HOLT:** YES, YOUR HONOR.
10 **THE COURT:** OKAY.
11 **MS. KEENAN:** YES, YOUR HONOR.
12 **THE COURT:** ALL RIGHT. CARRY ON.
13 **BY MS. KEENAN:**
14 **Q.** OKAY. SO WE CAN MOVE PAST TO A COUPLE OF OTHER QUESTIONS
15 I WANTED TO ASK YOU, MS. HO-SANG, ABOUT BVM'S WORK INVOLVING
16 DISCRIMINATION IN LOUISIANA MORE BROADLY.
17 **A.** OKAY.
18 **Q.** CAN YOU TALK ABOUT WHAT, IF ANY, PRACTICES YOU'VE OBSERVED
19 IN LOUISIANA THAT MAKE IT HARDER FOR FOLKS TO VOTE?
20 **A.** YES. SO THERE HAS BEEN REPORTS OF VOTER INTIMIDATION
21 DIRECTLY. THERE IS ALSO AN ISSUE OR CHALLENGE WITH AWARENESS
22 IN UNDERSTANDING OF ELECTIONS. THERE IS ALSO A LACK OF
23 RESOURCES TO REALLY HELP TO BOLSTER THE WORK AND TO BOLSTER THE
24 AWARENESS OF ELECTIONS AND UNDERSTANDING OF WHAT'S ON THE
25 BALLOT AND HOW IT IMPACTS OUR VOTERS.

03:49 THERE HAS ALSO BEEN -- IN TERMS OF FROM A POLICY PERSPECTIVE, THERE HAVE BEEN ATTEMPTS TO MAKE VOTING MORE ACCESSIBLE THAT HAVE BEEN BLOCKED BY THE LEGISLATURE. AND I THINK THAT IN MANY WAYS THAT THAT HAS MADE VOTING MORE DIFFICULT OR IT HAS, YOU KNOW, CREATED A PATH -- LESS OF A PATHWAY FOR MORE BLACK VOTERS AND MORE MARGINALIZED VOTERS TO GET TO THE BALLOT.

**Q.** YOU TALKED A LITTLE BIT ABOUT STRUGGLES WITH AWARENESS. WHY IS IT HARD FOR LOUISIANA VOTERS IN PARTICULAR TO STAY ON TOP OF INFORMATION ABOUT ELECTIONS?

**A.** WELL, NO. 1, I THINK BECAUSE THERE ARE SO MANY. I THINK THIS YEAR WE'VE HAD FOUR OR FIVE ELECTIONS, AND THERE IS A FATIGUE AROUND ELECTIONS. WHEN WE DO OUR ORGANIZING WORK AND WE HAVE CONVERSATIONS WITH OUR PARTNERS AND THEY HAVE CONVERSATIONS IN THE COMMUNITY, IT'S, "OH, THERE'S ANOTHER ELECTION" OR "I HAVE TO VOTE AGAIN." AND SO REALLY ENCOURAGING ON TOP OF THIS LAYER OF, YOU KNOW, "MY VOTE DOESN'T COUNT." AND THEN IT'S LIKE, "OH, I GOT TO VOTE AGAIN," AND THAT HAS DEFINITELY ADDED AN ADDITIONAL CHALLENGE.

AND THERE HAS BEEN AN ATTEMPT TO STREAMLINE ELECTIONS, TO EVEN HAVE A CONVERSATION ABOUT IT AND THAT HAS BEEN BLOCKED AS WELL. SO I THINK THAT THAT HAS BEEN A MAJOR CONTRIBUTOR TO VOTER APATHY.

**Q.** I WANT TO TALK NEXT ABOUT POLITICAL CAMPAIGN ADS. CAN YOU TALK ABOUT WHAT, IF ANY, RACIAL APPEALS OR UNDERTONES YOU'VE

03:50 OBSERVED IN CAMPAIGN ADS IN YOUR TIME LIVING IN LOUISIANA?
**A.** THE TOP OF MINE THAT COMES TO MIND IS THE "CALL A CRACKHEAD" COMMERICIAL. THAT WAS VERY OFFENSIVE TO ME, AND THAT WAS A COMMERCIAL THAT WAS -- IT CAME UP DURING THE MID-TERM ELECTION, SENATOR JOHN KENNEDY.

AND THEN MORE RECENTLY COMMERCIALS THAT WERE PUT FORTH BY OUR GOVERNOR-ELECT AROUND BEING TOUGH ON CRIME AND WOKE AROUND EDUCATION IN OUR SCHOOLS AND THE ACCURATE RETEACHING OF EDUCATION. AND I THINK FOR ME, SEEING THE FIGHT AROUND THE ACCURATE TEACHING AND SEEING ATTEMPTS TO BLOCK SPECIFICALLY AP AFRICAN-AMERICAN HISTORY, TO ME, IT FELT LIKE A DOG WHISTLE AND IT FELT LIKE A CONTINUATION AROUND THAT.

ANOTHER CONCERNING INSTANCE IN THE GOVERNOR-ELECT'S COMMERCIALS WAS SHOWING THE FACES OF BLACK D.A.'S. ONE OF THOSE D.A.'S I RECOGNIZE, BECAUSE IT'S THE D.A. IN THE PARISH THAT I USED TO LIVE IN AND HIS -- I DON'T KNOW WHAT HIS EXACT WORDS WERE, BUT, YOU KNOW, IN THE TOUGH ON CRIME PIECE, HE SHOWED THE FACES OF THOSE BLACK D.A.'S. SPECIFICALLY -- I KNOW SHREVEPORT WAS ONE OF THOSE AREAS THAT HAS A BLACK D.A. SO THOSE ARE THREE THAT I CAN THINK OFF TOP OF MIND.
**Q.** DO YOU RECALL THE RACE OF THE CANDIDATES WHO WERE RUNNING THOSE ADVERTISEMENTS?
**A.** YES.
**Q.** AND WHAT WAS IT?
**A.** WHITE.

03:52 **Q.** CAN YOU TALK ABOUT WHAT, IF ANY, TRENDS YOU'VE OBSERVED IN YOUR TIME IN LOUISIANA REGARDING THE SUCCESS OF BLACK CANDIDATES RUNNING FOR OFFICE?

**A.** IN ANY PARTICULAR JURISDICTION OR JUST IN GENERAL?

**Q.** YOU CAN -- YOU CAN TALK ABOUT IT SORT OF IN GENERAL AS IT RELATES EACH OF THE JURISDICTIONS THAT COME TO MIND.

**A.** RIGHT. SO ON THE LOCAL LEVEL, YOU KNOW, I'VE SEEN BLACK CANDIDATES BE SUCCESSFUL. BUT THE HIGHER UP THAT WE GO IN TERMS OF JURISDICTION, THE LESS LIKELY IT IS OR THE LESS THAT I HAVE SEEN. I HAVEN'T SEEN DURING MY TIME IN LOUISIANA A BLACK CANDIDATE WIN A STATEWIDE RACE. AND I'VE EVEN BEEN TOLD THAT IT'S IMPOSSIBLE BY VARIOUS INDIVIDUALS. SO I WOULD SAY THAT SPEAKING TO THE HIGHER OFFICES, IT IS VERY DIFFICULT AND HAS BEEN VERY FEW AND FAR BETWEEN.

AND ON THE LEGISLATIVE LEVEL, I HAVE SEEN SOME BLACK CANDIDATES IN MAJORITY-BLACK AREAS FIND SUCCESS. BUT I THINK OVERALL IF WE LOOK AT THE MAKEUP OF THE STATE LEGISLATURE, IT'S CLEAR THAT THERE'S NOT BEEN A LOT OF SUCCESS THERE.

**Q.** IN YOUR EXPERIENCE, MS. HO-SANG, BOTH ORGANIZING AND AS A RESIDENT OF LOUISIANA, HOW RESPONSIVE HAS THE LEGISLATURE BEEN TO THE NEEDS OF BLACK LOUISIANANS?

**A.** AGAIN, ON THE WHOLE, THERE IS A CLEAR LACK OF RESPONSE. I THINK THAT THERE HAVE BEEN VARIOUS LEGISLATORS WHO HAVE MADE ATTEMPTS. AND I THINK THERE HAVE BEEN SOME SUCCESS. AND SO I DON'T WANT TO DISMISS THAT. THAT HAS HAPPENED. BUT ON THE

03:54 WHOLE, THERE HAS NOT BEEN A LOT OF SUCCESS. AND I THINK IT'S EVIDENCED IN THE CONDITIONS IN OUR COMMUNITY AND IT'S EVIDENCED LIKE FOR THE EXAMPLE THAT I PROVIDED BEFORE AROUND STREAMLINING ELECTIONS OR EVEN WORK THAT HAS BEEN ATTEMPTED AROUND BLACK MATERNAL HEALTH OR CRIMINAL JUSTICE, THERE HAVE BEEN CHALLENGES THERE.

**Q.** OKAY. THANK YOU, MS. HO-SANG.

**MS. KEENAN:** NO FURTHER QUESTIONS.

**THE COURT:** CROSS.

**MS. KEENAN:** I'M SORRY, YOUR HONOR. BEFORE I PASS THE WITNESS, DO YOU MIND IF I CHECK-IN WITH YOUR COUNSEL QUICKLY?

**THE COURT:** GO AHEAD. TAKE A MINUTE.

**MS. KEENAN:** THANK YOU, YOUR HONOR.

JUST BRIEFLY, YOUR HONOR, TWO CLEAN-UP QUESTIONS.

**BY MS. KEENAN:**

**Q.** FIRST, DID ANY ELECTION OR GOTV SEASONS OVERLAP WITH THE TIMELINES WHEN YOU HAD TO ORGANIZE FOR THE REDISTRICTING PROCESS THAT YOU'VE TALKED ABOUT HERE TODAY?

**A.** YES. WE'VE HAD AN ELECTION EACH YEAR, SO ABSOLUTELY. THERE -- IN 2022, LIKE WE HAD SOME MUNICIPAL ELECTIONS EARLY IN THE YEAR, AND THEN TOWARD THE END OF 2022, OF COURSE, WE HAD OUR MID-TERM ELECTIONS. SO, YES.

**Q.** AND YOU'VE TALKED A LITTLE BIT ABOUT WHAT FAIR MAPS MEAN

03:55 TO YOU, BUT WHAT DO YOU THINK FAIR MAPS WOULD REPRESENT FOR THE RISING GENERATION OF BLACK VOTERS THAT BVM ORGANIZES AND FIGHTS FOR?

**A.** I THINK IT MEANS THAT WE CAN KEEP SOME YOUNG PEOPLE HERE. YOU KNOW, EVERY TIME I HAVE A CONVERSATION WITH A YOUNG PERSON, EVEN MY OWN YOUNG PEOPLE, THEY DON'T WANT TO BE HERE. THEY'VE HAD BAD EXPERIENCES THEMSELVES DIRECTLY.

AND, IN FACT, DURING THE REDISTRICTING SESSION, WE BROUGHT YOUNG PEOPLE WITH US TO TESTIFY AROUND FAIR MAPS. AND THEY EVEN HAD A VERY CONCERNING EXPERIENCE IN THEIR TESTIMONY. AND SO WE HOPE THAT FAIR MAPS MEANS WE CAN RETAIN OUR YOUNG, OUR BRIGHT, OUR BEST SO THAT THEY CAN CONTINUE TO HELP US WITH YOUR WORK AND ALSO JUST LIVE THEIR BEST LIFE IN LOUISIANA.

**Q.** WHEN YOU SAY THERE WAS A CONCERNING EXPERIENCE FOR THE YOUNG FOLKS WHO TESTIFIED, COULD YOU ELABORATE A LITTLE BIT ON WHAT YOU MEAN BY THAT?

**A.** YES. ONE OF THE REPRESENTATIVES -- AFTER THEIR TESTIMONY AND DURING THEIR TESTIMONY, THERE WAS A BACK-AND-FORTH AND HE WAS FACT CHECKING THEM AND THERE WAS SOMEWHAT OF AN ARGUMENT BETWEEN HIM AND THE YOUNG PEOPLE. HE DID END UP APOLOGIZING AT THE END FOR HIS BEHAVIOR, BUT THAT WAS VERY CONCERNING. IT WAS THEIR FIRST TIME TESTIFYING AT THE LEGISLATURE, AND THEY ENDED UP HAVING AN ARGUMENT WITH ONE OF THE LEADERS IN THE COMMITTEE.

**Q.** THANK YOU, MS. HO-SANG.

**A.** YOU'RE WELCOME.

03:57 1 **MS. KEENAN:** NOTHING FURTHER.
2 **THE COURT:** CROSS.
3 **CROSS-EXAMINATION**
4 **BY MS. HOLT:**
5 **Q.** GOOD AFTERNOON, MS. HO-SANG.
6 **A.** GOOD AFTERNOON.
7 **Q.** GOOD TO SEE YOU AGAIN. MY NAME IS CASSIE HOLT. I'M WITH
8 THE LAW FIRM OF NELSON MULLINS, AND I REPRESENT THE SECRETARY
9 OF STATE IN THIS MATTER.
10 MS. HO-SANG, WHO IS YOUR EMPLOYER?
11 **A.** THE BVM CAPACITY BUILDING INSTITUTE.
12 **Q.** DO YOU RECALL GIVING A DEPOSITION IN THIS MATTER?
13 **A.** YES.
14 **Q.** AND WOULD IT SURPRISE YOU THAT YOUR ANSWER WAS DIFFERENT
15 IN THAT DEPOSITION?
16 **A.** NO, IT WOULD NOT SURPRISE ME. SO BVM CAPACITY BUILDING
17 INSTITUTE AND BLACK VOTERS MATTER FUND ARE TWO ENTITIES, BUT A
18 MAJORITY OF THE WORK THAT I DO IS FOR THE BVM CAPACITY BUILDING
19 INSTITUTE.
20 **Q.** OKAY. SO IS YOUR TESTIMONY TODAY STILL THAT YOUR EMPLOYER
21 IS THE CAPACITY BUILDING INSTITUTE OR THE FUND?
22 **A.** BOTH ARE MY EMPLOYERS BECAUSE IT'S -- IT IS ONE
23 ORGANIZATION THAT HAS A C3 FUNCTION AND A C4 FUNCTION, AND IT'S
24 ALL BLACK VOTERS MATTER. SO, YES.
25 **Q.** BUT THEY ARE SEPARATE ENTITIES. CORRECT? THE C3 AND C4?

03:58 **A.** YES.
**Q.** DO YOU KNOW IF THEY HAVE SEPARATE WEBSITES?
**A.** TO MY UNDERSTANDING, I THINK THERE ARE TWO DIFFERENT WEBSITES.
**Q.** AND BVM CAPACITY BUILDING INSTITUTE DOES NOT HAVE ANY INDIVIDUAL MEMBERS. IS THAT CORRECT?
**A.** CORRECT.
**Q.** JUST PARTNER ORGANIZATIONS?
**A.** YES.
**Q.** OKAY. AND NOT EVERY PARTNER ORGANIZATION HAS MEMBERS. IS THAT CORRECT?
**A.** NOT EVERY PARTNER ORGANIZATION HAS MEMBERS, CORRECT.
**Q.** AND NOT EVERY PARTNER ORGANIZATION FOCUSES ON VOTER ENGAGEMENT. IS THAT CORRECT?
**A.** CORRECT.
**Q.** AND THE MINI GRANTS THAT WERE DISCUSSED EARLIER, THOSE ARE MOSTLY PAID BY THE CAPACITY BUILDING INSTITUTE. IS THAT CORRECT?
**A.** IT JUST REALLY DEPENDS ON WHAT THE FUNCTION OR WHAT THE PROPOSAL IS. IF THE PROPOSAL IS, YOU KNOW, GOTV WORK THAT IS NON-PARTISAN SPECIFICALLY, YES, THAT WILL COME DOWN THROUGH THE BVM CAPACITY BUILDING INSTITUTE. HOWEVER, WITH BLACK VOTERS MATTER FUND BEING A C4, IF THE WORK IS CONSIDERED A C4 FUNCTION, THEN IT WILL COME THROUGH THE BLACK VOTERS MATTER FUND.

04:00 1 **Q.** OKAY. AND I WOULD LIKE TO PULL BACK UP --
2 **MS. HOLT:** AND I WILL BRIEFLY CONFER WITH COUNSEL, IF
3 I MAY, YOUR HONOR?
4 **THE COURT:** YOU MAY.
5 **BY MS. HOLT:**
6 **Q.** OKAY. I'M GOING TO PULL BACK UP EXHIBIT 188.
7 **MS. HOLT:** AND, FORREST, I'M GOING TO USE THE ELMO
8 SO THAT WE CAN HAVE THE EMAIL ADDRESSES COVERED.
9 **THE COURT:** SHE PUT IT ON FOR YOU.
10 **MS. HOLT:** IF I CAN --
11 **THE COURT:** IT'S UPSIDE DOWN. WHAT IS GOING ON WITH
12 THE ELMO? IT'S ILLEGIBLE. OKAY. THAT'S BETTER. OKAY.
13 WHAT'S THE EXHIBIT NUMBER AGAIN? I'M SORRY,
14 MA'AM.
15 **MS. HOLT:** 188, YOUR HONOR.
16 **THE COURT:** THANK YOU.
17 **MS. HOLT:** PLAINTIFFS' EXHIBIT 188.
18 **THE COURT:** GO AHEAD. ALL RIGHT. GO AHEAD.
19 **BY MS. HOLT:**
20 **Q.** MS. HO-SANG, THIS DOCUMENT AS I JUST SAID HAS PREVIOUSLY
21 BEEN MARKED AS PLAINTIFFS' EXHIBIT 188 AND YOUR COUNSEL ASKED
22 YOU A FEW QUESTIONS ABOUT THIS DOCUMENT. IS THAT CORRECT?
23 **A.** YES.
24 **Q.** AND AT THE VERY END OF THE DOCUMENT, WE HAVE YOUR
25 SIGNATURE BLOCK. DO YOU SEE THAT?

04:01 **A.** YES.
**Q.** AND SITTING HERE TODAY IS YOUR SIGNATURE BLOCK THE SAME AS IT IS IN THIS EXHIBIT?
**A.** NO.
**MS. KEENAN:** OBJECTION, YOUR HONOR, TO RELEVANCE TO THE WITNESS'S SIGNATURE BLOCK IN THIS EMAIL. SHE'S ALREADY TESTIFIED THAT SHE WORKS WITH BOTH ORGANIZATIONS.
**THE COURT:** WHAT IS THE RELEVANCE? HELP ME UNDERSTAND.
**MS. HOLT:** THE RELEVANCE IS THE HARM, YOUR HONOR. THE HARM THAT WE -- THAT HAS BEEN ASSERTED IN THIS CASE IS NOT NECESSARILY ON BEHALF OF THE CAPACITY BUILDING INSTITUTE AND WE'RE TRYING FIGURE OUT EXACTLY WHICH ENTITY SUFFERED THE HARM.
**THE COURT:** OKAY. I'LL ALLOW IT.
**BY MS. HOLT:**
**Q.** SO, MS. HO-SANG, I WAS ASKING IF -- I'LL REPEAT THE QUESTION.
**A.** THANK YOU.
**Q.** IF THE SIGNATURE BLOCK AT THE BOTTOM OF THE EMAIL IS THE -- SITTING HERE TODAY IS THE SAME?
**A.** NO, IT IS NOT THE SAME.
**Q.** OKAY. AND ON THE SIGNATURE BLOCK HERE, DO YOU SEE HOW IT SAYS "BLACK VOTERS MATTER FUND"?
**A.** YES.
**Q.** OKAY. AND NOT BLACK VOTERS MATTER CAPACITY BUILDING

04:02 INSTITUTE. CORRECT?
**A.** YES.
**Q.** OKAY. AND LET'S -- AND I'M GOING TO TAKE THIS DOWN. AND BVM CAPACITY BUILDING INSTITUTE IS A PLAINTIFF IN THIS CASE. RIGHT?
**A.** YES.
**Q.** NOT THE BLACK VOTERS MATTER FUND?
**A.** CORRECT.
**Q.** AND I'D LIKE TO PULL BACK UP EXHIBIT -- PLAINTIFFS' EXHIBIT 184.
MS. HO-SANG, I BELIEVE YOU TESTIFIED TO THIS EXHIBIT EARLIER, PLAINTIFFS' EXHIBIT 184. IS THAT CORRECT?
**A.** YES.
**Q.** OKAY. AND IF WE COULD SCROLL TO THE SIGNATURE PAGE. I BELIEVE IT SHOULD BE PAGE 16. WELL, 15 ONTO 16.
MS. HO-SANG, DO YOU SEE YOUR NAME THERE?
**A.** YES, I DO.
**Q.** OKAY. AND IF WE COULD GO TO THE NEXT PAGE.
AND THE ORGANIZATION YOU SIGNED ON BEHALF OF IS THE BLACK VOTERS MATTER FUND. IS THAT CORRECT?
**A.** YES.
**Q.** OKAY. AND WE CAN TAKE THAT DOWN. THANK YOU.
AND, MS. HO-SANG, YOU TESTIFIED ABOUT THE BUS TOUR AND THE REDISTRICTING TAKEOVER. AND THOSE EVENTS TOOK PLACE OVER TWO TO THREE DAYS. IS THAT CORRECT?

04:04 1 **A.** YES. I THINK SO, YES.
2 **Q.** AND THE MAJORITY OF THOSE EVENTS TOOK PLACE IN BATON
3 ROUGE?
4 **A.** YES.
5 **Q.** AND THOSE EVENTS TOOK PLACE BEFORE HOUSE BILL 14 AND
6 SENATE BILL 1 WERE PASSED. IS THAT CORRECT?
7 **A.** CORRECT.
8 **MS. HOLT:** YOUR HONOR, IF I COULD HAVE A MOMENT TO
9 CONFER WITH MY --
10 **THE COURT:** YOU MAY.
11 **MS. HOLT:** NO FURTHER QUESTIONS. THANK YOU.
12 **THE COURT:** ANY REDIRECT?
13 **MS. KEENAN:** JUST A COUPLE, YOUR HONOR.
14 **THE COURT:** GO AHEAD.
15 **REDIRECT EXAMINATION**
16 **BY MS. KEENAN:**
17 **Q.** SO, MS. HO-SANG, I UNDERSTAND YOU JUST TESTIFIED THAT YOU
18 WORK FOR BOTH THE BVM FUND AND THE BVM CAPACITY BUILDING
19 INSTITUTE?
20 **A.** CORRECT.
21 **Q.** COULD YOU TALK A LITTLE BIT ABOUT HOW YOU WEAR TWO HATS IN
22 YOUR ROLE WITH THE ORGANIZATION?
23 **A.** YES. SO, AGAIN, THE BVM CAPACITY BUILDING INSTITUTE IS A
24 C3 ARM AND 90 PERCENT OR MORE OF THE WORK THAT WE DO IS THROUGH
25 OUR BVM CAPACITY BUILDING INSTITUTE BECAUSE WE ARE A

04:05 NON-PARTISAN 501(C)(3) ORGANIZATION.

THE BLACK VOTERS MATTER FUND IS THE C4 ARM OF THE ORGANIZATION. IT IS HOW WE ARE TECHNICALLY PAID. IT IS THE NAME THAT IS IN OUR EMAIL ADDRESSES. HOWEVER, THE WORK OF THE FUND IS LESS THAN 10 PERCENT, WHATEVER THE REMAINDER OF 90 PERCENT OF WHAT WE DO. IT IS VERY SELDOM THAT WE ARE DOING C4 WORK BECAUSE, AGAIN, OUR PRIMARY FOCUS -- IT'S IN OUR MISSION STATEMENT -- IS TO INCREASE BLACK CIVIC ENGAGEMENT AND THAT IS -- YOU KNOW, THAT IS COMPLETELY NON-PARTISAN.

**Q.** AND WHAT ABOUT THE REDISTRICTING WORK THAT YOU DID, DID YOU VIEW THAT AS PARTISAN OR NON-PARTISAN?

**A.** IT WAS NON-PARTISAN.

**Q.** ARE THE MEMBERS AND THE PARTNERS YOU DISCUSSED TODAY AFFILIATED STRICTLY WITH THE CAPACITY BUILDING INSTITUTE OR THE FUND OR BOTH OF THOSE ORGANIZATIONS?

**A.** BLACK VOTERS MATTER. WE DON'T -- IN TERMS OF -- IF YOU WOULD ASK A PARTNER "WHO DO YOU WORK WITH?" NO ONE WOULD SAY BLACK VOTERS MATTER FUND. EVERYONE WOULD SAY BLACK VOTERS MATTER AS AN ENTITY.

NOW, IN TERMS OF THE REDISTRICTING TAKEOVER AND IN TERMS OF THE FUNDS THAT WE EXPENDED, ALL OF THE FUNDS THAT WE EXPENDED FOR THE REDISTRICTING TAKEOVER, BECAUSE IT WAS NON-PARTISAN 501(C)(3) WORK, CAME THROUGH OUR BVM CAPACITY BUILDING INSTITUTE.

THE BUS WHICH IS LIKE -- EVERY TIME IT ROLLS IS ABOUT

04:06 1 $75,000 OR MORE, THAT IS THROUGH OUR BVM CAPACITY BUILDING
2 INSTITUTE. YOU KNOW, AGAIN, THE 90 PERCENT OF THE WORK WE DO
3 IN WHOLE, BUT 100 PERCENT OF THE WORK THAT WE DID AROUND
4 REDISTRICTING WAS NON-PARTISAN AND, THEREFORE, THROUGH THE BVM
5 CAPACITY BUILDING INSTITUTE.
6 **Q.** AND, MS. HO-SANG, JUST TO CONFIRM: DO YOU CHANGE YOUR
7 EMAIL SIGNATURE BLOCK FOR EVERY EMAIL THAT YOU SEND?
8 **A.** NO.
9 **Q.** THANK YOU.
10 **A.** I HAVE A STANDARD EMAIL SIGNATURE.
11 **Q.** THANK YOU.
12 **MS. KEENAN:** NOTHING FURTHER.
13 **THE COURT:** OKAY. WE ARE GOING TO WRAP COURT UP FOR
14 THE DAY. WE WILL RECOMMENCE -- YOU MAY STEP DOWN, MA'AM.
15 THANK YOU.
16 WE WILL COMMENCE AGAIN TOMORROW MORNING AT 9:00
17 A.M.
18 **(WHEREUPON, THE PROCEEDINGS WERE RECESSED UNTIL 11/28/2023 AT**
19 **9:00 A.M.)**
20 * * *
21
22
23
24
25

10:51

**CERTIFICATE**

I, SHANNON THOMPSON, CCR, OFFICIAL COURT REPORTER FOR THE UNITED STATES DISTRICT COURT, MIDDLE DISTRICT OF LOUISIANA, CERTIFY THAT THE FOREGOING IS A TRUE AND CORRECT TRANSCRIPT, TO THE BEST OF MY ABILITY AND UNDERSTANDING, FROM THE RECORD OF PROCEEDINGS IN THE ABOVE-ENTITLED MATTER.

Shannon Thompson

SHANNON THOMPSON, CCR
OFFICIAL COURT REPORTER