Exhibit 1

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

PRESS ROBINSON, et al., Plaintiffs, v. KYLE ARDOIN, in his official capacity as Secretary of State for Louisiana, Defendant. *consolidated with* EDWARD GALMON, SR., et al., Plaintiffs, v. KYLE ARDOIN, in his official capacity as Secretary of State for Louisiana, Defendant.	CIVIL ACTION NO. 3:22-CV-00211-SDD-SDJ *consolidated with* NO. 3:22-CV-00214-SDD-SDJ

I. INTRODUCTION

1. My name is Jeffrey D. Sadow. I earned a B.A. from the University of Oklahoma in public administration and political science in 1983, an M.B.A. from Vanderbilt University concentrating in management information systems and finance in 1985, and a Ph.D. from the University of New Orleans in political science in 1990.

2. At Louisiana State University Shreveport I served as an assistant professor of political science from 1991-97, and since then as an associate professor with tenure; attached as Exhibit A is my *curriculum vitae*.

3. I have taught a variety of courses, most relevantly American Government, Louisiana Government, Political Behavior, Political Parties and Interest Groups, Research Methods in the Social Sciences, State and Local Politics, and Urban Politics.

4. I have presented/published at/in a variety of conferences/journals, most relevantly in 1996 publishing "The Effects of the 1978 Shreveport Charter Change," in the *Northwestern Louisiana Historical Association Journal*, in 1996 "David Duke and Black Threat: Laying to Rest an Old Hypothesis Revisited" in the *American Political Review*, and in 2005 "Partisanship, Chauvinism, and Reverse Racial Dynamics in the 2003 Louisiana Gubernatorial Election" in *The Forum*.

5. I have written as a weekly political columnist for the Shreveport Times from 1997-98, the Westside Reader (West Baton Rouge Parish) from 2007-15, the Houma Daily Courier from 2008-15, Hanna Publications (Ouachita Citizen, Concordia Sentinel, and Franklin Sun) from 2013-present, the Baton Rouge Advocate from 2015-19, the Minden Press-Herald in 2018, and Focus SB (Caddo Parish) from 2019-2020, with subjects almost entirely about state and local politics in Louisiana.

6. Since 2005 I have authored the web log Between the Lines (http://www.between-lines.com), publishing nearly 4,500 posts exclusively concerning Louisiana state and local politics. This was twice named a state "best blog" by the Washington Post.

7. Since 2005 I have authored the web log Louisiana Legislature Log (http://www.laleglog.com), publishing over 500 entries about legislation introduced into the Louisiana Legislature.

8. I have granted approximately 500 media interviews concerning a variety of topics, to various local, state, national, and international outlets. Predominantly these have involved Louisiana state and local politics, and occasionally they have addressed reapportionment issues.

9. I have not at this date served as an expert witness concerning reapportionment issues.

10. I was retained by the defendants to this litigation to provide a historical overview of congressional reapportionment in Louisiana since 1992, to understand the motivations and dynamics that have produced the various maps, litigated and otherwise, and to evaluate plaintiffs' preferred maps in comparison to the enacted map.

11. I am compensated at a rate of $300 per hour. Payment doesn't depend upon the conclusions that I draw.

II. SUMMARY OF EXPERT CONCLUSIONS

12. An overview of past reapportionment efforts encompassing the 1990, 2000, and 2010 cycles shows these consistently produced maps that rejected multiple majority-minority (M/M) district plans. This provoked dissension from black elected officials involved in the process about whether these were necessary or constitutional, whether such plans less faithfully followed traditional principles of redistricting compared to the single M/M plans enacted in their stead, whether written by the courts or legislatively enacted and granted preclearance by the U.S. Department of Justice (DOJ), in an era where statewide black population remained essentially static and where the proportion of M/M districts of the whole increased over the two decades.

13. The 2020 cycle, following reapportionment principles approved by the Legislature, produced a single M/M plan and rejected attempts at multiple M/M maps, an outcome similar to

the two most recent cycles. Unlike the previous cycles, no black elected officials questioned the necessity of a multiple M/M map.

14. Plaintiffs' challenge to the enacted map contains alternatives of multiple M/M plans that they allege do a better job of meeting principles of reapportionment adopted by the Louisiana Legislature, or following judicial guidelines. However, by several quantitative and qualitative measures they do not and, in a way, suggest these alternatives primarily were constructed with race as the dominant criterion.

III. HISTORICAL OVERVIEW – 1990-2010 REAPPORTIONMENT CYCLES

The 1990 Cycle[1]

15. Louisiana congressional districts reapportionment in the 1992 Regular Session was guided heavily by the belief that two M/M districts had to be created in order to receive VRA Sec. 5 preclearance, attempts to gain partisan advantage by the minority Republican Party, the political ambition of a leading state senator, and protection of incumbents all in the context of the state having its number of seats reduced from eight to seven.

16. Entering this cycle, Louisiana had five Democrats and three Republicans in Congress, with only one M/M district and one black Democrat elected. The state's population according to the 1990 census was white non-Hispanic single race of 65.78 percent and black non-Hispanic single race of 30.60 percent. This meant M/M representation comprised 12.50 percent of the whole.

17. State and national Republicans, including the Pres. George Bush Administration and his DOJ, were supportive of drawing two M/M districts in the state, seeing this as part of a long-

[1] The following draws heavily upon Thysell, Joseph R. Jr. 2002. "Race Gerrymandering in Louisiana." *International Social Science Review* 77 (No. 3/4): 171-84.

term strategy to elbow out of office white Democrats by concentrating as many black voters as possible where two districts could do that better than one, depriving Democratic candidates in non-M/M districts of likely Democratic voters. From the perspective of Democratic incumbents, two M/M districts were part of a deliberate partisan gerrymander. The DOJ signaled to state officials that in the post-Thornburg v. Gingles[2] environment, black representation needed maximization where possible to satisfy preclearance requirements.

18. This believed imperative helped to goad the white Democrats who dominated the Legislature to follow along. Without that, the handful of Republicans in the Legislature, even if allied with the handful of black Democrats, would not have had the majorities necessary to pass such a plan. But with possible refusal by DOJ of preclearance, this provided the impetus to attempt to enact more than once plans with bizarrely-shaped districts that bore little resemblance to historical boundaries, tested the limits of compactness, and rent asunder to a degree far beyond the historical norm political subdivisions and communities of interest.

19. Also shaping the process was the publicly undisclosed but widely discerned desire of the chairman of the Senate and Governmental Affairs Committee Democrat state Sen. Cleo Fields to run in a new majority-black district. Having already attempted and failed to win in the Republican-leaning Eighth District in 1990, he helped to make it the sacrificial lamb and created the Fourth District with favorable demographics that meandered all over the state, from Shreveport across the northern part of the state, down the Mississippi River to Baton Rouge, emanating into Alexandria as well, while also bulging to the east of Baton Rouge and its west side into Lafayette, picking off majority black precincts all the while. Along the way, it divided Shreveport, Monroe, Alexandria, Baton Rouge, and Lafayette, knifing its way into four other

[2] 478 U.S. 30 (1986)

districts at some junctures only a precinct in width, and pushing two other districts to the brink of non-contiguity. Below is an image of the original congressional plan for the 1990s:

Louisiana Legislature's Original Map for the 1990s Cycle

20. After the Legislature stubbornly continued to draw two M/M districts, so as not to endanger preclearance, the series of Hays cases struck down this practice because the state could offer no compelling reason to justify the second M/M district. As a result, the federal court ended up ordering new districts. A second state attempt went down the Red River and then forked south of Natchitoches to Baton Rouge and Lafayette, making something more compact but encapsulating the same violations of traditional district-drawing only to a lesser degree as it divided four major cities. After a dispute over standing that allowed the first map to stand for the next round of elections in 1994, which delayed matters enough to derive further judicial guidance through the decision on Miller v. Johnson,[3] the court reaffirmed the constitutional infirmity of a two M/M district map and imposed its own, effective for the 1996 round of elections, which contained as the only M/M district an expanded version of the Second District.

[3] 515 U.S. 900 (1995)

Louisiana Legislature's Remedial Map for 1990s Cycle

United States Congressional Districts in Louisiana: 1995 – 1996
Data source: http://cdmaps.polisci.ucla.edu, *Digital Boundary Definitions of United States Congressional Districts, 1789 – 2012.*

Map Enacted by the Hays Court

United States Congressional Districts in Louisiana: 1997 – 2002
Data source: http://cdmaps.polisci.ucla.edu, *Digital Boundary Definitions of United States Congressional Districts, 1789 – 2012.*

21. Notably, the state tried to defend its maps by arguing some traditional reapportionment criteria applied, such as continuity of representation. But the courts ruled that

this desire did not carry sufficient importance to compensate for violation of other criteria, most prominently the divisions to political subdivisions and communities of interest. It concluded the same concerning the use of race, in that the state couldn't provide an interest compelling enough to vault race above all other criteria. Beyond the court's declarations on this matter, different interests had used race as a bludgeon to create a second M/M district to satisfy their own agendas.

The 2000 Cycle

22. Drawing districts for the 2002 elections is best explained as an exercise in continuity of representation, to the chagrin of the Louisiana Legislative Black Caucus (LLBC).

23. Entering this reapportionment cycle, Louisiana had five Republicans and two Democrats in Congress, with only one M/M district and one black Democrat elected. The state's population according to the 2000 census was white non-Hispanic single race of 62.53 percent and black non-Hispanic single race of 32.30 percent. This meant M/M representation comprised 14.28 percent of the whole.

24. During the reapportionment process that culminated in Act 10 of the 2001 Second Extraordinary Session, all seven members of the state's congressional delegation, including black Democrat Rep. William Jefferson of the Second District, communicated that they wished to see current district lines preserved as much as possible.[4] Act 10 represented a high degree of continuous representation with 94 percent of residents remaining in their current districts.

25. Only members of the LLBC objected in seeking a two M/M district solution. Its members argued that having only one amounted to "retrogression" under VRA Sec. 5, since there had been two in the 1992 and 1994 election cycles, and basic "fairness" as well should

[4] Naresh, Ragan. 2001. "Louisiana Lawmaker Seeks Lost Ground in Congressional Remap." *Congressional Quarterly Daily Monitor* (Oct. 3).

create a number of M/M districts as closely proportional to the proportion of black residents as possible to achieve "equal" representation. However, neither legislative Democrats nor their state party endorsed that view. As it turned out, neither did the DOJ of Pres. George W. Bush, which issued preclearance of the plan on Apr. 1, 2002 despite LLBC objections.

26. During the 2001 2nd Extraordinary Session, the LLBC plan was presented through Democrat state Rep. Arthur Morrell's HB 6, which drew another M/M district outside of the existing one in New Orleans that enveloped much of northeast Louisiana, followed down the Mississippi River to Baton Rouge and then veered towards Lafayette, splitting Monroe, Baton Rouge, and Lafayette between districts. By contrast, Act 10 kept all three cities whole, maintained only the division of the New Orleans metropolitan area south of Lake Pontchartrain, and split few parishes statewide.

27. Although legislators did not expressly articulate criteria for reapportionment in this round, they clearly applied an incumbent protection/district continuity standard and a desire to keep political subdivisions and communities of interest whole. An image of the districts drawn in Act 10 is below:

Map of Districts in Act 10

The 2010 Cycle

28. Combining the continuity of representation present in the 2000 cycle with the imperative of seat reduction from the 1990 cycle, the 2010 cycle almost entirely bypassed the discussion that dominated the 1990 cycle of adding an M/M seat.

29. Entering this reapportionment cycle, Louisiana had six Republicans and one Democrat in Congress, with only one M/M district and one black Democrat elected. The state's population according to the 2010 census was white non-Hispanic single race of 60.33 percent and black non-Hispanic single race of 31.82 percent (lower and more dispersed because of the impact of Hurricanes Katrina and Rita in 2005). This meant M/M representation comprised 14.28 percent of the whole.

30. But because of relative population loss to other states (even if about 65,000 higher in absolute numbers), Louisiana stood to lose a seat. Clearly contraction would cost a white majority district, all of which under the existing arrangement favored a Republican, since the M/M district not only would have to survive but also to expand because of the relatively large concentration of black residents in southeast Louisiana. This kind of plan effectively raised the proportion of M/M districts to 16.67 percent of the whole.

31. No fewer than 14 such plans were offered, almost all of which made freshman Third District Republican Rep. Jeff Landry the odd man out by putting him and Seventh District Republican Rep. Charles Boustany in the same district that geographically encompassed more of the Seventh. This change also pushed the majority of the old Third into the First and Sixth Districts, leaving the new Third running essentially along southwest Louisiana into Acadiana. These plans allowed survival of the Second District as M/M by extending it up the Mississippi River encompassing much of the River Parishes and into East and West Baton Rouge Parishes.

32. What to do north of this area consumed most of the 2011 First Extraordinary Session. The main arguments focused on whether to have north-south districts running parallel to each other that largely mirrored the current districts except extending more to south Louisiana or to create east-west districts running parallel. Demographics among them differed slightly, but the eventual adopted plan, Act 2, produced two northern districts of a roughly two-to-one white-black voting age population. It split only the New Orleans and Baton Rouge metropolitan areas and extended the Fifth District around into the Florida Parishes, thereby creating the largest congressional district by land area in the country in a state with multiple districts.

33. By contrast, a plan offered by House and Governmental Affairs Committee chairman Democrat state Rep. Rick Gallot, HB 3, would have created a northern-most district of 54 percent white and 42 percent black, which perhaps not coincidentally contained his residence. Gallot, himself black, repeatedly stressed that drawing two M/M districts he believed would require unconstitutional gerrymandering,[5] so a swing district of sorts provided the best opportunity legally for blacks to maximize their ability to obtain representation. Gallot offered another plan, HB 4, that kept the same north Louisiana boundaries, but, unlike in HB 3, curtailed the Fourth District's southern reaches into the Florida Parishes and instead extended the Fourth into Acadiana.

34. Gallot argued that the key metric to avoid a determination by DOJ of retrogression would be that any M/M district have at least 60 percent black population. To this, a couple of prominent demographers, Greg Rigamer of New Orleans and Elliott Stonecipher of Shreveport, agreed.[6] Thus, any plan that featured a district below that marker was suspect.

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[5] Barrow, Bill. 2011. "Remap could change how race influences politics in Louisiana; Priority in redistricting is compliance with law." *New Orleans Times-Picayune*, Mar. 20: A1

[6] Ballard, Mark. 2011. "The Worst of Both Worlds?" *Baton Rouge Advocate*, Mar. 20: B07.

35. Besides jurisprudential factors, in comparing maps' adherence to reapportionment criteria for this cycle the Legislature used formal guidelines fashioned by Gallot's committee and a similar set from the Senate and Governmental Affairs Committee, whose chairman Republican state Sen. Bob Kostelka offered SB 2. This plan had the formal backing of Republican Gov. Bobby Jindal and of all the state's GOP congressional delegation save Landry and varied only slightly with the eventual Act 2.

36. The House panel's version established, among other principles, that "All redistricting plans shall respect the recognized political boundaries and natural geography of this state, to the extent practicable" and counseled "to minimize voter confusion, due consideration shall be given to traditional district alignments."[7] The Senate panel's version almost was identical, except it didn't contain the phrase "to minimize voter confusion."[8]

37. Other provisions in both — such as near zero-tolerance equiproportional populations by district, use of contiguous geography in these, and pledges of minority protections as jurisprudentially defined by the Constitution and statute — articulated the implicit principles used in the 2000 cycle and echoed the landscape of reapportionment in the American states.[9]

38. Only one dissenter surfaced. Backed by the LLBC[10], no party state Rep. Michael Jackson introduced HB 42 to create two M/M districts. That second such district under his plan, the Fifth, began in the northeast and traveled through the east central part of the state before

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[7] Louisiana Legislature. House of Representatives. 2011. *Committee on House and Governmental Affairs Committee Rules for Redistricting*. 2011 First Extraordinary Sess., Jan. 19. https://house.louisiana.gov/h_redistricting2011/2011_H&GA_REAPP%20RULES_ADOPTED.pdf.

[8] Louisiana Legislature. Senate. 2011. *Committee on Senate and Governmental Affairs Committee Rules for Redistricting*. 2011 First Extraordinary Sess., Feb. 16. https://senate.legis.state.la.us/reDist2011/Documents/rules.pdf.

[9] Eckman, Sarah J. "Congressional Redistricting Criteria and Considerations," Congressional Research Service Insight #11618 version 3. https://crsreports.congress.gov/product/pdf/IN/IN11618 (Nov. 15, 2021).

[10] Anderson, Ed. 2011. "Bill creates a second minority district; It also would realign the other five. *New Orleans Times-Picayune*, Mar. 31:A02.

filtering out to Baton Rouge and the western Florida Parishes. Instead of sending the Second District into Baton Rouge, it was sent due west into Lafayette, which with the Fifth, foisted a pincher movement on a finger of the majority white Third District emanating from the southeast. Thus, the Second bisected the New Orleans area and Lafayette, while the Fifth split Monroe, Alexandria, and Baton Rouge, creating in the latter a district with 55 percent black majority.

39. By the now-formally adopted principles, Rep. Jackson's map clearly respected neither recognized political boundaries nor traditional district alignments. Besides the substantial alterations to the Second and Fifth, the Sixth District retained little of its existing territory, and the other three saw substantial minorities of their existing land areas dispatched elsewhere. And obviously it did not meet Gallot's criterion.

40. Gallot's two maps, HB3 and HB4, fared better according to the principles. Their alignments split only Monroe and Natchitoches, besides the Baton Rouge and New Orleans areas, although HB 4 carved up the Capitol Area across four districts.

41. Yet the Senate – which recently had come under Republican control by virtue of several Democrats switching party affiliation – bucked the plan preferred by Jindal in favor of SB 3 by Democrat state Sen. Lydia Jackson. It followed Gallot's criterion with a 40 percent black population for the Fourth District running across the northern part of the state. However, in the process it put Shreveport exurbs into the same district as Lake Charles and Lafayette. Another district strung together Alexandria, Houma, and the New Orleans exurbs, although in the process separating Lafayette from nearby Opelousas and the east bank of the Red River from Alexandria's suburbs. As with all other plans splitting the New Orleans and Baton Rouge districts, it arguably adhered at least as well to the reapportionment principles.

42. Practically speaking, Sen. Jackson's bill separated Boustany and Landry but threw the Fourth District's Republican Rep. John Fleming together with the Fifth District's Republican Rep. Rodney Alexander. Sen. Jackson also resided in that proposed district. With unanimous support from black Democrats, white Democrats, and most of the white ex-Democrats, the Senate passed SB 3.[11]

43. However, spurred by the threat of a Jindal veto, Gallot's committee narrowly derailed that effort.[12] With his preferred SB 2 apparently locked up in the Senate, Jindal at first called on delaying congressional reapportionment until 2012[13] – when after state elections in the fall Republicans were expected to (and ultimately did) expand their narrow legislative majorities. But eventually Jindal swung his support to the similar bill HB 6 that became Act 2 (after representatives undid Senate changes that had put HB 6 in the same posture as SB 3, making for a second rescue of the bill since before heading to the Senate previously it already had survived an attempt to put it into the same posture as HB 42) with legislative leaders pleading to members that otherwise no congressional reapportionment bill this year would become law.[14]

44. Jindal signed HB 6 and, as in 2001, the LLBC protested to DOJ. On Aug. 1, 2011 DOJ confirmed preclearance of Act 2. An image of this plan is below:

[11] Louisiana Legislature. Senate. 2011. *Daily Journal*, First Extraordinary Sess. (Apr. 5): 244.
[12] Tilove, Jonathan. 2011. "Remap strains state GOP unity; Support for proposal cast as betrayal." *New Orleans Times-Picayune*, Apr. 8: A01.
[13] Barrow, Bill, 2011. "Jindal, congressmen call for delay of remap; Tensions over decisions mount." *New Orleans Times-Picayune*, Apr. 10: A01.
[14] Hasten, Mike. 2011. "Louisiana Legislature OKs congressional redistricting plan, sends to Jindal." *Alexandria Town Talk*, Apr. 14.

Map of Districts in Act 2

Conclusions on the 1990-2010 Reapportionment Cycles

45. From 1990 to 2010, the state's black population changed little proportionally, while actually the proportion of M/M districts of the whole increased due to reduction in the number of districts. Regardless of this static statewide black population proportion, claims for the necessity of having multiple M/M districts varied considerably depending upon the partisan and personal interests of the elected officials involved. While the early portion of the 1990 cycle was shaped decisively by DOJ insistence on maximizing M/M districts wherever possible, making policy-makers focus on race as the dominant criterion and using that for their own personal and partisan purposes, the post-Shaw environment that negated this interpretation saw dissension break out among black political elites in maintaining the necessity of two M/M districts. In 2000, the state's leading black elected official, a member of Congress, said he wanted a plan with only his single M/M district. In 2010, two influential black legislators attempted – and succeeded temporarily in one chamber on multiple occasions – passage of a plan deliberately designed to create a swing district instead of a second M/M district because they believed the latter could not

be drawn in a constitutional fashion due to that district not having at least 60 percent black population.

46. Throughout, because of Louisiana's demography that packs black residents mainly in its largest cities separated from 50 to 250 miles from each other and in corridors along the Mississippi River, between New Orleans and Baton Rouge and to a lesser extent northward, multiple M/M districts proposed were injurious to traditional reapportionment principles — most prominently preserving political subdivisions and existing boundaries — that by the 2010 cycle became codified. In each circumstance, race stood out as the only plausible explanation for why these districts took on the shapes they did – even, in a less intensive way, in the drawing of the 2010 swing districts. By contrast, the single M/M plans enacted minimized this disruption, limited only to division of the New Orleans and Baton Rouge metropolitan areas in an effort to create the sole M/M district.

47. Additionally, no offsetting reasons or compelling state interest existed to justify the greater disruption of reapportionment principles featured in multiple M/M plans. The 1990 cycle ended with court intervention to produce a single M/M district, born of the principle that to produce a map with two M/M districts gave race undue prominence as a reapportionment factor. This deliberate discrimination made other explanations for its boundaries appear as disingenuous rationalizations, such as trying to achieve partisan goals, fulfill incumbent wishes, cater to alleged commonality of socioeconomic interests, represent a mythical commonality of interest of people living on the same river, or recreate a district designed to reelect a congressman dead nearly a decade.[15] Shorn of those rationalizations, the nullified districts clearly segregated by race "could not be justified without strong evidence as to the lingering effects of

[15] Thyssen, pp. 177-79.

past discrimination or continuing legal prejudice in voting laws and procedures, coupled with specific remedies ….”[16] The evidence that wasn’t present in the 1990 cycle was just as absent for the 2000 and 2010 cycles, which again supplied insufficient justification to draw maps with another M/M district to the exclusion of the single M/M maps ultimately preferred by the majoritarian branches.

IV. 2020 CYCLE

48. Entering this cycle with six Republicans and one Democrat elected and one M/M district, 2020 Census data revealed little had changed from the previous decades: white non-Hispanic single race population was 55.75 percent; black non-Hispanic single race was 31.18 percent. This meant M/M representation remained 16.67 percent.

49. Thus, over the 1990-2020 period black non-Hispanic single race population had increased in proportion to the entire population only 0.58 points and actually had declined 1.12 points since 2000. Over the same period, among the state’s districts the proportion of M/M districts had risen from 14.28 percent to 16.67 percent.

50. For the 2020 cycle, the Louisiana Legislature in its 2021 Regular Session passed HCR 90 that became Joint Rule 21. This restated and made formal the principles followed in 2011. Besides requiring that “plans shall respect the established boundaries of parishes, municipalities, and other political subdivisions and natural geography of this state to the extent practicable,” it also added “this criterion is subordinate to and shall not be used to undermine the maintenance of communities of interest within the same district to the extent practicable.”[17] In effect, this meant map-drawers would put some weight on continuity of representation for

[16] *Hays v. State of Louisiana*, 862 F.Supp. 124 (1994).
[17] Louisiana Legislature. *Joint Rules*, JRULE 21. https://legis.la.gov/Legis/Law.aspx?d=1238755

communities of interest within existing districts formed over time because they traditionally had been represented in the same district. This would serve as a corollary to preferring to draw boundaries along existing lines, or as closely as possible to that.

51. The session, the 1st Extraordinary Session of 2022, following the familiar path this century, saw the passage of two identical congressional reapportionment plans that contained a single M/M district while rejecting several others that drew multiple such districts. Besides the novelty of having two identical plans sent to Democrat Gov. John Bel Edwards, the chief executive provided his own twist by vetoing both of them. That led to a historic veto session featuring the first-ever veto override in such a session of one of the bills, becoming Act 5 on Mar. 31, 2022. Almost immediately after, the plaintiffs sued.

52. Act 5 emulated in large part Act 2 of the 2011 1st ES, just as Act 10 of the 2001 2nd ES had copied fairly faithfully the 1996 court redraw. To accommodate population loss in the north relative to the south, some Florida Parishes previously split had their southern portions rolled into the Fifth District to become whole, and St. Martin Parish, which is geographically split into northern and southern portions by Iberia Parish, saw its southern part ceded from the Third District to the First District. St. Landry Parish also found itself split, with its eastern half moved from the Fourth District to the Fifth. A copy of the Act 5 map is below:

Map of Districts in Act 5

53. This fairly high degree of continuity thus largely replicated existing divisions of political subdivisions. Of the state's nine Census Bureau-defined Metropolitan Statistical Areas (MSAs) in the state – New Orleans-Metairie-Kenner, Baton Rouge, Lafayette, Shreveport-Bossier City, Houma-Bayou Cane-Thibodaux, Lake Charles, Monroe, Alexandria, and Hammond – five featured split parishes: New Orleans MSA among the First, Second, and Sixth Districts; Baton Rouge MSA between the Second and Sixth; Lafayette MSA between the Third and Sixth; Houma MSA between the First and Sixth, and Hammond MSA between the First and Sixth. In all, this created 11 split segments, and four MSAs kept whole parishes. The splits largely came as a consequence of drawing the M/M district and its ripple effects on others.

V. COMPARISONS WITH PLAINTIFFS' PLANS

54. Plaintiffs present three[18] illustrative plans that create two very narrow black majority population M/M districts. While they allege these maps do as well as, or slightly better than, the Act 5 map in keeping political subdivisions whole and together communities of interest by using some often-employed metrics for sizing up districts in reapportionment, more intuitive statistical measures and facial evidence show they do not, and they certainly do great violence to continuity of representation.

55. Several measures can evaluate to what degree a plan separates political subdivisions and communities of interest, which are built around proximate political subdivisions, stemming from a Willie Sutton[19] conceptualization: the more mapmakers elevate a criterion such as race to the forefront in drawing boundaries, the more the process disturbs the boundary integrity of the largest population centers, because that's where the people are to redistribute. Thus, measures to detect this must concentrate on how a map treats parishes within MSAs and the largest parishes statewide within those MSAs.

56. One way is to determine how many people are affected by splits among districts with a parish in an MSA. In a district where no parishes within an MSA are split with another district, that number would be zero indicating perfect integrity in preserving subdivisions and communities. The higher the raw number, the less fidelity is paid to keeping these whole.

57. Another indicator is assessing in a plan how many MSAs feature parish splits and to how many districts. For a map with perfect integrity, no parish within an MSA would be split

[18] There are actually four, but the sole Fairfax plan is so close to that of Illustrative Plan 1 of Cooper that for the purposes of this exposition and due to the limited time to prepare this report it will be treated as producing the same results.

[19] Although he denied actually ever saying it, infamous bank robber Willie Sutton supposedly answered a reporter, when asked why he robbed banks, with "Because that's where the money is." (https://www.fbi.gov/history/famous-cases/willie-sutton)

among districts. The more splits that occur, the less fidelity there is to keeping subdivisions and communities together. Making the measure more robust is detailing how many MSA parishes are split how many ways, where the more extra-fragmented MSAs exist in a plan, the less faithfully the plan protects subdivisions and communities.

58. Concentrating on the largest MSA parishes, greater protection of subdivisions and communities would occur where the fewest such parishes are split among districts, So, the more such parishes split, the less such protection a plan provides.

59. Data to evaluate Act 5 on these metrics, using voting-age population data, exists in its enrolled version, while plaintiffs provide such statistics for their Illustrative Plan 1 (IP1), Illustrative Plan 2 (IP2), and Illustrative Plan 3 (IP3). Table 1 presents for each MSA by district the number of people residing in a split parish in that MSA assigned to that district, for each of Act 5, IP1, IP2, and IP3.

Table 1:

MSA Split Parishes by Population in District, by Plan

Plan	MSA[20]	CD1	CD2	CD3	CD4	CD5	CD6	ALL
Act 5	NOMK	235717	466247				20930	
	BR		113181				379000	
	L			38250			1154	
	SBC							
	HBCT	84348					72276	
	LC							
	M							
	A							
	H	30157				71334		
	Totals	349772	579428	38250	0	71334	473860	1513094
IP1	NOMK	309702	435241				108135	
	BR		35960			169497	242382	

[20] NOMK = New Orleans-Metairie-Kenner (7 parishes); BR = Baton Rouge (9); L = Lafayette (5); SBC = Shreveport-Bossier City (3); HBCT = Houma-Bayou Cane-Thibodaux (2); LC = Lake Charles (2); M = Monroe (2); A = Alexandria (2); H = Hammond (1). Altogether these include over half of the state's parishes.

	L	27871		159943		48852		
	SBC							
	HBCT							
	LC							
	M				49519	70681		
	A				37318	61474		
	H							
	Totals	337573	471201	159943	86837	350504	350517	1756575
IP2	NOMK	392327	438390				61092	
	BR		7283			158183	282103	
	L		32249	151626				
	SBC							
	HBCT							
	LC							
	M				55388	64812		
	A				59346	39446		
	H							
	Totals	392327	477922	151626	114734	262441	343195	1742245
IP3	NOMK	263525	435241				154312	
	BR		35960			151830	260049	
	L	36287		146837		53542		
	SBC							
	HBCT							
	LC							
	M				61294	58906		
	A			56904		41888		
	H					61154	40337	
	Totals	299812	471201	203741	61294	367320	454698	1858066

60. Act 5 has the fewest total people affected by parishes within an MSA that are split among districts, while IP1 has 16 percent more, IP2 15 percent more, and IP3 23 percent more. Thus, Act 5 does the best job in keeping together subdivisions and communities.

61. Table 2 is derived from Table 1. It shows figures for the number of MSAs with split parishes and the kinds of splits. The most any MSA with split parishes was divided into was three districts, so accordingly it presents the number of MSA parish splits into three, two, and

zero districts, as well as the total number of splits endured (computable from divisions by multiplying the number of MSA splits by how many ways for each, then summing).

Table 2:

MSAs by Number of District Divisions Splitting Parishes, and Total Plan Splits

Plan	Three	Two	Zero	Splits
Act 5	1	4	4	11
IP1	3	2	4	13
IP2	2	3	4	12
IP3	3	3	3	15

62. While three plans kept four MSAs from having any of their parishes split among districts, Act 5 only allowed one three-way split (see previous discussion) while the plaintiffs' plans engineered more and with IP3 having one fewer zero split MSA. Again, having MSAs with fewer parish splits and across fewer districts signals better ability to protect subdivisions and communities of interest.

63. Table 3 provides details about whether the state's 14 largest parishes according to the 2020 Census – those with at least 100,000 residents that in total comprise about two-thirds of the state's population – are split among districts, by plan.

Table 3:

District Splits in a Parish for 100,000+ Population, by Plan

Parish	Act 5	IP1	IP2	IP3
East Baton Rouge	2	2	2	2
Jefferson	2	2	2	2
Orleans	2	2	2	2
St. Tammany	0	2	2	2
Lafayette	0	2	2	2
Caddo	0	0	0	0
Calcasieu	0	0	0	0
Ouachita	0	2	2	2
Livingston	0	0	0	0
Tangipahoa	2	0	0	2

Rapides	0	2	2	2
Bossier	0	0	0	0
Ascension	2	2	2	2
Terrebonne	2	0	0	0
Totals	12	16	16	18

64. Again, Act 5 injures the fewest large parishes, splitting only six (no parish was split into more than two districts in any plan). By contrast, IP1 and IP2 split eight, and IP3 divided nine.

65. A final indicator of whether a plan divides subdivisions and communities can come from distances between the central cities of the nine MSAs. A map whose districts carve these up to a greater degree will split the parishes of more central cities among its districts. Thus, if a hypothetical driver goes to each district on a mission to drive from each central city that has at least part of its parish in the district to every other, creating n(n-1)/2 treks where n equals the number of central cities with at least part of its parish in a district, the sum of these indicates how spread out the district is and makes for a propinquity argument: the farther apart distinct larger population centers of a district are, the less likely they are to share a community of interests. Therefore, the higher the sum, the less the districts adhere to preserving communities, and also likely indicate greater division of subdivisions and interests.

66. Tables 4 through 7 present the mileage for trips required by the districts in each plan and the total of these for the plan (to reduce confusion, these are reported in the two cells representing the poles of the trip even as it is only one journey, although if two districts require the same trip, then the figure is doubled, and so on; and because these are double-reported, for exposition's sake the total is divided by half). An empty row or column indicates that central city was not in a district with any other central city.

Table 4:

Miles Traveled[21] between All Central Cities in Districts under Act 5

Central city	NO	BR	S	L	LC	M	A	Houma	Hammond	Total/2
New Orleans		81						58	58	
Baton Rouge	81							85		
Shreveport										
Lafayette					75					
Lake Charles				75						
Monroe							97		208	
Alexandria						97			156	
Houma	58	85							86	
Hammond	58					208	156	86		
										904

Table 5:

Miles Traveled between All Central Cities in Districts under IP1

Central city	NO	BR	S	L	LC	M	A	Houma	Hammond	Total/2
New Orleans								58		
Baton Rouge				59		187	128		45	
Shreveport						100	125			
Lafayette		59			75	184	89			
Lake Charles				75						
Monroe		187	100	184			194			
Alexandria		128	125	89		194				
Houma	58									
Hammond		45								
										1244

[21] Computed at https://mileagemath.com/distance/louisiana and Google Maps.

Table 6:

Miles Traveled between All Central Cities in Districts under IP2

Central city	NO	BR	S	L	LC	M	A	Houma	Hammond	Total/2
New Orleans				135				58		
Baton Rouge						187	128		45	
Shreveport						100	125			
Lafayette	135				75					
Lake Charles				75						
Monroe		187	100				194			
Alexandria		128	125			194				
Houma	58									
Hammond		45								
										1047

Table 7:

Miles Traveled between All Central Cities in Districts under IP3

Central city	NO	BR	S	L	LC	M	A	Houma	Hammond	Total/2
New Orleans								58		
Baton Rouge				59		187	128		90	
Shreveport						100				
Lafayette		59			75	184	178		101	
Lake Charles				75			99			
Monroe		187	100	184			97		208	
Alexandria		128		178	99	97			156	
Houma	58									
Hammond		90		101		208	156			
										1720

67. As Table 4 makes obvious, Act 5 requires by far the least amount of driving miles. Going from central city to central city within each district of each plan would require only 904 miles, or 73 percent of the distance for IP1, 86 percent of the distance for IP2, and 53 percent of the distance for IP3, which at 1,720 miles is about the same amount of driving to get from New Orleans to Las Vegas, throwing in cruising the Strip a time or two.

68. Finally, on their faces the three illustrative plans pose problems, particularly with the additional M/M district outside of the New Orleans area termed the Fifth District. IP1 (reproduced below) grabs at Baton Rouge, Monroe, Alexandria, and Lafayette in a never-before-seen combination (Fifth), marries part of Baton Rouge to Hammond and half of St. Tammany (Sixth) while the other half finds itself part of a district (First) that wraps around south of New Orleans (only picking up New Orleans East and a bare sliver of the Orleans/Jefferson lakefront) that steams through bayou country to within a stone's throw of Lafayette, in the process trapping another district (Second) with the rest of Orleans and Jefferson tied to the River Parishes that separates West and East Baton Rouge – all novel combinations.

Figure 12

Illustrative Plan 1

69. IP2 (reproduced below) similarly scoops from Monroe, Alexandria and Baton Rouge and hurls itself across the northern border of the state, stopping only within a couple of dozen

miles from the southern border of Bossier City (Fifth). It creates another shotgun marriage of Baton Rouge and St. Tammany (Sixth) but at least in the wraparound district (First) with the rest of St. Tammany (and a somewhat bigger chunk of Jefferson) stops before Acadiana. Instead, the River Parishes district (Two) heads more westerly to let the Baton Rouge parishes to unite, but at the cost of capturing much of Lafayette and otherwise separating it from its suburbs, somehow uniting New Orleans' Little Woods neighborhood ragged beach on the shores of Lake Pontchartrain with the Atchafalaya River basin and its swamps, and connecting New Orleans jazz with Breaux Bridge zydeco – often conflated in movies, but never before in congressional representation.

Figure 14

Illustrative Plan 2

70. Perhaps the most audacious of all, IP3 (reproduced below) features the same strange bedfellows of Baton Rouge and St. Tammany (Sixth) and River Parishes tied to most of Orleans and Jefferson while keeping West and East Baton Rouge apart (Second), but then shoots for

topping the 1993-97 Fourth District's orgy of slicing and dicing by finding a way to stitch together Macon Ridge, the central hills, Cajun country, the strawberries of the Florida Parishes, and supposed Capitol Area sophistication by ingesting parts of Monroe, Alexandria, Lafayette, Baton Rouge, and Hammond that might cause its congressman when rambling around this district to become the first in history to rack up frequent flier miles to travel among all of its central cities (Fifth).

Figure 16

Illustrative Plan 3

71. Using refined mathematical measurements, plaintiffs may assert their maps don't seem unusual and perform even better on those metrics than Act 5, leading them to claim they fulfill better criteria such as protecting subdivisions and interests. But these induce a kind of ecological fallacy; not all subdivision splits are created equally. Compared to Act 5, their plans aggressively dissect most of the state's largest central cities and metropolitan areas and then, in a manner admonished against in Miller v. Johnson, sew the remains into a patchwork of

communities hundreds of miles apart and metaphorically millions of miles separated from each other in all of social, cultural, and economic terms.

72. More intuitive statistical measures and tests capture how plaintiffs' plans, compared to Act 5, create districts more dismissive of traditional boundaries, continuity of representation, and of maintaining community interests in their zeal to divide large such communities so as to tie their separate parts to the separated parts of other such communities rendered the same way, a perception reinforced by observing the maps that create unions and divisions not witnessed for a quarter century by a strategy later deemed unconstitutional. Their end products appear understandable only through the lens of race, as the product of a search party combing the state for people of particular races and bringing some together while fencing others off to achieve a certain demographic end.

I declare under penalty of perjury that the foregoing is true and correct. 28 U.S.C. § 1746

Jeffrey D. Sadow
Bossier City, LA
Apr. 29, 2022

Exhibit A

VITAE

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EDUCATION

ACADEMIC CAREER

B.A. (Public Administration & Political. Science)	University of Oklahoma, 1983
M.B.A. (Management Information Systems & Finance)	Vanderbilt University, 1985
Ph.D. (Political Science)	University of New Orleans, 1990

Dissertation Title: "Structure and Clarity in Ideological Identification," directed by Dennis W. Gleiber.

AREAS OF SPECIALIZATION

Political Behavior, with a concentration in political communication, American political behavior (voting and state), and political psychology.

International Relations, with a concentration in the South Pacific, gaming-simulations, and theory.

Political Theory, with a concentration in conservative thought, contemporary theory, and liberal theory.

EMPLOYMENT

ACADEMIC APPOINTMENTS

Associate Professor of Political Science, Louisiana State University in Shreveport, 1997-present

Assistant Professor of Political Science, Louisiana State University in Shreveport, 1991-97.

Adjunct Professor of Political Science, University of Illinois at Springfield, 2000-01.

Visiting Professor of Political Science, Centenary College, 2000, 2005.

Visiting Professor of Political Science, Southern University-Shreveport, 1991.

Assistant Professor of Political Science, University of Mississippi, 1990-91.
Assistant Professor of Political Science, University of Alabama in Huntsville, 1989-90.
Visiting Assistant Professor of Political Science, University of Southern Mississippi, 1989.
Teaching Assistant in Political Science, University of New Orleans, 1987-88.

COURSES TAUGHT

Undergraduate

American Government (freshman and sophomore levels; classroom and Internet)
American Legislative Process (classroom)
European Politics (classroom and Internet)
Introduction to International Studies (team taught; classroom)
Introduction to Political Science (classroom and Internet)
Louisiana Government (classroom and Internet)
Political Parties and Interest Groups (classroom)
Research Methods in the Social Sciences (classroom and Internet)
Sources and Methods in History (guest lecturer; classroom)
State and Local Politics (classroom)
Third World Politics (classroom and Internet)
The United States and the United Nations (classroom)
Urban Politics (classroom)
Western Political Thought (Internet)

Graduate/Undergraduate

Balkan History from 1879 (compressed video facilitator; classroom)
International Organizations (classroom and Internet)
International Politics (classroom and Internet)
Introduction to Public Administration (classroom)
Political Behavior (classroom and Internet)
Politics of the Cinema (classroom, compressed video, and Internet)
Public Policy and Evaluation (classroom and Internet)
U.S. Foreign Policy from World War II (classroom and Internet)

Graduate

Public Policy Evaluation (classroom)
Data Administration in Human Services Organizations (Internet)
Nonprofit Governance and Decision-making (correspondence)
Tutorial in International Law (classroom)

RESEARCH EXPERIENCE

Research Director, Louisiana Community Policing Institute, 1997-1998.
ICPSR quantitative methods coursework, 1987 and 1989.
Research assistant for Professors Steven Shull and Robert Jordan, Fall, 1986 through Summer, 1987, and Summer, 1988.
Intern, University of New Orleans Poll, under the direction of Professor Susan Howell, developing survey research instruments and assisting in poll management, Fall, 1986.

OTHER EXPERIENCE

First Commerce Corp., New Orleans, LA., 1985-86.

Department Manager, Official Items, for $4 billion bank holding company, supervising seven employees handling $68 million in accounts including all State of Louisiana items.

The Oklahoma Daily, Norman, OK., 1980-83.

Editor-in-Chief, Copy Chief, copy editor, reporter.

MANUSCRIPTS

ARTICLES -- EDITED VOLUMES

"Delivery Models for Curricula within the American Humanics Programs," with N. Dolch, R. Kidwell, and J. Smith, in Michael O'Neill and Kathleen Fletcher, eds. *Nonprofit Management Education: A U.S. and World Perspective*. Greenwood, 1998.

"Delivery Models for Curricula within the American Humanics Programs," with N. Dolch, R. Kidwell, and J. Smith, in "Nonprofit Management Education 1996: A U.S. and World Perspective." San Francisco: Institute for Nonprofit Organization Management, 1996.

ARTICLES -- REFEREED JOURNALS

"The Nature of Nonprofit Graduate Education: Models of Curriculum Delivery," (with Norman A. Dolch, Marvin Ernst, John E. McClusky, and Rosanne Mirabella) in *Nonprofit and Voluntary Sector Quarterly*, (Dec., 2007) 36:4 (supp): 28-50.

"Partisanship, Chauvinism, and Reverse Racial Dynamics in the 2003 Louisiana Gubernatorial Election," in The Forum, Spring, 2005: article 5.

"Viewing Political Film in an Almost-Empty Theater," in *EPS: European Political Science*, Spring, 2002:62-64.

"David Duke and Black Threat: Laying to Rest an Old Hypothesis Revisited," in *American Political Review*, Spring, 1996:58-69.

"Pedagogical Problems in Playing Planetary Politics," in *Simulation and Gaming*, Sep., 1991: 373-81.

ARTICLES -- EDITED JOURNALS

"The Effects of the 1978 Shreveport Charter Change," *The Northwestern Louisiana Historical Association Journal*, Winter, 1996: 41-57.

"America, the South Pacific, and Benign Neglect," *Asian Thought and Society*, May, 1990: 236-48.

"Computer Applications in Teaching International Political Interaction," (principal author) with R.S. Jordan and P. Sanchez-Navarro, *The Political Science Teacher*, Winter, 1989: 8-11

BOOK REVIEWS

Feldman, Glenn. *The Great Melding: War, the Dixiecrat Rebellion, and the Southern Model for America's New Conservatism*, in *Louisiana History*, Spring, 2017: 247-49.

Lockerbie, Brad. *Do Voters Look to the Future? Economics and Elections*, in *American Political*

Review, Jun., 2009.
Butler, Daniel Allen. *The Other Side of the Night*, in *The Northern Mariner*, Jul., 2009: 346-48.
Steinberger, Peter J. *The Concept of Political Judgment*, in *Political Psychology*, Mar., 1995: 207-210.
Lal, Victor. Fiji: *Coups in Paradise*, in the *American Political Science Review*, Dec. 1991: 1486-87.
Pugh, Martin C. *The ANZUS Crisis, Nuclear Visiting, and Deterrence*, in the *American Political Science Review*, Dec. 1990: 1473-75.
Dean, Eddie and Stan Ritova. *Rabuka: No Other Way*, in *Asian Thought and Society*, Oct. 1990: 324-26.

MONOGRAPHS
"The Provision of the Right to Counsel in Caddo Parish, Louisiana," with Bernadette Jones Palombo. July, 2004. Underwritten by the Southern Poverty Law Center and the Open Society Institute.

REFERENCE ENTRIES
"Life-Cycle Effect," in Warren, Kenneth F., ed., *The Encyclopedia of Campaigns, Elections, and Electoral Behavior*. Sage Publications, 2008.

PAPERS PRESENTED
"The 'Obama Effect' and its Impact on the 2008 Louisiana Elections," at the Louisiana Political Science Association annual meeting, Apr. 3, 2009.
"Term Limits and Their Effects on Legislators' Voting Behavior Relative to Their Districts," at the Southern Political Science Association annual meeting, Jan. 9, 2009.
"Racism and Chauvinism as Competing Explanations for Bobby Jindal's Statewide Election Results," at the Louisiana Political Science Association annual meeting, Feb. 8, 2008.
"After the Perfect Storm: Displacement and Term Limits in the 2007 Louisiana State Elections," at the Southern Political Science Association annual meeting, Jan. 12, 2008.
"The Perfect Storm: Louisiana State Elections in 2007," at the Southern Political Science Association annual meeting, Jan. 6, 2007
"Online Instruction's Impact on Power Conceptualizations In and Out of the 'Classroom,' at the American Political Science Association annual meeting, Aug. 31, 2006
"Moving the Curriculum Online: Initial Impression of a Case Study," at the Transformation, Teaching, Leading, and Research in Challenging Times Conference, Apr. 21, 2006
"The Abnormal Vote in Louisiana's Coming Elections," at the Louisiana Political Science Association annual meeting, Mar. 3, 2006
"The Provision of the Right to Counsel in Caddo Parish, Louisiana," with Bernadette Jones Palombo, at the Academy for Criminal Justice Sciences annual meeting, Mar. 17, 2005.
"Where and Whom with You Sit Affects Where You Stand: Racial Dynamics in the 2003 Louisiana Gubernatorial Election," at the Southern Political Science Association annual meeting, Jan. 8, 2005.
"An Experimental Study on Cinema's Effects on Political Attitudes," at the Southern Political Science Association annual meeting, Jan. 10, 2004.

"Terror in the Aisles – on Planes, Trains, in Theaters, and within the Public's Mind," at the American Political Science Association annual meeting, Aug. 30, 2002.
"Teaching Political Film in an Empty Theater," at the ECPR 2001 conference, Sep. 8. 2001.
"Political Film and Political Attitudes," at the American Political Science Association annual meeting, Sep. 1, 2001
"Presidential Candidate Websites: A Test of the Uses and Gratifications Theory of Internet Campaigning," at the Illinois Political Science Association annual meeting, Nov. 11, 2000.
"Coups, South Pacific Style," at the International Studies Association-Midwest annual meeting, Oct. 27, 2000.
"A Uses and Gratifications Theory of Internet Campaigning," at the American Political Science Association annual meeting, Sep. 1, 2000.
"Political Campaigning on the Internet: The Revolution that Isn't, Yet," (principal author), with K. James, at the Southwestern Political Science Association annual meeting, Mar. 16, 2000.
"Virtual Billboards? Candidate Web Sites and Campaigning in 1998," (principal author) with K. James, at the American Political Science Association annual meeting, Sep. 3, 1999.
"You Can Take the Islander Out of the Pacific, but Can You Take the Pacific Out of the Islander," at the Pacific Islands Political Studies Association biannual meeting, Dec. 7, 1998.
"The Three Faces of Power and Subversion in The Manchurian Candidate," at the American Political Science Association annual meeting, Sep. 6, 1998.
"Levels of Political Knowledge and Local Voting," at the Southwestern Political Science Association annual meeting, Mar. 19, 1998.
"Effectiveness of Campaign Techniques in Local Elections," at the Louisiana Political Science Association annual meeting, Feb. 27, 1998.
"Utilization of the World Wide Web as a Communicator of Campaign Information," with K. James, at the American Political Science Association annual meeting, Aug. 30, 1997.
"Elite Endorsement Effects in Local Elections," at the American Political Science Association annual meeting, Sep. 1, 1996.
"Delivery Models for Curricula within the American Humanics Programs," with N. Dolch, R. Kidwell, and J. Smith, at the Nonprofit Management Education 1996: A U.S. and World Perspective conference, Mar. 15, 1996.
"'Black Threat' and Southern Urban Voting," at the Louisiana Political Science Association annual meeting, Mar. 7, 1996.
"Plugged In: Computer Conferencing Information's Effect on 1994 Voting Behavior," at the American Political Science Association annual meeting, Sep. 1, 1995.
"How Do National Factors Affect Local Elections," at the Southwestern Political Science Association annual meeting, Mar. 24, 1995.
"The Subversive Effects of the 1978 Shreveport Charter Change," at the Louisiana Political Science Association annual meeting, Mar. 3, 1995.
"Hot Air or Hot Button: Talk Media and Their Relationship to Political Attitudes," at the Southern Political Science Association annual meeting, Nov. 5, 1994.
"Beavis and Butt-head's Shaping of Political Attitudes," at the Southwestern Political Science Association annual meeting, Mar. 31, 1994.

"Benign to Total Neglect? U.S.-South Pacific Relations in the Post-Soviet Era," at the Pacific Islands Political Studies Association biannual meeting, Dec. 7, 1993.
"Mainstreaming or Extremimg: Television and Political Orientation," at the Southwestern Political Science Association annual meeting, Mar. 19, 1993.
“Protest Candidates in Recent Louisiana Elections," at the Louisiana Political Science Association annual meeting, Mar. 4, 1993.
"An Ideological Public of Non-Ideologues," at the Southern Political Science Association annual meeting, Nov. 6, 1992.
"Racism or Resentment and the David Duke Supporter," at the American Political Science Association annual meeting, Aug. 30, 1992.
"PC: Do Students Fear It or Want to Own One?", at the Southwestern Political Science Association annual meeting, Mar. 28, 1992.
"The Politics of Plato, Jane Fonda, and Do Students Give a Damn," at the Western Political Science Association annual meeting, Mar. 19, 1992.
"Determinants of Radicals' Differing Partisanships and Political Attitudes," (principal author) and B. R. Gitz, at the Northeastern Political Science Association annual meeting, Nov. 15, 1991.
"Status or Race Polarization and Today's Voter," at the American Political Science Association annual meeting, Aug. 29, 1991.
"Information Legislators Use to Redistrict," at the Midwest Political Science Association annual meeting, Apr. 20, 1991.
"Some of the People None of the Time," (principal author) and B. R. Gitz, at the Midwest Political Science Association annual meeting, Apr. 19, 1991.
"Candidate Success Routes and Political Party Relevance," at the Alabama Political Science Association annual meeting, Apr. 6, 1991.
"Gender Differences and Personal Freedom," at the Southern Political Science Association annual meeting, Nov. 9, 1990.
"1988 as an I-word Election," at the Midwest Political Science Association annual meeting, Apr. 7, 1990.
"I Come Not to Praise Constraint, But to Bury It," at the Southwestern Political Science Association annual meeting, Mar. 28, 1990.
"Reaffirmation, Reelection, and Reptiles," at the Southern Political Science Association annual meeting, Nov. 4, 1989.
"Modeling God as an International Political Actor, or Pedagogical Problems in Playing Planetary Politics," (principal author) and M. S. Ziegler, at the International Studies Association-South annual meeting, Nov. 3, 1989.
"What is Ideological Identification, Thought Process or Mass Belief System," at the American Political Science Association annual meeting, Sep. 3, 1989.
"Extrapolitical Ideas in the Origins of Ideological Identification," at the Midwest Political Science Association annual meeting, Apr. 15, 1989.
"Strong Democracy as Thin Democracy," at the Northeastern Political Science Association annual meeting, Nov. 11, 1988.
"A Conservative Public Explained: Tired Symbols or Unclear Meanings," at the Southern Political Science Association annual meeting, Nov. 4, 1988.

"Benign Neglect: the Neglected Strategy in U.S. Foreign Policy towards the South Pacific," at the Southern Political Science Association annual meeting, Nov. 3, 1988.
"Partisanship Socialization in the Urban South," at the Louisiana Political Science Association annual meeting, Mar. 12, 1988.
"The Formation of Partisan and Ideological Identification in France Using a Volition-Based Model," at the Southern Political Science Association annual meeting, Nov. 5, 1987.
"Racial Differences in the Adoption of Partisanship and Ideology," at the Louisiana Political Science Association annual meeting, Mar. 28, 1987.

PROFESSIONAL ACTIVITIES

JOURNALS AND PUBLISHERS

Reviewer, *Politics and Policy,* 2009, 2010, 2011
Reviewer, Lexington Books, 2007.
Associate Editor, Politics and Policy, 2001-02.
Referee, American Politics Quarterly, 2002.
Reviewer, Longman Publishing, 2001.
Referee, Journal of Politics, 1999.
Reviewer, Harcourt Brace College Publishers, 1996-97.
Referee, Harvard Journal of Press and Politics, 1996.
Referee, Southeastern Political Review, 1995-98.
Referee, Political Research Quarterly, 1993.
Referee, Quarterly Journal of Ideology, 1992, 1997, 2002.
Referee, American Journal of Political Science, 1990.

CONFERENCES

Discussant and chair, “American Politics,” Louisiana Political Science Association annual Meeting, Mar. 2, 2013
Discussant and chair, “American Politics,” Louisiana Political Science Association annual meeting, Feb. 25, 2012.
Chair, “International Relations,” Louisiana Political Science Association annual meeting, Feb. 25, 2012.
Discussant and chair, “Louisiana at 200: Institutional Evolution,” Southern Political Science Association annual meeting, Jan. 14, 2012.
Participant, roundtable discussion, “Louisiana Politics,” Southern Political Science Association annual meeting, Jan. 14, 2012.
Participant, roundtable discussion, “Redistricting in Louisiana,” Southern Political Science Association annual meeting, Jan. 8, 2011.
Participant, roundtable discussion, “Presidential Primary Election of the U.S. and South Korean President,” Southern Political Science Association annual meeting, Jan. 9, 2009.
Participant, roundtable discussion “Revenge of the Republicans,” Southern Political Science Association annual meeting, Jan. 12, 2008.
Participant, roundtable discussion “Louisiana Political Developments in 2007,” Southern Political Science Association annual meeting, Jan. 6, 2007.

Discussant, It's Showtime: Political Elections in Film roundtable, American Political Science Association annual meeting, Sep. 3, 2004.
Instructor, Using Film to Teach Political Concepts short course, American Political Science Association annual meeting, Aug. 27, 2003.
Chair, International Politics panel, Louisiana Political Science Association annual meeting, Mar. 7, 2003.
Chair, Media Politics panel, Southwestern Political Science Association annual meeting, Mar. 30, 2002.
Discussant, Rights, Preferences, and Behavior panel, Louisiana Political Science Association annual meeting, Feb. 15, 2002.
Chair, Parties, Elections, and the Internet panel, Southwestern Political Science Association annual meeting, Mar. 16, 2000.
Discussant, Legislative Elections and Political Parties panel, Southwestern Political Science Association annual meeting, Mar. 16, 2000.
Chair and Discussant, Electoral Politics panel, Louisiana Political Science Association annual meeting, Dec. 3, 1999.
Chair, Women in the Political System panel, Visible Women in the South Conference, Louisiana State University in Shreveport, Oct. 23, 1998.
Chair and Discussant, Dimensions of Political Issues and Communication panel, Southwestern Political Science Association annual meeting, Mar. 28, 1997.
Discussant, Roundtable on Undergraduate Education, Louisiana Political Science Association annual meeting, Mar. 7, 1997.
Discussant, Interplay of Influence: Media, Citizens, and Government in a Changing Communications Environment panel, American Political Science Association annual meeting, Aug. 31, 1996.
Discussant, Norms in Legislative Bodies panel, Southwestern Political Science Association annual meeting, Mar. 23, 1996.
Discussant, Issue Salience and Mass Political Behavior panel, Western Political Science Association annual meeting, Mar. 15, 1996.
Discussant, Creating the Model Four-Year Curriculum in Political Science roundtable, Louisiana Political Science Association, Mar. 8, 1996.
Discussant, Running for the Hill: Elections for the House and Senate panel, Southwestern Political Science Association annual meeting, Apr. 1, 1994.
Conference Chairman, Louisiana Political Science Association annual meeting, Mar. 3-5, 1994, Long Beach, MS.
Discussant, International Politics panel, Louisiana Political Science Association annual meeting, Mar. 4, 1994.
Discussant, Politics of Racial Conflict panel, American Political Science Association annual meeting, Aug. 31, 1992.
Discussant, Psychological Ramifications of the Gender Gap panel, Northeastern Political Science Association annual meeting, Nov. 14, 1991.
Moderator, 9th and 10th or the Forgotten Amendments panel, Louisiana State University in Shreveport Fall Forum, Sep. 19, 1991.
Discussant, Diffusion of Campaign Techniques panel, American Political Science Association annual meeting, Aug. 30, 1991.

Discussant, roundtable on Political Parties in Mississippi, Mississippi Political Science Association annual meeting, Feb. 16, 1991.

Chairman and discussant, Political Information and Networks panel, Southwestern Political Science Association annual meeting, Mar. 28, 1991.

Discussant, Political Context and Attitudes panel, American Political Science Association annual meeting, Aug. 30, 1990.

Discussant, International Relations panel, Louisiana Political Science Association annual meeting, Mar. 12, 1988.

GRANTS

Student Technology Fee Grant, Louisiana State University Shreveport, "Upgrade Computer Lab in BH304," $20,786 in 2016.

Student Technology Fee Grant, Louisiana State University Shreveport, "Projector and Monitor: BH 301," $1,031 in 2015.

Student Technology Fee Grant, Louisiana State University Shreveport, "Projector: BH 461," $1,055 in 2014.

Student Technology Fee Grant, Louisiana State University Shreveport, with G. Joiner, C. Hale, C. White, and H Wise. "Projector: BH 301," $982 in 2013.

Student Technology Fee Grant, Louisiana State University Shreveport, with G. Joiner, C. Hale, C. White, and H. Wise. "BH101, BH 461 and BH 463 smart classroom upgrades." $2,835 in 2012.

Student Technology Fee Grant, Louisiana State University Shreveport, with G. Joiner, C. Hale, C. White, and H. Wise. "Bronson Hall 108 Smart Classroom II," $2,962 in 2012.

Student Technology Fee Grant, Louisiana State University Shreveport, with R. Arnold, G. Joiner, C. Hale, C. White, and H. Wise. "Bronson Hall 108 Smart Classroom," $3,889 in 2009.

Student Technology Fee Grant, Louisiana State University Shreveport, with R. Arnold, G. Joiner, C. Hale, C. White, and H. Wise. "Bronson Hall 101 Smart Classroom," $4,031 in 2008.

Student Technology Fee Grant, Louisiana State University Shreveport, with R. Arnold, G. Joiner, and C. White, "Classroom Smart Cart," $4,650 in 2006.

Louisiana Board of Regents Support Fund Grant, Louisiana Board of Regents, with M. Conway and L. Krajewski, "Curriculum Development for Comparative Culture," $13,066 in 2003.

Student Technology Fee Grant, Louisiana State University in Shreveport, Blackboard/Internet Access Classroom in Bronson Hall 465, $5,969 in 2003.

Faculty Development Grant, Louisiana State University in Shreveport, for travel to one professional meeting, $250 in 2001.

Faculty Development Grant, Louisiana State University in Shreveport, for travel to one professional meeting, $400 in 1999.

Faculty Research Grant, Louisiana State University in Shreveport, for "Candidate Web Site Survey," $500 in 1999.

Faculty Research Grant (with K. James), Louisiana State University in Shreveport, for "Candidate Web Site Survey," $500 in 1998.

Faculty Development Grant, Louisiana State University in Shreveport, for equipment purchase, $150 in 1997.
Faculty Development Grants, Louisiana State University in Shreveport, for travel to three professional meetings, $800 in 1996.
Southwest Institute for Research on Women, The University of Arizona, "Enlarging our World View: Undergraduate Education and the Middle East" Conference travel stipend, $720 in 1994.
Eisenhower Leadership Training Program, U.S. Department of Education, Project Manager for LSU-S Leadership Studies Program A. McLaurin, director), $162,914 in 1994.
Faculty Research Grant, Louisiana State University in Shreveport, for "American Mass Popular Culture and Its Effects on the Political Values of American Youths" $500 in 1993.

HONORS

Best in Conference Award, for paper presented at the Transformations: Teaching, Leading, and Researching in Challenging Times Conference, 2006.
Louisiana State University in Shreveport Foundation Faculty Excellence Award, 1994-95.
President and Vice-President, Epsilon Rho chapter of Pi Sigma Alpha, 1987-89.
Member, Pi Sigma Alpha.

PROFESSIONAL ASSOCIATIONS

Offices

Treasurer, Louisiana Political Science Association, 2001-present.
Executive Council, Louisiana Political Science Association, 1998-present.
Webmaster and Executive Governing Committee member (ex-oficio), International Society for Political Psychology, 2000-2004.
Executive Committee, Conference Group on Film and Politics, 1998-2004.
Membership Director, Conference Group on Film and Politics, 2000-2004.
President, Louisiana Political Science Association, 1994-95, 2000-2001.
Vice President, Louisiana Political Science Association, 1993-94, 1999-2000.

Memberships

American Political Science Association
Politics, Literature, and Film Section (APSA)
International Society for Political Psychology
Louisiana Political Science Association
National Association of Scholars

SERVICE

PROFESSIONAL

Secretariat, Model Illinois Government, 2000-01.

UNIVERSITY

University

Member, Graduate Council, LSU in Shreveport, 1997-2000, 2002.
Member, Graduate Human Services Administration Executive Committee, LSU in Shreveport, 1999-2002.
University Grievance Committee, LSU in Shreveport, 1999-2000.
Chairman, Courses and Curriculum Committee, LSU in Shreveport, 1994-98, 2007-09.
Secretary, Courses and Curriculum Committee, LSU in Shreveport, 1993-94.
Member, Courses and Curriculum Committee, LSU in Shreveport, 1992-98, 2006-09.
Member, General Education Requirements Committee, LSU in Shreveport, 2007-09.
Member, Distance Learning Committee, LSU in Shreveport, 1995-1997.
Member, American Humanics Advisory Board, LSU in Shreveport, 1994-2002.
Member, Southern Association of Colleges and Schools Undergraduate Curriculum Self-Study Committee, LSU in Shreveport, 1992-93.

College

Member, College of Liberal Arts Educational Requirements Review Committee, 2007.
Member, College of Liberal Arts Courses and Curriculum Committee, LSU in Shreveport, 1992-1998.
Member, International Studies Committee, LSU in Shreveport, 1991-2000.
Member, Computer Services Search Committee, LSU in Shreveport, 1995.
Member, Board of Public Issues Forum, LSU in Shreveport, 1993-1994.

Department

Chairman, Department of History/Social Sciences Technology Committee, 2005-present.
Chairman, Department of History/Social Sciences Curriculum Review Committee, 2005-present.
Member, Department of History/Social Sciences Recruitment and Retention Committee, 2005-present.
Member, Departmental Search Committees, 2000-08.

Other

Adviser, Model Illinois Government, University of Illinois in Springfield, 2000-01.
Adviser, Model United Nations, University of Illinois in Springfield, 2000-01.
Adviser, College Republicans, LSU in Shreveport, 1992-1995; 2003-04.
Adviser, International Studies Club, LSU in Shreveport, 1992-93.
Adviser, Political Science Club, University of Alabama in Huntsville, 1989-90.
Adviser, Sigma Chi Gamma social fraternity, University of Alabama in Huntsville, 1990.
Adviser, Delta Iota Chi social fraternity, University of New Orleans, 1989.

COMMUNITY

Lecturer, "2016 Elections," Shreveport Building Owners and Managers Association, Sep. 9, 2016.
Lecturer, "Looking to 2013 in Louisiana Politics," Shreveport Downtown Optimists, Dec. 13, 2012
Lecturer, "Bill Passage in the Louisiana Legislature," Northwest Louisiana Professional Civil Law Notary Association, May 1, 2012
Lecturer, "Louisiana Retirement System Reform," We the People of Northwest

Louisiana, Apr. 24, 2012
Lecturer, “2010: Budget Deficits All Around,” Southwest Shreveport Rotary, Jan. 14, 2010
Lecturer, “2008 Elections and Beyond,” West Shreveport Rotary, Jan. 23, 2009.
Lecturer, “2008 Elections and Beyond,” East Shreveport Rotary, Jan. 20, 2009.
Lecturer, “2007 Session and Elections,” Benton Lions Club, Jul. 11, 2007.
Lecturer, “2007 Session and Elections,” Southwest Shreveport Rotary, Mar. 15, 2007.
Lecturer, “2007 Session and Elections,” Red River issues Group, Mar. 6, 2007
Lecturer, “2007 Session and Elections,” Shreveport Downtown Optimists, Mar. 3, 2007.
Lecturer, “2007 Session and Elections,” Bossier Republican Women’s Club, Feb. 27, 2007.
Lecturer, “2004 Elections,” Sons of the American Revolution, Jun. 22, 2004.
Lecturer, “Louisiana Senate Contest,” Caddo Parish Professional Women’s Club, Shreveport, LA, Dec. 3, 2002.
Lecturer, “Fiscal Reform in Louisiana,” Caddo Parish Republican Political Action Committee, Shreveport, LA, Dec. 4, 2001.
Lecturer, “The Middle East and Terrorism,” Southwest Shreveport Rotary Club, Shreveport, LA , Oct. 18, 2001.
Lecturer, “The War on Terrorism,” Bossier Parish Republican Political Action Committee, Bossier City, LA, Oct. 2, 2001.
Lecturer, "1998 Elections," West Shreveport Rotary Club, Shreveport, LA, Jul. 8, 1998.
Lecturer, "1998 City Elections," Downtown Optimists Club, Shreveport, LA, Jun. 5, 1998.
Lecturer, "1998 Mayor's Contest," North Shreveport Lions Club, Shreveport, LA, Mar. 26, 1998.
Lecturer, "1997 Louisiana Legislative Actions," Sons of the American Revolution, Shreveport, LA, Jun. 24, 1997.
Lecturer, "The Second First 100 Days of the Clinton Administration," Women's Department Club, Minden, LA, May 6, 1997.
Lecturer, "1996 Elections," East Shreveport Rotary Club, Nov. 4, 1996.
Lecturer, on "Women's Political Participation," Captain Shreve High School, May 15, 1996.
Panelist, "Affirmative Action," Women's History Week at LSU-S, Mar. 12, 1996.
Lecturer, on "Local Northwest Louisiana Politics," Junior League of Caddo/Bossier, Mar. 1, 1996.
Lecturer, on "Recent Third World Leaders," Captain Shreve High School, Dec. 6, 1995.
Lecturer, on "National and State Politics through 1996," Women's Department Club, Minden, LA, May 4, 1995.
Lecturer, on "Getting into the College of Your Choice," Shreveport Booker T. Washington High School 4-H Club, Nov. 16, 1994.
Lecturer, on "1994 Elections in Caddo Parish and the U.S.," West Shreveport Rotary Club, Nov. 9, 1994.
Instructor, Shreveport/Bossier Chamber of Commerce Political Training Institute, Jun.-Jul., 1994.

Panelist, "Robert Oakley on Somalia," Public Issues Forum, Louisiana State University in Shreveport, Feb. 21, 1994.
Consultant, Caddo Parish Sheriff's Office, 1993.
Moderator, "Face to Face: Sexual Harassment in the Wake of the Hill/Thomas Confrontation," Louisiana State University in Shreveport Symposium, Mar. 16, 1993.
Judge, Red River Debate Classic, 1993-98, 2001-02.
Panelist, "The New World Order," Magale Library Forum, Centenary College, May 7, 1992.
Lecturer, on "Presidential Primary Wrap-Up," College of Liberal Arts Forum, LSU in Shreveport, Apr. 23, 1992
Lecturer, on "David Duke as Political Priest or Pied Piper," College of Liberal Arts Forum, LSUS in Shreveport, Mar. 17, 1992.
Panelist, Louisiana Legislative Reapportionment Forum, Jan.-Feb., 1992, in Shreveport, New Orleans, and Baton Rouge, LA. (three sessions).
Judge, Louisiana State Exhibit Museum essay contest, 1991.
Lecturer, on "The 1988 Presidential General Election Campaign," College of Liberal Arts Forum, University of New Orleans, Oct. 16, 1988.

MEDIA

Weekly political columnist, for The Oklahoma Daily, 1982-83; Vanderbilt Hustler, 1983-85; New Orleans Driftwood, 1986-90; The Times of Shreveport, Bossier City, and the Ark-La-Tex, 1997-98; The Westside Reader, 2007-2015; The Houma Daily Courier, 2008-2015; Hanna Publications, 2013-present; Fax-Net Update, 2001-2017; The Baton Rouge Advocate, 2015-2019; The Minden Press-Herald, 2018; The Caddo Inquisitor, 2019-2020.
Occasional political columnist, for the Times, Forum Magazine; PoliticsLa.com (2003-2004); BayouBuzz.com, 2004-2016; BossierNow, 2020-present.
Blogger, Between the Lines (http://jeffsadow.blogspot.com) and Louisiana Legislature Log (http://laleglog.blogspot.com)
Political analyst for local television and radio stations and newspapers; statewide public television; several regional, national, and international newspapers, magazines and wire services; and for Louisiana statewide radio stations and networks and Texas radio stations, 1990-present (approximately 475 appearances).
Consultant, Shreveport Times and KTBS-TV poll operations, 1994-96.
Commentator, bi-weekly talk radio show, KEEL-AM 710, Shreveport, 2002.
Commentator, weekly talk radio show, KBCL-AM 1070, Shreveport, 1993-2000.
Host, daily talk radio show, KBCL-AM 1070, Shreveport, 1996-1999.
Commentator, various cable access television shows, 1993-2016.