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

DECLARATION OF JOEL WATSON, JR.

Now comes Joel Watson, Jr., who deposes and says:

1. I am over 18 years of age, legally competent to give this declaration, and have personal knowledge of the facts set forth in it.
2. I have worked in the field of election administration and political campaigns since 2013. For the past 3.5 years I have been employed as the Director of Special Projects in the Louisiana Secretary of State's office.
3. In my capacity as Director of Special Projects I complete projects in a variety of fields including communications, assisting with legislation, voter registration, reporting, and election data.

Robinson v. Ardoin
3:22-cv-211;
3:22-cv-214
SOS_02

4. In my capacity as Director of Special Projects I have access to the state ERIN system, and am also familiar with the data posted on our website. I routinely use ERIN and the information on our website to compile information on voter registration and/or elections.
5. Exhibit A is a spreadsheet I created using publicly available voter registration data from the Secretary of State's Website found at https://www.sos.la.gov/ElectionsAndVoting/Pages/RegistrationStatisticsStatewide.aspx. On April 25, 2022, I accessed this information and pulled reports containing voter registration and party affiliation information for April of each year dating back to 2002. Column B reports the total number of registered voters for the state of Louisiana. Column C reports net change in the total number of registered voters year over year, and the total over the course of the last 20 years. As you can see, Louisiana has gained 243,087 registered voters in the last 20 years. Column D reports the number of Louisiana voters who are registered Democrats in each year since 2002. Column E again calculates the change in number of registered Democrats year over year. As you can see there has been a steady decline in the number of voters registered as Democrats over the course of the last 20 years, totaling a loss of 415,996 registered Democratic voters over the past 20 years. Column F shows the number of Louisiana Voters who are registered as Republican. Column G again calculates the change in number of registered Republicans year over year. Column G shows that there has been an increase in voters registering as Republican over the course of the last 20 years, totaling an increase of 368,756 registered Republican voters.
6. Exhibit B is a spreadsheet I created using publicly available election data from ballotopedia.org

[https://ballotpedia.org/Louisiana_House_of_Representatives_elections,_2019] On April 25, 2022, I accessed this information and pulled election results for the Louisiana House and Louisiana Senate for election years 2007, 2011, 2015, and 2019. I used these election results to show the partisan breakdown of the members of the Louisiana Legislature. Columns B through D show the number of members of the Louisiana State House broken down by party affiliation. Columns F-H show the same information for the Louisiana Senate. This spreadsheet shows that the number of Democratic members in the House declined from 53 after the 2007 election to 35 after the 2019 election, and declined in the Senate from 28 after the 2007 election to 12 after the 2019 election. This corresponds to an increase in Republican members in both the House and Senate.

7. Exhibit C is a spreadsheet showing election returns for statewide races dating back to 1990. I created this spreadsheet with data from https://voterportal.sos.la.gov/graphical which I accessed on April 26, 2022. Column A lists the statewide election. Column B lists the percentage of the Democratic vote. Column C shows the Democratic raw vote total. Columns E and F show this information for the Republican totals, and Columns F and G show this for the "other" totals. Column H reflects the total vote for each race. Column I shows the result of each race. Exhibit C reflects a trend of increasing outright wins during the primary election by a Republican candidate over the course of the last 30 years.

8. Exhibit D is a spreadsheet reflecting registered voters in East Baton Rouge Parish dating back to April 2002. I created this spreadsheet with data from https://www.sos.la.gov/ElectionsAndVoting/Pages/RegistrationStatisticsStatewide.aspx. On April 25, 2022, I accessed this information and pulled reports containing voter

registration information for April of each year dating back to 2002 . Column A reflects the month and year of the data collected. Column B reflects the total number of registered voters in East Baton Rouge Parish. Column C reflects the number of Black Registered Voters in East Baton Rouge Parish. Column D Reflects the number of Black Registered Voters in East Baton Rouge Parish as a percentage of all registered voters in East Baton Rouge Parish.

9. Exhibit E is a spreadsheet showing the winner of the Mayor-President election for East Baton Rouge Parish dating back to 2004. I worked with other staff in the Secretary of State's office to pull this report using data from the Secretary of State's ERIN System. Exhibit E shows that since 2004, East Baton Rouge Parish has elected a black candidate to the office of Mayor-President.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on the 29 day of April, 2022, at Baton Rouge, Louisiana.

JOEL WATSON, JR.

4871-3505-9230 v.1

Exhibit A

	Total	Net Change	Dems	Net Change	Reps	Net Change	Other	Net Change
April 2002	2,769,514		1,617,581		633,517		518,416	
April 2003	2,728,779	-40,735	1,572,460	-45,121	632,241	-1,276	524,078	5,662
April 2004	2,803,172	74,393	1,581,921	9,461	658,995	26,754	562,256	38,178
April 2005	2,822,961	19,789	1,560,985	-20,936	682,324	23,329	579,652	17,396
April 2006	2,856,684	33,723	1,552,145	-8,840	697,851	15,527	606,688	27,036
April 2007	2,809,946	-46,738	1,505,970	-46,175	691,700	-6,151	612,276	5,588
April 2008	2,857,347	47,401	1,503,113	-2,857	714,659	22,959	639,465	27,189
April 2009	2,903,436	46,089	1,518,601	15,488	740,740	26,081	644,095	4,630
April 2010	2,914,180	10,744	1,500,085	-18,516	750,073	9,333	664,022	19,927
April 2011	2,820,244	-93,936	1,414,839	-85,246	751,647	1,574	653,758	-10,264
April 2012	2,866,341	46,097	1,401,850	-12,989	779,812	28,165	684,679	30,921
April 2013	2,915,672	49,331	1,398,679	-3,171	808,140	28,328	708,853	24,174
April 2014	2,911,071	-4,601	1,376,726	-21,953	807,311	-829	727,034	18,181
April 2015	2,879,795	-31,276	1,337,557	-39,169	805,944	-1,367	736,294	9,260
April 2016	2,927,642	47,847	1,330,165	-7,392	851,823	45,879	745,654	9,360
April 2017	2,976,028	48,386	1,316,175	-13,990	894,929	43,106	764,924	19,270
April 2018	2,957,987	-18,041	1,291,359	-24,816	895,531	602	771,097	6,173
April 2019	2,957,064	-923	1,265,487	-25,872	911,794	16,263	779,783	8,686
April 2020	2,992,140	35,076	1,257,686	-7,801	944,599	32,805	789,855	10,072
April 2021	3,093,405	101,265	1,246,573	-11,113	1,022,481	77,882	824,351	34,496
April 2022	3,012,601	-80,804	1,201,585	-44,988	1,002,273	-20,208	808,743	-15,608
2002-2022	Total Net Chan	243,087	D Net Change	-415,996	R Net Change	368,756	O Net Change	290,327

Exhibit B

	HOUSE				SENATE		
	DEMS	REPS	IND		DEMS	REPS	IND
2007 Election Result	53	50	2		28	11	0
2011 Election Result	45	58	2		15	24	0
2015 Election Result	42	61	2		14	25	0
2019 Election Result	35	68	2		12	27	0

Exhibit C

	Comb. Dem.%	Comb. Dem Raw	Comb. GOP%	Comb. GOP Raw	Comb. Other%	Comb. Other Raw	Tot. Vote	Result
1990 US Senate	56.52%	789,121	43.48%	607,091	0.00%	0	1,396,212	Dem Win
1991 Primary-Gov.	35.47%	549,486	63.82%	988,833	0.71%	11,035	1,549,354	Runoff
1991 Primary-Lt. Gov.	57.42%	836,405	42.58%	620,199	0.00%	0	1,456,604	Runoff
1991 Primary-SOS	54.19%	744,416	45.81%	629,237	0.00%	0	1,373,653	Runoff
1991 Primary-AG	67.53%	959,727	32.47%	461,427	0.00%	0	1,421,154	Runoff
1991 Primary-AgCom	77.70%	1,069,853	22.30%	307,080	0.00%	0	1,376,933	Dem Win
1991 Primary-InsCom	36.33%	520,503	63.67%	912,212	0.00%	0	1,432,715	Runoff
1991 Primary-ElecCom	71.63%	940,309	28.37%	372,480	0.00%	0	1,312,789	Dem Win
1991 General-Gov.	61.17%	1,057,031	38.83%	671,009	0.00%	0	1,728,040	Dem Win
1991 General-Lt. Gov.	59.27%	1,009,026	40.73%	693,412	0.00%	0	1,702,438	Dem Win
1991 General-SOS	49.72%	818,355	50.28%	827,506	0.00%	0	1,645,861	GOP Win
1991 General-AG	68.91%	1,147,592	31.09%	517,660	0.00%	0	1,665,252	Dem Win
1991 General-InsCom	59.78%	1,002,038	40.22%	674,097	0.00%	0	1,676,135	Dem Win
1992 Presidential	45.58%	815,971	40.97%	733,386	13.44%	240,660	1,790,017	Dem Win
1995 Primary-Gov.	53.78%	793,801	44.09%	650,667	2.13%	31,428	1,475,896	Runoff
1995 Primary-Lt. Gov.	66.86%	903,804	26.81%	362,374	6.33%	85,577	1,351,755	Runoff
1995 Primary-SOS	43.91%	583,022	56.09%	744,707	0.00%	0	1,327,729	GOP Win
1995 Primary-AG	76.45%	1,019,041	19.82%	264,150	3.73%	49,771	1,332,962	Dem Win
1995 Primary-Treasurer	63.90%	820,682	36.10%	463,735	0.00%	0	1,284,417	Runoff
1995 Primary-AgCom	79.45%	1,052,738	20.55%	272,349	0.00%	0	1,325,087	Dem Win
1995 Primary-InsCom	66.89%	902,868	27.65%	373,234	5.46%	73,686	1,349,788	Dem Win
1995 Primary-ElecCom	74.68%	954,076	25.32%	323,422	0.00%	0	1,277,498	Dem Win
1995 General-Gov.	36.50%	565,861	63.50%	984,499	0.00%	0	1,550,360	GOP Win
1995 General-Lt. Gov.	65.25%	964,559	34.75%	513,613	0.00%	0	1,478,172	Dem Win
1995 General-Treasurer	100.00%	1,409,244	0.00%	0	0.00%	0	1,409,244	Dem Win
1996 US Senate-Primar	43.54%	534,887	54.59%	670,716	1.87%	22,993	1,228,596	Runoff
1996 Presidential	52.01%	927,837	39.94%	712,586	8.05%	143,536	1,783,959	Dem Win
1996 General-US Senat	50.17%	852,945	49.83%	847,157	0.00%	0	1,700,102	Dem Win
1998 US Senate	65.05%	630,395	32.46%	314,580	2.50%	24,190	969,165	Dem Win
1999 Primary-Gov.	33.89%	438,975	65.60%	849,615	0.51%	6,615	1,295,205	GOP Win
1999 Primary-Lt. Gov.	80.22%	968,249	18.18%	219,418	1.60%	19,345	1,207,012	Dem Win
1999 Primary-Treasurer	100.00%	1,119,115	0.00%	0	0.00%	0	1,119,115	Dem Win
1999 Primary-InsCom	69.66%	821,872	30.34%	357,934	0.00%	0	1,179,806	Runoff
1999 Primary-ElecCom	33.28%	387,672	57.23%	666,666	9.48%	110,479	1,164,817	Runoff
1999 General-InsCom	57.18%	426,098	42.82%	319,124	0.00%	0	745,222	Dem Win
1999 General-ElecCom	0.00%	0	100.00%	740,078	0.00%	0	740,078	GOP Win
2000 Presidential	44.88%	792,344	52.55%	927,871	2.57%	45,441	1,765,656	GOP Win
2002 Primary-US Senat	47.89%	596,900	50.77%	632,702	1.34%	16,731	1,246,333	Runoff
2002 General-US Senat	51.70%	638,654	48.30%	596,642	0.00%	0	1,235,296	Dem Win
2003 Primary-Gov.	58.75%	800,478	39.34%	535,973	1.91%	26,073	1,362,524	Runoff
2003 Primary-Lt. Gov.	52.68%	674,803	47.32%	606,076	0.00%	0	1,280,879	Dem Win
2003 Primary-SOS	22.42%	284,125	72.30%	916,235	5.28%	66,969	1,267,329	GOP Win
2003 Primary-AG	53.55%	689,179	46.45%	597,917	0.00%	0	1,287,096	Dem Win
2003 Primary-AgCom	65.63%	822,682	34.37%	430,856	0.00%	0	1,253,538	Dem Win
2003 Primary-InsCom	53.56%	675,043	43.64%	549,924	2.80%	35,280	1,260,247	Runoff

2003 General-Gov.	51.95%	731,358	48.05%	676,484	0.00%	0	1,407,842	Dem Win
2003 General-InsCom	57.70%	773,578	42.30%	567,034	0.00%	0	1,340,612	Dem Win
2004 Presidential	42.22%	820,299	56.72%	1,102,169	1.06%	20,638	1,943,106	GOP Win
2004 US Senate	47.48%	877,482	51.03%	943,014	1.49%	27,560	1,848,056	GOP Win
2007 Primary-Gov.	30.65%	397,755	53.88%	699,275	15.47%	200,810	1,297,840	GOP Win
2007 Primary-Lt. Gov.	56.60%	701,887	40.85%	506,603	2.54%	31,520	1,240,010	Dem Win
2007 Primary-SOS	31.27%	374,199	63.32%	757,821	5.41%	64,723	1,196,743	GOP Win
2007 Primary-AG	67.56%	823,807	32.44%	395,498	0.00%	0	1,219,305	Runoff
2007 Primary-AgCom	41.35%	505,504	58.65%	717,123	0.00%	0	1,222,627	Runoff (Dem candidate dropped out before runoff, GOP win)
2007 Primary-InsCom	35.58%	423,986	64.42%	767,537	0.00%	0	1,191,523	GOP Win
2007 General-AG	66.60%	477,574	33.40%	239,485	0.00%	0	717,059	Dem Win
2008 Presidential	39.93%	782,989	58.56%	1,148,275	1.50%	29,497	1,960,761	GOP Win
2008 US Senate	52.11%	988,298	45.72%	867,177	2.17%	41,099	1,896,574	Dem Win
2010 US Senate	37.67%	476,572	56.55%	715,415	5.77%	73,007	1,264,994	GOP Win
2011 Primary-Gov.	28.16%	288,161	65.80%	673,239	6.04%	61,763	1,023,163	GOP Win
2011 Primary-Lt. Gov.	0.00%	0	100.00%	949,590	0.00%	0	949,590	GOP Win
2011 Primary-SOS	0.00%	0	100.00%	890,786	0.00%	0	890,786	GOP Win
2011 Primary-AgCom	27.80%	267,942	66.50%	640,886	5.70%	54,888	963,716	GOP Win
2011 Primary-InsCom	32.54%	314,317	67.46%	651,559	0.00%	0	965,876	GOP Win
2012 Presidential	40.58%	809,141	57.78%	1,152,262	1.64%	32,662	1,994,065	GOP Win
2014 Primary-US Senat	43.42%	639,233	55.69%	819,777	0.89%	13,034	1,472,044	Runoff
2014 General-US Senat	44.07%	561,210	55.93%	712,379	0.00%	0	1,273,589	GOP Win
2015 Primary-Gov.	57.25%	637,938	41.61%	463,700	1.14%	12,698	1,114,336	Runoff
2015 Primary-Lt. Gov.	33.29%	361,092	66.71%	723,733	0.00%	0	1,084,825	Runoff
2015 Primary-SOS	37.79%	394,587	62.21%	649,540	0.00%	0	1,044,127	GOP Win
2015 Primary-AG	28.44%	302,763	71.56%	761,842	0.00%	0	1,064,605	Runoff
2015 Primary-Trasurer	0.00%	0	100.00%	983,468	0.00%	0	983,468	GOP Win
2015 Primary-AgCom	30.12%	312,705	66.39%	689,316	3.49%	36,214	1,038,235	GOP Win
2015 Primary-InsCom	32.42%	340,242	67.58%	709,301	0.00%	0	1,049,543	GOP Win
2015 General-Gov.	56.11%	646,924	43.89%	505,940	0.00%	0	1,152,864	Dem Win
2015 General-Lt. Gov.	44.62%	506,640	55.38%	628,876	0.00%	0	1,135,516	GOP Win
2015 General-AG	0.00%	0	100.00%	1,084,374	0.00%	0	1,084,374	GOP Win
2016 Presidential	38.45%	780,154	58.09%	1,178,638	3.46%	70,240	2,029,032	GOP Win
2016 Primary-US Senat	35.96%	695,288	61.33%	1,185,889	2.71%	52,458	1,933,635	Runoff
2016 General-US Senat	39.35%	347,816	60.65%	536,191	0.00%	0	884,007	GOP Win
2019 Primary-Gov.	47.41%	636,963	51.84%	696,434	0.75%	10,084	1,343,481	Runoff
2019 Primary-Lt. Gov.	31.86%	413,556	68.14%	884,309	0.00%	0	1,297,865	GOP Win
2019 Primary-SOS	33.78%	434,587	66.22%	851,885	0.00%	0	1,286,472	Runoff
2019 Primary-AG	33.79%	436,502	66.21%	855,366	0.00%	0	1,291,868	GOP Win
2019 Primary-Treasurer	34.53%	442,740	60.02%	769,462	5.45%	69,908	1,282,110	GOP Win
2019 Primary-AgCom	34.95%	446,241	65.05%	830,427	0.00%	0	1,276,668	GOP Win
2019 Primary-InsCom	0.00%	0	100.00%	1,180,860	0.00%	0	1,180,860	GOP Wing
2019 General-Gov.	51.33%	774,498	48.67%	734,286	0.00%	0	1,508,784	Dem Win
2019 General-SOS	40.93%	601,126	59.07%	867,607	0.00%	0	1,468,733	GOP Win
2020 Presidential	39.85%	856,034	58.46%	1,255,776	1.69%	36,252	2,148,062	GOP Win
2020 US Senate	35.29%	730,989	61.18%	1,267,291	3.54%	73,263	2,071,543	GOP Win

Exhibit D

	EBR Total Reg.	EBR Black Registered Voters, Ra	EBR Black % of All Reg. Voters
April 2002	249,495	85,529	34.28%
April 2003	242,370	84,807	34.99%
April 2004	248,317	88,820	35.77%
April 2005	252,345	92,867	36.80%
April 2006	254,160	94,205	37.07%
April 2007	248,849	92,995	37.37%
April 2008	260,107	100,515	38.64%
April 2009	271,801	111,157	40.90%
April 2010	271,666	111,352	40.99%
April 2011	266,498	109,992	41.27%
April 2012	269,526	112,003	41.56%
April 2013	278,615	118,992	42.71%
April 2014	277,241	119,146	42.98%
April 2015	278,002	121,502	43.71%
April 2016	282,819	123,287	43.59%
April 2017	285,738	124,119	43.44%
April 2018	282,539	123,355	43.66%
April 2019	283,596	123,837	43.67%
April 2020	289,841	128,185	44.23%
April 2021	299,783	132,380	44.16%
April 2022	291,518	129,447	44.40%

Exhibit E

ElectionDate	OfficeTitle	Description	Parish	BallotLastNam	BallotFirstNam	Race	Result
11/2/2004	Mayor-President	Metro Council, City of Baton Rou	EAST BATON ROUG	Holden	Melvin L. "Kip"	Black	Elected
10/4/2008	Mayor-President	Metro Council, City of Baton Rou	EAST BATON ROUG	Holden	Melvin "Kip"	Black	Elected
11/6/2012	Mayor-President	Metro Council, City of Baton Rou	EAST BATON ROUG	Holden	Melvin "Kip"	Black	Elected
12/10/2016	Mayor-President	Metro Council, City of Baton Rou	EAST BATON ROUG	Broome	Sharon Weston	Black	Elected
12/5/2020	Mayor-President	Metro Council, City of Baton Rou	EAST BATON ROUG	Broome	Sharon Weston	Black	Elected