UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

PRESS ROBINSON, 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-RLB
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-00214-SDD-RLB

DECLARATION OF ALICE WASHINGTON IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to 28 U.S.C. § 1746, I, Dr. Alice Washington, declare as follows:

1. My name is Alice Washington. I am over 18 years of age and am competent to make this declaration. I have personal knowledge of the statements made in this affidavit and each is true and correct.
2. I am Black and a U.S. citizen.
3. I am a resident of the State of Louisiana, and I currently reside in Baton Rouge, Louisiana.
4. I am lawfully registered to vote in Congressional District ("CD") 6.
5. I am a regular voter who votes in federal, state, and local elections. I last voted in the 2020 general election. I intend to vote in future elections, including the upcoming 2022 congressional election.

Hearing Exhibit
PR-5
3:22-cv-00211-SDD-RLB

6. I have phone banked for candidates in previous elections. I have also written to and met with my representatives to discuss issues that are important to me, and to seek constituent services.

7. I learned about the redistricting process through the leaders of Together Louisiana, a community non-profit, which made me pay more attention to the process. I volunteered with Together Louisiana and the ACLU to work for a fair redistricting process. I have also learned about redistricting through following the news.

8. I support a second Black-majority district because I support fairness in our society. I care about this cause as a matter of fairness. Right now, the Baton Rouge area's population is approximately one-third Black, and I hoped that redistricting would distribute the population so that elections are fairer. When I go to vote, sometimes I feel that my vote will not matter because the candidates I believe in can never win. I believe that a second Black-majority is necessary to assure that people of color are represented and heard on the issues they care about. I also believe it is important for all of society to have a chance to come together and live more harmoniously, which will be accomplished by fairer representation.

9. I supported the maps introduced during the legislative session that included two majority-Black districts because I felt that they protected my community. As a social worker, I identify with communities of underserved people. I have a lifelong commitment to underserved communities. Any of these maps would

have kept the Black community in Baton Rouge intact, while also providing Black voters in CD 6 with an equal opportunity to elect candidates of their choice.

10. I am frustrated that the Legislature has enacted a map that packs Black voters into CD 2 and disperses Black voters across the other five congressional districts. I believe that the enacted map does not give equal weight to all votes because it dilutes Black voting strength in five out of six congressional districts in Louisiana.

11. Because of the way the congressional redistricting map has been drawn, I do not have equal access to my congressional representative when compared to other voters. Under the enacted map, my voice and the voices of other Black citizens in my district is submerged in a much larger white population. Because of that, elected officials don't need the support of the Black community to win elections, which means that I will have to work harder than white voters to get the attention of my Congressperson. I feel that the enacted map dilutes my vote and deprives me of the opportunity to elect a candidate of my choice. I also believe that the enacted map deprives me of my voice as a Black voter and deprives me of my right to be heard by my congressional representative.

12. I feel that my representative, Congressman Garret Graves, does not represent my views or my community. Sometimes my representatives vote in a way that does not support my community's interests. For example, following the January 6, 2021 attack on the United States Capitol, Congressman Graves voted to overturn the election results, which I found outrageous. Many people in my community feel the same frustration, and want to have their voices heard. Our communities

suffer when the government's policies favor large corporations over us, as a result of our representatives ignoring our views. I believe that if the enacted map remains in place, it would be even more difficult for me to advocate for myself and appeal to my representatives to listen to my views.

13. I declare under penalty of perjury that the foregoing is true and correct. This Declaration was executed on April 14, 2022.

Dr. Alice Washington