May 2, 2022

***Robinson, et al. v. Ardoin*, No. 3:22-cv-00211-SDD-SDJ**
***Galmon, et al. v. Ardoin*, No. 3:22-cv-00214-SDD-SDJ**

UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF LOUISIANA

REBUTTAL EXPERT REPORT OF WILLIAM COOPER

William Cooper

EXHIBIT
GX-29

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.	Case No. 3:22-cv-00211-SDD-SDJ
EDWARD GALMON, SR. et al., Plaintiffs, v. R. KYLE ARDOIN, in his official capacity as Louisiana Secretary of State, Defendant.	Case No. 3:22-cv-00214-SDD-SDJ

SECOND DECLARATION OF WILLIAM S. COOPER

WILLIAM S. COOPER, acting in accordance with 28 U.S.C. § 1746, Federal Rule of Civil Procedure 26(a)(2)(B), and Federal Rules of Evidence 702 and 703, does hereby declare and say:

I. INTRODUCTION

1. My name is William S. Cooper. On April 15, 2022, I submitted my initial declaration in this matter.

2. This supplemental declaration responds to declarations filed by four experts for the Defendants in this matter who directly address the substance of my initial report. It also provides a correction to my April 15 declaration regarding the Black CVAP percentages: this correction does not alter any of my conclusions in that declaration.

3. In addition, I have attached corrected maps and statistics for the Enacted Plan in **Exhibit A** replacing the Exhibit H series in my April 15 declaration. I inadvertently reported maps and statistics for SB 1 as the Enacted Plan rather than HB 1/SB 5. This correction does not change the opinions expressed in my April 15 declaration regarding the Enacted Plan because the plan statistics for HB 1/SB 5 are almost identical to SB 1 in terms of parish splits, political subdivision splits, compactness, and dilution of minority voting strength.

4. **Exhibit A-1** contains detailed 2020 population statistics by district for the Enacted Plan. To facilitate comparison with Plaintiffs' illustrative plans, the map in **Exhibit A-2** is a high resolution map. **Exhibit A-3** contains maps in sequential order that zoom in on each of the six congressional districts. **Exhibit A-4** zooms in on the New Orleans MSA, which is split between CD 1, CD 2, and CD 3. **Exhibit A-5** zooms in on the Baton Rouge MSA, which is split between CD 2, CD 5 and CD 6. **Exhibit A-6** identifies the parish-level population by district. **Exhibit A-7** identifies district splits by parish and VTD. **Exhibit A-8** identifies municipal

splits by district**. Exhibit A-9** identifies regional district splits (Core Based Statistical Areas ("CBSAs")) comprised of Metropolitan Statistical Areas ("MSAs") and Micropolitan Statistical Areas.

5. The Defendants in this matter have employed a scattershot approach in their response to my declaration, relying on four experts who attempt to find fault with my illustrative plans.

6. Not a single one of these experts takes into account a key component of traditional redistricting principles – the avoidance of minority vote dilution. In contrast to the Enacted Plan, the three illustrative plans that I prepared and presented in my April 15 declaration adhere to traditional redistricting principles, including the non-dilution of minority voting strength, as well as one-person one-vote, compactness, contiguity, respect for communities of interest, while minimizing political subdivision splits to the extent practicable. Contrary to the suggestion of Defendants' experts, race did not predominate in the drawing of any of these illustrative plans; rather, I simultaneously considered and balanced all of the redistricting factors listed above.

7. **Section II** describes Illustrative Plan 4 – a plan with *de minimis* deviation that is drawn entirely at the VTD-level, responding to Defendants' expert Thomas Bryan. Like the other illustrative plans, Illustrative Plan 4 adheres to traditional redistricting principles of one-person one-vote, compactness, contiguity,

respect for communities of interest, minimizing political subdivision splits, and non-dilution of minority voting strength. Like the other illustrative plans, race did not predominate in the drawing of Illustrative Plan 4; again, I simultaneously considered and balanced all of the redistricting factors listed above.

8. **Section III** addresses additional items raised by the four experts for the Defendants in their declarations.

9. **Section IV** provides the corrected NH SR Black CVAP percentages for the illustrative plans.

II. ILLUSTRATIVE PLAN 4

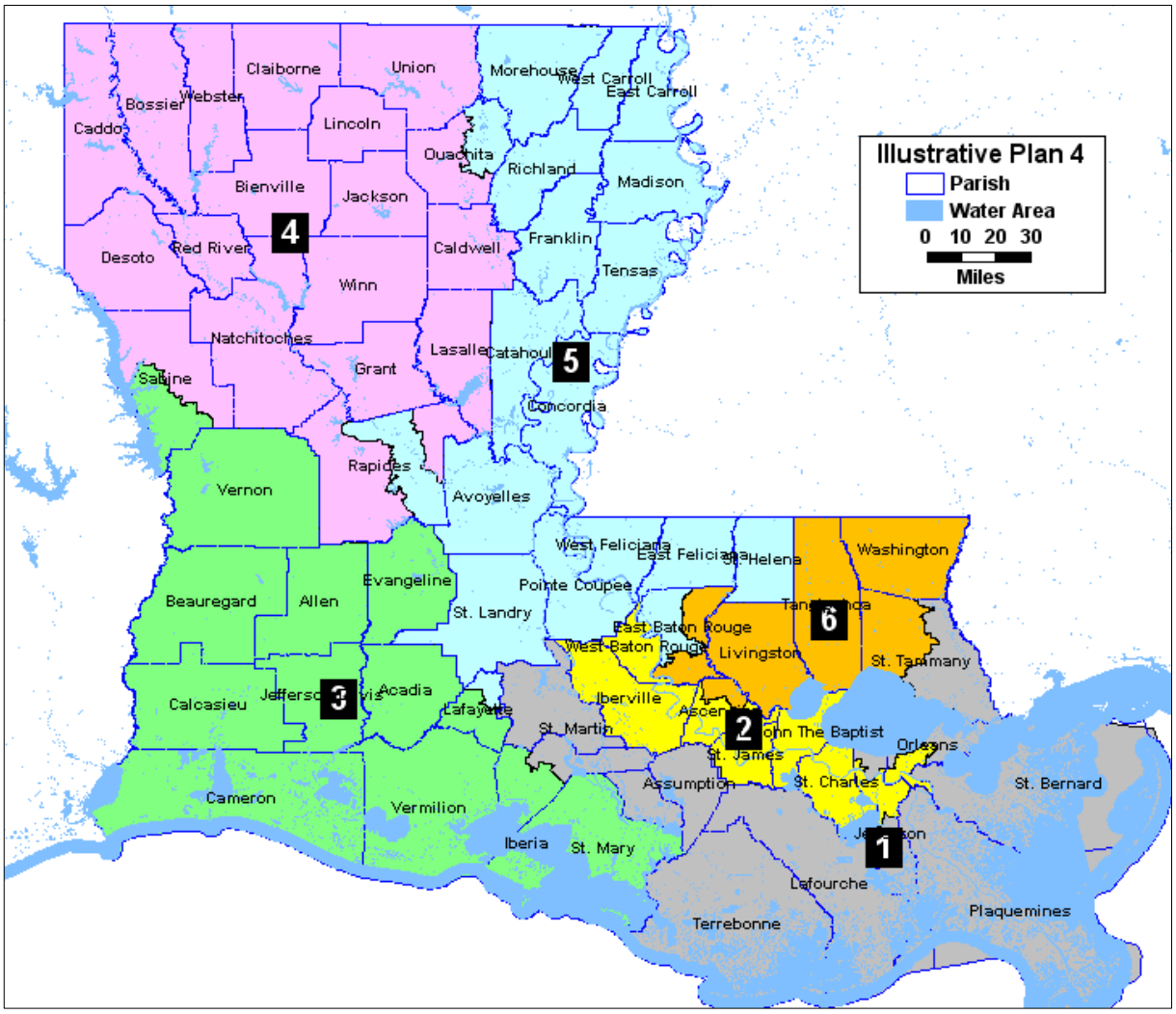
10. Illustrative Plans 1, 2, and 3 are zero deviation plans, meaning that some precinct splits are necessary so that all districts are within +/- 1 person of the ideal district size. It is my understanding that some courts have required that illustrative plans meet that stringent standard.

11. Defendants' expert Thomas Bryan criticized Illustrative Plans 1, 2, and 3 for having "numerous VTD splits" in service of achieving "a minimum population deviation of 1." (Bryan Declaration, p. 31, ¶56). Accordingly, below and attached as **Exhibit B-2** in response is Illustrative Plan 4, which minimizes VTD splits instead of population deviation.

12. Illustrative Plan 4 demonstrates that it is possible to draw a second majority Black congressional district without splitting VTDs, while adhering to all other traditional redistricting principles.

13. The map in **Figure 1** depicts Illustrative Plan 4. District 2 is 50.06% BVAP and District 5 is 50.29% BVAP.

Figure 1
Illustrative Plan 4



14. Illustrative Plan 4 splits ten parishes and zero VTDs – five fewer parish splits than the 15 found in the Enacted Plan.

15. Majority-Black District 2 extends west from New Orleans to Iberville Parish and north to West Baton Rouge Parish. Of the eight parishes in District 2, three are split: Ascension, Jefferson, and Orleans. (**Exhibit B-6**).

16. Majority-Black District 5 extends north from the Baton Rouge MSA to the Monroe MSA, west to the Parishes of St. Landry, Lafayette and Rapides, and east to majority-Black St. Helena Parish.

17. District 5 encompasses 19 parishes, splitting just four: East Baton Rouge, Lafayette, Ouachita, and Rapides. (**Exhibit B-6)**

18. The table in **Figure 2** presents 2020 summary population statistics for Illustrative Plan 4.

Figure 2
Illustrative Plan 4 – 2020 Census

District	Population	Dev.	18+ Pop	% 18+ Black	% 18+ Latino	% 18+ NH White
1	776235	-58	599404	18.14%	10.03%	66.20%
2	776266	-27	603596	50.06%	8.59%	37.51%
3	776252	-41	586230	19.79%	5.24%	70.72%
4	776256	-37	596127	31.47%	4.11%	60.23%
5	776390	97	593324	50.29%	3.44%	43.73%
6	776358	65	591867	17.38%	6.09%	71.94%

19. The overall deviation for Illustrative Plan 4 is 155 persons. District 1 is 58 persons under the ideal population and District 5 is 97 persons over the ideal population. The total deviation is slightly higher than the Enacted Plan, which has a

total deviation of 65 persons but splits a VTD. The total deviation is lower than the 2011 Plan, which had a total deviation of 162 persons.

20. **Exhibit B-1** contains detailed 2020 population statistics by district for Illustrative Plan 4. The maps and statistical summaries in the **Exhibit B** series are in the same sequence and format as the **Exhibit A** series.

21. **Figure 3** compares Illustrative Plan 4 to the Enacted Plan in terms of political subdivision splits. Illustrative Plan 4 is superior to the Enacted Plan across all five categories.

Figure 3
Political Subdivision Splits

	Parish Splits	**Populated 2020 VTD Splits**	**Populated Municipal Splits**	**Single-Parish Populated Municipal Splits***	**CBSA splits**
2022 Plan (HB 1)	15	1	36	25	18
Illustrative Plan 4	10	0	30	21	14

***** Excludes splits in 12 municipalities where the splits are a result of municipal lines crossing into an adjacent parish.

22. **Figure 4** compares compactness scores for Illustrative Plan 4 and the Enacted Plan. Illustrative Plan 4 has the same mean average Reock score (.37) and a higher mean average Polsby-Popper score (.18) than the Enacted Plan.

Figure 4
Compactness Scores – Illustrative Plan 4 vs 2022 Enacted Plan

	Reock				Polsby-Popper		
		Low	High			Low	High
2022 Plan							
All Districts (mean avg.)	.37	.18	.50		.14	.06	.29
CD 2	.18				06		
Illustrative Plan 4							
All Districts (mean avg.)	.37	.23	.56		.18	.09	.29
District 2	.23				.15		
District 5	.35				.09		

III. RESPONSE TO GINGLES 1 REBUTTAL DECLARATIONS

23. Below are my responses to four rebuttal declarations in alphabetical order.[1]

A. Expert Report of Thomas Bryan

24. First, as Mr. Bryan points out and noted *supra*, I mistakenly referenced SB 1 rather than SB 5 as the Enacted Plan in my initial report. In the **Exhibit A** series attached to this declaration, I have corrected the Exhibit H series maps and statistics from my April 15 declaration to reflect HB1/SB5 (the Enacted Plan). One can discern differences in the maps under the Enacted Plan compared to SB 1, but the plan statistics are very similar. Moreover, the illustrative plans are superior

[1] Note that there were five other experts (Dr. Alford, Dr. Blunt, Dr. Lewis, Dr. Murray, and Dr. Solanky) who did not address any aspect of my initial declaration.

across objective and quantifiable measures of traditional redistricting principles in almost every instance.

25. Mr. Bryan acknowledges that Illustrative Plans 1, 2, and 3 each contain two districts (District 2 and District 5) with Any Part Black voting age majorities under the 2020 Census. (Bryan Report – p. 20, Table III.A.7).[2]

26. Mr. Bryan and I agree that Illustrative Plans 1, 2, and 3 split fewer municipalities than the Enacted Plan, (Bryan Report – p. 23, Table III.B.1).

27. "Misallocation" (Bryan Report –p.23, ¶39) as it relates to redistricting is not a useful metric. Due to segregated housing patterns in Louisiana, population distribution across a jurisdiction is not uniform by race. Therefore, it would be difficult to split areas that mirror the jurisdiction-wide racial percentages.

B. Expert Report of Michael Hefner

28. The Louisiana Regional Folklore Program ("LRFP") regional map (Hefner report, p.8, Map 1) identifies five cultural regions in Louisiana.

29. It is not clear, however, that the Louisiana Legislature recognized these regions as communities of interest in the formation of congressional districts. Under the Enacted Plan, the five regions are split into 13 parts (**Exhibit C-5**).

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[2] "African American" or "Black" refers to persons who are Any Part Black (i.e., persons of one or more races that are some part Black), including Hispanic Black, unless otherwise specified. It is my understanding that following the U.S. Supreme Court decision in *Georgia v. Ashcroft*, 539 U.S. 461 (2003), the "Any Part" definition is the appropriate Census classification to use in Section 2 cases.

30. The illustrative plans contain slightly more splits of the five Folklore regions: they are split into 15 parts by Illustrative Plan 1 (**Exhibit C-1**), 16 parts by Illustrative Plan 2 (**Exhibit C-2**), 15 parts by Illustrative Plan 3 (**Exhibit C-3**), and 15 parts by Illustrative Plan 4 (**Exhibit C-4**).

31. As shown in the **Exhibit C** series, Region III (the 22 parishes of Acadiana) is split into three parts under the Enacted Plan. The Enacted Plan assigns 83% of Acadiana's population to District 3. Notably, Illustrative Plan 2 assigns 81% of Acadiana's population to District 3 and Illustrative Plan 1 assigns 74.4% to District 3.

32. Reading Mr. Heffner's report, one would think that the Enacted Plan keeps the 8-Parish Cajun Heartland[3] entirely in a single congressional district. But that is not the case. The Enacted Plan splits the Cajun Heartland into three pieces, with 81% assigned to District 3 – just slightly more than under Illustrative Plan 2, with 72% of the Cajun Heartland assigned to District 3.

C. <u>Expert Report of M. V. "Trey" Hood</u>

33. Dr. Hood conducts a core-retention analysis on the Enacted Plan and Illustrative Plans 1, 2, and 3. I do not disagree with his calculations, but I question the relevance of the analysis within the context of a Section 2 claim where the

[3] The parishes of Lafayette, Acadia, Iberia, St. Landry, St. Martin, Vermilion, Evangeline and St. Mary.

additional majority Black district is adjacent to five other districts. Almost inevitably, several of the five districts would change substantially from the previous districts.

34. Nevertheless, all but one of the illustrative plan districts (majority Black District 5 with a core retention of 47.0% in Illustrative Plan 3) maintain a majority of the overall 2020 population that resided in the district under the 2011 Plan. (Hood Report, p.2, Table 1)

35. Illustrative Plan 4, not reviewed by Dr. Hood, has core retention rates ranging from 52.4% in majority-Black District 5 to 85% in majority-Black District 2.

D. Expert Report of Jeffrey D. Sadow

36. Dr. Sadow cherry picks metrics to claim the Enacted Plan outperforms plaintiffs' illustrative plans. For example, rather than examining the impact of congressional district splits among people who live in OMB-designated Core Based Statistical Areas,[4] which include ten smaller urbanized Micropolitan Statistical

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[4] **Exhibit I-1** in my April 15 declaration is a Census Bureau-produced map, depicting the 19 Core Based Statistical Areas in Louisiana.

Metropolitan Statistical Areas are defined by the U.S. Office of Management and Budget and reported in historical and current census data produced by the Census Bureau. MSAs "consist of the county or counties (or equivalent entities) associated with at least one urbanized area of at least 50,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties." A micropolitan area must have

Areas ("MPSAs"), Dr. Sadow has selected only the nine large Metropolitan Statistical Areas ("MSAs") at the parish level for his analysis. (Sadow Report, pp. 20-23) Thus, Dr. Sadow's focus on MSAs ignores the impact of district splits on people who live in any part of the state that is not part of an MSA, including small cities and non-metro parishes. Similarly, Dr. Sadow's focus on just the 14 largest parishes ignores the rest of the state without justification. (Sadow Report, p. 23)

37. In fact, after factoring in people who live in and around the smaller cities that comprise MPSAs, regional population impacted by splits is greater in the Enacted Plan than under the four illustrative plans.

38. Exhibit **A-9** shows that when all 19 CBSAs in Louisiana are tallied, 3.37 million people live in split CBSAs under the Enacted Plan. The illustrative plans fare better. The population living in split CBSAs amounts to 2.98 million under Illustrative Plan 1 (**Exhibit D-1**), 3.07 million under Illustrative Plan 2 (**Exhibit D-2)**, 3.11 million under Illustrative Plan 3 (**Exhibit D-3**), and 2.98 million under Illustrative Plan 4 (**Exhibit D-4**).

39. Dr. Sadow repeatedly raises "continuity of representation" as a reason to not draw an additional majority-Black district in Louisiana (Sadow Report, p.7, p.9, p.10. p.11, p.18, p.20, p.21. p. 23, p.72.). Like "core retention" (Hood Report),

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an urbanized area of at least 10,000 but less than 50,000 persons. *See* About, U.S. Census Bureau, https://www.census.gov/programs-surveys/metro-micro/about.html

continuity of representation is unlikely in areas included in an additional majority-Black district where Section 2 plaintiffs are required to demonstrate that a new district could be drawn that was not drawn before.

IV. CORRECTED BLACK CVAP BY DISTRICT

40. The Black CVAP percentages referenced in the plan statistics in my April 15 declaration were mislabeled as NH SR Black (non-Hispanic, single-race Black). Instead, those percentages represent NH DOJ Black CVAP – that is, non-Hispanic single-race Black plus non-Hispanic Black/White.

41. Figure 5 below corrects Figure 21 in my April 15 declaration. **Exhibits E-1, E-2, and E-3** correct the corresponding exhibits from my April 15 declarations, which are Exhibits J-1, K-1, and L-1, respectively.

Figure 5
2016-2020 Citizen Voting Age Population by Plan

	% NH SR Black CVAP	% NH White CVAP	NH SR Black CVAP to NH White CVAP Margin	July 2021 Black Registered Voters
2022 Plan				
District 2	61.31%	31.45%	29.86%	61.46%
Illustrative Plan 1				
District 2	52.82%	39.31%	13.51%	52.33%
District 5	50.37%	46.19%	4.18%	51.84%
Illustrative Plan 2				
District 2	53.07%	39.53%	13.54%	52.72%
District 5	50.71%	45.92%	4.79%	51.53%
Illustrative Plan 3				
District 2	52.82%	39.31%	13.51%	52.33%
District 5	51.72%	44.86%	6.86%	53.35%
Illustrative Plan 4				
District 2	52.63%	39.53%	13.10%	52.23%
District 5	50.78%	45.75%	5.03%	52.17%

42. The two majority Black districts in each of the four illustrative remain majority Black CVAP based on the more conservative NH single-race Black CVAP metric.

43. This correction does not alter any of my conclusions in my April 15 declaration.

# # #

I reserve the right to continue to supplement my reports in light of additional facts, testimony and/or materials that may come to light.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: May 2, 2022

WILLIAM S. COOPER

EXHIBIT A-1

Population Summary Report
Louisiana Congress -- Enacted Plan -- HB1/SB5
2020 Census

District	Population POPULATION	Deviation DEVIATION	AP Black AP_BLACK	% AP Black :_AP_BLACK	18+ Pop F18_POP	18 + AP Black F18_AP_BLA	% 18+ AP Black F_18_AP_BL	18+ Latino F18_HISPAN	% 18+ Latino F_18_HISPA	18+ NH White NH18_WHT	% 18+ NH White F_NH18_WHT
1	776268	-25	115838	14.92%	601559	81105	13.48%	65811	10.94%	420268	69.86%
2	776317	24	473236	60.96%	600203	352018	58.65%	47041	7.84%	179129	29.84%
3	776275	-18	205820	26.51%	586488	144434	24.63%	27487	4.69%	392996	67.01%
4	776333	40	277767	35.78%	591095	199907	33.82%	24043	4.07%	343535	58.12%
5	776277	-16	272728	35.13%	597389	196617	32.91%	21569	3.61%	360144	60.29%
6	776287	-6	197730	25.47%	593814	141688	23.86%	37711	6.35%	386038	65.01%
Total	**4657757**		**1543119**	**33.13%**	**3570548**	**1115769**	**31.25%**	**223662**	**6.26%**	**2082110**	**58.31%**

District	% NH SR Black CVAP	% NH White CVAP	% July 2021 Black Registered
1	11.91%	78.03%	11.45%
2	61.31%	31.45%	61.46%
3	23.91%	70.97%	24.06%
4	33.79%	60.79%	34.32%
5	33.74%	62.62%	33.21%
6	22.65%	71.16%	22.52%

Source for % Citizen Voting Age (CVAP) -- 2020 Citizen Voting Age Population by Race and Ethnicity Special Tabulation (U.S. Census Bureau)
https://www.census.gov/programs-surveys/decennial-census/about/voting-rights/cvap.html

-- calculated by disaggregating 2016-2020 ACS block group estimates to 2020 census blocks

Source for Voter Registration Stats: State of Louisiana via Redistricting Data Hub

https://redistrictingdatahub.org/dataset/louisiana-voter-registration-file-at-the-vtd-level/
https://redistrictingdatahub.org/wp-content/uploads/2021/09/readme_la_voter_reg_official.txt

-- calculated by disaggregating 2020 VTD data to 2020 census blocks

EXHIBIT A-2

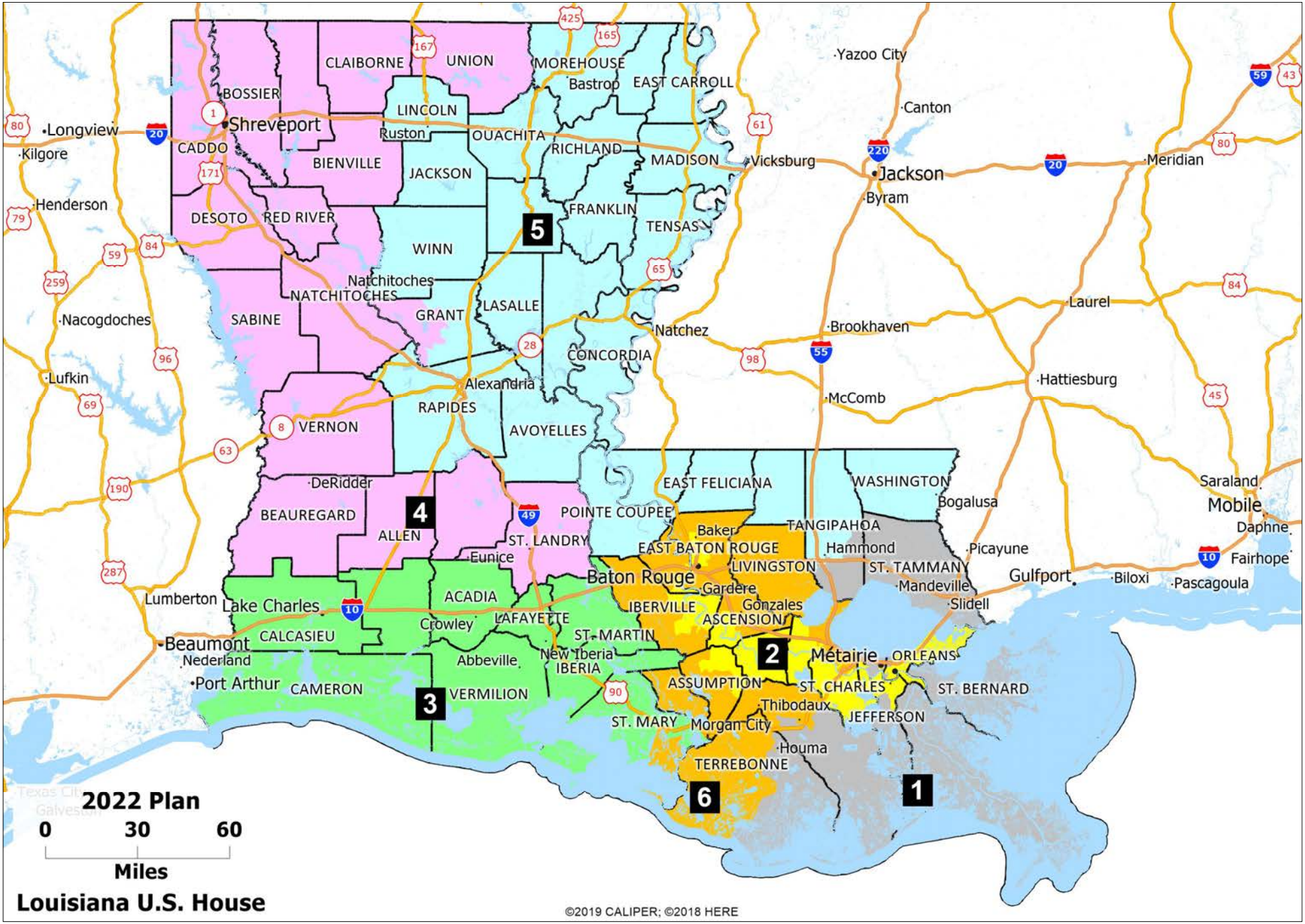
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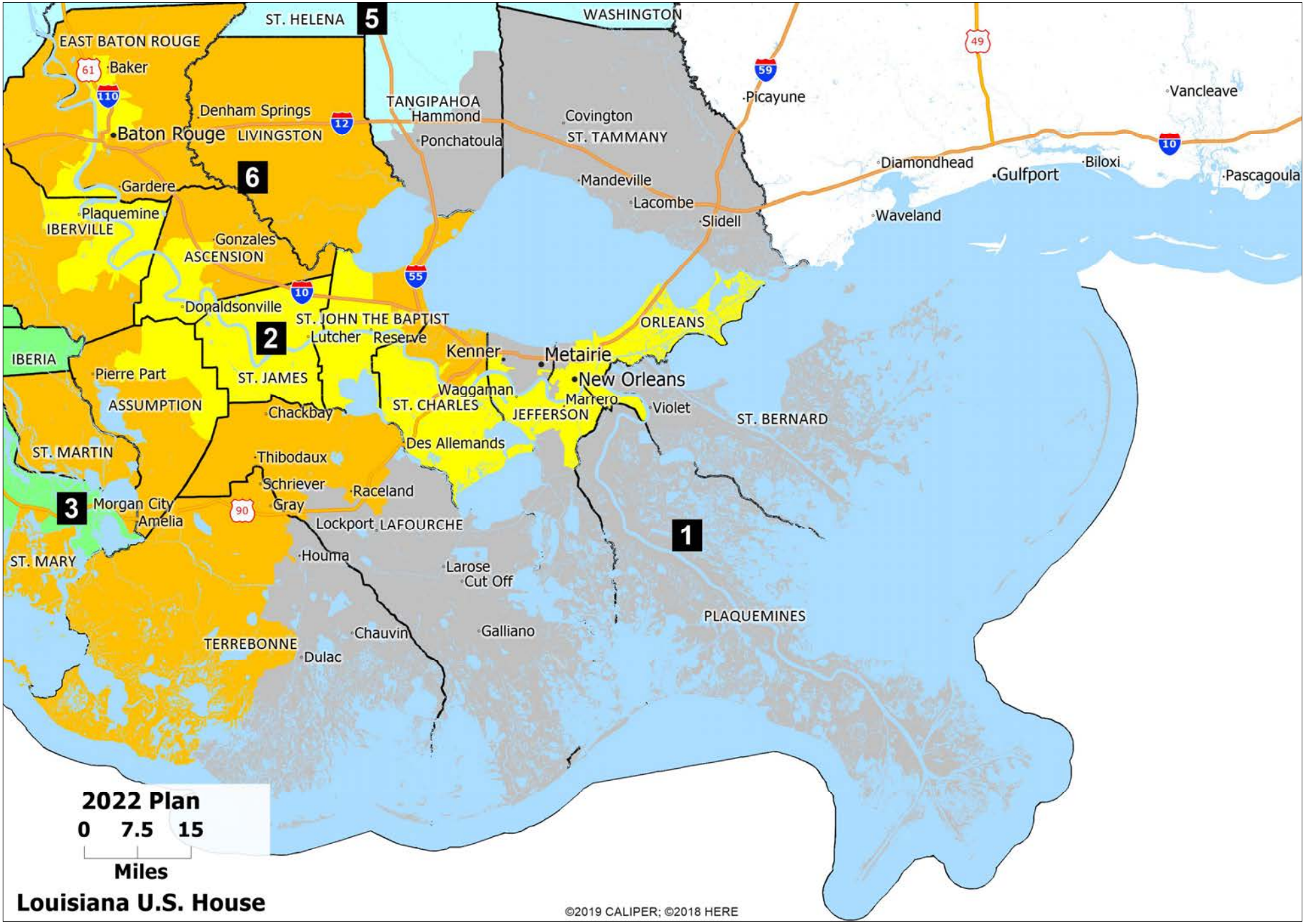
EXHIBIT A-3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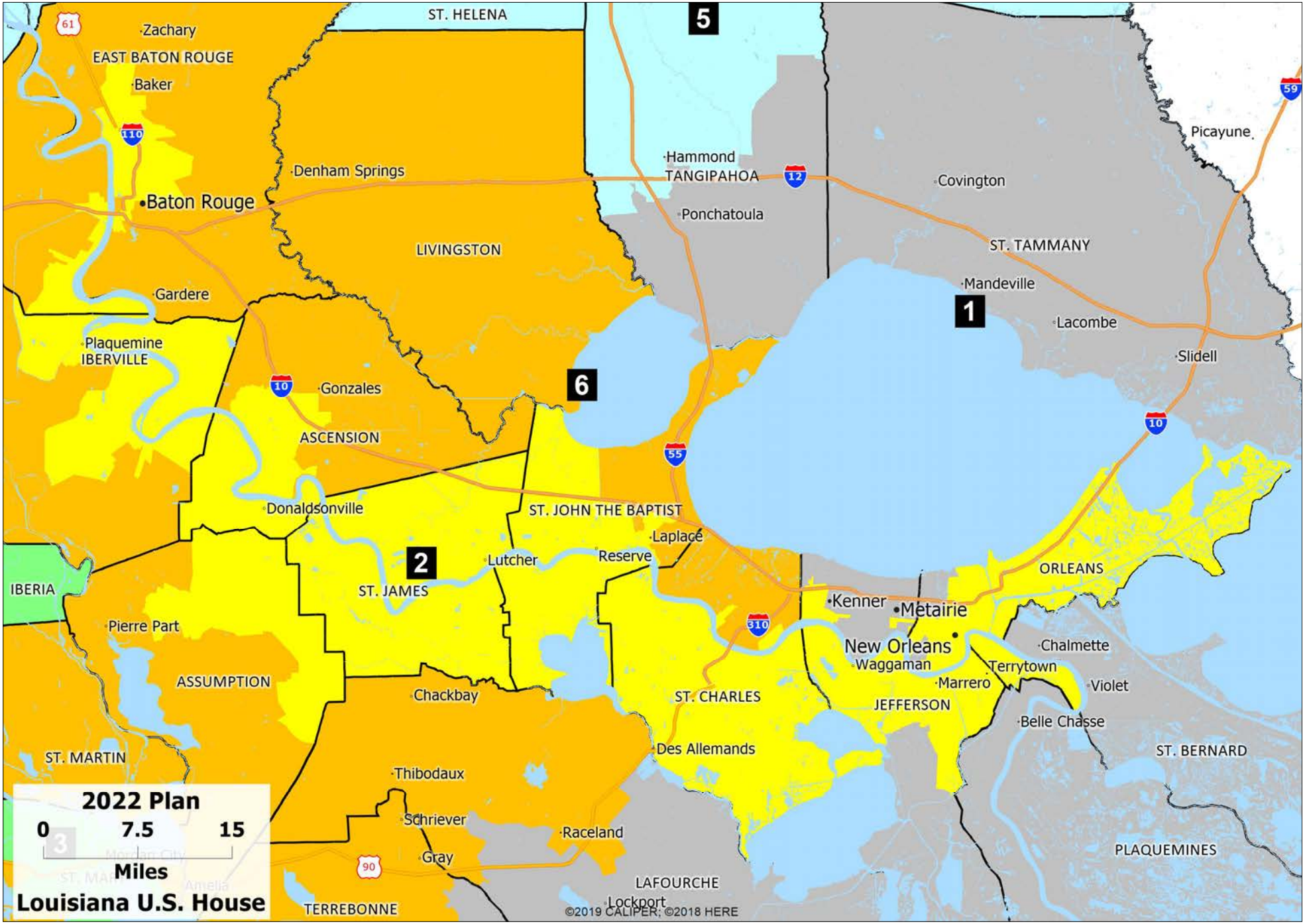
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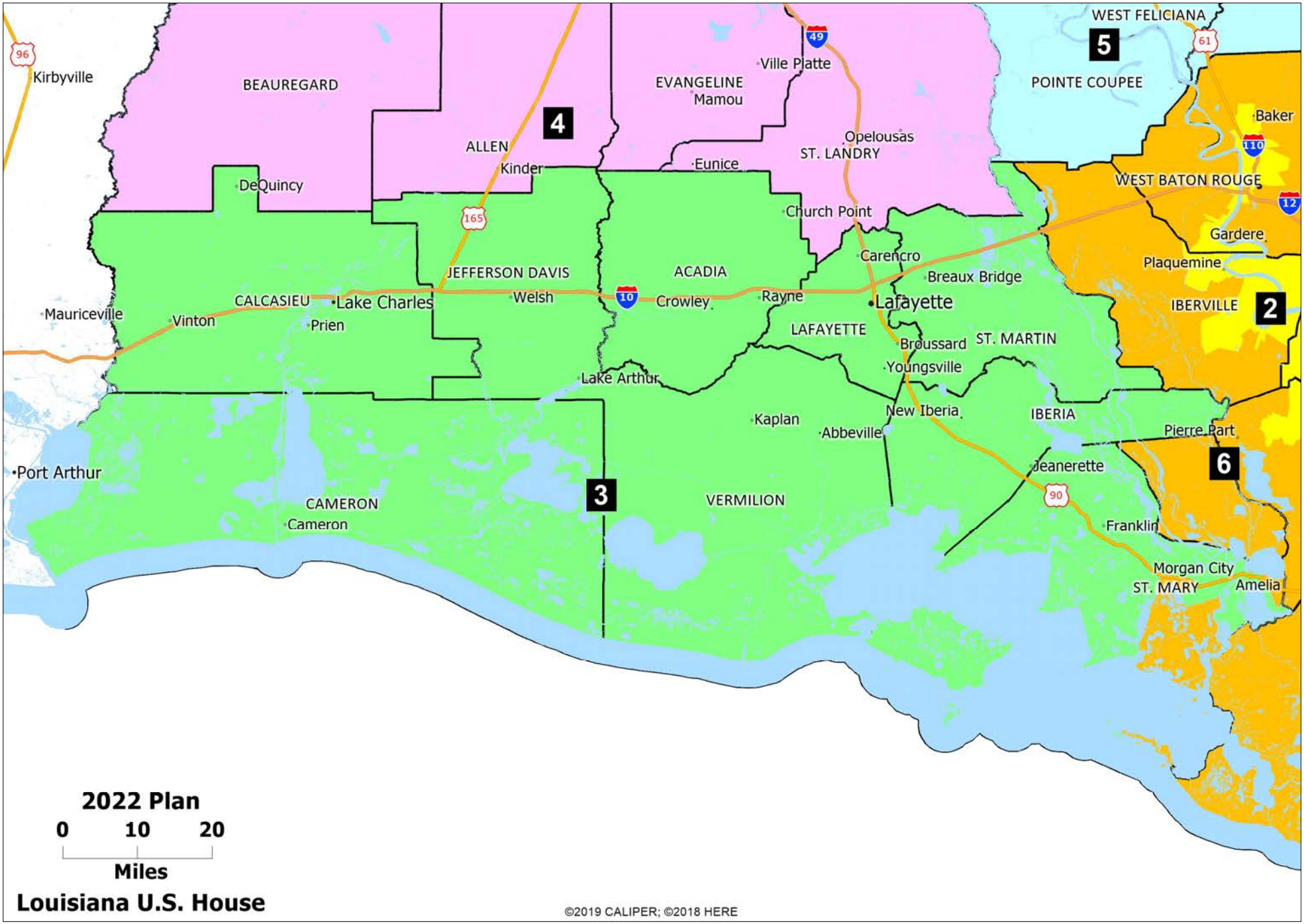
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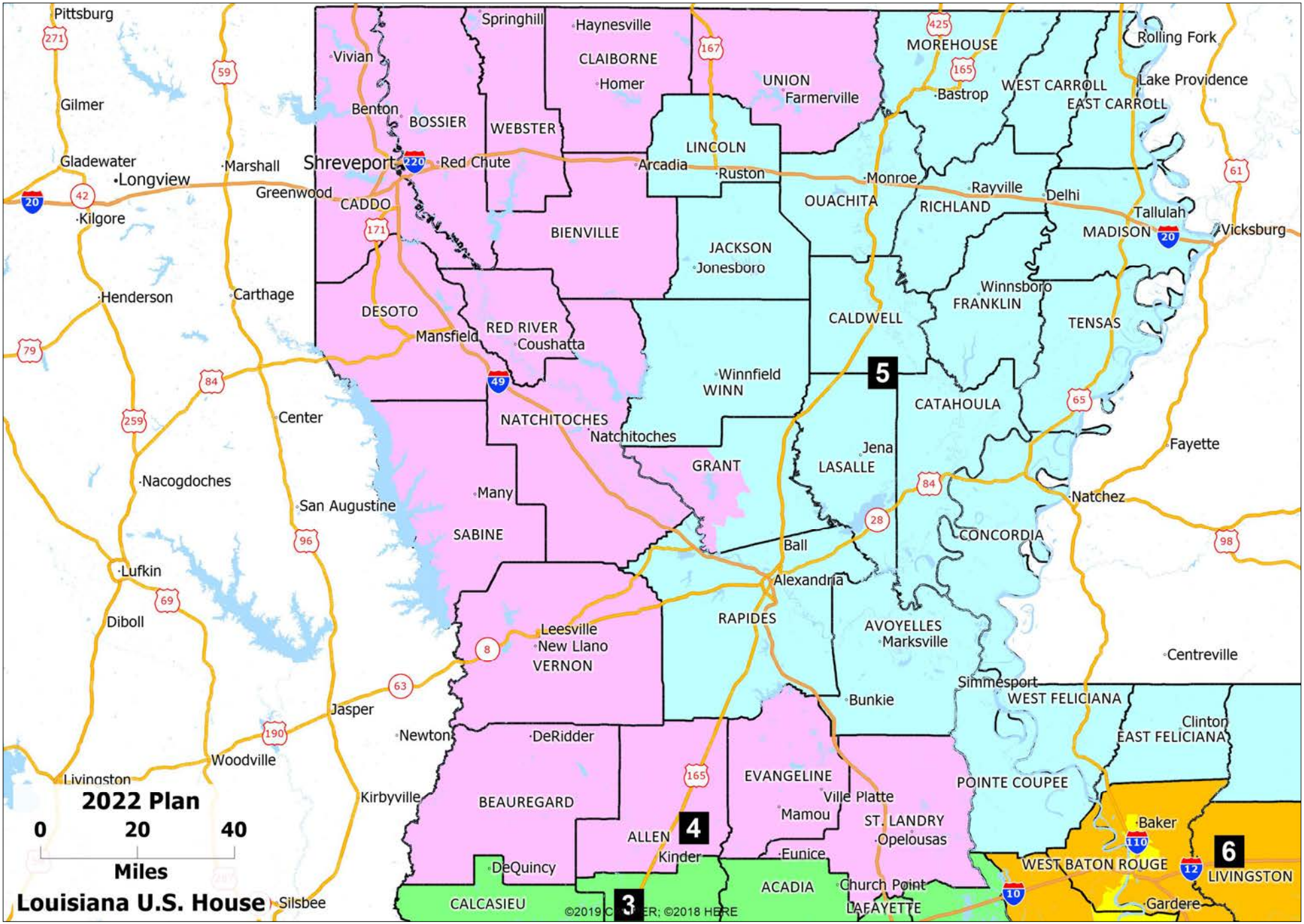
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POINTE COUPEE
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Ville Platte
Mamou
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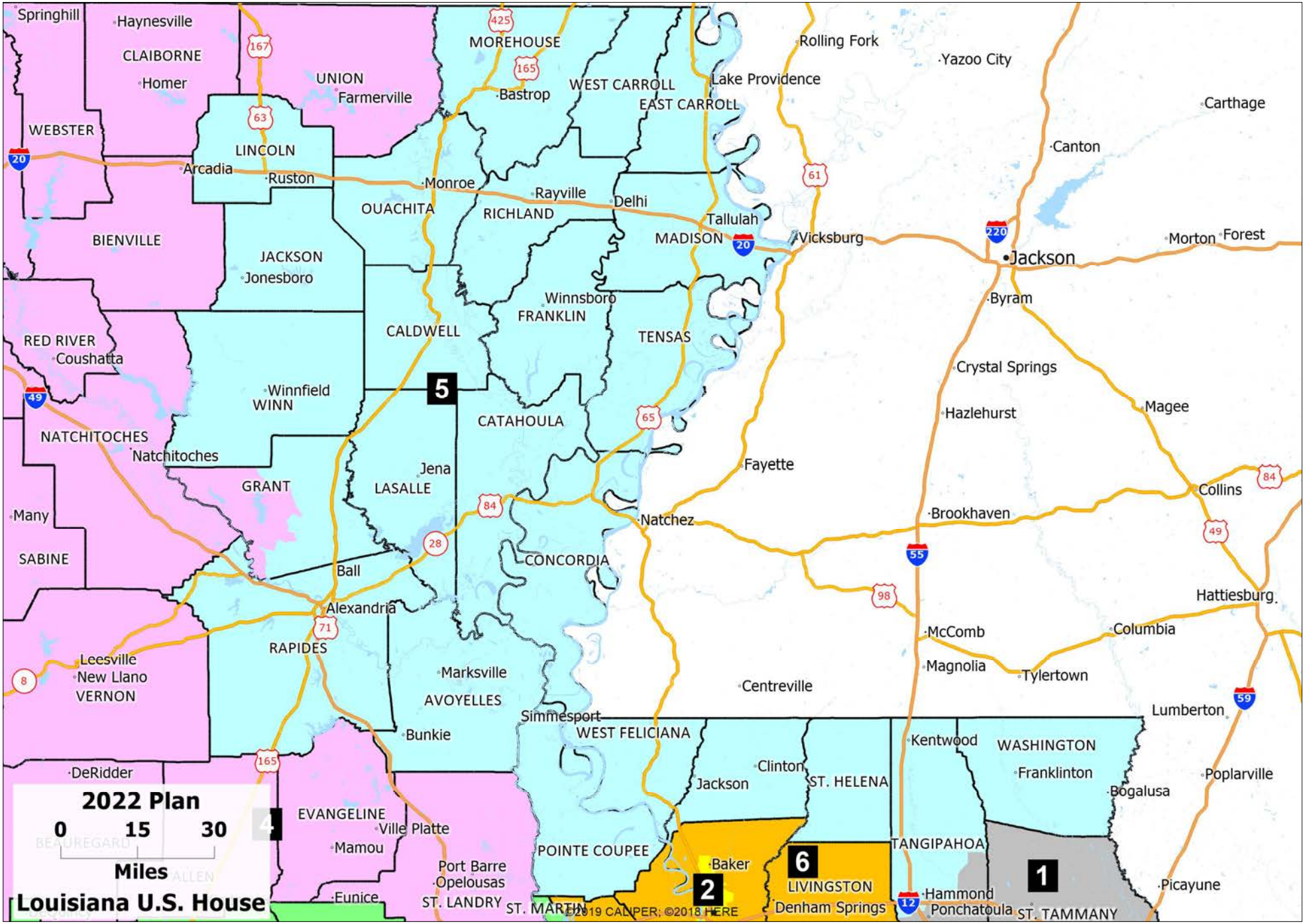
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LINCOLN
Arcadia
Ruston
Monroe
Rayville
Delhi
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Ville Platte
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Picayune
Port Barre
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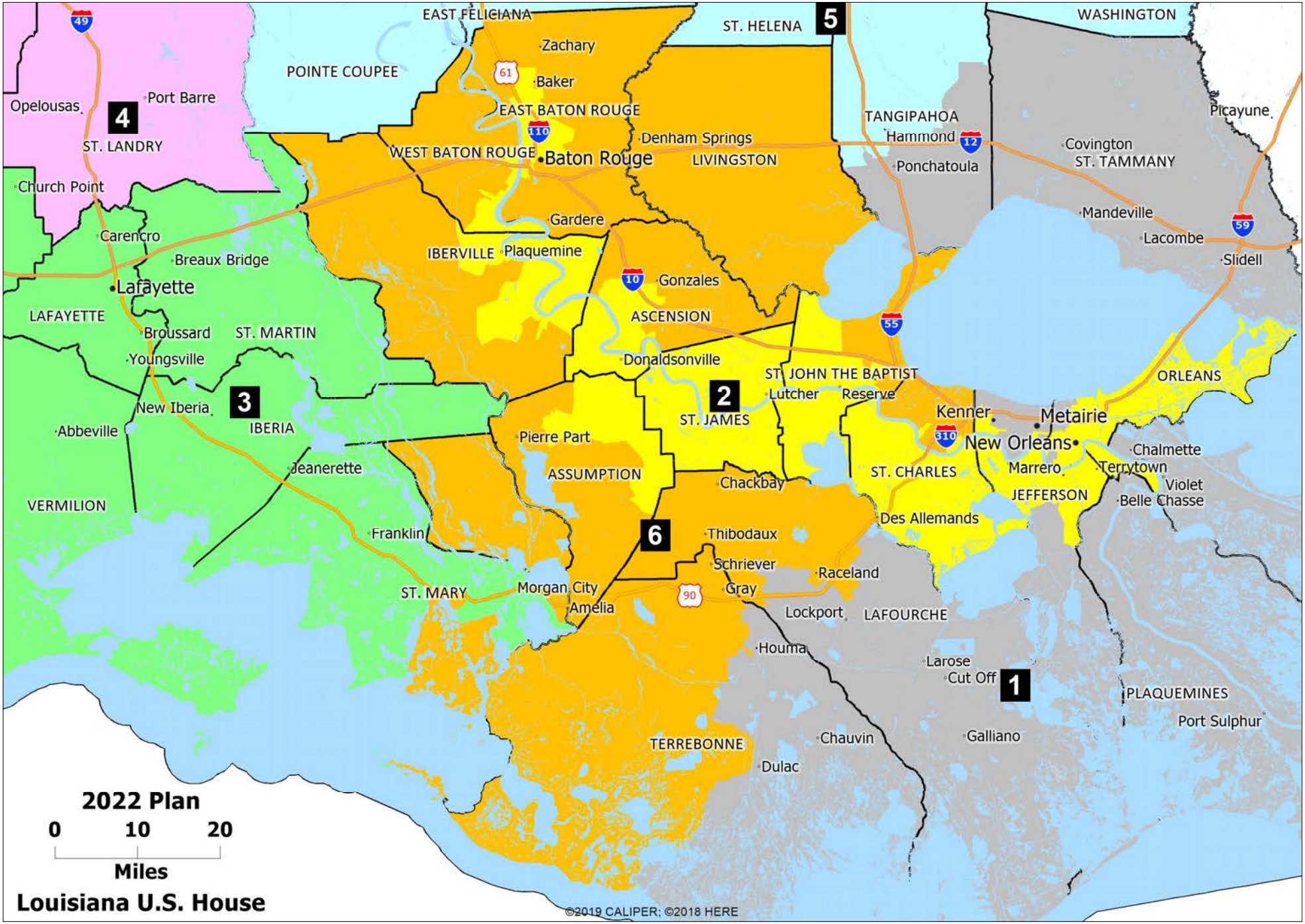
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Pierre Part
New Orleans
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Marrero
Terrytown
Chackbay
Violet
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Schriever
Raceland
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Morgan City
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Amelia
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EXHIBIT A-4

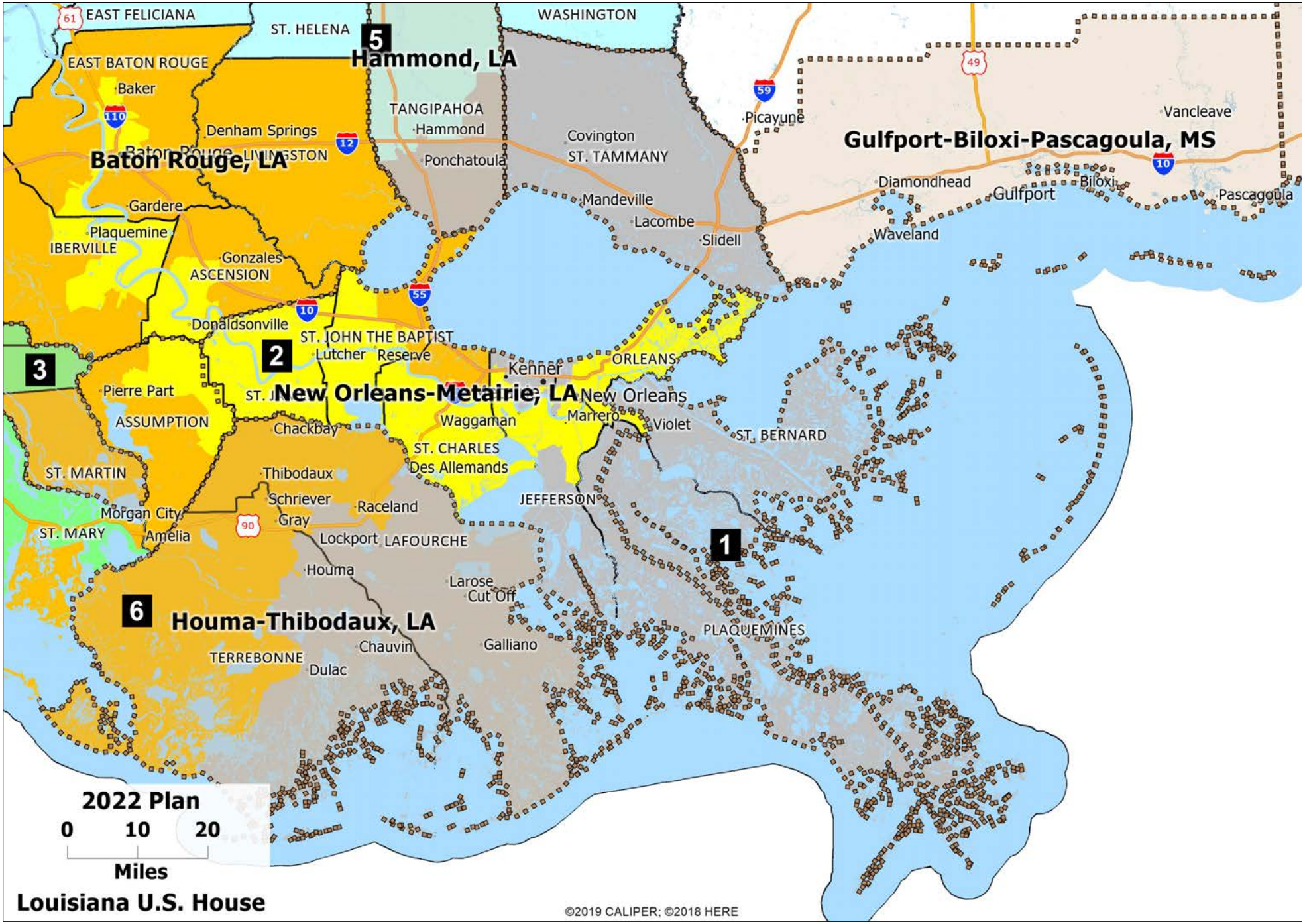
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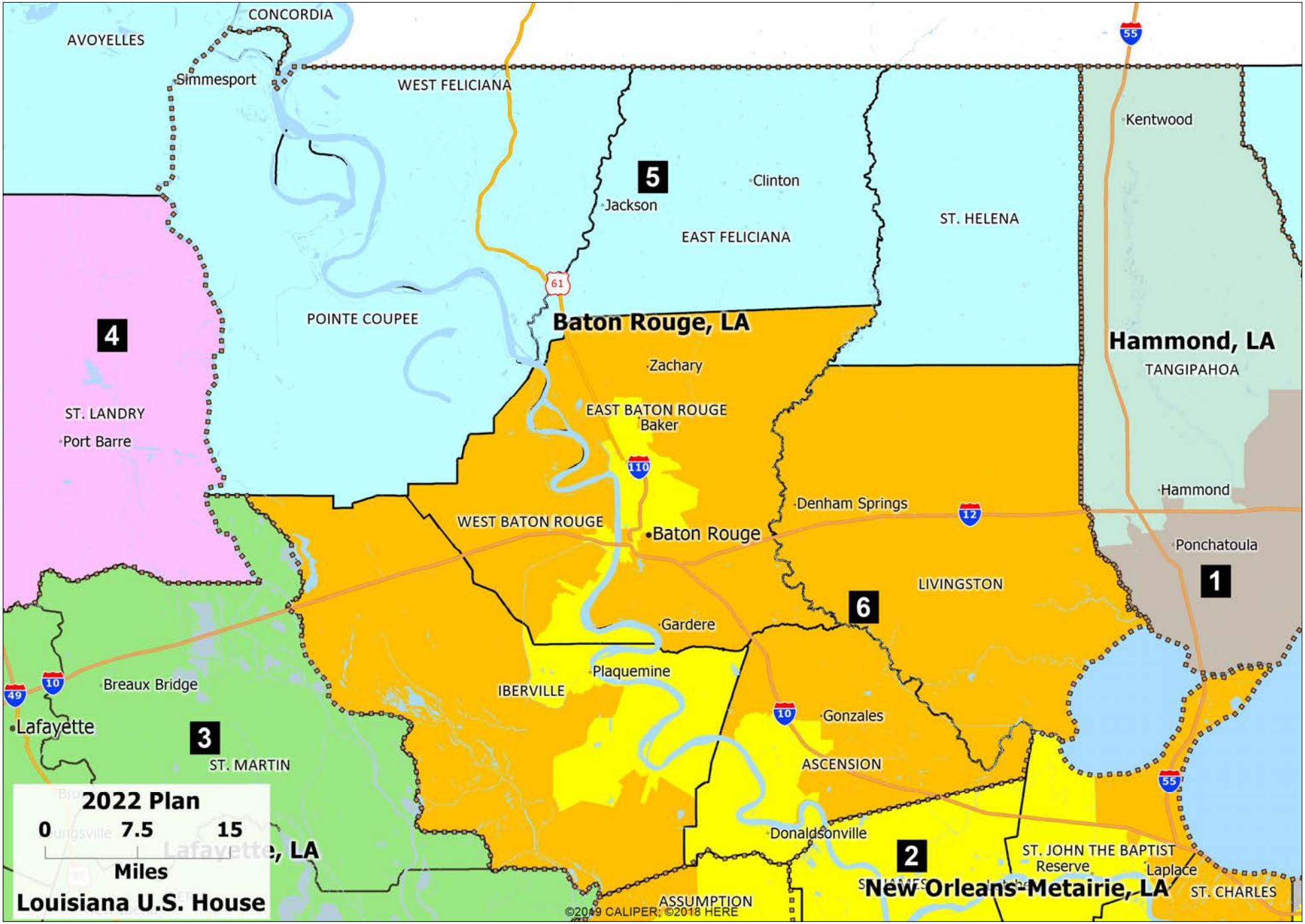
EXHIBIT A-5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ASSUMPTION
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EXHIBIT A-6

User:
Plan Name: **Enacted_2022_HB-1_SB-5**
Plan Type:

Plan Components

Monday, May 2, 2022 1:43 PM

	Population	[18+_Pop]	[18+_AP_Blk]
District 1			
County: Jefferson LA (part)	245,132	196,104	23,683
County Jefferson LA Subtotal	**245,132**	**196,104**	**23,683**
County: Lafourche LA (part)	43,701	33,330	1,095
County Lafourche LA Subtotal	**43,701**	**33,330**	**1,095**
County: Orleans LA (part)	48,050	39,613	3,348
County Orleans LA Subtotal	**48,050**	**39,613**	**3,348**
County: Plaquemines LA	23,515	17,334	3,857
County: St. Bernard LA	43,764	31,775	7,944
County: St. Tammany LA	264,570	202,228	26,761
County: Tangipahoa LA (part)	39,681	30,157	4,838
County Tangipahoa LA Subtotal	**39,681**	**30,157**	**4,838**
County: Terrebonne LA (part)	67,855	51,018	9,579
County Terrebonne LA Subtotal	**67,855**	**51,018**	**9,579**
District 1 Total	**776,268**	**601,559**	**81,105**
District 2			
County: Ascension LA (part)	20,892	15,426	9,766
County Ascension LA Subtotal	**20,892**	**15,426**	**9,766**
County: Assumption LA (part)	6,710	5,270	2,764
County Assumption LA Subtotal	**6,710**	**5,270**	**2,764**
County: East Baton Rouge LA (part)	94,325	70,960	63,632
County East Baton Rouge LA Subtotal	**94,325**	**70,960**	**63,632**
County: Iberville LA (part)	21,073	16,631	8,363
County Iberville LA Subtotal	**21,073**	**16,631**	**8,363**
County: Jefferson LA (part)	195,649	148,550	68,492
County Jefferson LA Subtotal	**195,649**	**148,550**	**68,492**
County: Orleans LA (part)	335,947	266,583	162,720
County Orleans LA Subtotal	**335,947**	**266,583**	**162,720**
County: St. Charles LA (part)	34,943	26,288	7,957
County St. Charles LA Subtotal	**34,943**	**26,288**	**7,957**
County: St. James LA	20,192	15,505	7,297
County: St. John the Baptist LA (part)	32,678	24,826	15,831
County St. John the Baptist LA Subtotal	**32,678**	**24,826**	**15,831**
County: West Baton Rouge LA (part)	13,908	10,164	5,196
Subtotal	**13,908**	**10,164**	**5,196**
County West Baton Rouge LA Subtotal	**13,908**	**10,164**	**5,196**
District 2 Total	**776,317**	**600,203**	**352,018**
District 3			
County: Acadia LA	57,576	42,943	7,383
County: Calcasieu LA	216,785	163,166	41,898

Plan Components

Enacted_2022_HB-1_SB-5

	Population	[18+_Pop]	[18+_AP_Blk]
District 3			
County: Cameron LA	5,617	4,358	79
County: Iberia LA	69,929	52,791	17,069
County: Jefferson Davis LA	32,250	24,039	4,006
County: Lafayette LA	241,753	183,875	45,917
County: St. Martin LA (part)	50,399	38,250	11,282
County St. Martin LA Subtotal	**50,399**	**38,250**	**11,282**
County: St. Mary LA (part)	44,607	34,054	11,013
County St. Mary LA Subtotal	**44,607**	**34,054**	**11,013**
County: Vermilion LA	57,359	43,012	5,787
District 3 Total	**776,275**	**586,488**	**144,434**
District 4			
County: Allen LA	22,750	17,510	3,275
County: Beauregard LA	36,549	27,489	3,495
County: Bienville LA	12,981	10,073	4,284
County: Bossier LA	128,746	95,876	22,440
County: Caddo LA	237,848	182,407	86,359
County: Claiborne LA	14,170	11,507	4,824
County: De Soto LA	26,812	20,440	7,425
County: Evangeline LA	32,350	24,408	6,483
County: Grant LA (part)	7,473	5,801	1,133
County Grant LA Subtotal	**7,473**	**5,801**	**1,133**
County: Natchitoches LA	37,515	29,349	11,415
County: Red River LA	7,620	5,714	2,164
County: Sabine LA	22,155	17,064	2,655
County: St. Landry LA	82,540	61,811	25,497
County: Union LA	21,107	16,632	3,861
County: Vernon LA	48,750	36,261	5,133
County: Webster LA	36,967	28,753	9,464
District 4 Total	**776,333**	**591,095**	**199,907**
District 5			
County: Avoyelles LA	39,693	30,578	8,311
County: Caldwell LA	9,645	7,478	1,224
County: Catahoula LA	8,906	6,951	1,736
County: Concordia LA	18,687	14,217	5,613
County: East Carroll LA	7,459	5,901	4,043
County: East Feliciana LA	19,539	16,183	5,918
County: Franklin LA	19,774	15,028	4,779
County: Grant LA (part)	14,696	11,726	1,584
County Grant LA Subtotal	**14,696**	**11,726**	**1,584**
County: Jackson LA	15,031	11,783	3,125
County: LaSalle LA	14,791	11,563	1,065
County: Lincoln LA	48,396	38,655	15,119
County: Madison LA	10,017	7,435	4,391
County: Morehouse LA	25,629	20,062	9,300
County: Ouachita LA	160,368	120,200	42,290

Plan Components

Enacted_2022_HB-1_SB-5

	Population	[18+_Pop]	[18+_AP_Blk]
District 5			
County: Pointe Coupee LA	20,758	16,250	5,502
County: Rapides LA	130,023	98,792	30,205
County: Richland LA	20,043	15,383	5,546
County: St. Helena LA	10,920	8,463	4,371
County: Tangipahoa LA (part)	93,476	71,334	24,379
County Tangipahoa LA Subtotal	**93,476**	**71,334**	**24,379**
County: Tensas LA	4,147	3,235	1,728
County: Washington LA	45,463	34,951	9,732
County: West Carroll LA	9,751	7,532	1,010
County: West Feliciana LA	15,310	12,783	2,951
County: Winn LA	13,755	10,906	2,695
District 5 Total	**776,277**	**597,389**	**196,617**
District 6			
County: Ascension LA (part)	105,608	76,531	12,373
County Ascension LA Subtotal	**105,608**	**76,531**	**12,373**
County: Assumption LA (part)	14,329	11,346	1,943
County Assumption LA Subtotal	**14,329**	**11,346**	**1,943**
County: East Baton Rouge LA (part)	362,456	284,652	93,158
County East Baton Rouge LA Subtotal	**362,456**	**284,652**	**93,158**
County: Iberville LA (part)	9,168	7,455	1,869
County Iberville LA Subtotal	**9,168**	**7,455**	**1,869**
County: Lafourche LA (part)	53,856	41,289	9,982
County Lafourche LA Subtotal	**53,856**	**41,289**	**9,982**
County: Livingston LA	142,282	105,141	8,136
County: St. Charles LA (part)	17,606	13,253	1,933
County St. Charles LA Subtotal	**17,606**	**13,253**	**1,933**
County: St. John the Baptist LA (part)	9,799	7,677	2,606
County St. John the Baptist LA Subtotal	**9,799**	**7,677**	**2,606**
County: St. Martin LA (part)	1,368	1,154	11
County St. Martin LA Subtotal	**1,368**	**1,154**	**11**
County: St. Mary LA (part)	4,799	3,467	507
County St. Mary LA Subtotal	**4,799**	**3,467**	**507**
County: Terrebonne LA (part)	41,725	31,487	6,217
County Terrebonne LA Subtotal	**41,725**	**31,487**	**6,217**
County: West Baton Rouge LA (part)	13,291	10,362	2,953
Subtotal	**13,291**	**10,362**	**2,953**
County West Baton Rouge LA Subtotal	**13,291**	**10,362**	**2,953**
District 6 Total	**776,287**	**593,814**	**141,688**
State Totals	**4,657,757**	**3,570,548**	**1,115,769**

EXHIBIT A-7

User:
Plan Name: **Enacted_2022_HB-1_SB-5**
Plan Type:

Political Subdivison Splits Between Districts

Monday, May 2, 2022 1:47 PM

Split Counts

Number of subdivisions split into more than one district:		Number of splits involving no population:	
County	15	County	0
Voting District	1	Voting District	0

Number of times a subdivision is split into multiple districts:

County	15
Voting District	1

County	Voting District	District	Population
Split Counties:			
Ascension LA		2	20,892
Ascension LA		6	105,608
Assumption LA		2	6,710
Assumption LA		6	14,329
East Baton Rouge LA		2	94,325
East Baton Rouge LA		6	362,456
Grant LA		4	7,473
Grant LA		5	14,696
Iberville LA		2	21,073
Iberville LA		6	9,168
Jefferson LA		1	245,132
Jefferson LA		2	195,649
Lafourche LA		1	43,701
Lafourche LA		6	53,856
Orleans LA		1	48,050
Orleans LA		2	335,947
St. Charles LA		2	34,943
St. Charles LA		6	17,606
St. John the Baptist LA		2	32,678
St. John the Baptist LA		6	9,799
St. Martin LA		3	50,399
St. Martin LA		6	1,368
St. Mary LA		3	44,607
St. Mary LA		6	4,799
Tangipahoa LA		1	39,681
Tangipahoa LA		5	93,476
Terrebonne LA		1	67,855
Terrebonne LA		6	41,725
West Baton Rouge LA		2	13,908
West Baton Rouge LA		6	13,291
Split VTDs:			
West Baton Rouge LA	2B	2	250
West Baton Rouge LA	2B	6	1,869

EXHIBIT A-8

User:
Plan Name: **Enacted_2022_HB-1_SB-5**
Plan Type:

Communities of Interest (Condensed)

Monday, May 2, 2022 1:52 PM

Whole Census Place : 287
Census Place Splits: 38
Zero Population Census Place Splits: 2

District	Census Place	Population	% Pop	District	Census Place	Population	% Pop
1	Houma	31,448	94.14%				
1	Kenner	52,353	78.79%				
1	New Orleans	48,050	12.51%				
1	Ponchatoula	7,647	97.76%				
1	Hammond	3,001	15.32%				
2	Kenner	14,095	21.21%				
2	Port Allen	4,315	87.37%				
2	Baton Rouge	79,011	34.73%				
2	Baker	3,119	25.04%				
2	New Orleans	335,947	87.49%				
2	White Castle	1,722	100.00%				
2	Gonzales	5,972	48.83%				
2	Plaquemine	6,159	98.25%				
2	Addis	6,700	99.54%				
2	Brusly	694	26.92%				
3	Basile	0	0.00%				
3	Eunice	302	3.21%				
3	Arnaudville	39	3.87%				
3	Morgan City	10,449	91.08%				
3	Patterson	4,325	72.92%				
4	Basile	1,214	100.00%				
4	Eunice	9,120	96.79%				
4	Downsville	96	80.00%				
4	Arnaudville	970	96.13%				
5	Downsville	24	20.00%				
5	Ponchatoula	175	2.24%				
5	Hammond	16,583	84.68%				
6	Morgan City	1,023	8.92%				
6	Houma	1,958	5.86%				
6	Port Allen	624	12.63%				
6	Baton Rouge	148,459	65.27%				
6	Baker	9,336	74.96%				
6	White Castle	0	0.00%				
6	Gonzales	6,259	51.17%				
6	Patterson	1,606	27.08%				
6	Plaquemine	110	1.75%				
6	Addis	31	0.46%				
6	Brusly	1,884	73.08%				

EXHIBIT A-9

User:
Plan Name: **Enacted_2022_HB-1_SB-5**
Plan Type:

Communities of Interest (Condensed)

Monday, May 2, 2022 2:00 PM

Whole CBSA : 11
CBSA Splits: 18
Zero Population CBSA Splits: 0

District	CBSA	Population	% Pop	District	CBSA	Population	% Pop
1	Houma-Thibodaux, LA	111,556	53.86%				
1	Hammond, LA	39,681	29.80%				
1	New Orleans-Metairie, LA	625,031	49.14%				
2	Baton Rouge, LA	156,908	18.02%				
2	New Orleans-Metairie, LA	619,409	48.70%				
3	Lafayette, LA	477,016	99.71%				
3	Morgan City, LA	44,607	90.29%				
4	Alexandria, LA	7,473	4.91%				
4	Monroe, LA	21,107	10.19%				
5	Alexandria, LA	144,719	95.09%				
5	Baton Rouge, LA	66,527	7.64%				
5	Hammond, LA	93,476	70.20%				
5	Monroe, LA	185,997	89.81%				
6	Lafayette, LA	1,368	0.29%				
6	Morgan City, LA	4,799	9.71%				
6	Houma-Thibodaux, LA	95,581	46.14%				
6	Baton Rouge, LA	647,134	74.33%				
6	New Orleans-Metairie, LA	27,405	2.15%				

EXHIBIT B-1

Population Summary Report
Louisiana Congress -- Illustrative Plan 4
2020 Census

District	Population	Deviation	AP Black	% AP Black	18+ Pop	18 + AP Black	% 18+ AP Black	18+ Latino	% 18+ Latino	18+ NH White	% 18+ NH White
1	776235	-58	154967	19.96%	599404	108721	18.14%	60131	10.03%	396822	66.20%
2	776266	-27	406069	52.31%	603596	302153	50.06%	51841	8.59%	226410	37.51%
3	776252	-41	166121	21.40%	586230	116020	19.79%	30735	5.24%	414576	70.72%
4	776256	-37	258080	33.25%	596127	187628	31.47%	24505	4.11%	359047	60.23%
5	776390	97	411838	53.05%	593324	298354	50.29%	20393	3.44%	259437	43.73%
6	776358	65	146044	18.81%	591867	102893	17.38%	36057	6.09%	425818	71.94%
Total	**4657757**		**1543119**	**33.13%**	**3570548**	**1115769**	**31.25%**	**223662**	**6.26%**	**2082110**	**58.31%**

District	% NH SR Black CVAP	% NH White CVAP	% July 2021 Black Registered
1	16.39%	73.87%	16.83%
2	52.63%	39.53%	52.23%
3	19.06%	74.91%	18.77%
4	32.17%	63.02%	30.90%
5	50.78%	45.75%	52.17%
6	16.76%	77.60%	15.55%

Source for % Citizen Voting Age (CVAP) -- 2020 Citizen Voting Age Population by Race and Ethnicity Special Tabulation (U.S. Census Bureau)
https://www.census.gov/programs-surveys/decennial-census/about/voting-rights/cvap.html

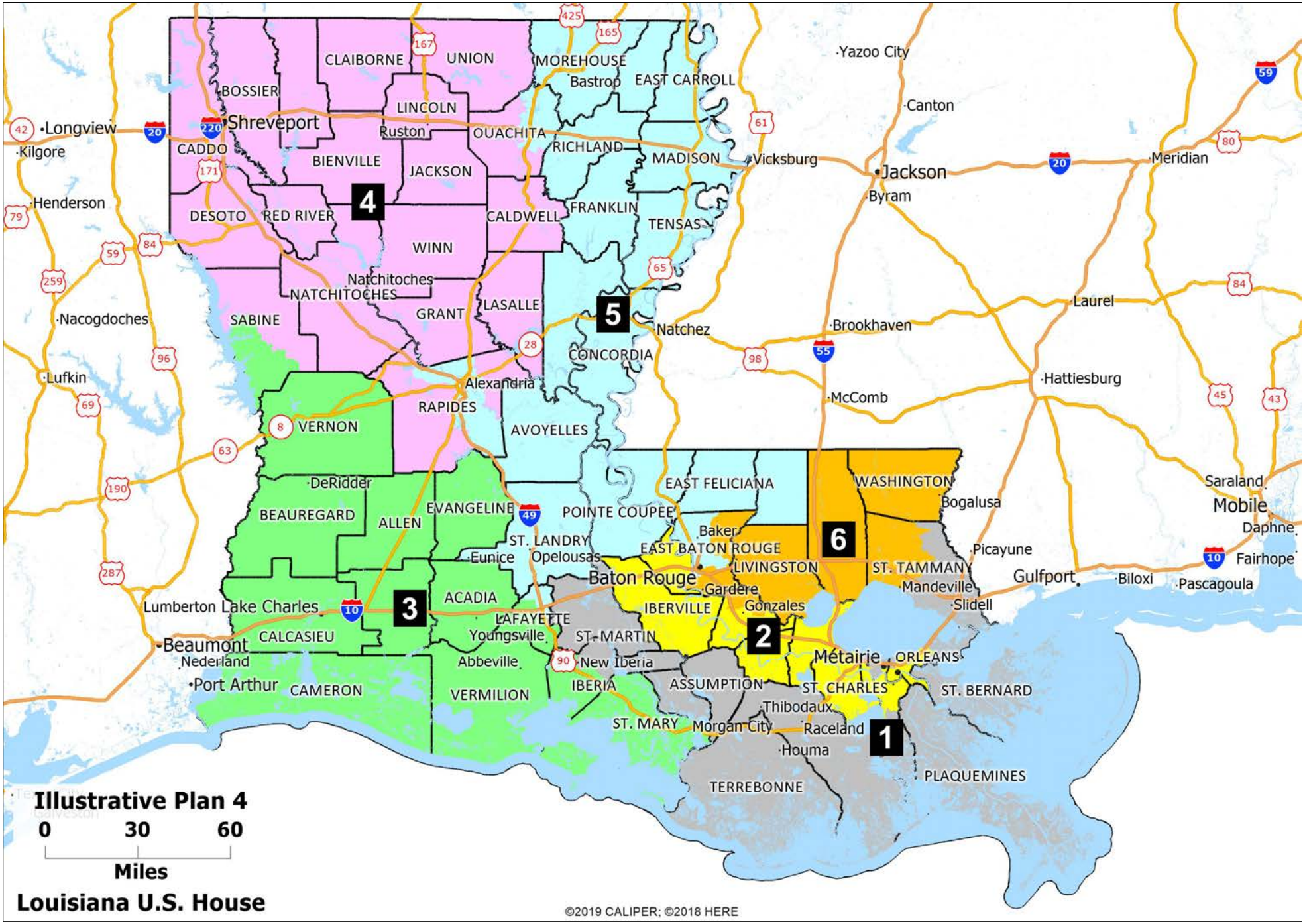
-- calculated by disaggregating 2016-2020 ACS block group estimates to 2020 census blocks

Source for Voter Registration Stats: State of Louisiana via Redistricting Data Hub

https://redistrictingdatahub.org/dataset/louisiana-voter-registration-file-at-the-vtd-level/
https://redistrictingdatahub.org/wp-content/uploads/2021/09/readme_la_voter_reg_official.txt

-- calculated by disaggregating 2020 VTD data to 2020 census blocks

EXHIBIT B-2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Henderson
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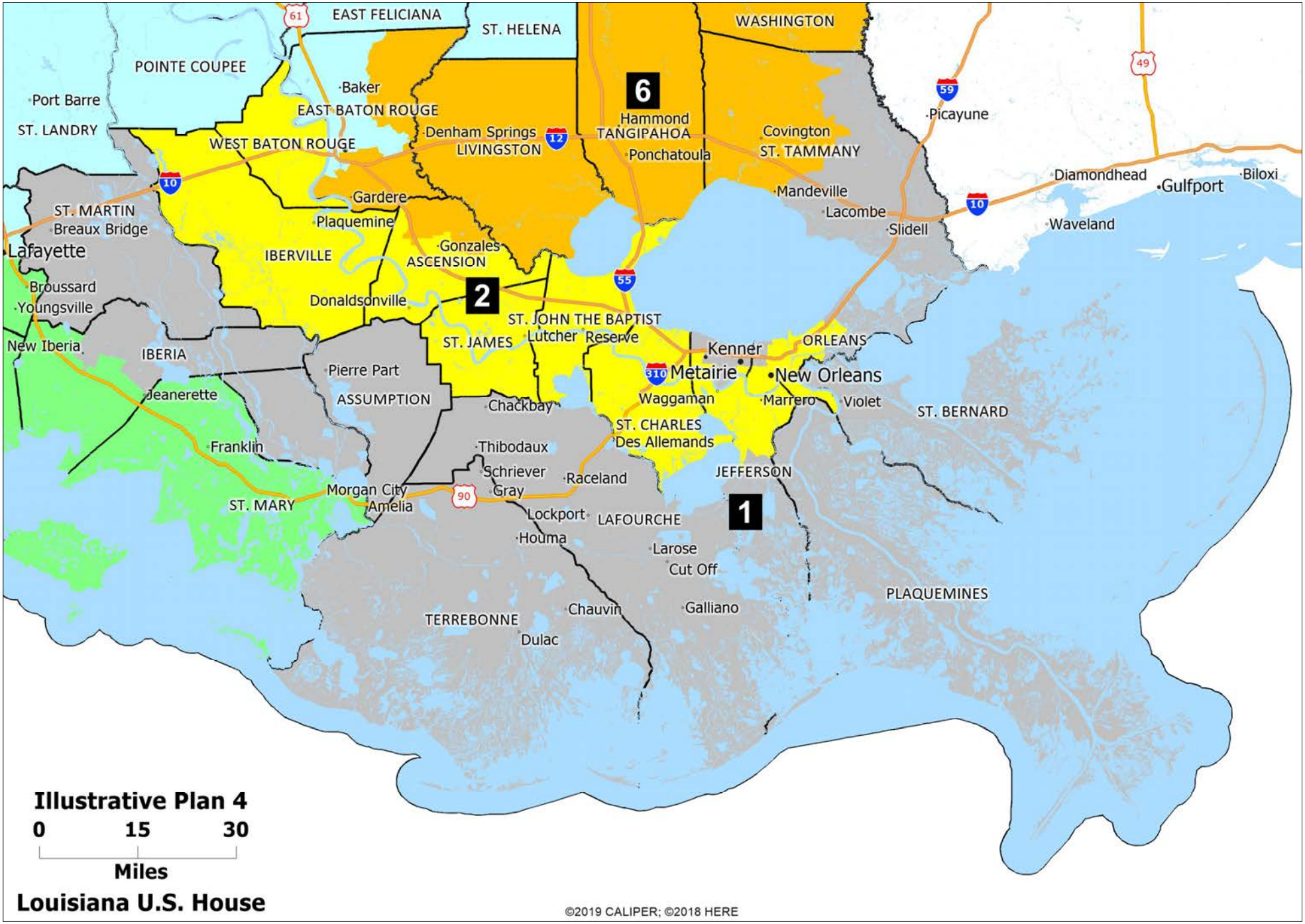
EXHIBIT B-3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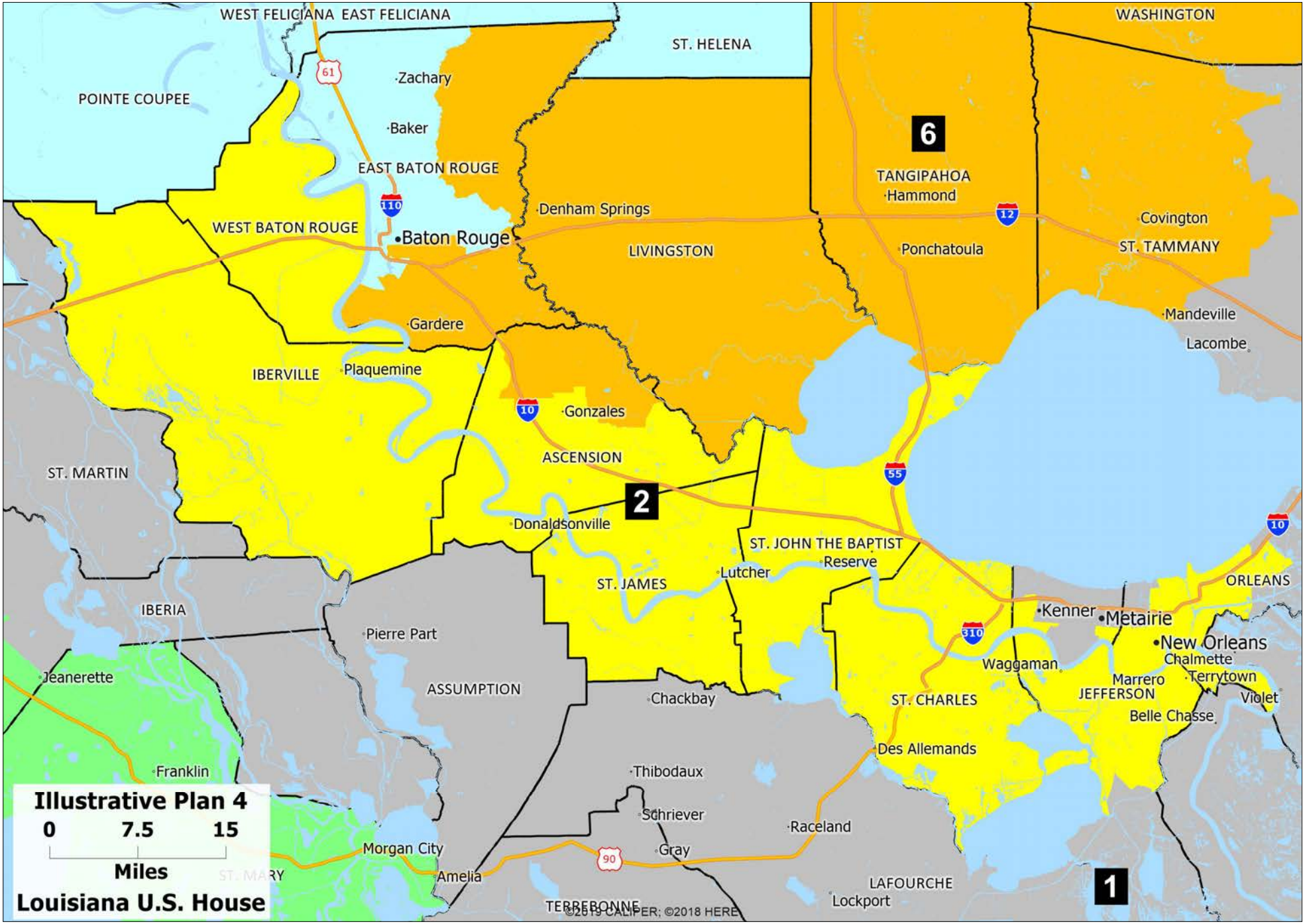
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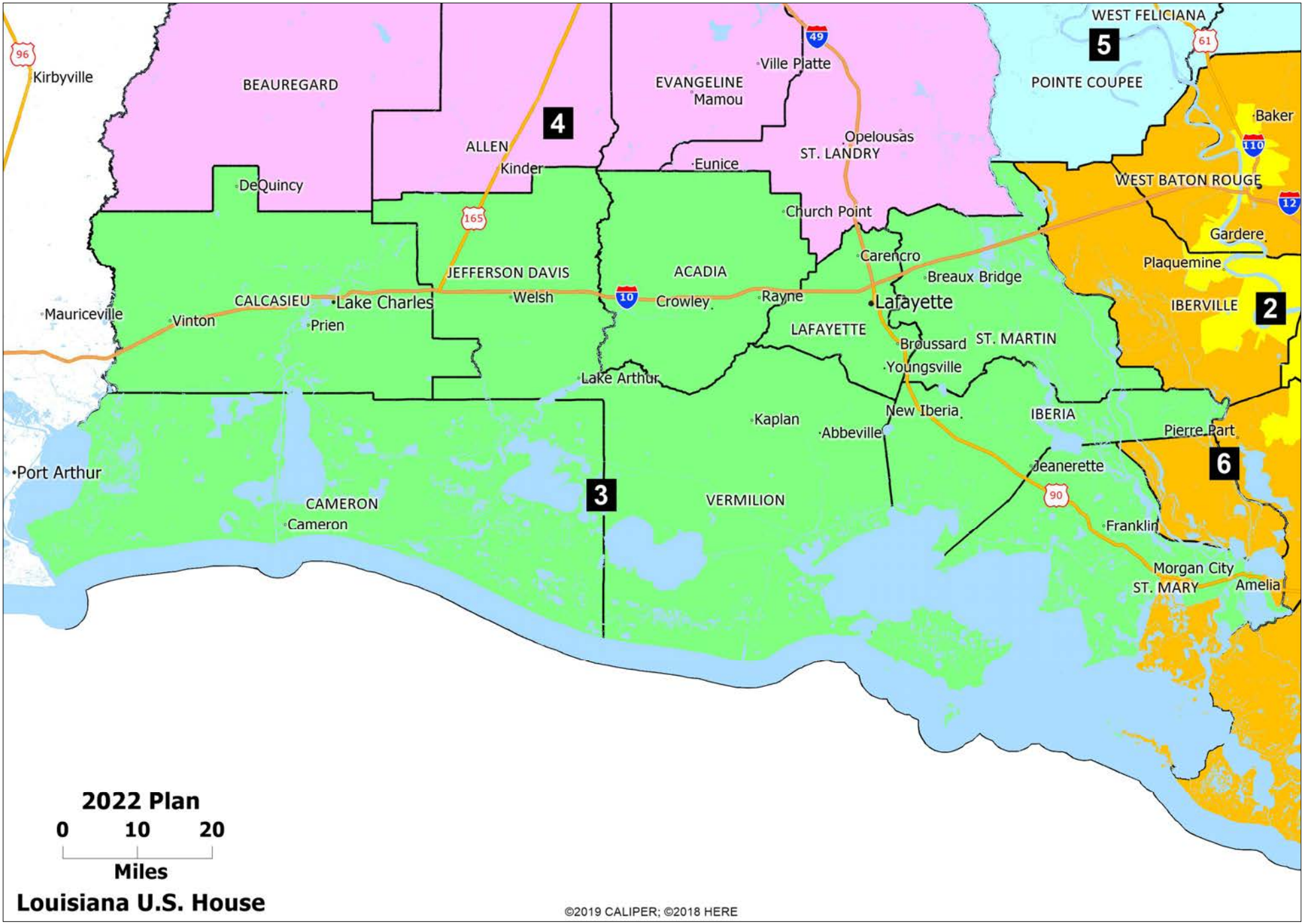
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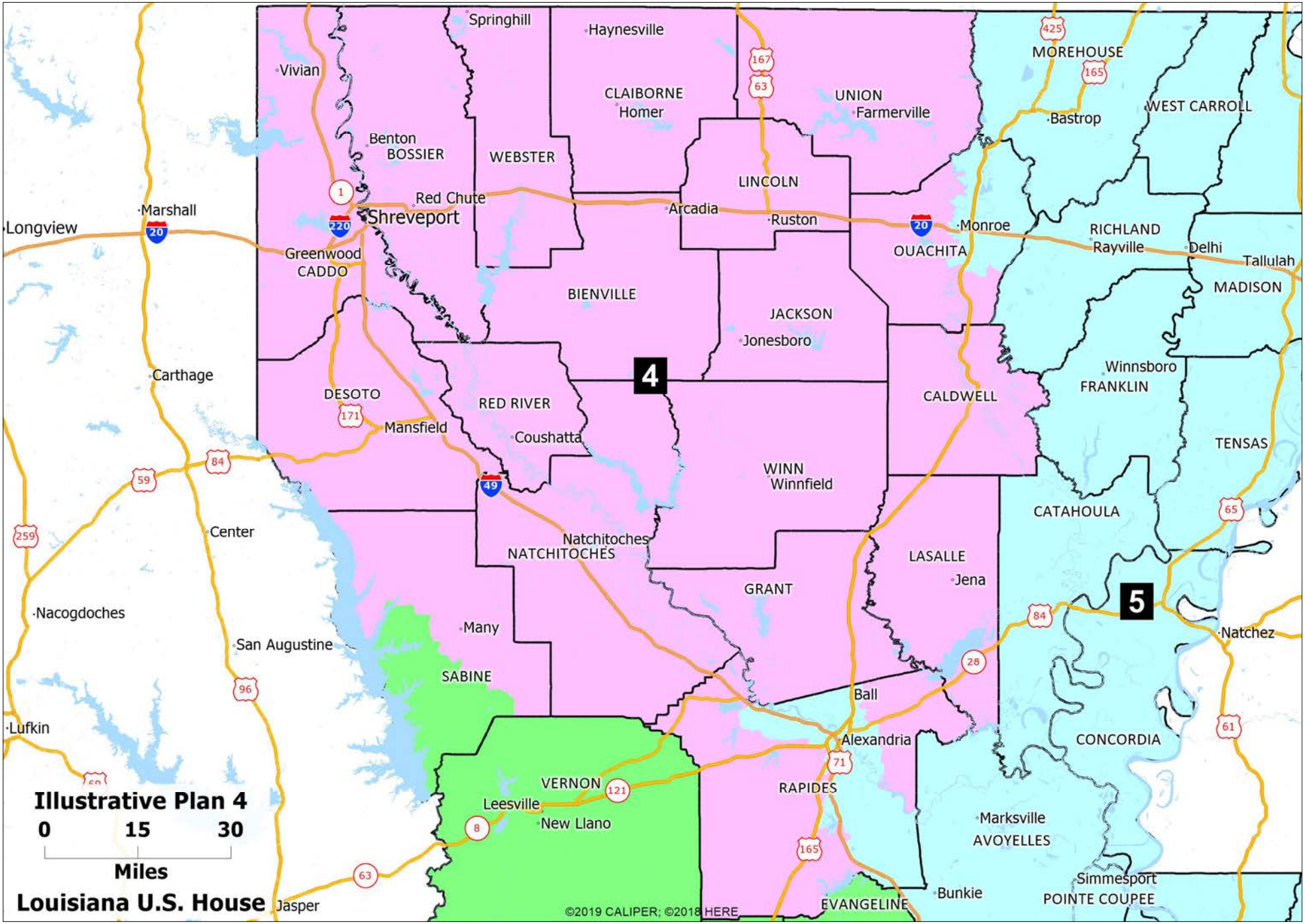
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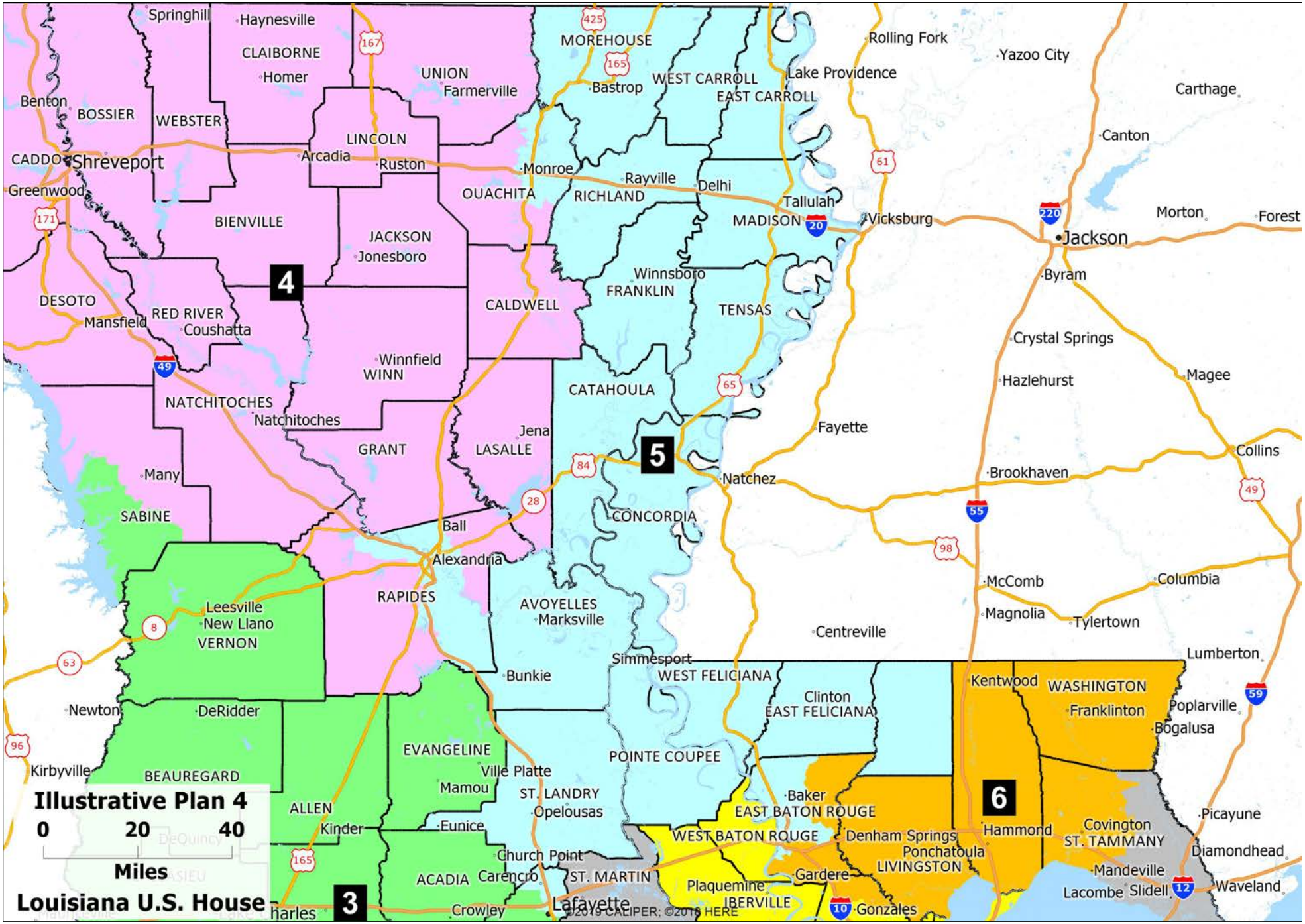
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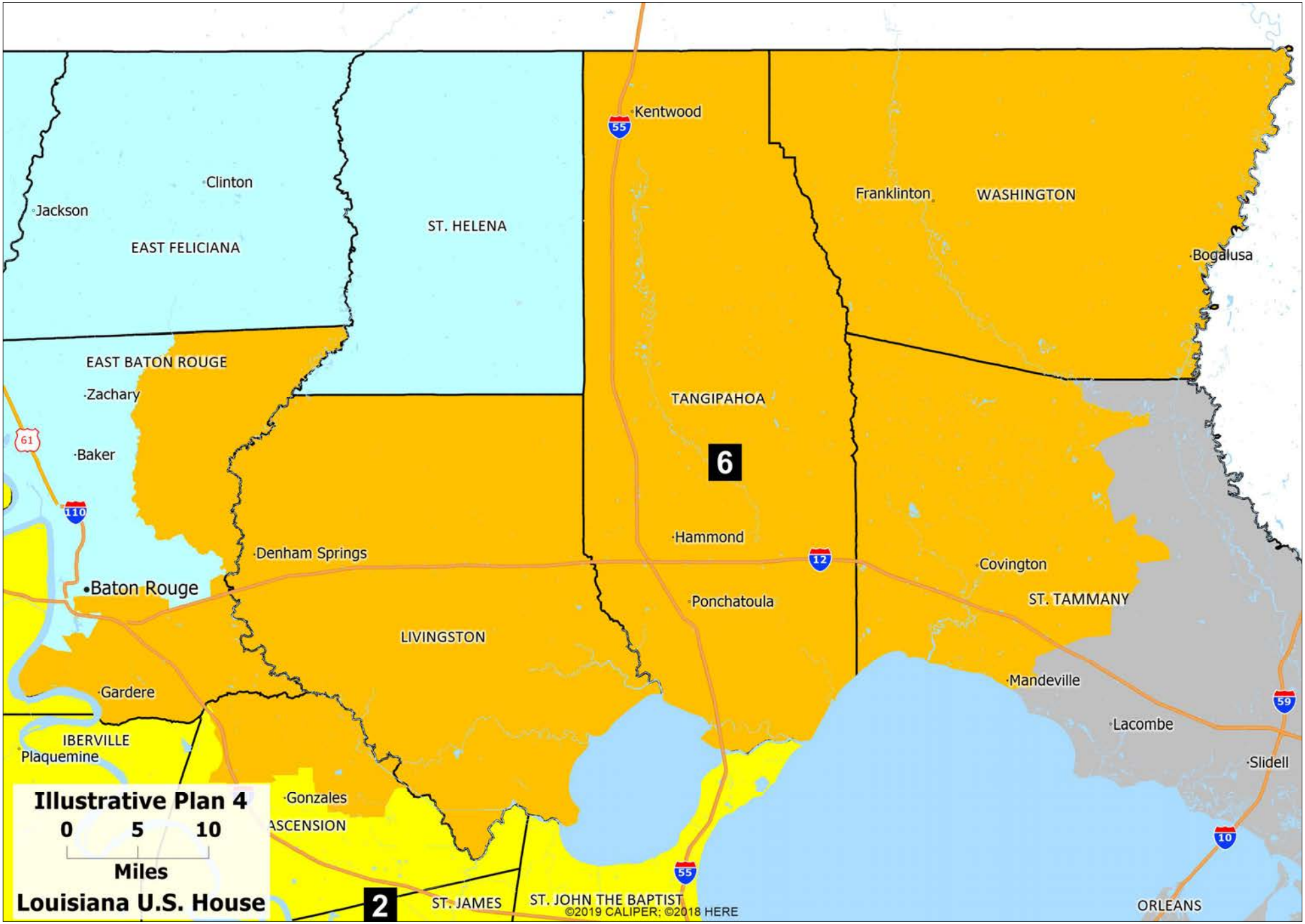
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EXHIBIT B-4

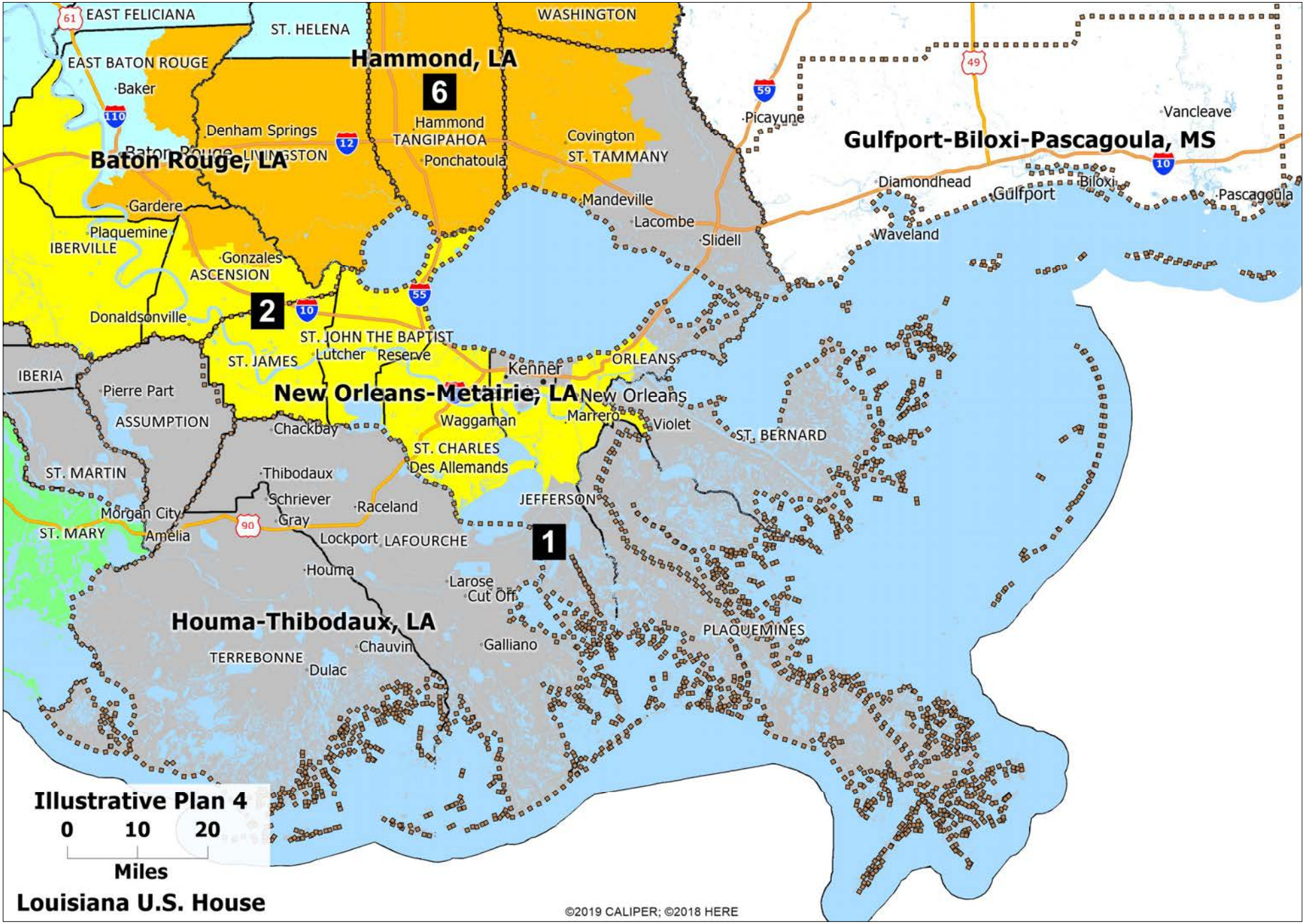
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EXHIBIT B-5

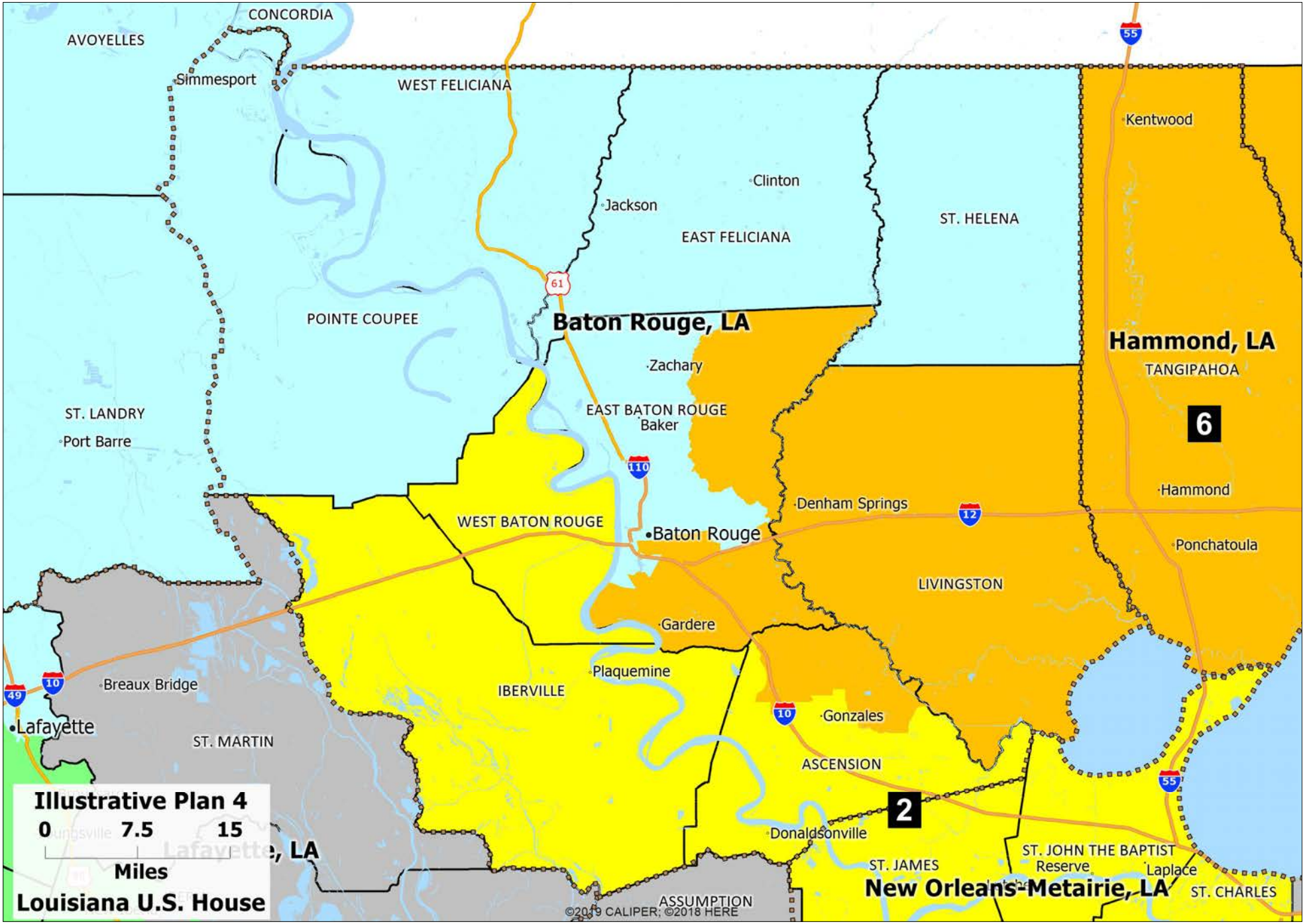
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EXHIBIT B-6

User:
Plan Name: **Illustrative_4**
Plan Type:

Plan Components

Sunday, May 1, 2022 11:10 AM

	Population	[18+_Pop]	[18+_AP_Blk]
District 01			
County: Assumption LA	21,039	16,616	4,707
County: Iberia LA (part)	37,143	27,783	10,152
County Iberia LA Subtotal	**37,143**	**27,783**	**10,152**
County: Jefferson LA (part)	236,363	188,976	22,244
County Jefferson LA Subtotal	**236,363**	**188,976**	**22,244**
County: Lafourche LA	97,557	74,619	11,077
County: Orleans LA (part)	33,047	26,383	1,891
County Orleans LA Subtotal	**33,047**	**26,383**	**1,891**
County: Plaquemines LA	23,515	17,334	3,857
County: St. Bernard LA	43,764	31,775	7,944
County: St. Martin LA	51,767	39,404	11,293
County: St. Tammany LA (part)	122,460	94,009	19,760
County St. Tammany LA Subtotal	**122,460**	**94,009**	**19,760**
County: Terrebonne LA	109,580	82,505	15,796
District 01 Total	**776,235**	**599,404**	**108,721**
District 02			
County: Ascension LA (part)	48,240	35,944	14,040
County Ascension LA Subtotal	**48,240**	**35,944**	**14,040**
County: Iberville LA	30,241	24,086	10,232
County: Jefferson LA (part)	204,418	155,678	69,931
County Jefferson LA Subtotal	**204,418**	**155,678**	**69,931**
County: Orleans LA (part)	350,950	279,813	164,177
County Orleans LA Subtotal	**350,950**	**279,813**	**164,177**
County: St. Charles LA	52,549	39,541	9,890
County: St. James LA	20,192	15,505	7,297
County: St. John the Baptist LA	42,477	32,503	18,437
County: West Baton Rouge LA	27,199	20,526	8,149
District 02 Total	**776,266**	**603,596**	**302,153**
District 03			
County: Acadia LA	57,576	42,943	7,383
County: Allen LA	22,750	17,510	3,275
County: Beauregard LA	36,549	27,489	3,495
County: Calcasieu LA	216,785	163,166	41,898
County: Cameron LA	5,617	4,358	79
County: Evangeline LA	32,350	24,408	6,483
County: Iberia LA (part)	32,786	25,008	6,917
County Iberia LA Subtotal	**32,786**	**25,008**	**6,917**
County: Jefferson Davis LA	32,250	24,039	4,006
County: Lafayette LA (part)	176,754	134,592	19,684
County Lafayette LA Subtotal	**176,754**	**134,592**	**19,684**

Plan Components

Illustrative_4

	Population	[18+_Pop]	[18+_AP_Blk]
District 03			
County: Sabine LA (part)	7,320	5,923	360
County Sabine LA Subtotal	**7,320**	**5,923**	**360**
County: St. Mary LA	49,406	37,521	11,520
County: Vermilion LA	57,359	43,012	5,787
County: Vernon LA	48,750	36,261	5,133
District 03 Total	**776,252**	**586,230**	**116,020**
District 04			
County: Bienville LA	12,981	10,073	4,284
County: Bossier LA	128,746	95,876	22,440
County: Caddo LA	237,848	182,407	86,359
County: Caldwell LA	9,645	7,478	1,224
County: Claiborne LA	14,170	11,507	4,824
County: De Soto LA	26,812	20,440	7,425
County: Grant LA	22,169	17,527	2,717
County: Jackson LA	15,031	11,783	3,125
County: LaSalle LA	14,791	11,563	1,065
County: Lincoln LA	48,396	38,655	15,119
County: Natchitoches LA	37,515	29,349	11,415
County: Ouachita LA (part)	65,186	49,417	4,192
County Ouachita LA Subtotal	**65,186**	**49,417**	**4,192**
County: Rapides LA (part)	48,682	36,906	2,960
County Rapides LA Subtotal	**48,682**	**36,906**	**2,960**
County: Red River LA	7,620	5,714	2,164
County: Sabine LA (part)	14,835	11,141	2,295
County Sabine LA Subtotal	**14,835**	**11,141**	**2,295**
County: Union LA	21,107	16,632	3,861
County: Webster LA	36,967	28,753	9,464
County: Winn LA	13,755	10,906	2,695
District 04 Total	**776,256**	**596,127**	**187,628**
District 05			
County: Avoyelles LA	39,693	30,578	8,311
County: Catahoula LA	8,906	6,951	1,736
County: Concordia LA	18,687	14,217	5,613
County: East Baton Rouge LA (part)	221,695	169,560	116,082
County East Baton Rouge LA Subtotal	**221,695**	**169,560**	**116,082**
County: East Carroll LA	7,459	5,901	4,043
County: East Feliciana LA	19,539	16,183	5,918
County: Franklin LA	19,774	15,028	4,779
County: Lafayette LA (part)	64,999	49,283	26,233
County Lafayette LA Subtotal	**64,999**	**49,283**	**26,233**
County: Madison LA	10,017	7,435	4,391
County: Morehouse LA	25,629	20,062	9,300
County: Ouachita LA (part)	95,182	70,783	38,098
County Ouachita LA Subtotal	**95,182**	**70,783**	**38,098**

Plan Components

Illustrative_4

	Population	[18+_Pop]	[18+_AP_Blk]
District 05			
County: Pointe Coupee LA	20,758	16,250	5,502
County: Rapides LA (part)	81,341	61,886	27,245
County Rapides LA Subtotal	**81,341**	**61,886**	**27,245**
County: Richland LA	20,043	15,383	5,546
County: St. Helena LA	10,920	8,463	4,371
County: St. Landry LA	82,540	61,811	25,497
County: Tensas LA	4,147	3,235	1,728
County: West Carroll LA	9,751	7,532	1,010
County: West Feliciana LA	15,310	12,783	2,951
District 05 Total	**776,390**	**593,324**	**298,354**
District 06			
County: Ascension LA (part)	78,260	56,013	8,099
County Ascension LA Subtotal	**78,260**	**56,013**	**8,099**
County: East Baton Rouge LA (part)	235,086	186,052	40,708
County East Baton Rouge LA Subtotal	**235,086**	**186,052**	**40,708**
County: Livingston LA	142,282	105,141	8,136
County: St. Tammany LA (part)	142,110	108,219	7,001
County St. Tammany LA Subtotal	**142,110**	**108,219**	**7,001**
County: Tangipahoa LA	133,157	101,491	29,217
County: Washington LA	45,463	34,951	9,732
District 06 Total	**776,358**	**591,867**	**102,893**
State Totals	**4,657,757**	**3,570,548**	**1,115,769**

EXHIBIT B-7

User:
Plan Name: **Illustrative_4**
Plan Type:

Political Subdivison Splits Between Districts

Sunday, May 1, 2022 11:01 AM

Split Counts

Number of subdivisions split into more than one district:		Number of splits involving no population:	
County	10	County	0
Voting District		Voting District	0

Number of times a subdivision is split into multiple districts:

County	10

County	Voting District	District	Population
Split Counties:			
Ascension LA		02	48,240
Ascension LA		06	78,260
East Baton Rouge LA		05	221,695
East Baton Rouge LA		06	235,086
Iberia LA		01	37,143
Iberia LA		03	32,786
Jefferson LA		01	236,363
Jefferson LA		02	204,418
Lafayette LA		03	176,754
Lafayette LA		05	64,999
Orleans LA		01	33,047
Orleans LA		02	350,950
Ouachita LA		04	65,186
Ouachita LA		05	95,182
Rapides LA		04	48,682
Rapides LA		05	81,341
Sabine LA		03	7,320
Sabine LA		04	14,835
St. Tammany LA		01	122,460
St. Tammany LA		06	142,110

EXHIBIT B-8

User:
Plan Name: **Illustrative_4**
Plan Type:

Communities of Interest (Condensed)

Monday, May 2, 2022 2:26 PM

Whole Census Place : 290
Census Place Splits: 32
Zero Population Census Place Splits: 2

District	Census Place	Population	% Pop	District	Census Place	Population	% Pop
01	Broussard LA	190	1.42%				
01	New Iberia LA	25,204	88.26%				
01	Arnaudville LA	39	3.87%				
01	Morgan City LA	0	0.00%				
01	Kenner LA	56,858	85.57%				
01	New Orleans LA	33,047	8.61%				
01	Mandeville LA	0	0.00%				
02	Kenner LA	9,590	14.43%				
02	New Orleans LA	350,950	91.39%				
03	Eunice LA	302	3.21%				
03	Lafayette LA	82,561	68.02%				
03	Carencro LA	29	0.31%				
03	Broussard LA	13,227	98.58%				
03	New Iberia LA	3,351	11.74%				
03	Morgan City LA	11,472	100.00%				
04	Alexandria LA	10,793	23.84%				
04	Pineville LA	289	2.01%				
04	Ball LA	31	0.78%				
04	West Monroe LA	8,264	63.07%				
05	Eunice LA	9,120	96.79%				
05	Lafayette LA	38,813	31.98%				
05	Carencro LA	9,243	99.69%				
05	Arnaudville LA	970	96.13%				
05	Alexandria LA	34,482	76.16%				
05	Pineville LA	14,095	97.99%				
05	Ball LA	3,930	99.22%				
05	Baton Rouge LA	143,479	63.08%				
05	Zachary LA	19,303	99.93%				
05	West Monroe LA	4,839	36.93%				
06	Baton Rouge LA	83,991	36.92%				
06	Zachary LA	13	0.07%				
06	Mandeville LA	13,192	100.00%				

EXHIBIT B-9

User:
Plan Name: **Illustrative_4**
Plan Type:

Communities of Interest (Condensed)

Monday, May 2, 2022 2:32 PM

Whole CBSA : 14
CBSA Splits: 14
Zero Population CBSA Splits: 0

District	CBSA	Population	% Pop	District	CBSA	Population	% Pop
01	Lafayette, LA	88,910	18.59%				
01	Baton Rouge, LA	21,039	2.42%				
01	New Orleans-Metairie, LA	459,149	36.10%				
02	Baton Rouge, LA	105,680	12.14%				
02	New Orleans-Metairie, LA	670,586	52.73%				
03	Lafayette, LA	324,475	67.83%				
04	Alexandria, LA	70,851	46.55%				
04	Monroe, LA	86,293	41.67%				
05	Alexandria, LA	81,341	53.45%				
05	Lafayette, LA	64,999	13.59%				
05	Baton Rouge, LA	288,222	33.11%				
05	Monroe, LA	120,811	58.33%				
06	Baton Rouge, LA	455,628	52.34%				
06	New Orleans-Metairie, LA	142,110	11.17%				

EXHIBIT C-1

User:
Plan Name: Folklore_Regions
Plan Type:

Core Constituencies

Saturday, April 30, 2022 8:52 PM

From Plan: **Illustrative_1**

Plan: Folklore_Regions, District I -- 457,869 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 04	238,405 (52.07%)	185,963 (52.77%)	47,178 (38.23%)
Dist. 05	219,464 (47.93%)	166,425 (47.23%)	76,224 (61.77%)
Total and % Population		352,388 (76.96%)	123,402 (26.95%)

Plan: Folklore_Regions, District II -- 751,635 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 03	92,548 (12.31%)	69,619 (12.16%)	8,987 (4.86%)
Dist. 04	537,888 (71.56%)	410,732 (71.76%)	142,702 (77.13%)
Dist. 05	121,199 (16.12%)	92,052 (16.08%)	33,325 (18.01%)
Total and % Population		572,403 (76.15%)	185,014 (24.61%)

Plan: Folklore_Regions, District III -- 920,082 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 01	88,873 (9.66%)	67,275 (9.68%)	21,473 (11.92%)
Dist. 03	683,745 (74.31%)	516,900 (74.39%)	106,854 (59.30%)
Dist. 05	147,464 (16.03%)	110,663 (15.93%)	51,880 (28.79%)
Total and % Population		694,838 (75.52%)	180,207 (19.59%)

Plan: Folklore_Regions, District IV -- 1,371,544 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 01	228,176 (16.64%)	173,740 (16.57%)	31,580 (9.56%)
Dist. 02	221,220 (16.13%)	167,851 (16.01%)	68,535 (20.75%)
Dist. 05	288,166 (21.01%)	223,176 (21.28%)	134,973 (40.86%)
Dist. 06	633,982 (46.22%)	483,965 (46.15%)	95,253 (28.83%)
Total and % Population		1,048,732 (76.46%)	330,341 (24.09%)

Plan: Folklore_Regions, District V -- 1,156,627 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 01	459,243 (39.71%)	358,811 (39.77%)	55,988 (18.86%)
Dist. 02	555,073 (47.99%)	435,241 (48.24%)	233,978 (78.83%)
Dist. 06	142,311 (12.30%)	108,135 (11.99%)	6,839 (2.30%)
Total and % Population		902,187 (78.00%)	296,805 (25.66%)

EXHIBIT C-2

User:
Plan Name: Folklore_Regions
Plan Type:

Core Constituencies

Saturday, April 30, 2022 1:47 PM

From Plan: **Illustrative_2**

Plan: Folklore_Regions, District I -- 457,869 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 4	149,398 (32.63%)	114,965 (32.62%)	19,582 (15.87%)
Dist. 5	308,471 (67.37%)	237,423 (67.38%)	103,820 (84.13%)
Total and % Population		352,388 (76.96%)	123,402 (26.95%)

Plan: Folklore_Regions, District II -- 751,635 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 3	32,682 (4.35%)	24,599 (4.30%)	3,261 (1.76%)
Dist. 4	626,895 (83.40%)	477,780 (83.47%)	150,229 (81.20%)
Dist. 5	92,058 (12.25%)	70,024 (12.23%)	31,524 (17.04%)
Total and % Population		572,403 (76.15%)	185,014 (24.61%)

Plan: Folklore_Regions, District III -- 920,082 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 1	559 (0.06%)	420 (0.06%)	215 (0.12%)
Dist. 2	93,372 (10.15%)	71,653 (10.31%)	31,332 (17.39%)
Dist. 3	743,611 (80.82%)	560,954 (80.73%)	123,163 (68.35%)
Dist. 5	82,540 (8.97%)	61,811 (8.90%)	25,497 (14.15%)
Total and % Population		694,838 (75.52%)	180,207 (19.59%)

Plan: Folklore_Regions, District IV -- 1,371,544 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 1	232,293 (16.94%)	176,206 (16.80%)	31,494 (9.53%)
Dist. 2	151,079 (11.02%)	116,452 (11.10%)	50,832 (15.39%)
Dist. 5	293,224 (21.38%)	223,925 (21.35%)	136,011 (41.17%)
Dist. 6	694,948 (50.67%)	532,149 (50.74%)	112,004 (33.91%)
Total and % Population		1,048,732 (76.46%)	330,341 (24.09%)

Plan: Folklore_Regions, District V -- 1,156,627 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 1	543,441 (46.98%)	422,354 (46.81%)	67,153 (22.63%)
Dist. 2	531,842 (45.98%)	417,931 (46.32%)	224,818 (75.75%)
Dist. 6	81,344 (7.03%)	61,902 (6.86%)	4,834 (1.63%)
Total and % Population		902,187 (78.00%)	296,805 (25.66%)

EXHIBIT C-3

User:
Plan Name: Folklore_Regions
Plan Type:

Core Constituencies

Saturday, April 30, 2022 1:49 PM

From Plan: **Illustrative_3**

Plan: Folklore_Regions, District I -- 457,869 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 04	279,673 (61.08%)	217,800 (61.81%)	58,914 (47.74%)
Dist. 05	178,196 (38.92%)	134,588 (38.19%)	64,488 (52.26%)
Total and % Population		352,388 (76.96%)	123,402 (26.95%)

Plan: Folklore_Regions, District II -- 751,635 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 03	159,742 (21.25%)	120,654 (21.08%)	15,765 (8.52%)
Dist. 04	496,620 (66.07%)	379,283 (66.26%)	137,870 (74.52%)
Dist. 05	95,273 (12.68%)	72,466 (12.66%)	31,379 (16.96%)
Total and % Population		572,403 (76.15%)	185,014 (24.61%)

Plan: Folklore_Regions, District III -- 920,082 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 01	149,507 (16.25%)	113,212 (16.29%)	36,857 (20.45%)
Dist. 03	616,551 (67.01%)	466,273 (67.11%)	89,793 (49.83%)
Dist. 05	154,024 (16.74%)	115,353 (16.60%)	53,557 (29.72%)
Total and % Population		694,838 (75.52%)	180,207 (19.59%)

Plan: Folklore_Regions, District IV -- 1,371,544 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 01	228,176 (16.64%)	173,740 (16.57%)	31,580 (9.56%)
Dist. 02	221,220 (16.13%)	167,851 (16.01%)	68,535 (20.75%)
Dist. 05	348,800 (25.43%)	266,663 (25.43%)	154,729 (46.84%)
Dist. 06	573,348 (41.80%)	440,478 (42.00%)	75,497 (22.85%)
Total and % Population		1,048,732 (76.46%)	330,341 (24.09%)

Plan: Folklore_Regions, District V -- 1,156,627 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 01	398,610 (34.46%)	312,634 (34.65%)	42,606 (14.35%)
Dist. 02	555,073 (47.99%)	435,241 (48.24%)	233,978 (78.83%)
Dist. 06	202,944 (17.55%)	154,312 (17.10%)	20,221 (6.81%)
Total and % Population		902,187 (78.00%)	296,805 (25.66%)

EXHIBIT C-4

User:
Plan Name: Folklore_Regions
Plan Type:

Core Constituencies

Saturday, April 30, 2022 1:50 PM

From Plan: **Illustrative_4**

Plan: Folklore_Regions, District I -- 457,869 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 04	238,274 (52.04%)	185,861 (52.74%)	47,158 (38.21%)
Dist. 05	219,595 (47.96%)	166,527 (47.26%)	76,244 (61.79%)
Total and % Population		352,388 (76.96%)	123,402 (26.95%)

Plan: Folklore_Regions, District II -- 751,635 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 03	92,619 (12.32%)	69,673 (12.17%)	8,988 (4.86%)
Dist. 04	537,982 (71.57%)	410,266 (71.67%)	140,470 (75.92%)
Dist. 05	121,034 (16.10%)	92,464 (16.15%)	35,556 (19.22%)
Total and % Population		572,403 (76.15%)	185,014 (24.61%)

Plan: Folklore_Regions, District III -- 920,082 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 01	88,910 (9.66%)	67,187 (9.67%)	21,445 (11.90%)
Dist. 03	683,633 (74.30%)	516,557 (74.34%)	107,032 (59.39%)
Dist. 05	147,539 (16.04%)	111,094 (15.99%)	51,730 (28.71%)
Total and % Population		694,838 (75.52%)	180,207 (19.59%)

Plan: Folklore_Regions, District IV -- 1,371,544 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 01	228,176 (16.64%)	173,740 (16.57%)	31,580 (9.56%)
Dist. 02	220,898 (16.11%)	168,105 (16.03%)	68,045 (20.60%)
Dist. 05	288,222 (21.01%)	223,239 (21.29%)	134,824 (40.81%)
Dist. 06	634,248 (46.24%)	483,648 (46.12%)	95,892 (29.03%)
Total and % Population		1,048,732 (76.46%)	330,341 (24.09%)

Plan: Folklore_Regions, District V -- 1,156,627 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 01	459,149 (39.70%)	358,477 (39.73%)	55,696 (18.77%)
Dist. 02	555,368 (48.02%)	435,491 (48.27%)	234,108 (78.88%)
Dist. 06	142,110 (12.29%)	108,219 (12.00%)	7,001 (2.36%)
Total and % Population		902,187 (78.00%)	296,805 (25.66%)

EXHIBIT C-5

User:
Plan Name: Folklore_Regions
Plan Type:

Core Constituencies

Saturday, April 30, 2022 1:43 PM

From Plan: **Enacted_2022_Corrected_4_30**

Plan: Folklore_Regions, District I -- 457,869 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 4	85,225 (18.61%)	66,965 (19.00%)	22,433 (18.18%)
Dist. 5	372,644 (81.39%)	285,423 (81.00%)	100,969 (81.82%)
Total and % Population		352,388 (76.96%)	123,402 (26.95%)

Plan: Folklore_Regions, District II -- 751,635 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 4	553,468 (73.64%)	420,401 (73.44%)	142,219 (76.87%)
Dist. 5	198,167 (26.36%)	152,002 (26.56%)	42,795 (23.13%)
Total and % Population		572,403 (76.15%)	185,014 (24.61%)

Plan: Folklore_Regions, District III -- 920,082 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 3	776,275 (84.37%)	586,488 (84.41%)	144,434 (80.15%)
Dist. 4	137,640 (14.96%)	103,729 (14.93%)	35,255 (19.56%)
Dist. 6	6,167 (0.67%)	4,621 (0.67%)	518 (0.29%)
Total and % Population		694,838 (75.52%)	180,207 (19.59%)

Plan: Folklore_Regions, District IV -- 1,371,544 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 1	151,237 (11.03%)	114,505 (10.92%)	15,512 (4.70%)
Dist. 2	244,721 (17.84%)	185,070 (17.65%)	120,806 (36.57%)
Dist. 5	205,466 (14.98%)	159,964 (15.25%)	52,853 (16.00%)
Dist. 6	770,120 (56.15%)	589,193 (56.18%)	141,170 (42.73%)
Total and % Population		1,048,732 (76.46%)	330,341 (24.09%)

Plan: Folklore_Regions, District V -- 1,156,627 Total Population

	Population	[18+_Pop]	[18+_AP_Blk]
Dist. 1	625,031 (54.04%)	487,054 (53.99%)	65,593 (22.10%)
Dist. 2	531,596 (45.96%)	415,133 (46.01%)	231,212 (77.90%)
Total and % Population		902,187 (78.00%)	296,805 (25.66%)

EXHIBIT D-1

User:
Plan Name: **Illustrative_1**
Plan Type:

Communities of Interest (Condensed)

Thursday, April 7, 2022 4:43 PM

Whole CBSA : 14
CBSA Splits: 14
Zero Population CBSA Splits: 0

District	CBSA	Population	% Pop	District	CBSA	Population	% Pop
01	Lafayette, LA	88,873	18.58%				
01	Baton Rouge, LA	21,039	2.42%				
01	New Orleans-Metairie, LA	459,243	36.11%				
02	Baton Rouge, LA	106,002	12.18%				
02	New Orleans-Metairie, LA	670,291	52.70%				
03	Lafayette, LA	324,587	67.85%				
04	Alexandria, LA	70,686	46.45%				
04	Monroe, LA	86,424	41.73%				
05	Alexandria, LA	81,506	53.55%				
05	Lafayette, LA	64,924	13.57%				
05	Baton Rouge, LA	288,166	33.10%				
05	Monroe, LA	120,680	58.27%				
06	Baton Rouge, LA	455,362	52.31%				
06	New Orleans-Metairie, LA	142,311	11.19%				

EXHIBIT D-2

User:
Plan Name: **Illustrative_2**
Plan Type:

Communities of Interest (Condensed)

Thursday, April 7, 2022 5:12 PM

Whole CBSA : 12
CBSA Splits: 16
Zero Population CBSA Splits: 0

District	CBSA	Population	% Pop	District	CBSA	Population	% Pop
1	Morgan City, LA	559	1.13%				
1	New Orleans-Metairie, LA	568,597	44.71%				
2	Lafayette, LA	93,372	19.52%				
2	Baton Rouge, LA	61,017	7.01%				
2	New Orleans-Metairie, LA	621,904	48.90%				
3	DeRidder, LA	32,682	89.42%				
3	Lafayette, LA	385,012	80.48%				
3	Morgan City, LA	48,847	98.87%				
4	DeRidder, LA	3,867	10.58%				
4	Alexandria, LA	99,827	65.59%				
4	Monroe, LA	72,964	35.23%				
5	Alexandria, LA	52,365	34.41%				
5	Baton Rouge, LA	293,224	33.68%				
5	Monroe, LA	134,140	64.77%				
6	Baton Rouge, LA	516,328	59.31%				
6	New Orleans-Metairie, LA	81,344	6.40%				

EXHIBIT D-3

User:
Plan Name: **Illustrative_3**
Plan Type:

Communities of Interest (Condensed)

Thursday, April 7, 2022 5:20 PM

Whole CBSA : 13
CBSA Splits: 17
Zero Population CBSA Splits: 0

District	CBSA	Population	% Pop	District	CBSA	Population	% Pop
01	Lafayette, LA	100,101	20.92%				
01	Baton Rouge, LA	21,039	2.42%				
01	New Orleans-Metairie, LA	398,610	31.34%				
02	Baton Rouge, LA	106,002	12.18%				
02	New Orleans-Metairie, LA	670,291	52.70%				
03	Alexandria, LA	74,443	48.91%				
03	Lafayette, LA	306,799	64.13%				
04	Alexandria, LA	22,169	14.57%				
04	Monroe, LA	127,692	61.66%				
05	Alexandria, LA	55,580	36.52%				
05	Lafayette, LA	71,484	14.94%				
05	Baton Rouge, LA	268,860	30.88%				
05	Hammond, LA	79,940	60.03%				
05	Monroe, LA	79,412	38.34%				
06	Baton Rouge, LA	474,668	54.52%				
06	Hammond, LA	53,217	39.97%				
06	New Orleans-Metairie, LA	202,944	15.96%				

EXHIBIT D-4

User:
Plan Name: **Illustrative_4**
Plan Type:

Communities of Interest (Condensed)

Monday, May 2, 2022 2:32 PM

Whole CBSA : 14
CBSA Splits: 14
Zero Population CBSA Splits: 0

District	CBSA	Population	% Pop	District	CBSA	Population	% Pop
01	Lafayette, LA	88,910	18.59%				
01	Baton Rouge, LA	21,039	2.42%				
01	New Orleans-Metairie, LA	459,149	36.10%				
02	Baton Rouge, LA	105,680	12.14%				
02	New Orleans-Metairie, LA	670,586	52.73%				
03	Lafayette, LA	324,475	67.83%				
04	Alexandria, LA	70,851	46.55%				
04	Monroe, LA	86,293	41.67%				
05	Alexandria, LA	81,341	53.45%				
05	Lafayette, LA	64,999	13.59%				
05	Baton Rouge, LA	288,222	33.11%				
05	Monroe, LA	120,811	58.33%				
06	Baton Rouge, LA	455,628	52.34%				
06	New Orleans-Metairie, LA	142,110	11.17%				

EXHIBIT E-1

Population Summary Report
Louisiana Congress -- Illustrative Plan 1
2020 Census

District	Population	Deviation	AP Black	% AP Black	18+ Pop	18 + AP Black	% 18+ AP Black	18+ Latino	% 18+ Latino	18+ NH White	% 18+ NH White
1	776292	-1	155355	20.01%	599826	109041	18.18%	60271	10.05%	396685	66.13%
2	776293	0	406680	52.39%	603092	302513	50.16%	51759	8.58%	225537	37.40%
3	776293	0	165787	21.36%	586519	115841	19.75%	30658	5.23%	415185	70.79%
4	776293	0	261185	33.65%	596695	189880	31.82%	24639	4.13%	357357	59.89%
5	776293	0	409265	52.72%	592316	296402	50.04%	20168	3.40%	260464	43.97%
6	776293	0	144847	18.66%	592100	102092	17.24%	36167	6.11%	426882	72.10%
Total	**4657757**		**1543119**	**33.13%**	**3570548**	**1115769**	**31.25%**	**223662**	**6.26%**	**2082110**	**58.31%**

District	% NH SR Black CVAP	% NH White CVAP	% July 2021 Black Registered
1	16.42%	73.88%	16.88%
2	52.82%	39.31%	52.33%
3	19.05%	74.91%	18.72%
4	32.59%	62.58%	31.28%
5	50.37%	46.19%	51.84%
6	16.51%	77.84%	15.40%

Source for % Citizen Voting Age (CVAP) -- 2020 Citizen Voting Age Population by Race and Ethnicity Special Tabulation (U.S. Census Bureau)
https://www.census.gov/programs-surveys/decennial-census/about/voting-rights/cvap.html

-- calculated by disaggregating 2016-2020 ACS block group estimates to 2020 census blocks

Source for Voter Registration Stats: State of Louisiana via Redistricting Data Hub

https://redistrictingdatahub.org/dataset/louisiana-voter-registration-file-at-the-vtd-level/
https://redistrictingdatahub.org/wp-content/uploads/2021/09/readme_la_voter_reg_official.txt

-- calculated by disaggregating 2020 VTD data to 2020 census blocks

EXHIBIT E-2

Population Summary Report
Louisiana Congress -- Illustrative Plan 2
2020 Census

District	Population	Deviation	AP Black	% AP Black	18+ Pop	18 + AP Black	% 18+ AP Black	18+ Latino	% 18+ Latino	18+ NH White	% 18+ NH White
1	776293	0	140334	18.08%	598980	98862	16.51%	65326	10.91%	399732	66.74%
2	776293	0	412581	53.15%	606036	306982	50.65%	46785	7.72%	229831	37.92%
3	776293	0	181209	23.34%	585553	126424	21.59%	29617	5.06%	406600	69.44%
4	776293	0	236618	30.48%	592745	169811	28.65%	25859	4.36%	369521	62.34%
5	776293	0	408130	52.57%	593183	296852	50.04%	20163	3.40%	261385	44.06%
6	776292	-1	164247	21.16%	594051	116838	19.67%	35912	6.05%	415041	69.87%
Total	**4657757**		**1543119**	**33.13%**	**3570548**	**1115769**	**31.25%**	**223662**	**6.26%**	**2082110**	**58.31%**

District	% NH SR Black CVAP	% NH White CVAP	% July 2021 Black Registered
1	14.95%	74.79%	14.83%
2	53.07%	39.53%	52.72%
3	20.75%	73.84%	20.70%
4	28.95%	65.43%	28.18%
5	50.71%	45.92%	51.53%
6	18.70%	75.79%	18.12%

Source for % Citizen Voting Age (CVAP) -- 2020 Citizen Voting Age Population by Race and Ethnicity Special Tabulation (U.S. Census Bureau)
https://www.census.gov/programs-surveys/decennial-census/about/voting-rights/cvap.html

-- calculated by disaggregating 2016-2020 ACS block group estimates to 2020 census blocks

Source for Voter Registration Stats: State of Louisiana via Redistricting Data Hub

https://redistrictingdatahub.org/dataset/louisiana-voter-registration-file-at-the-vtd-level/
https://redistrictingdatahub.org/wp-content/uploads/2021/09/readme_la_voter_reg_official.txt

-- calculated by disaggregating 2020 VTD data to 2020 census blocks

EXHIBIT E-3

Population Summary Report
Louisiana Congress -- Illustrative Plan 3
2020 Census

District	Population	Deviation	AP Black	% AP Black	18+ Pop	18 + AP Black	% 18+ AP Black	18+ Latino	% 18+ Latino	18+ NH White	% 18+ NH White
1	776293	0	157338	20.27%	599586	111043	18.52%	60443	10.08%	394484	65.79%
2	776293	0	406680	52.39%	603092	302513	50.16%	51759	8.58%	225537	37.40%
3	776293	0	151597	19.53%	586927	105558	17.98%	28957	4.93%	426910	72.74%
4	776293	0	270437	34.84%	597083	196784	32.96%	23736	3.98%	352454	59.03%
5	776293	0	421811	54.34%	589070	304153	51.63%	21614	3.67%	249264	42.31%
6	776292	-1	135256	17.42%	594790	95718	16.09%	37153	6.25%	433461	72.88%
Total	**4657757**		**1543119**	**33.13%**	**3570548**	**1115769**	**31.25%**	**223662**	**6.26%**	**2082110**	**58.31%**

District	% NH SR Black CVAP	% NH White CVAP	% July 2021 Black Registered
1	17.47%	72.89%	17.46%
2	52.82%	39.31%	52.33%
3	16.99%	77.01%	16.58%
4	33.70%	61.73%	32.48%
5	51.72%	44.86%	53.35%
6	14.76%	79.20%	14.27%

Source for % Citizen Voting Age (CVAP) -- 2020 Citizen Voting Age Population by Race and Ethnicity Special Tabulation (U.S. Census Bureau)
https://www.census.gov/programs-surveys/decennial-census/about/voting-rights/cvap.html

-- calculated by disaggregating 2016-2020 ACS block group estimates to 2020 census blocks

Source for Voter Registration Stats: State of Louisiana via Redistricting Data Hub

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-- calculated by disaggregating 2020 VTD data to 2020 census blocks