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 CLEE LOWE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to 28 U.S.C. § 1746, I, Rev. Clee Lowe, declare as follows:

1. My name is Clee Lowe. 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 2022 in the special election for district judge, via absentee ballot. I intend to vote in future elections, including the upcoming 2022 congressional elections.

Hearing Exhibit
PR-6
3:22-cv-00211-SDD-RLB

6. I have attended rallies for candidates, and write to my representatives to express my views. As a pastor, I have contacted my representatives to provide services for veterans who attend my church.

7. I learned about redistricting through news reports, conversations with others in my community who are concerned about redistricting, and by following the legislative session. I work with a grassroots organizing group called Together Baton Rouge, as well as a statewide group called Together Louisiana. I work with these groups to train community leaders to effect change that improves the quality of life in the communities in my parish, including redistricting advocacy to ensure fair representation. I participated in a redistricting summit to discuss issues related to fair representation for my community.

8. I supported the maps introduced during the legislative session that included two majority-Black districts because I felt that they protected my community. It is only fair, given the shifts in population and the increase in the Black population, that we have representation for our desires and issues. The population shifts make clear that there must be an additional Black-minority district so we have the opportunity to elect representatives of our choice. Any of these maps would have kept the Black community in Baton Rouge intact while also providing them with an equal opportunity to elect candidates of their choice.

9. 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.

10. One result of the vote dilution caused in my district, CD 6, by the enacted map, that harms me is that I will not have equal access to my congressional representative when compared to other voters. Under the enacted map, the strength of my vote is diluted, which means that I will have to work harder than white voters in the other five congressional districts, to get the attention of my Congressperson. Because I live in CD 6, I feel that the enacted map dilutes my vote and deprives me of the opportunity to see candidates I believe in win elections to represent me. 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.

11. My congressional representative, Congressman Garret Graves, has not been responsive to the concerns in the Black community in our district. He has not visited Black institutions, such as churches and businesses. I feel that he does not respond to our community's concerns. I believe that the if the enacted map remains in place, it would be even more difficult for me to advocate for myself and appeal to my representative. That will make it more difficult to express my views and connect my congregation members with critical government services.

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

Rev. Clee Lowe