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 EDWIN RENÉ SOULÉ IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to 28 U.S.C. § 1746, I, Edwin René Soulé, declare as follows:

1. My name is Edwin René Soulé. I am over 18 years of age and 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 Hammond, Louisiana.
4. I am lawfully registered to vote in Congressional District ("CD") 1.
5. I am a regular voter who votes in federal, state, and local elections. I most recently voted in the elections for Hammond City Judge on March 17, 2022. I intend to vote in future elections, including the upcoming 2022 congressional election.

Hearing Exhibit
PR-4
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6. I have been politically active for over the past 40 years. I regularly attend rallies and town halls in Hammond and neighboring parishes, as well as legislative committee hearings at the State Capitol in Baton Rouge. I worked as campaign manager for a candidate for CD 5, Sandra "Candy" Christophe, during the special election for CD 5, in March 2021.

7. I am a community leader and social advocate, as well as a member of the Tangipahoa Parish NAACP. Throughout the redistricting process, I have been reaching out to legislators to urge them to pass a congressional map with two majority-Black districts.

8. I am frustrated that the Legislature overrode the Governor's veto to enact a map with only one majority-Black district. I believe that another majority-Black district would not only bring equal access to representation for those Black voters who would live in a second majority-Black district but for all Black voters across the state. A second majority-Black district would give Black voters a true voice in a significant segment of the state.

9. Because my vote is diluted living in CD 1, I will have to work harder to get the attention of my Congressperson. I feel that the Legislature's failure to pass a map that gives Black Louisianans an equal opportunity to elect candidates of their choice deprives me of my voice and my right to be heard by my congressional representative.

10. I have previously met with my Congressperson, Representative Steve Scalise, at a town hall meeting, approximately four years ago. I brought up my concerns about the economic issues and hardships facing everyday working people. I remember

he interrupted me and dismissed what I had to say before I could finish my remarks. He was not responsive to my concerns and did not treat me like a constituent that he represents. I believe that under the enacted map, it will continue to be difficult for me to advocate for myself and appeal to my representative.

11. I do not believe that my vote counts and is given equal weight as the vote of white Louisianans. I believe my community is underserved by my current representative. For instance, I was personally impacted by Hurricane Ida in August 2021. It was one of the strongest hurricanes that has hit Louisiana in recent years. I did relief work following the Hurricane and saw firsthand the devastation and damage it caused throughout CD 1. But Representative Scalise voted against critical hurricane recovery funds.

12. As the 2022 congressional election is approaching, I believe that I will need to increase efforts in my community to encourage people to vote and to advocate for my needs.

13. I believe that because of the way the congressional map is drawn, my congressperson does not have to pay attention or be responsive to my needs. He can ostracize Black voters because our voting strength is diluted. This means that we do not a chance to raise issues and ensure that Black voices are heard. This makes me feel frustrated because the way the congressional map is drawn prevents Black voters from having any real influence over our representative to respond to our needs.

14. I know that my representative does not have to be responsive because my vote does not carry equal weight.

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

Edwin René Soulé

Edwin René Soulé