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 AMBROSE SIMS IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to 28 U.S.C. § 1746, I, Ambrose Sims, declare as follows:

1. My name is Ambrose Sims. 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 West Feliciana, Louisiana.
4. I am lawfully registered to vote in Congressional District ("CD") 5.
5. I am a regular voter who votes in federal, state, and local elections. I try to vote in every election. I intend to vote in future elections, including the upcoming 2022 congressional elections.

Hearing Exhibit
PR-9
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6. I consider myself to be a politically active person. I have worked or volunteered on political campaigns at the local and congressional level. Most recently, I worked for a congressional campaign in 2016. I have also hosted fundraisers and canvassed candidates I believe in.

7. As President of the West Feliciana NAACP, I have helped run and coordinate voter registration drives, get-out-the-vote campaigns, and phone-banking events. While I was not personally able to attend the legislative road shows on redistricting, I encouraged West Feliciana NAACP members to attend. I also encouraged them to attend webinars on redistricting and to write to their representatives about their displeasure over the recent Congressional map veto override.

8. I have known that redistricting is important for as long as I remember, but I first became involved in redistricting advocacy in 2010. In both the last and current redistricting cycles, I have encouraged friends, families, and neighbors to educate themselves on redistricting.

9. There is no doubt in my mind that there should be a second majority- Black congressional district in Louisiana. It is commonsense and it is only fair that a state with a one-third Black population should be able to elect officials who will be responsive to their needs in one third of the congressional districts.

10. Knowing that my interests are not fairly represented in Congress makes me feel helpless. I work hard each day to organize my community and to advocate for a wide array of issues, such as equal access to cell towers and high-speed internet, but it feels as though my voice is falling on deaf ears.

11. The enacted plan disempowers my community by splitting our numbers and diluting the power of our vote. West Feliciana is more rural, has a larger Black population,

and has fewer resources than many of the more metropolitan, whiter, and wealthier areas that our community is districted with. We are a distinct community, with distinct needs. If the enacted plan is not enjoined, I will be denied the opportunity to elect a candidate who votes for my and my community's needs and interests.

12. Because the strength of my vote is diluted under the enacted map, I will lose the ability to advocate effectively for causes I am passionate about, like economic justice, economic development, fair wages, fair employment practices, and modernizing West Feliciana by investing in our infrastructure. I am very active in my community, and I know I am not the only one who feels frustrated. My community is under-served and always has been, and folks understandably feel apathetic.

13. If a second majority-Black district were enacted, I would feel a renewed sense that change is possible. I dream of a future when I can call my Congressperson about the issues I care about and actually see real results for people who look like me. I might even consider running for office myself.

14. I was born in the Deep South in the early 1950s and have experienced inequality and discrimination my entire life. I was one of only a few Black students to graduate from Louisiana State University in 1973. It is my lifelong passion to build a Louisiana that is inclusive and fair, and I firmly believe that one way to do that is by making sure my voice is heard at the congressional level.

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

Ambrose Sims

Ambrose Sims