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 MICHAEL W. MCCLANAHAN IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to 28 U.S.C. § 1746, I, Michael W. McClanahan, declare as follows:

1. My name is Michael W. McClanahan. I am over the age of 18 and competent to make this declaration.

2. I am the President of the National Association for the Advancement of Colored People Louisiana State Conference ("Louisiana NAACP"). The Louisiana NAACP is a Plaintiff in this case.

3. The Louisiana NAACP was chartered in 1943. I have served as President of the Louisiana NAACP since 2017 and am currently in my third term. We are a nonprofit and nonpartisan organization and a State Conference of the National Association for the Advancement

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of Colored People. The Louisiana NAACP's work is devoted to pursuing the social, political, economic, and educational equity of Black people in this state and nation. Our mission includes eliminating racial discrimination and uplifting the protection of voting rights and fair political participation. As a nonprofit, the Louisiana NAACP depends entirely on the work of volunteers, supported by membership fees and private donors.

4. The Louisiana NAACP's work in support of voting rights includes multiple statewide initiatives. Our voter engagement work during recent elections has included "get out the vote" ("GOTV") campaigns; widespread voter registration efforts; voter engagement and education via social media; Relational Voting and the Hustle Initiative, which are voter engagement, registration, and information programs which have engaged over 100,000 Louisiana voters; and a "Souls to the Polls" program that engaged tens of thousands of Louisiana voters during the last presidential election.

5. The Louisiana NAACP has approximately 5,000 members throughout Louisiana, including Black Louisianans who are registered voters. The Louisiana NAACP has over 40 local branches comprising adult members and 16 youth and college chapters across the state. Members live and are registered voters in nearly every parish in Louisiana, including in every Congressional Districts ("CD") as drawn in the enacted congressional map. The Louisiana NAACP has active chapters in all six congressional districts, including: St. Bernard (CD 1); New Orleans (CD 2); Lafayette (CD 3); Shreveport (CD 4); Monroe (CD 5); and Baton Rouge (CD 6).

6. Under the enacted map, Black voters in Louisiana are packed into CD 2 because they constitute a disproportionate majority. Black voters are dispersed, or cracked, across the other five congressional districts, which deprives Black people of meaningful representation and

opportunities to elect our preferred candidates, despite making up nearly one-third of Louisiana's population. If elections proceed under the enacted maps, Black voting strength in Louisiana will be diluted and NAACP members living in the State will be directly impacted.

7. The Louisiana NAACP's involvement in the redistricting process has been a multi-year effort, encompassing various forms of advocacy.

8. The Louisiana NAACP has been deeply involved in the formal legislative redistricting process. On behalf of the NAACP, I was personally in attendance at multiple committee hearings throughout the redistricting roadshow and special session. Other members of the NAACP made their voices heard by testifying at the roadshow hearings, testifying during the redistricting session, placing calls and sending texts to the Governor, urging him to veto the maps passed by the legislature, and contacting state legislators to ask them to sustain the Governor's veto.

9. The Louisiana NAACP signed multiple letters throughout the redistricting process on October 18, 2021, December 14, 2021, February 4, 2022, and February 18, 2022, and submitted maps along with the first letter on October 18.

10. After the Legislature passed maps that did not increase representation for Black voters in Louisiana, including NAACP members, our organization launched several coordinated campaigns to demand that the Governor veto the map. We hosted a press conference and rally at the Governor's mansion on February 23, 2022. Prior to the veto override session, members of the Louisiana NAACP and local chapters made over 100 calls to legislators to urge them to sustain the Governor's veto.

11. The Legislature nevertheless overrode the Governor's veto and passed a map with only one majority-Black district, choosing to pack Black voters in CD 2, rather than give Black

voters in each of the six congressional districts an equal opportunity to elect candidates of their choice. As a result, the Louisiana NAACP has shifted our efforts to fight against the effects of voter dilution in the other five congressional districts, by increasing education and outreach to voters in affected districts.

12. The discriminatory map will impede the Louisiana NAACP's mission to achieve equitable political representation for Black voters across the entire state. The Louisiana NAACP will be forced to divert resources from its broader statewide voter registration and community empowerment initiatives to ensure that its constituents and members in the affected districts are able to engage with the political process on equal footing with those in other districts.

13. For instance, the Louisiana NAACP typically engages in GOTV across the entire state, including organizing voter education events and preparing voter materials. However, the Louisiana NAACP has not been able to begin our general GOTV and voter education work for the upcoming fall elections because we have needed to focus on redistricting advocacy and will continue toshift our focus to target districts where Black voting strength is diluted.

14. In addition, the Louisiana NAACP will need to devote more of its own resources to engage with the congressional candidates that represent Black voters in CD 1, 3, 4, 5, and 6, to ensure that Black voters have a voice and opportunity to be heard by their elected officials.

15. The Louisiana NAACP has devoted significant time and resources to redistricting education. We had to educate people on what redistricting means and how to engage in the process, and we had to recontinue our advocacy efforts after the Governor's veto was overridden. When the Legislature acts to weaken the voices of Black voters, such as by enacting a map that dilutes Black voting strength, NAACP members and other voters become disillusioned with the process and become apathetic. Political participation is a cornerstone of the Louisiana NAACP's

mission. Now, under the discriminatory map, the NAACP will have to redouble its efforts to engage Black voters and convince them that their vote matters, which will require more resources and will make it more difficult to accomplish other organizational goals.

16. Despite the significant efforts and resources that we have devoted to advocating for a representative congressional map, the Louisiana legislature has insisted on enacting a map that violates federal law and deprives Black voters an equal opportunity to participate in the political process and elect their candidate of choice in five out of six congressional districts.

17. During the roadshow, the legislative session, and the campaign to sustain the veto, the Louisiana NAACP has advocated for a congressional map with two majority-Black districts. In our advocacy letter, we presented the Legislature with several alternative configurations that would have included two majority-Black districts. We supported each of the maps introduced during the special session that included a second majority-Black district. I believe that any of these maps would have reversed longstanding dilution of Black voting strength in Louisiana's congressional maps.

18. The maps also adhered to traditional redistricting principles and protected communities of interest. For instance, Native communities in Houma, Thibodaux, and Lafourche typically live off the Bayous and form a distinct community of interest. Under the current congressional map, this distinct community of interest is split. At least one map introduced during the legislative session with two majority-Black districts kept this community in the same congressional district.

19. In addition, these maps would have had Baton Rouge and New Orleans in two separate congressional districts. This configuration, in my opinion, better reflects the different

communities of interest in Baton Rouge and New Orleans. There is no compelling reason for Baton Rouge and New Orleans to be packed into a single congressional district.

20. I know from my work with Louisiana NAACP members and from attending the roadshow that people from Baton Rouge do not want to be in the same congressional district as people from New Orleans because Baton Rouge and New Orleans are two cities with distinct needs.

21. In my personal experience, as a resident of Baton Rouge, I firmly believe that Baton Rouge and New Orleans should not be in the same congressional district because they are two very different cities. Baton Rouge and its metropolitan area constitute a distinct community of interest than New Orleans. Baton Rouge has different food, different culture, and a different energy than New Orleans. Despite being the capital city, Baton Rouge is a blue-collar town. Unlike New Orleans, Baton Rouge has experienced slower economic development and has a slower pace than New Orleans.

22. Moreover, CD2 in the enacted map cracks the population of Baton Rouge in two. These two regions have historically been part of the greater Baton Rouge area. Splitting this defined, established community disenfranchises and diminishes the power of Black voters in the greater Baton Rouge area by preventing them from being represented by a single Congressmember.

23. I believe that a second majority-Black district is needed in Louisiana to combat the impact of racial discrimination and give Black people in Louisiana a voice and an opportunity for equal access to representation to combat the longstanding effects of racial discrimination in Louisiana.

24. Racism is alive and well in the state of Louisiana. Black people in Louisiana

experience discrimination in all aspects of everyday life, including housing, economic development, healthcare, and criminal justice.

25. In my experience as President of the Louisiana NAACP, I have personally witnessed the effects of institutional racism in Louisiana. For instance, some of my work takes me to rural Louisiana, where poverty rates are disproportionately high in Black communities. In addition, I recently served on the Governor's Covid-19 task force where it became glaringly obvious to me that Black Louisianans, particularly during the Covid-19 pandemic, do not have equal access to quality health care as white Louisianans.

26. Another example of Louisiana's long history of racism includes environmental racism. Louisiana is home to Cancer Alley, where petrochemical plants running along the Mississippi River between Baton Rouge and New Orleans, have caused high rates of cancer and respiratory diseases. The rates of illness are disproportionately higher for Black people living in Cancer Alley than for white people.

27. I believe that this institutional and environmental racism can be attributed in part to the way our congressional maps are drawn, which perpetuates longstanding discrimination against Black people. The configuration of the congressional map with only one majority-Black district means that Black Louisianans, who make up nearly one-third of the state's population, do not have an equal opportunity to elect candidates of their choice. Black Louisianans do not have equal access to representation or to their congressional representatives.

28. A map with two majority-Black districts would help move the state of Louisiana in the right direction and address this history of discrimination by finally giving Louisiana's Black residents an equal voice and opportunity to participate in the political

process.

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

MICHAEL W. MCCLANAHAN