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 ASHLEY SHELTON IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to 28 U.S.C. § 1746, I, Ashley Shelton, declare as follows:

1. I am 45 years old and competent to make this declaration.

2. I am Black and a U.S. citizen.

3. I am a lawfully registered voter. I reside and am registered to vote in Congressional District ("CD") 6.

4. I have voted in Louisiana since I turned 18 years old.

5. I am a resident of Baton Rouge, Louisiana, where I have lived my whole life. I serve as the President and CEO of the Power Coalition for Equity and Justice ("PCEJ").

6. PCEJ is a nonpartisan, nonprofit statewide civic engagement table in Louisiana that works to build grassroots power, advocate for community-centered policies, and increase voter participation.

7. PCEJ's mission is to support community-driven activism and grassroots

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leadership development to empower citizens to address classism, racism, and other marginalization in their own lives and communities. PCEJ advances its mission with the support of a small full- and part-time staff, community volunteers, and a membership of nonprofit and advocacy organizations united around an integrated civic engagement strategy to educate and empower voters across Louisiana.

8. In 2019, PCEJ staff, volunteers, and member organizations engaged with 465,406 infrequent and semi-frequent voters of color through hundreds of thousands of doors knocked, phone calls, and text messages, totaling over 1.2 million contact attempts in an effort to support civic participation. In 2020, PCEJ's efforts, including over 2.7 million contact attempts to infrequent and semi-frequent voters of color, helped contribute to the highest early voter turnout in Louisiana history. PCEJ continued this work in 2021, activating participation in local elections through outreach and registration drives. In recent election cycles, PCEJ also provided rides to the polls and rapid response voter support during early voting and on election days.

9. PCEJ, along with its stakeholders, constituents, and member organizations, has been deeply engaged in every step of the redistricting process. PCEJ has organized numerous trainings to educate the community about redistricting, has mobilized voters and volunteers to participate in the redistricting roadshows, has advocated for the passage of a congressional plan with two majority-Black districts that gives Black voters in Louisiana an equal opportunity to elect candidates of their choice.

10. PCEJ hosted at least five trainings on the redistricting process before the Redistricting Roadshow began. The Redistricting Roadshow where public meeting about redistricting hosted by the Louisiana Legislature across the state October 2021 through January 2022. PCEJ also hosted nine trainings over the course of the roadshow, one at each stop. In

addition, PCEJ organized approximately 250 Louisiana voters to travel to Baton Rouge and make public comments during the redistricting special session. The resounding theme of the testimony was the need for fair and equitable maps and a second majority-Black district.

11. On behalf of Power Coalition, I attended the roadshow in Baton Rouge and the majority of the special session hearings. Members of PCEJ staff were present at every roadshow hearing and throughout the special session and veto override session.

12. PCEJ submitted three letters to the Legislature and one to the Governor during the redistricting process. One of these letters, submitted in October 2021, included seven different maps that included two majority-Black districts and protected communities of interest. Similar maps were introduced as legislation and amendments during the redistricting special session. None, however, made it out of committee.

13. When the Legislature first passed H.B. 1 and S.B. 5, which include only one majority-Black district, PCEJ launched voter outreach and public education campaigns to demand that the Governor veto the Legislature's map.

14. Despite PCEJ's immense efforts, I was frustrated when the Legislature overrode the Governor's veto to enact a congressional map with only majority-Black district and failed to provide equitable representation for Black voters and PCEJ's broad and diverse constituencies. The enacted map perpetuates longstanding vote dilution in Louisiana by packing Black voters in CD 2, and dispersing Black voters across the other five congressional districts, which prevents Black voters from having an equal opportunity to elect candidates of choice.

15. PCEJ's stakeholders, constituents, and member organizations are directly impacted by vote dilution under the enacted map. Several of our partners, such as Voice of the Experienced ("VOTE") and Step Up Louisiana actively participated in redistricting advocacy on

behalf of their affected constituents. These organizations provided testimony, participated in workshops and days of action, and helped with trainings throughout the redistricting process.

16. I am also personally impacted by the discriminatory effect of the enacted congressional map. As a resident of Baton Rouge, I live in CD 6 and am represented by Representative Garret Graves. Despite living in a city that is over 50 percent Black, I do not feel that I have ever had the opportunity to elect a candidate of choice in my congressional district.

17. I do not believe that my congressional representative has ever been responsive to my needs or the needs of my community because of the way my congressional district is drawn to dilute Black voting strength. For example, only one congressperson voted in favor of Build Back Better, an infrastructure bill that is desperately needed in Louisiana, the second poorest state in the country. I do not understand why my congressperson, Representative Garret Graves, voted against a bill that would help my community.

18. Although not in my district, another example of this unresponsiveness occurred in CD 1, another majority-white district where Black voting strength is diluted. Representative Steve Scalise voted against much needed hurricane recovery aid relief despite his district being decimated by Hurricane Ida in 2021.

19. Throughout the entire redistricting process, and as a result of the enactment of the discriminatory congressional map, PCEJ has diverted staff time and resources from our routine voter mobilization efforts and policy work to advocate for fair and equal districts.

20. First, PCEJ has spent significant resources on digital ads to target and reach out to communities that will be impacted by the enacted map. The financial resources we used to campaign for the Governor's veto and for the Legislature to sustain the veto are resources that we would have used for other programs.

21. PCEJ relies on volunteers for our voter advocacy and Election Day efforts, which include "Get Out the Vote" ("GOTV"), rides to the polls, and election monitoring efforts. In addition, we regularly organize and host events to educate voters with candidate surveys and forums. We have recently been forced to divert volunteer recruitment from our own to instead steer potential volunteers to advocacy efforts related to the redistricting roadshows, special session, and veto campaign.

22. For instance, when PCEJ launched campaigns to demand the Governor's veto, these efforts coincided with the timing of the recent municipal elections in the majority of parishes statewide. As a result, PCEJ was required to divert time and resources from our routine voter mobilization efforts to advocate for fair and equal districts.

23. As the 2022 congressional election approaches, PCEJ will be forced to divert resources from its broader, statewide voter registration and community engagement initiatives to fight against the discriminatory maps and its dilutive effects. Because the Legislature has enacted a map that packs Black voters into CD 2 and cracks them among the remaining districts, PCEJ will need to increase education and outreach to member organizations and voters in CD 1, 3, 4, 5, and 6, where Black voting strength is diluted.

24. One example is that we regularly travel across the state to conduct voter education and engagement trainings, including GOTV trainings, to reach voters statewide. With the congressional elections approaching, we typically would conduct these trainings across the state, reaching voters statewide. But because the enacted map will dilute Black voting strength in specific districts, these statewide trainings may now be delayed, if not canceled, because staff members and member organizations that would typically be involved with these initiatives will need to shift focus to helping, educating, and advocating for affected voters. The diluted map has

a direct effect on PCEJ's ability to achieve our mission: to educate and empower as many voters as possible. We will have to add more staff and build an organizing team dedicated to combatting the effects of vote dilution. We have to expend more resources to keep voters who feel disenfranchised involved by creating new materials, hosting community events, and simply conducting more intensive outreach. These organizers will need to work even harder to activate voters of color, who are aware their voices are minimized because of district lines. A three-minute conversation at the door now turns into a five-minute conversation.

25. If the current enacted map stays in place , PCEJ will be forced to redouble efforts to reach voters who are impacted by the discriminatory congressional map. Voters who live in cracked districts are more difficult to engage because they feel, based on the results of elections, that their votes don't matter. It takes more time and resources to empower them and educate them on the importance of their votes. Alternatively, voters in competitive districts where they may have the opportunity to elect candidates of choice are easier to motivate and take less time to educate. If the state had passed a map with two majority-Black districts, we would be able to reach and educate more voters. By making our voter mobilization work more expensive and less effective, we have to devote less resources to our other goals.

26. Our work in future elections has also been hindered by our ongoing efforts to address the discriminatory impact of the enacted map. Louisiana will have statewide elections in 2023. Typically, PCEJ would begin building the infrastructure for statewide mobilization efforts in 2022, but because we will have to divert resources and refocus efforts on educating and targeting voters residing in cracked congressional districts, we cannot begin our work on future elections. This will inevitably result in PCEJ engaging fewer voters during the 2023 statewide elections.

27. A map that includes a second majority-Black district is the "North Star" of PCEJ's work. A second majority-Black district would give Black voters in Louisiana an equal opportunity to elect candidates of their choice and to combat longstanding racial discrimination in Louisiana.

28. Louisiana is my home state and a place that I love deeply, but our state has a long history of racial discrimination and inequity that cannot be denied. Black people in Louisiana experience inequity and discrimination in every facet of life.

29. Louisiana is a state that year after year, witnesses the very real impact of climate change. The last several elections have been preceded by major climate events in Louisiana and the effects of the climate devastation have disproportionately impacted Black communities. PCEJ works to support communities after these natural disasters, through various means such as cash assistance and, importantly, surveying damage to polling sites to understand the impact on vulnerable communities in order to guide these voters on how to participate.

30. We have the highest maternal mortality rate of Black women in the country. PCEJ works with several maternal health organizations, recently successfully advocating to ensure midwives and doulas are covered by health insurance. Voting is the social determinant of health that is rarely discussed. The only way to fix many of these issues and the effects of racial discrimination is for Black voters to have equal opportunity to elect candidates that they prefer to fix the issues that directly impact our community.

31. During the roadshows, numerous member organizations and constituents of PCEJ voiced their support for a congressional map with two majority-Black districts. PCEJ supported the maps introduced during the legislative session that included two majority-Black districts. Any one of those maps would have given Black voters an equal opportunity to elect

candidates of their choice and protected communities of interest throughout the state. Many Baton Rouge and New Orleans residents testified at the roadshows that they are distinct communities of interest and should not be in the same congressional district. A map with two majority-Black districts would protect these communities of interest.

32. The maps with two majority-Black districts also protects distinct communities of interest in the Delta Parishes, the petrochemical industry and pipelines in the southern part of the state, as well as the Cajun and Creole communities in the Acadian region.

33. Under a map with only one majority-Black district, New Orleans and the Black communities in Baton Rouge are packed into a single congressional district, CD 2. This occurs despite New Orleans and Baton Rouge constituting two distinct communities of interest. There is no reason that Baton Rouge and New Orleans need to be in the same congressional district. A map with two majority-Black districts would separate Baton Rouge and New Orleans into two congressional districts and would protect the distinct communities of interest therein.

34. As a resident of Baton Rouge, I know that Baton Rouge makes up its own community of interest. Although Baton Rouge is one of the largest cities in Louisiana, it is smaller than New Orleans. Because it is not as population dense, it has more of an intimate community feel compared to the urban environment in New Orleans.

35. The life and culture in Baton Rouge is not as fast-paced as New Orleans. While New Orleans has a booming economy, an academic community made up of private universities, colleges and some historically Black colleges and universities, Baton Rouge has slower economic development and a tighter knit academic community, made up of two historically Black colleges and universities.

36. Because the Legislature has enacted a map that dilutes Black voting strength and

deprives Black voters of an equal opportunity to elect candidates of their choice, our members and constituencies must advocate for their votes to be given equal weight. PCEJ must work with member organizations and constituencies to combat unlawful vote dilution resulting from the enacted map and ensure that affected voters have equal access to representation.

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

Ashley Shelton

ASHLEY SHELTON