UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

PRESS ROBINSON, EDGAR CAGE, DOROTHY NAIRNE, EDWIN RENE SOULE, ALICE WASHINGTON, CLEE EARNEST LOWE, DAVANTE LEWIS, MARTHA DAVIS, AMBROSE SIMS, NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE ("NAACP") LOUISIANA STATE CONFERENCE, AND POWER COALITION FOR EQUITY AND JUSTICE, *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., CIARA HART, NORRIS HENDERSON, TRAMELLE HOWARD, *Plaintiffs*, v. KYLE ARDOIN, in his official capacity as Secretary of State for Louisiana. *Defendant*.	Civil Action No. 3:22-cv-00214-SDD-RLB

Supplemental Report of Dr. Lisa Handley:

Review of Illustrative Map 2A

Hearing Exhibit
PR-91
3:22-cv-00211-SDD-RLB

Plaintiffs' demography expert Tony Fairfax has slightly revised Illustrative Map 2. I have reviewed this revised map, referred to as Illustrative Map 2A. Table 1 provides the BVAP percentages of the six districts in Illustrative Map 2A. The Black voting age percentage the column labeled "%BVAP, AP" has been calculated by counting all persons who checked "Black or African American" on their census form, including Blacks who indicated they were Hispanic. The column labeled "%BVAP, DOJ" includes all persons who marked either Black alone or marked two racial categories – Black and white – except for those respondents who also indicated that they were Hispanic. Table 1 shows that regardless of how BVAP is calculated, Illustrative Map 2A offers two majority BVAP districts.

Table 1: Percent Black Voting Age Population in Illustrative Map 2A Districts

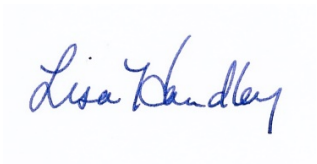
District	%BVAP, AP	%BVAP, DOJ
1	17.12%	16.07%
2	51.55%	50.02%
3	18.23%	17.60%
4	31.90%	31.25%
5	51.98%	51.15%
6	16.79%	16.28%

A district-specific, functional analysis of the districts in Illustrative Map 2A produced effectiveness scores that are identical to the district scores in Illustrative Map 2. These scores are reported in Table 2. Illustrative Map 2A offers two congressional districts (Districts 2 and 5) that are likely to provide Black voters with an opportunity to elect their candidates of choice to Congress.

Table 2: Effectiveness Scores for Illustrative Map 2A Districts

Illustrative Map 2A Districts	Effectiveness Score #1: Percent of Contests Black-Preferred Candidate Wins or Advances to Runoff From all 15 Elections	Effectiveness Score #2: Percent of Two-Candidate Contests Black-Preferred Candidate Wins
1	13.3%	0.0%
2	100.0%	100.0%
3	0.0%	0.0%
4	26.7%	0.0%
5	86.7%	77.8%
6	0.0%	0.0%

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed May 6, 2022.



Lisa Handley, Ph. D.