STATE 2a

Supplemental Expert Report
of
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Expert in Demography for the
Louisiana Attorney General

Robinson v. Ardoin

and

Galmon v. Ardoin

May 5, 2022

EXPERT REPORT OF THOMAS M. BRYAN

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I. EXECUTIVE SUMMARY

1. I was engaged by the Louisiana Attorney General's office to assess the characteristics of five congressional redistricting plans and to determine:
   a. whether the plans meet the numerosity criteria from the first prong of Gingles[1]; and
   b. if there was evidence that race appeared to predominate in the design of any of the plans.

II. ASSIGNMENT

2. Subsequent to my initial report, I have been provided two rebuttal reports, by Mr. William Cooper and Mr. Anthony Fairfax. This supplemental report assesses Mr. Cooper's new Illustrative 4 Plan and detailed measurement of multi-race population. [2]

3. My conclusions remain the same as in my initial report.

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[1] Under the Gingles test, plaintiffs must show the existence of three preconditions:

- The racial or language minority group must be "sufficiently large and geographically compact to constitute a majority in a single-member district";
- The minority group is "politically cohesive" (meaning its members tend to vote similarly); and
- The "majority votes sufficiently as a bloc to enable it ...to usually to defeat the minority's preferred candidate."

[2] As of the time of filing of this report, I have not received the electronic files for Mr. Fairfax's Illustrative 2 Plan, so I have been unable to analyze it and therefore do not address it in this report.

III. REDISTRICTING PERFORMANCE

A. Population and Characteristics

4. The VAP by race and ethnicity by district for the Enrolled Plan is shown in **Appendix 1.A**. The Enrolled Plan has one solidly Black district majority (District 2) no matter the definition of Black that is used. The VAP by race and ethnicity for the Robinson Illustrative Plan and the Galmon Illustrative Plans 1-4 are shown in **Appendix 1.B through Appendix 1.F**. The new Galmon Illustrative 4 Plan is similar to other Illustrative Plans, as it offers two districts that are Black majority, but only by the Any Part Black (APB) definition[3].

5. The Census Bureau reports some 288 different population counts for each level of Census geography in the country (71 in P1 "Race", 73 in P2 "Hispanic or Latino, and Not Hispanic or Latino by Race", 71 in P3 "Race for the Population 18 Years and Over" and 73 in P4 "Hispanic or Latino, and Not Hispanic or Latino by Race for the Population 18 Years and Over". In **Appendix 1.G** through **Appendix 1.J**, I document each of these unique combinations and their associated numeric population counts (and percent of total) for Louisiana from the 2020 Census PL94-171 dataset.[4]

- As shown in **Appendix 1.G,** there are 32 possible Black alone or in combination possibilities for Table P1 (total population).
- As shown in **Appendix 1.H**, there are 64 possible Black alone or in combination possibilities when divided by Hispanic origin for Table P2 (total population).[5]
- As shown in **Appendix 1.I,** there are 32 possible Black alone or in combination possibilities for Table P3 (voting age population).
- As shown in **Appendix 1.J**, there are 64 possible Black alone or in combination possibilities when divided by Hispanic origin Table P4 (voting age population).

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[3] This definition is what I refer to as "Any Part" or "All" Black This definition counts a minority by race alone or in combination with other races (no matter how many other races are mentioned) as well as by Hispanic. Beyond the DOJ definition for example – if someone responds to the census by self-identifying as Black, white, Asian, Native Hawaiian Pacific Islander, American Indian Alaskan Native and "some other" – then by the "Any Part Black" definition they are counted as Black even though it was only one of races reported. For the purposes of the Louisiana analysis - we use this definition to refer to Any Part Black (or "APB").

[4] https://www.census.gov/programs-surveys/decennial-census/about/rdo/summary-files.html

[5] As noted previously, the Census Bureau considers "Hispanic" to be an 'ethnic' designation and not a 'racial' designation, so a person can be "Black, Non-Hispanic" or "Black, Hispanic."

6. For the purposes of redistricting, there are multiple definitions of race to consider. The first is race alone. This is the most exclusive definition, excluding minorities from a racial category who are multi-race or of Hispanic origin. This is the definition that has been used historically, prior to the evolution of the multi-race definition in the census. In **Appendix 1.J**, we can see that the number of Black alone, non-Hispanic VAP is 1,066,511 (29.9% of total VAP).

   - The addition of Black and white in combination, not Hispanic (the first level DOJ definition) adds 18,172 (0.5% of 3,570,548 total VAP) for a total Black DOJ population of 1,084,683.
   - The addition of Black in combination with other races, not Hispanic, adds 16,011 more (0.5% of 3,570,548 total VAP) for a larger total Black, all races but not Hispanic population of 1,100,694 (this result is only to demonstrate the cumulative math, this is not an estimate used anywhere else in our analysis).
   - In addition to this, there are 15,075 Black alone or in combination with other race *Hispanics* (0.4% of 3,570,548 total VAP) which includes 7,243 Hispanic Black alone, and 7,832 Hispanic Black multi-race - for a grand total Any Part Black of 1,115,769.

7. These constituent, Black multi-race and Black Hispanic (of any race) VAP populations add a total of 49,258 (or an incremental 1.38% of the total VAP of 3,570,548) to the BNH definition, to achieve the APB result of 1,115,769. By this math, I am *unable* to verify the statement on P.5, Para 13 of the Fairfax supplemental report, "The State of Louisiana has a significant amount of multi-race Black persons (3.26%). It is my opinion that the Black multi-race population is significant enough to warrant adding to the Black population in a district."

8. For the purposes of the Voting Rights Act, the DOJ has provided "Guidance under Section 2 of the Voting Rights Act, 52 U.S.C. 10301, for redistricting and methods of electing government bodies"[6]. They say, "Where there are significant numbers of such responses, the Department will, as required by both the OMB guidance and judicial opinions, allocate these responses on an iterative basis to each of the component single-race categories for analysis." The DOJ does not make clear what "significant" is, and I am not aware of any demographic literature that has examined or reviewed this specific language in this context.

[6] https://www.justice.gov/opa/press-release/file/1429486/download

9. Even if we *did* have a bright line definition of what "significant" is from the DOJ – their next guidance makes the measurement of these multi-race and ethnic populations open to interpretation. They state:

> "If there are significant numbers of responses in a jurisdiction that self-identify as Hispanic/Latino and one or more minority races (for example, Hispanics/Latinos who list their race as Black/African American), the Department will conduct its initial analysis by allocating those responses to the Hispanic/Latino category and then repeat its analysis by allocating those responses to the relevant minority race category."

10. As stated in my initial report, there are a variety of ways to allocate populations in demography. Since 15,075 (30.6%) of the incremental 49,258 multi-race, ethnic Black population are Hispanic Blacks, if and how this population gets allocated to the Black category could be definitive when there are illustrative districts that are a majority-minority by only hundreds of people classified as "Black".

11. The table below illustrate that the Plaintiff's new Illustrative 4 Plan does not have any districts that meet the Gingle's criteria of majority under the Black alone or Black DOJ definition. All of the Plaintiff's Illustrative Plans, including this latest Illustrative 4 plan, have two majority VAP districts only when using the APB definition including Blacks who self-identify as Hispanic as well.

12. I detail the percent Black characteristics of the new Plaintiff Illustrative 4 Plan in ***Table III.A.1***.

    a. District 2 has a Black alone VAP share of 47.67% - not a majority. With the addition of Black and white population comprising the DOJ definition, that share rises to 48.31% - also not a majority. When Any Part Black (APB) is considered – the share rises to 50.06%, or a majority only when every combination of Black alone or in combination is considered.

    b. District 5 has a Black alone VAP share of 48.86% - not a majority. With the addition of Black and white population comprising the DOJ definition, that share rises to 49.46% - also not a majority. When Any Part Black (APB) is considered – the share rises to 50.29%, or a majority only when every combination of Black alone or in combination is considered.

Table III.A.1 Galmon Illustrative 4 Plan Black Share of Voting Age Population

Illustrative 4 Plan	Black Alone	Black DOJ	Any Part Black
1	16.91%	17.31%	18.14%
2	**47.67%**	**48.31%**	**50.06%**
3	18.59%	19.14%	19.79%
4	30.34%	30.82%	31.47%
5	**48.86%**	**49.46%**	**50.29%**
6	16.50%	16.88%	17.38%

13. Next, I am going to detail the specific characteristics of the Black population that make up the difference between the Black DOJ definition and the Any Part Black (APB) definition. In the Illustrative 4 Plan, District 2, the VAP is 603,596 – which means it needs 301,798 + 1 Black population to be >50%. The BNH population in District 2 is 287,725. If you add Black in combination with all other races, not Hispanic, you get 295,510 (or only 48.96% Black). District 2 needs the addition of 6,288 + 1 more Black Hispanics before it hits the 50% majority tipping point. The plan actually adds 6,643 Black Hispanics to get to an APB majority of 302,153 (50.06%), or 353 more Black Hispanics than needed to make a 50% + 1 APB target number.

14. In District 5, the VAP is 593,324 – which means it needs 296,662 + 1 Black population to be >50%. The BNH population in District 5 is 289,884. If you add Black in combination with all other races, not Hispanic, you get 296,493 (or only 49.97% Black). District 5 needs the addition of 169 more Black Hispanics before it hits the majority 50% tipping point. The plan actually adds 1,861 Black Hispanics to get to an APB majority of 298,354 (50.29%).

15. In both District 2 and District 5 of the Illustrative 4 Plan, a determination of whether Blacks are in fact majority districts comes down to the interpretation of specifically what multi-racial or ethics categories should be included. This finding is consistent and applicable to the other Illustrative plans presented by the Plaintiffs. If the definition of "significant" was intended to be numeric, it is difficult to envision that the DOJ had a number such as 1.38% (49,258[7] out of 3,570,548 LA VAP population) in mind. Or even if you divide 49,258 by the APB VAP population of 1,115,769 – that only results in an estimate within the Black population of 4.41%. An opinion that the definition of "significant" is relevant here would have us believe that it is *any* value, no matter how small, that results in a majority district is "significant".

[7] See Para 7. 49,258 is the incremental Black VAP population beyond Black alone, including Black DOJ population.

16. In conclusion, I do not offer an expert opinion on what the correct definition of Black is to use in determining "majority", and I do not offer an opinion on what the standard of "significant population" is or should be. I offer these points to illustrate that what constitutes a majority-minority is clouded by complex demographic definitions.

B. District Boundaries, Parish and Place Geographic Splits Analysis.

17. The US Census Bureau provides useful details in understanding the number and characteristics of these geographic layers in Louisiana, as follows:[8]

- Parishes: There are 64 county equivalents in Louisiana known as parishes.
- Places: There are 488 places in Louisiana; 304 incorporated places and 184 census designated places (CDPs). The incorporated places consist of 69 cities, 128 towns, and 107 villages.

18. An examination of the number of place splits by plan in ***Table III.B.1*** shows the Enrolled Plan with 19 place splits. The Illustrative Plan follows with slightly more at 21, and the Illustrative Plans 1-4 follow with 13, 16, 16 and 16 place splits respectively. What is significant is *how* each of these plans splits places – when they do.

Table III.B.1 Place Splits by Plan

Plan	Split	Unsplit
HB1 Enrolled	19	285
Illustrative	21	283
Illustrative 1	13	291
Illustrative 2	16	288
Illustrative 3	16	288
Illustrative 4	16	288

19. In the course of my analysis, I created tables showing not only the number of splits for each plan – but the size and population characteristics of the pieces that result from each place split. In **Appendix 2 Illustrative 4 Plan Place Splits Analysis** I show the total population (and share) and the APB population (and share) for each place piece split, by plan. My findings here are consistent with earlier findings, insofar as the Black population is split significantly differently than the total population, by place.

[8] https://www.census.gov/geographies/reference-files/2010/geo/state-local-geo-guides-2010/louisiana.html and current TIGER shapefiles

20. As with my initial report, I created a series of maps showing the splits of Louisiana places to visually illustrate the demographics of the pieces that were split. I focus this analysis on Baton Rouge and Lafayette, but a visual analysis of other places shows my observations there are generalizable to other places in the state.

21. Galmon Illustrative 4 Plan Place Splits by Race: As with my assessment of the Robinson Illustrative Plan and Galmon Plans 1-3 in my initial report, the Illustrative 4 Plan divides Louisiana's cities by race, very carefully. Plan 4 appears to most closely resemble Plan 1 – with enhancements to reduce VTD splits. In **Map Appendix B, Baton Rouge Split by Race** is shown with % Any Part Black (APB) by 2020 Census Block. As with the earlier Galmon Illustrative Plans, District 5 appears to be cut off the northern half (predominantly Black) part of the city. The remaining (predominantly white) part of the city is again left to District 6. As with the division of Baton Rouge, an examination of **Map Appendix C Lafayette Split by Race again** shows the city almost perfectly divided cleanly along racial lines, north and south.

22. An examination of the number of parish splits by plan in ***Table III.B.2*** shows the Enrolled Plan with the most splits – at 15. The Robinson Illustrative plan follows with 14, and the Galmon Illustrative Plans follow with 10, 11, 10 and 10 Parish splits respectively.

Table III.B.2 Parish Splits by Plan

Plan	Split	Unsplit
HB1 Enrolled	15	49
Illustrative	14	50
Illustrative 1	10	54
Illustrative 2	11	53
Illustrative 3	10	54
Illustrative 4	10	54

IV. CONCLUSION

23. For the reasons stated in this report and illustrated in the Appendices - I still conclude that the Plaintiff's Illustrative Plans fail the voting age population and numerosity requirements for the majority minority districts using the Black alone non-Hispanic category and the Black DOJ formulation. Only when one adds multi-race Black with two up to additional five races in combination with persons who are both Black and Hispanic do you achieve two majority minority districts with > 50% of Black VAP.

* * *

Submitted: May 5, 2022

Thomas M. Bryan

Appendix 1 Demographics

A. HB1 / SB5 Enrolled Plan: Voting Age Population by Race and Ethnicity

District	Total Pop	WNH Pop	APB NH	BNH NH	All Other NH	Hispanic
1	601,559	420,268	81,105	72,977	42,503	65,811
2	600,203	179,129	352,018	338,179	35,854	47,041
3	586,488	392,996	144,434	137,106	28,899	27,487
4	591,095	343,535	199,907	192,343	31,174	24,043
5	597,389	360,144	196,617	190,118	25,558	21,569
6	593,814	386,038	141,688	135,788	34,277	37,711
Grand Total	**3,570,548**	**2,082,110**	**1,115,769**	**1,066,511**	**198,265**	**223,662**

B. Robinson Illustrative Plan: Voting Age Population by Race and Ethnicity

District	Total Pop	WNH Pop	APB NH	BNH Pop	Other NH	Hispanic
1	603,084	394,140	110,315	101,553	42,773	64,618
2	603,764	218,098	307,670	294,198	40,066	51,402
3	586,948	428,229	105,115	98,440	31,630	28,649
4	596,366	357,220	190,267	183,466	31,689	23,991
5	589,193	252,112	306,701	298,337	20,064	18,680
6	591,193	432,311	95,701	90,517	32,043	36,322
Grand Total	**3,570,548**	**2,082,110**	**1,115,769**	**1,066,511**	**198,265**	**223,662**

C. Galmon Illustrative 1 Plan: Voting Age Population by Race and Ethnicity

District	Total Pop	WNH Pop	APB NH	BNH Pop	Other NH	Hispanic
1	599,826	396,685	109,041	101,677	41,193	60,271
2	603,092	225,537	302,513	288,076	37,720	51,759
3	586,519	415,185	115,841	108,807	31,869	30,658
4	596,695	357,357	189,880	183,088	31,611	24,639
5	592,316	260,464	296,402	287,986	23,698	20,168
6	592,100	426,882	102,092	96,877	32,174	36,167
Grand Total	**3,570,548**	**2,082,110**	**1,115,769**	**1,066,511**	**198,265**	**223,662**

D. Galmon Illustrative 2 Plan: Voting Age Population by Race and Ethnicity

District	Total Pop	WNH Pop	APB NH	BNH Pop	Other NH	Hispanic
1	598,980	399,732	98,862	91,591	42,331	65,326
2	606,036	229,831	306,982	292,507	36,913	46,785
3	585,553	406,600	126,424	119,366	29,970	29,617
4	592,745	369,521	169,811	163,140	34,225	25,859
5	593,183	261,385	296,852	288,597	23,038	20,163
6	594,051	415,041	116,838	111,310	31,788	35,912
Grand Total	**3,570,548**	**2,082,110**	**1,115,769**	**1,066,511**	**198,265**	**223,662**

E. Galmon Illustrative 3 Plan: Voting Age Population Characteristics

District	Total Pop	WNH Pop	APB NH	BNH Pop	Other NH	Hispanic
1	599,586	394,484	111,043	104,032	40,627	60,443
2	603,092	225,537	302,513	288,076	37,720	51,759
3	586,927	426,910	105,558	98,724	32,336	28,957
4	597,083	352,454	196,784	189,789	31,104	23,736
5	589,070	249,264	304,153	295,866	22,326	21,614
6	594,790	433,461	95,718	90,024	34,152	37,153
Grand Total	**3,570,548**	**2,082,110**	**1,115,769**	**1,066,511**	**198,265**	**223,662**

F. Galmon Illustrative 4 Plan: Voting Age Population Characteristics

District	Total Pop	WNH Pop	APB NH	BNH Pop	Other NH	Hispanic
01	599,404	396,822	108,721	101,388	41,063	60,131
02	603,596	226,410	302,153	287,725	37,620	51,841
03	586,230	414,576	116,020	108,993	31,926	30,735
04	596,127	359,047	187,628	180,873	31,702	24,505
05	593,324	259,437	298,354	289,884	23,610	20,393
06	591,867	425,818	102,893	97,648	32,344	36,057
Grand Total	**3,570,548**	**2,082,110**	**1,115,769**	**1,066,511**	**198,265**	**223,662**

G. Louisiana Total Population with Black Alone and in Combination P1

P1 Total Pop	#	% of Total
Total:	4,657,757	100.0%
Black or African American alone	**1,464,023**	**31.4%**
White; Black or African American	**43,631**	**0.9%**
Black or African American; American Indian and Alaska Native	7,332	0.2%
Black or African American; Asian	2,323	0.0%
Black or African American; Native Hawaiian and Other Pacific Islander	419	0.0%
Black or African American; Some Other Race	13,305	0.3%
White; Black or African American; American Indian and Alaska Native	4,955	0.1%
White; Black or African American; Asian	985	0.0%
White; Black or African American; Native Hawaiian and Other Pacific Islander	121	0.0%
White; Black or African American; Some Other Race	2,995	0.1%
Black or African American; American Indian and Alaska Native; Asian	137	0.0%
Black or African American; American Indian and Alaska Native; Native Hawaiian and Other Pacific Islander	40	0.0%
Black or African American; American Indian and Alaska Native; Some Other Race	374	0.0%
Black or African American; Asian; Native Hawaiian and Other Pacific Islander	170	0.0%
Black or African American; Asian; Some Other Race	128	0.0%
Black or African American; Native Hawaiian and Other Pacific Islander; Some Other Race	46	0.0%
White; Black or African American; American Indian and Alaska Native; Asian	339	0.0%
White; Black or African American; American Indian and Alaska Native; Native Hawaiian and Other Pacific Islander	46	0.0%
White; Black or African American; American Indian and Alaska Native; Some Other Race	1,250	0.0%
White; Black or African American; Asian; Native Hawaiian and Other Pacific Islander	64	0.0%
White; Black or African American; Asian; Some Other Race	67	0.0%
White; Black or African American; Native Hawaiian and Other Pacific Islander; Some Other Race	30	0.0%
Black or African American; American Indian and Alaska Native; Asian; Native Hawaiian and Other Pacific Islander	38	0.0%
Black or African American; American Indian and Alaska Native; Asian; Some Other Race	21	0.0%
Black or African American; American Indian and Alaska Native; Native Hawaiian and Other Pacific Islander; Some Other Race	1	0.0%
Black or African American; Asian; Native Hawaiian and Other Pacific Islander; Some Other Race	47	0.0%
White; Black or African American; American Indian and Alaska Native; Asian; Native Hawaiian and Other Pacific Islander	82	0.0%
White; Black or African American; American Indian and Alaska Native; Asian; Some Other Race	95	0.0%
White; Black or African American; American Indian and Alaska Native; Native Hawaiian and Other Pacific Islander; Some Other Race	3	0.0%
White; Black or African American; Asian; Native Hawaiian and Other Pacific Islander; Some Other Race	11	0.0%
Black or African American; American Indian and Alaska Native; Asian; Native Hawaiian and Other Pacific Islander; Some Other Race	8	0.0%
White; Black or African American; American Indian and Alaska Native; Asian; Native Hawaiian and Other Pacific Islander; Some Other Race	33	0.0%
Black Alone or In Combination	**1,543,119**	**33.1%**

H. Louisiana Total Population with Black Alone and in Combination by Hispanic Origin P2

P2 Total Pop by Hispanic	#	% of Total		Hispanic (P1 - P2)	% of Total
Not Hispanic or Latino:	4,335,208	93%		322,549	6.9%
Black or African American alone	**1,452,420**	**31%**		**11,603**	**0.2%**
White; Black or African American	**41,902**	**0.9%**		**1,729**	**0.0%**
Black or African American; American Indian and Alaska Native	6,931	0.1%		401	0.0%
Black or African American; Asian	2,185	0.0%		138	0.0%
Black or African American; Native Hawaiian and Other Pacific Islander	371	0.0%		48	0.0%
Black or African American; Some Other Race	6,202	0.1%		7,103	0.2%
White; Black or African American; American Indian and Alaska Native	4,341	0.1%		614	0.0%
White; Black or African American; Asian	886	0.0%		99	0.0%
White; Black or African American; Native Hawaiian and Other Pacific Islander	112	0.0%		9	0.0%
White; Black or African American; Some Other Race	1,525	0.0%		1,470	0.0%
Black or African American; American Indian and Alaska Native; Asian	119	0.0%		18	0.0%
Black or African American; American Indian and Alaska Native; Native Hawaiian and Other Pacific Islander	36	0.0%		4	0.0%
Black or African American; American Indian and Alaska Native; Some Other Race	230	0.0%		144	0.0%
Black or African American; Asian; Native Hawaiian and Other Pacific Islander	136	0.0%		34	0.0%
Black or African American; Asian; Some Other Race	74	0.0%		54	0.0%
Black or African American; Native Hawaiian and Other Pacific Islander; Some Other Race	20	0.0%		26	0.0%
White; Black or African American; American Indian and Alaska Native; Asian	253	0.0%		86	0.0%
White; Black or African American; American Indian and Alaska Native; Native Hawaiian and Other Pacific Islander	37	0.0%		9	0.0%
White; Black or African American; American Indian and Alaska Native; Some Other Race	450	0.0%		800	0.0%
White; Black or African American; Asian; Native Hawaiian and Other Pacific Islander	49	0.0%		15	0.0%
White; Black or African American; Asian; Some Other Race	32	0.0%		35	0.0%
White; Black or African American; Native Hawaiian and Other Pacific Islander; Some Other Race	16	0.0%		14	0.0%
Black or African American; American Indian and Alaska Native; Asian; Native Hawaiian and Other Pacific Islander	26	0.0%		12	0.0%
Black or African American; American Indian and Alaska Native; Asian; Some Other Race	18	0.0%		3	0.0%
Black or African American; American Indian and Alaska Native; Native Hawaiian and Other Pacific Islander; Some Other Race	0	0.0%		1	0.0%
Black or African American; Asian; Native Hawaiian and Other Pacific Islander; Some Other Race	41	0.0%		6	0.0%
White; Black or African American; American Indian and Alaska Native; Asian; Native Hawaiian and Other Pacific Islander	51	0.0%		31	0.0%
White; Black or African American; American Indian and Alaska Native; Asian; Some Other Race	48	0.0%		47	0.0%
White; Black or African American; American Indian and Alaska Native; Native Hawaiian and Other Pacific Islander; Some Other Race	1	0.0%		2	0.0%
White; Black or African American; Asian; Native Hawaiian and Other Pacific Islander; Some Other Race	7	0.0%		4	0.0%
Black or African American; American Indian and Alaska Native; Asian; Native Hawaiian and Other Pacific Islander; Some Other Race	8	0.0%		0	0.0%
White; Black or African American; American Indian and Alaska Native; Asian; Native Hawaiian and Other Pacific Islander; Some Other Race	20	0.0%		13	0.0%
Black Alone or In Combination, non-Hispanic and Hispanic	**1,518,547**	**32.6%**		**24,572**	**0.5%**

I. Louisiana Voting Age Population with Black Alone and in Combination P3

P3 VAP	Louisiana	% of Total
Total:	3,570,548	100.0%
Black or African American alone	**1,073,754**	**30.1%**
White; Black or African American	**18,851**	**0.5%**
Black or African American; American Indian and Alaska Native	5,100	0.1%
Black or African American; Asian	1,299	0.0%
Black or African American; Native Hawaiian and Other Pacific Islander	248	0.0%
Black or African American; Some Other Race	9,241	0.3%
White; Black or African American; American Indian and Alaska Native	3,096	0.1%
White; Black or African American; Asian	406	0.0%
White; Black or African American; Native Hawaiian and Other Pacific Islander	65	0.0%
White; Black or African American; Some Other Race	1,642	0.0%
Black or African American; American Indian and Alaska Native; Asian	98	0.0%
Black or African American; American Indian and Alaska Native; Native Hawaiian and Other Pacific Islander	25	0.0%
Black or African American; American Indian and Alaska Native; Some Other Race	260	0.0%
Black or African American; Asian; Native Hawaiian and Other Pacific Islander	103	0.0%
Black or African American; Asian; Some Other Race	82	0.0%
Black or African American; Native Hawaiian and Other Pacific Islander; Some Other Race	28	0.0%
White; Black or African American; American Indian and Alaska Native; Asian	197	0.0%
White; Black or African American; American Indian and Alaska Native; Native Hawaiian and Other Pacific Islander	27	0.0%
White; Black or African American; American Indian and Alaska Native; Some Other Race	875	0.0%
White; Black or African American; Asian; Native Hawaiian and Other Pacific Islander	45	0.0%
White; Black or African American; Asian; Some Other Race	40	0.0%
White; Black or African American; Native Hawaiian and Other Pacific Islander; Some Other Race	22	0.0%
Black or African American; American Indian and Alaska Native; Asian; Native Hawaiian and Other Pacific Islander	26	0.0%
Black or African American; American Indian and Alaska Native; Asian; Some Other Race	19	0.0%
Black or African American; American Indian and Alaska Native; Native Hawaiian and Other Pacific Islander; Some Other Race	1	0.0%
Black or African American; Asian; Native Hawaiian and Other Pacific Islander; Some Other Race	25	0.0%
White; Black or African American; American Indian and Alaska Native; Asian; Native Hawaiian and Other Pacific Islander	62	0.0%
White; Black or African American; American Indian and Alaska Native; Asian; Some Other Race	77	0.0%
White; Black or African American; American Indian and Alaska Native; Native Hawaiian and Other Pacific Islander; Some Other Race	3	0.0%
White; Black or African American; Asian; Native Hawaiian and Other Pacific Islander; Some Other Race	11	0.0%
Black or African American; American Indian and Alaska Native; Asian; Native Hawaiian and Other Pacific Islander; Some Other Race	8	0.0%
White; Black or African American; American Indian and Alaska Native; Asian; Native Hawaiian and Other Pacific Islander; Some Other Race	33	0.0%
Black Alone or In Combination	**1,115,769**	**31.2%**

J. Louisiana Total Population with Black Alone and in Combination by Hispanic Origin P4

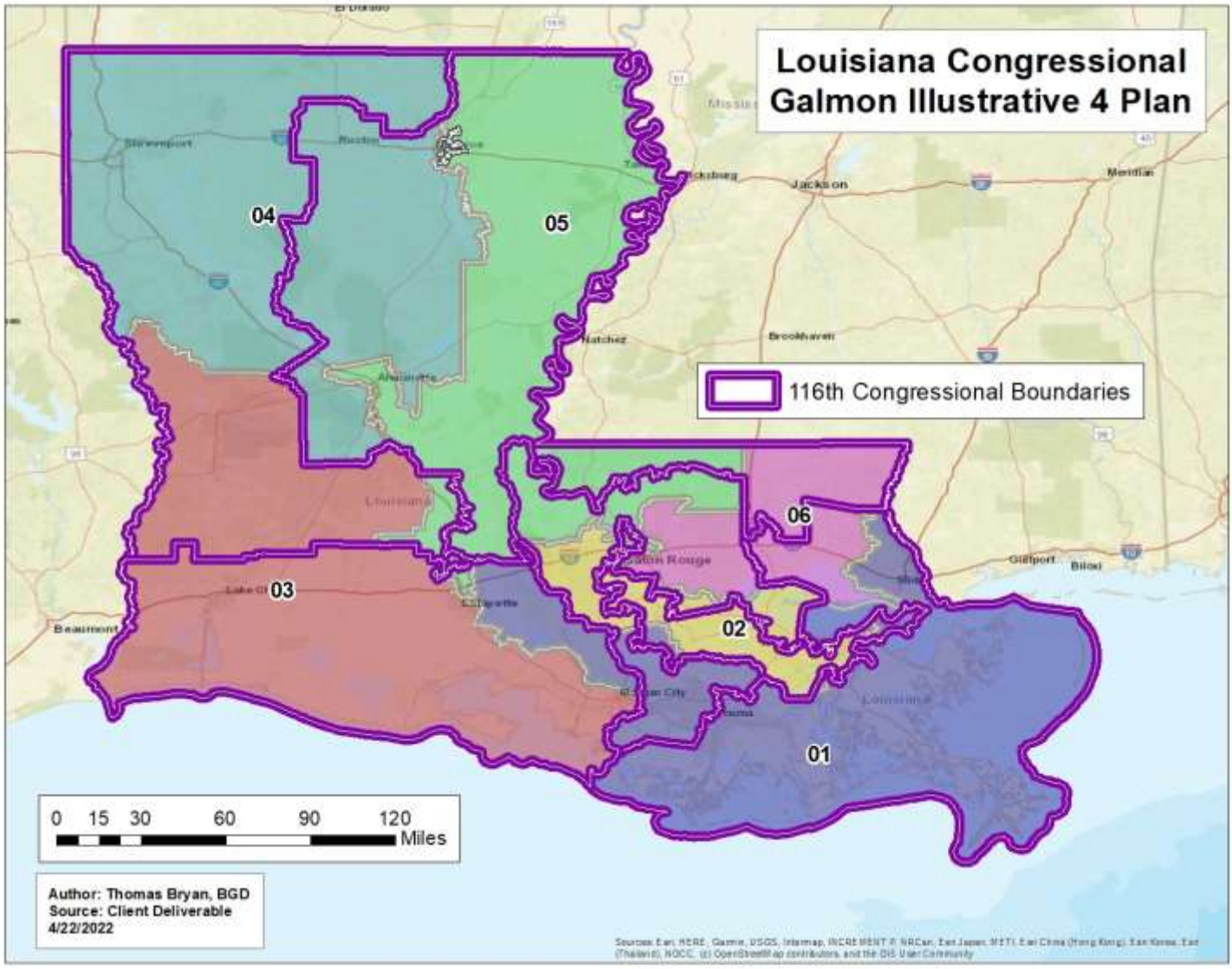
P4 VAP by Hispanic	Louisiana	% of Total		Hispanic (P3 - P4)	% of Total
Not Hispanic or Latino:	3,346,886	93.7%		223,662	6.3%
Black or African American alone	**1,066,511**	**29.9%**		**7,243**	**0.2%**
White; Black or African American	**18,172**	**0.5%**		**679**	**0.0%**
Black or African American; American Indian and Alaska Native	4,858	0.1%		242	0.0%
Black or African American; Asian	1,215	0.0%		84	0.0%
Black or African American; Native Hawaiian and Other Pacific Islander	226	0.0%		22	0.0%
Black or African American; Some Other Race	4,426	0.1%		4,815	0.1%
White; Black or African American; American Indian and Alaska Native	2,752	0.1%		344	0.0%
White; Black or African American; Asian	366	0.0%		40	0.0%
White; Black or African American; Native Hawaiian and Other Pacific Islander	56	0.0%		9	0.0%
White; Black or African American; Some Other Race	920	0.0%		722	0.0%
Black or African American; American Indian and Alaska Native; Asian	83	0.0%		15	0.0%
Black or African American; American Indian and Alaska Native; Native Hawaiian and Oth	21	0.0%		4	0.0%
Black or African American; American Indian and Alaska Native; Some Other Race	177	0.0%		83	0.0%
Black or African American; Asian; Native Hawaiian and Other Pacific Islander	83	0.0%		20	0.0%
Black or African American; Asian; Some Other Race	50	0.0%		32	0.0%
Black or African American; Native Hawaiian and Other Pacific Islander; Some Other Race	9	0.0%		19	0.0%
White; Black or African American; American Indian and Alaska Native; Asian	153	0.0%		44	0.0%
White; Black or African American; American Indian and Alaska Native; Native Hawaiian a	25	0.0%		2	0.0%
White; Black or African American; American Indian and Alaska Native; Some Other Race	338	0.0%		537	0.0%
White; Black or African American; Asian; Native Hawaiian and Other Pacific Islander	34	0.0%		11	0.0%
White; Black or African American; Asian; Some Other Race	24	0.0%		16	0.0%
White; Black or African American; Native Hawaiian and Other Pacific Islander; Some Oth	13	0.0%		9	0.0%
Black or African American; American Indian and Alaska Native; Asian; Native Hawaiian a	21	0.0%		5	0.0%
Black or African American; American Indian and Alaska Native; Asian; Some Other Race	16	0.0%		3	0.0%
Black or African American; American Indian and Alaska Native; Native Hawaiian and Oth	0	0.0%		1	0.0%
Black or African American; Asian; Native Hawaiian and Other Pacific Islander; Some Othe	25	0.0%		0	0.0%
White; Black or African American; American Indian and Alaska Native; Asian; Native Haw	42	0.0%		20	0.0%
White; Black or African American; American Indian and Alaska Native; Asian; Some Othe	42	0.0%		35	0.0%
White; Black or African American; American Indian and Alaska Native; Native Hawaiian a	1	0.0%		2	0.0%
White; Black or African American; Asian; Native Hawaiian and Other Pacific Islander; Sor	7	0.0%		4	0.0%
Black or African American; American Indian and Alaska Native; Asian; Native Hawaiian a	8	0.0%		0	0.0%
White; Black or African American; American Indian and Alaska Native; Asian; Native Haw	20	0.0%		13	0.0%
Black Alone or In Combination, non-Hispanic and Hispanic	**1,100,694**	**30.8%**		**15,075**	**0.4%**

Appendix 2 Illustrative 4 Plan Place Splits Analysis

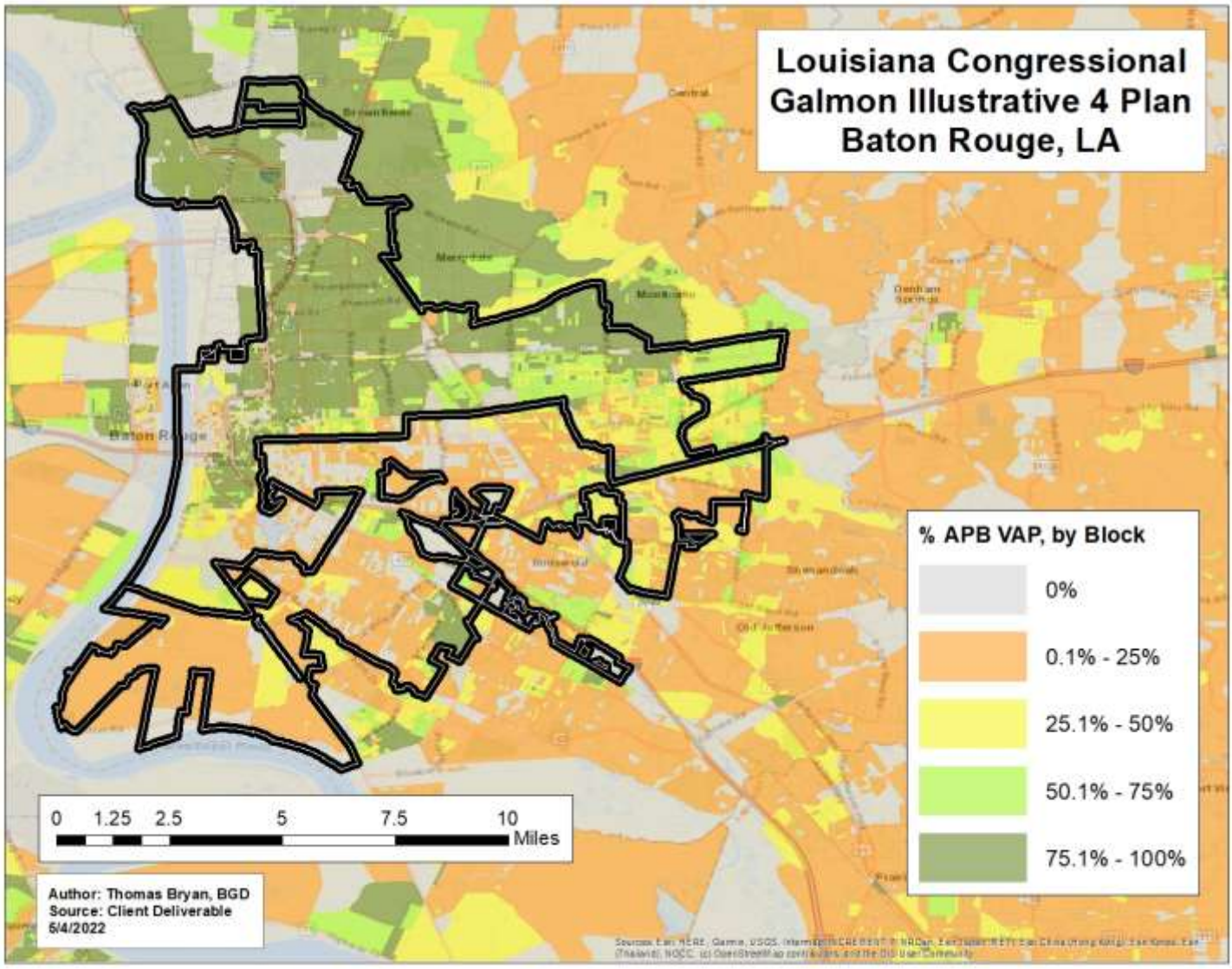
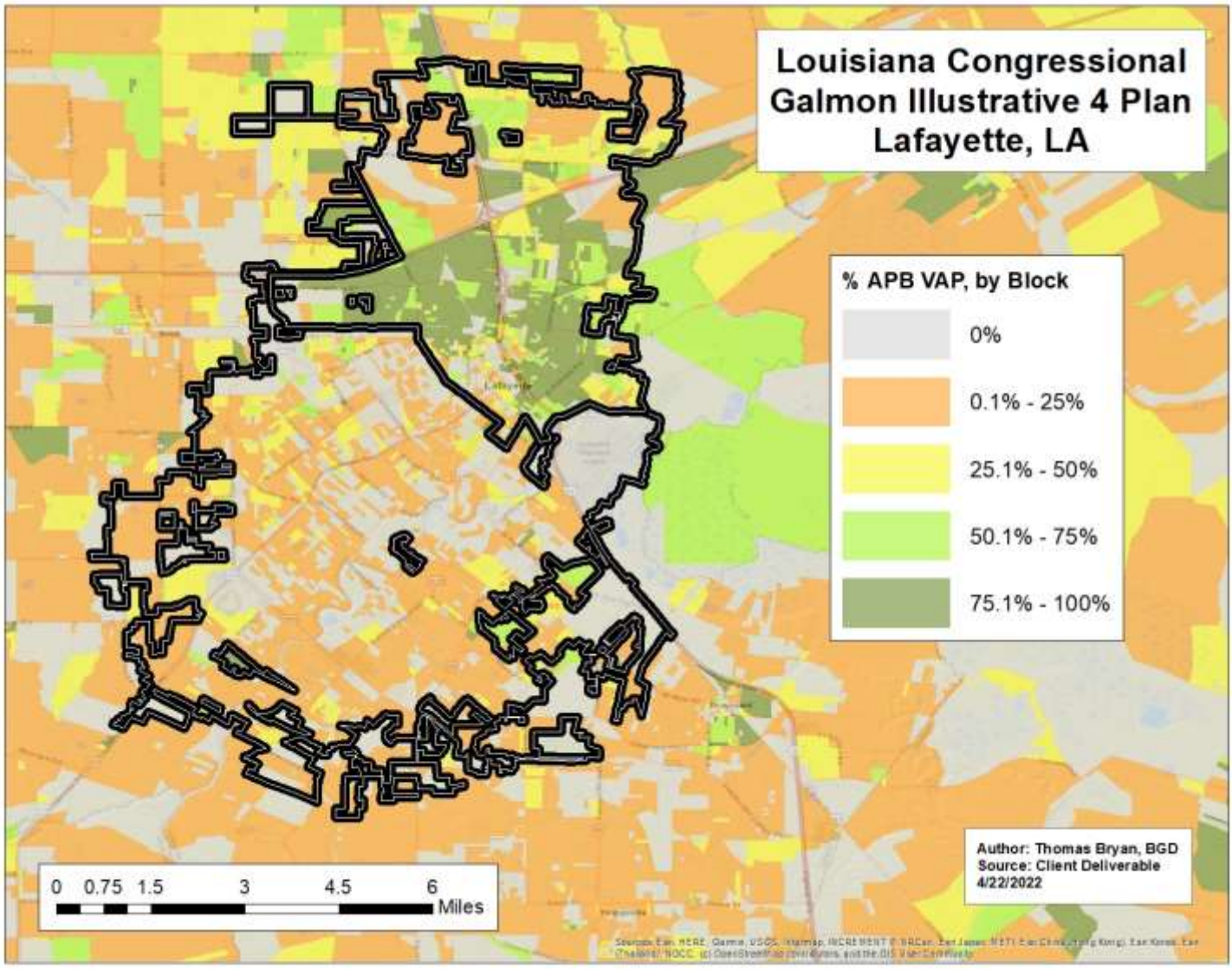
Place Name	District	Total	Total Percent	Black	Black Percent
Alexandria city	4	10,793	23.8%	1,939	18.0%
	5	34,482	76.2%	23,792	69.0%
Arnaudville town	1	39	3.9%	5	12.8%
	5	970	96.1%	127	13.1%
Ball town	4	31	0.8%	6	19.4%
	5	3,930	99.2%	516	13.1%
Baton Rouge city	5	143,479	63.1%	105,132	73.3%
	6	83,991	36.9%	20,965	25.0%
Broussard city	1	190	1.4%	25	13.2%
	3	13,227	98.6%	2,323	17.6%
Carencro city	3	29	0.3%	3	10.3%
	5	9,243	99.7%	4,561	49.3%
Eunice city	3	302	3.2%	31	10.3%
	5	9,120	96.8%	3,487	38.2%
Kenner city	1	56,858	85.6%	9,803	17.2%
	2	9,590	14.4%	6,021	62.8%
Lafayette city	3	82,561	68.0%	12,482	15.1%
	5	38,813	32.0%	26,872	69.2%
Mandeville city	1	0	0.0%	0	0.0%
	6	13,192	100.0%	707	5.4%
Morgan City city	1	0	0.0%	0	0.0%
	3	11,472	100.0%	2,766	24.1%
New Iberia city	1	25,204	88.3%	12,460	49.4%
	3	3,351	11.7%	830	24.8%
New Orleans city	1	33,047	8.6%	2,459	7.4%
	2	350,950	91.4%	216,510	61.7%
Pineville city	4	289	2.0%	48	16.6%
	5	14,095	98.0%	5,085	36.1%
West Monroe city	4	8,264	63.1%	1,737	21.0%
	5	4,839	36.9%	3,164	65.4%
Zachary city	5	19,303	99.9%	9,040	46.8%
	6	13	0.1%	0	0.0%

Appendix 4 Louisiana Maps

A. Galmon Illustrative 4 Plan and Existing Plan



B. Baton Rouge Galmon Illustrative 4 Plan Split by % Any Part Black VAP



C. Lafayette Galmon Illustrative 4 Plan Split by % Any Part Black VAP