Exhibit C

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

REBUTTAL EXPERT REPORT OF ANTHONY E. FAIRFAX

A. Introduction

1. I have been retained by counsel representing the Plaintiffs in this lawsuit to respond to the September 15, 2023 Report by Dr. Douglas Johnson in response to my expert Remedial Plan.

B. Background

2. In my expert report dated April 15, 2022, I found it was possible to draw an Illustrative Plan that adheres to state and federal redistricting criteria and creates two reasonably compact, majority-Black[1] districts in Louisiana's six-district Congressional map.

3. In its opinion dated June 6, 2022, this Court credited my testimony in a decision ordering the Louisiana Legislature to add a second majority-minority district by June 20, 2022. *Robinson v. Ardoin*, No. 22-211-SDD-SDJ, 2022 WL 2012389 (M.D. La. June 6, 2022).

4. On June 17, 2022, this Court issued an order requiring the parties to jointly submit a remedial map in the event the Louisiana Legislature failed to do so. Thereafter, the Plaintiffs' counsel asked that I prepare a remedial congressional districting plan based on Illustrative Plan 2A that made the majority-Black districts more compact, minimized political boundary splits, particularly parishes, and incorporated testimony on communities of interest identified at the Preliminary Injunction hearing, specifically the community of interest among Assumption Parish and the other River Parishes.

5. On June 22, 2023, I submitted a Remedial Plan for Louisiana's congressional districts. Dr. Johnson responded to my Remedial Plan with his report on June 27, 2023. On September 15, 2023, Dr. Johnson submitted an additional report responding to my Remedial Plan.

[1] Using voting age population ("VAP") and citizen voting age population ("CVAP").

C. Qualifications

6. My qualifications and expertise are described fully in my expert report, submitted on April 15, 2022, to this Court and available at ECF No. 41-2, 3:22-cv-00211-SDD-SDJ. This Court credited my testimony, in this case, *Robinson v. Ardoin*, in its opinion, dated June 6, 2022, as did a panel of the Fifth Circuit considering this case on June 12, 2022.

D. Summary of Dr. Johnson's Opinions

7. A summary of the issues raised in Dr. Johnson's expert reports includes the following:

    a) Dr. Johnson states that the Remedial Plan's district boundaries follow race more closely than the thematic maps of No High School Education % and Community Resilience Estimates (CRE) in several of the parish split areas.

    b) Dr. Johnson states that the Remedial Plan split military bases, specifically Fort Polk (now Fort Johnson).

    c) Dr. Johnson states that splits of Vernon and St. Tammany Parishes are accomplished in an unexplained manner.

E. Methodology

8. In developing the maps used in this report, I accessed the original thematic map data that was used to develop the Remedial Plan. However, instead of including only statewide maps, I have developed zoomed areas for closer viewing of the thematic attributes that were used to prepare my Remedial Plan (and previous Illustrative Plans). To view the Fort Polk military base, I overlayed the military base in addition to parish and VTD boundaries to analyze Dr. Johnson's allegations on that issue. Finally, no maps were necessary to address the issue of the split in St. Tammany Parish.

F. Response to Dr. Johnson's statements that district boundaries follow race more than the thematic maps of No High School Education % and Community Resilience Estimates (CRE) in several of the parish split areas.

General Response

9. As a general response to Dr. Johnson's statement on race, his analysis only considers two of the five socioeconomic and CRE risk factors that I used during the development of the Remedial Plan. All six indicators,[2] in some part, were used to define the general configuration of the congressional districts, specifically CD 5 and, to a lesser extent CD 2.

10. The focus of Dr. Johnson's mapping analysis used only the "No High School Education" and the ">3 CRE Risk Factors" maps (*See* Dr. Johnson Report page 3, paragraph 15.) In addition to the "No High School Education" and the ">3 CRE Risk Factors maps," four other socioeconomic indicators were used to determine the configuration of the districts. The four others are: Median Household Income, Food Stamps %, Poverty %, and Renter %. All six maps of these socioeconomic indicators were included in Appendix C in my supplemental report dated May 2, 2022, ECF No. 123-1.

11. These provide the full picture of the general configuration of CD 5 and to a lesser extent CD 2. I use the term general because other factors are involved in the creation of the districts other than socioeconomic aspects. These other factors include redistricting criteria that will be explained further throughout this report. These additional factors were also not disputed in Dr. Johnson's report.

12. That said, the starting point for CD 5 consisted of the six socioeconomic aspects of the Delta parishes and below. Figure 1 provides a visual picture of the general area of CD 5. The overall shape of CD 5 is clearly identified in the six socioeconomic map image in Figure 1.

[22] For the purpose of this report the six "socioeconomic" indicators or variables will include No High School Education, Median Household Income, Food Stamps %, Poverty %, and Renter % plus the >3 CRE Risk Factors

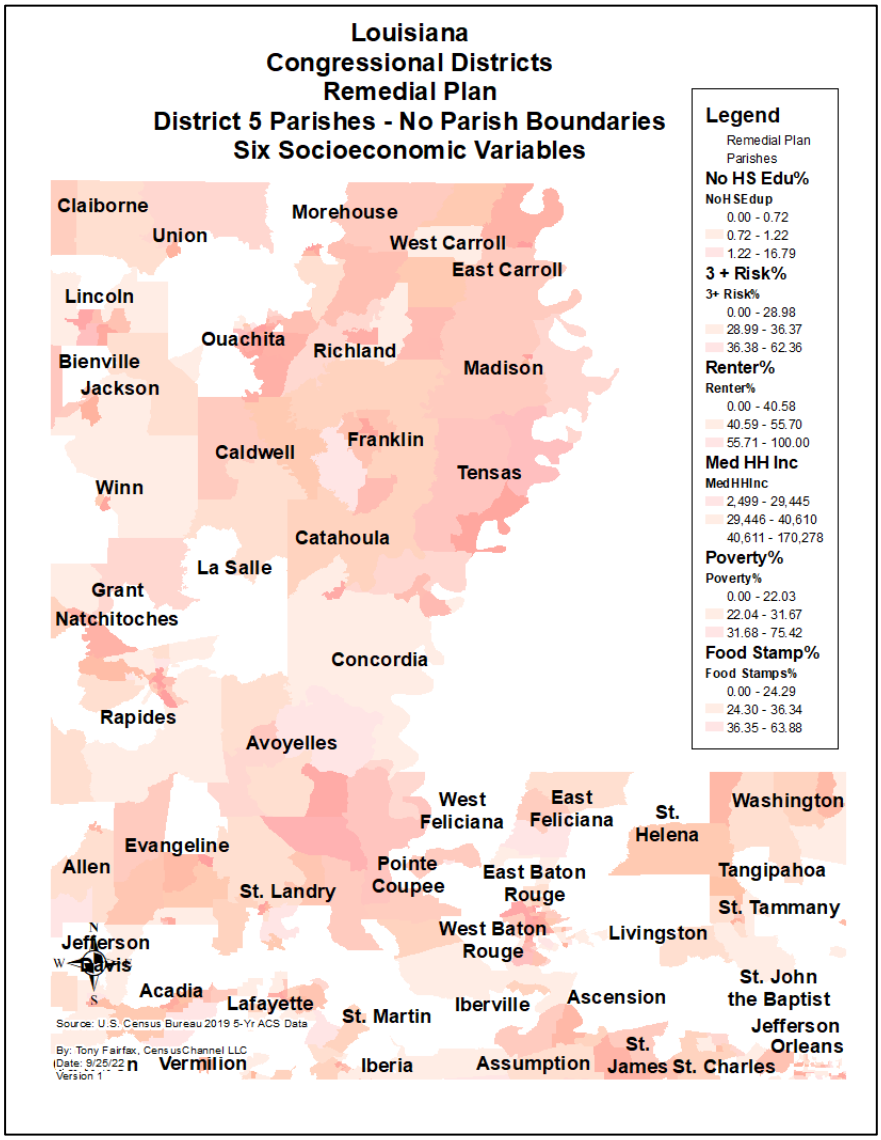


Figure 1 – All Six Socioeconomic Variables with Remedial Plan w/No Parish Boundaries

13. Figure 1 presents all six socioeconomic variables (at the census tract level) overlayed on top of each other.[3] Each variable was made transparent to reveal the impact of all layers. The colors used to display the socioeconomic variables are the same in order to not bias or favor

[3] Initially, I used one sixth (17%) opacity (for six layers) or 83% transparency setting for each overlay. Because this setting produced such a faint shading, I ultimately ended up using 80% transparency or 20% opacity.

one variable over another. The boundaries of the parishes have been removed to allow for focusing on the thematic map areas only.

14. An analysis of the thematic map reveals the general pattern and starting point for CD 5. Overlaying the boundary of CD 5, as shown in Figure 2, simply groups the visual collection of socioeconomic variables common to the district.

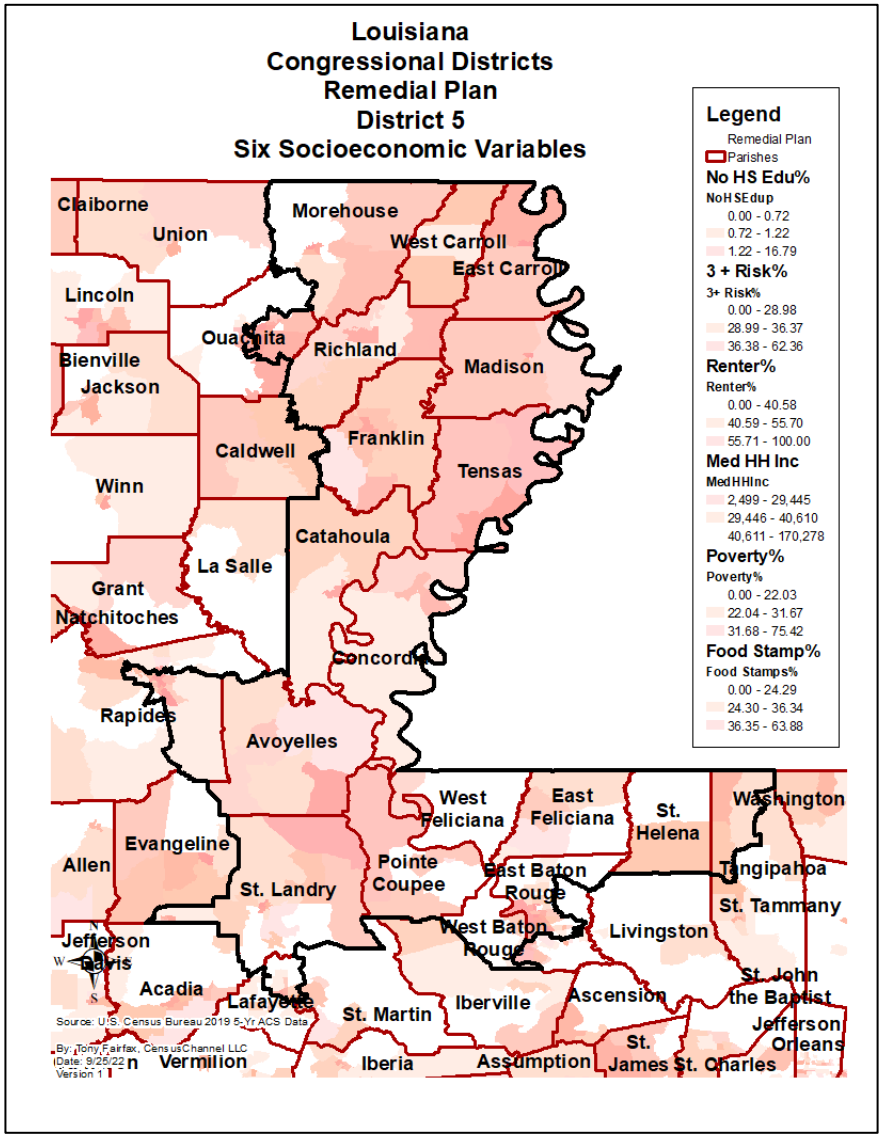


Figure 2 – All Six Socioeconomic Thematic Variables with Remedial Plan CD 5

15. The color theme of the census tracts clearly presents the core configuration of CD 5 using whole parishes from Morehouse through the Delta Parishes to St. Landry. The district then extends eastward, similar to the Enacted and 2012 Plans, however, not as much.

16. A parish that was left out of CD 5 was Caldwell. As I previously mentioned in testimony, Caldwell Parish was not added because I determined that it created a less compact district. That said, it can be added, and other parts dropped, and CD 5 can continue to hold its majority-Black status.

17. Regarding the parish splits for CD 5, the map shows the added portion includes areas that generally match the combined six socioeconomic variables for the district, as shown in Figure 2.

18. In addition, when zoomed into each of the parish splits, boundaries are further defined not necessarily by all socioeconomic variables but, in some cases, one or more. In essence, the split areas that were added to CD 5 (or CD 2 in some instances) are defined further using one or more of the socioeconomic aspects.

19. It is important to note that it is improbable that any congressional district will consist of the same socioeconomic aspects throughout the entire district. Thus, there will always be areas within the district that differ from the majority aspects of the district.

20. The socioeconomic maps were also not the only aspects that defined the shape of CD 5, CD 2, as well as the other districts. The plan was designed using redistricting criteria such as equal population, compactness, minimizing political subdivisions, considering existing boundaries, and preserving communities of interest. The state's policy of using whole

precincts or VTDs also influenced the shape of the district configurations. These were additional aspects that defined configurations of the districts, specifically CD 5 and CD 2.

21. Finally, it is not unreasonable or uncommon to have a significant amount of majority Black VTDs contained within a majority Black district. In fact, it is most likely for that to occur.

22. Below are my responses to Dr. Johnson's allegations delineated by each parish that was split.

Ouachita Parish

23. Dr. Johnson, on page 5, paragraph 19, discusses the split of Ouachita Parish. He states, "The Congressional District matches much closer with racial data than with No HS Edu% map and the % with >3 Risk Factors." Although the No High School Education and the >3 CRE Risk Factors maps show some alignment with the Ouachita area selected for CD 5, all six socioeconomic indicators show a fairly high correlation with CD 5's boundaries.

24. Figure 3 again displays all six socioeconomic variables overlayed on top of each other with a transparency for each layer. The large red-colored portion to the south of the district in Ouachita Parish is a single VTD. The population of the VTD is 1,058 and could be added and other parts removed, and CD 5 could continue to retain its majority Black status (as mentioned in my previous testimony).

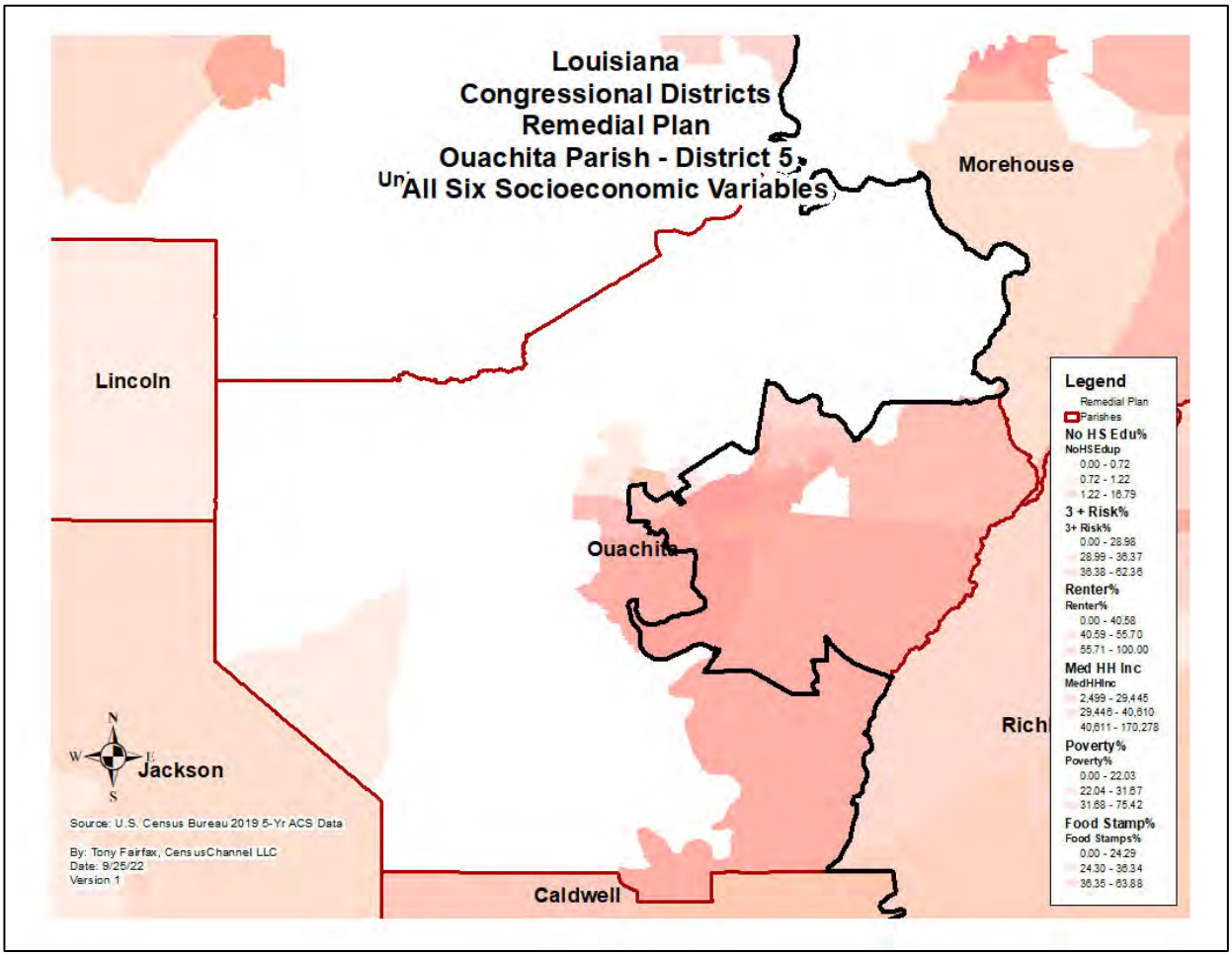


Figure 3 – Ouachita Parish Zoom of Six Socioeconomic Variables of the Remedial Plan CD 5

25. However, a close reflection of the district can be seen when Renter % is presented. Figure 4 depicts a zoomed-in map of the Ouachita Parish split with the top two quintiles of the percentage of renters overlayed. The boundary of CD 5 adds the overwhelming portion of Ouachita Parish that noticeably matches the socioeconomic community of renters.

26. It is also important to note that Dr. Johnson's map of Ouachita Parish on page 4 includes areas with VTDs below 40% Black within CD 5. Other VTDs can be seen within CD 5 that are under 50% and above 40% Black. The inclusion of these non-majority Black areas as well as the generalized matching of CD 5's configuration to socioeconomic configuration contradicts Dr. Johnson's implied allegation of race predominating.

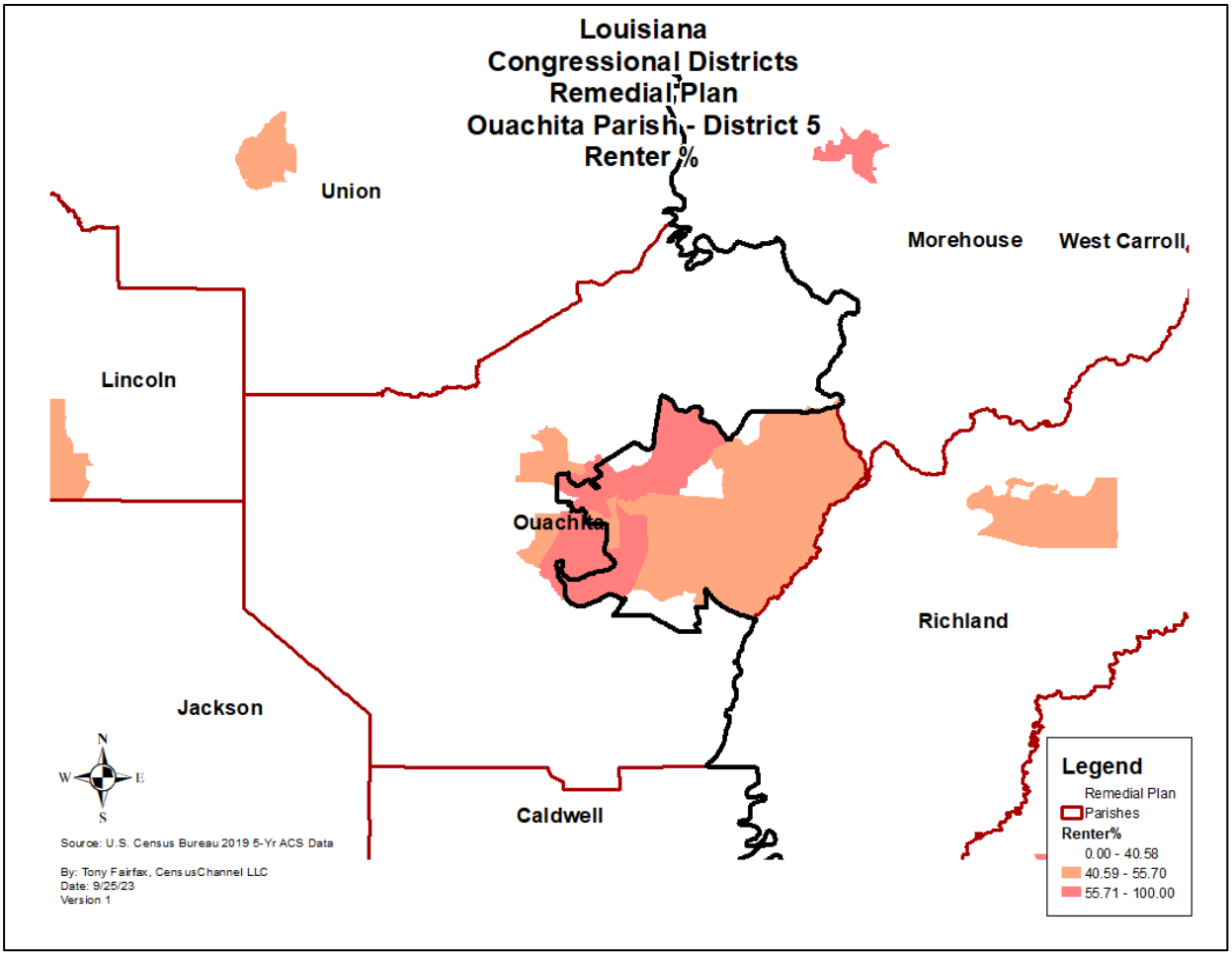


Figure 4 – Ouachita Parish Zoom of Renter % of the Remedial Plan CD 5

Rapides Parish

27. Dr. Johnson, on page 7, paragraph 23 of his report discusses the split of Rapides Parish. He states, "The VTDs pulled into CD5 in Rapides Parish match much more precisely with race than they are for education and CRE." Although the No High School Education and the >3 CRE Risk Factors maps show some alignment with the Rapides area selected, viewing all of the six variables is much closer. Figure 5 depicts a zoomed-in map of the Rapides Parish split with the top two quintiles for all six socioeconomic variables overlayed.

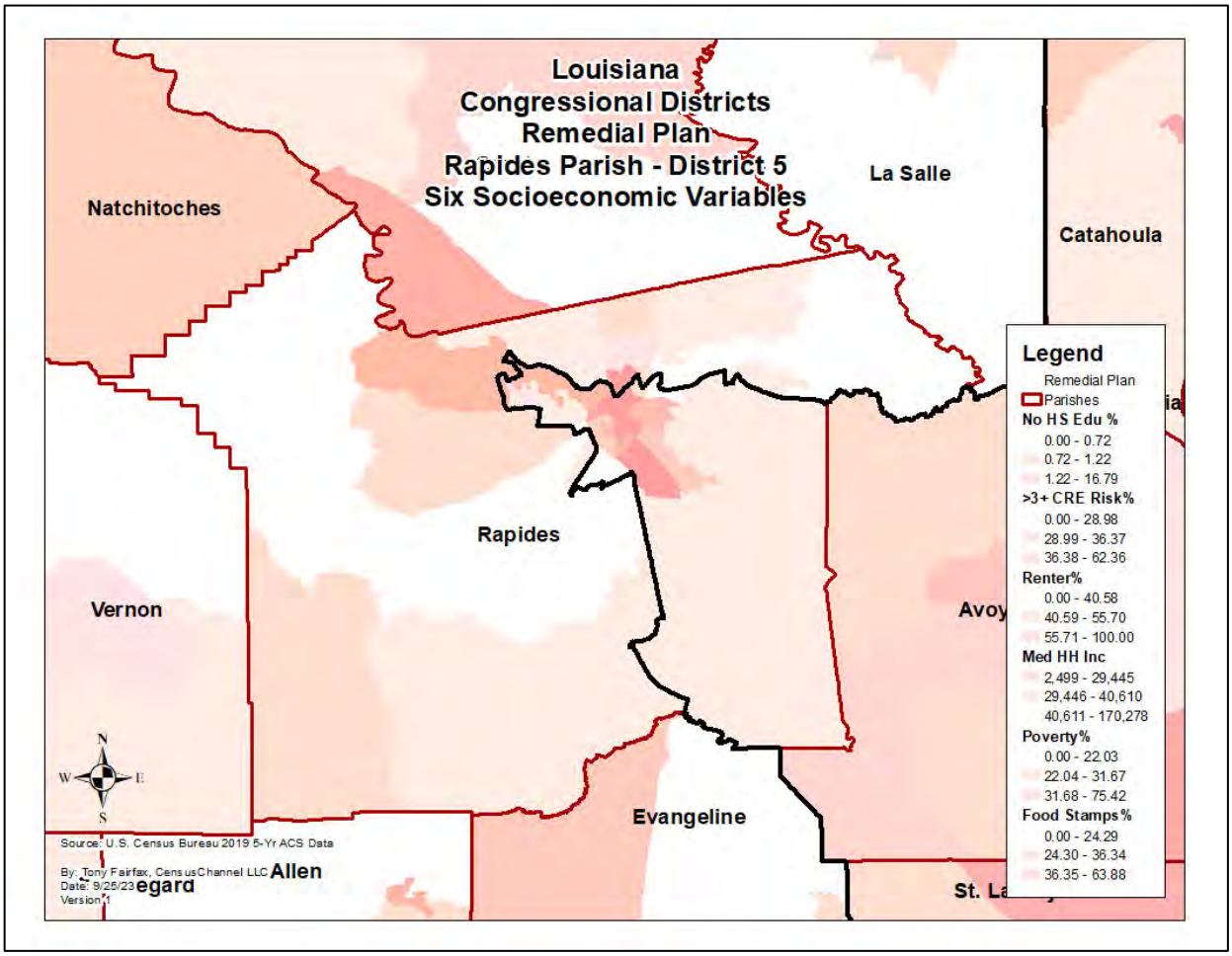


Figure 5 – All Six Socioeconomic Variables for Rapides Parish Remedial Plan CD 5

28. While the areas to the northwest have a reddish shade, adding those areas to CD 5 would move it closer to the border of Grant Parish and could further divide Rapides Parish. Also, adding the reddish areas to the southwest would make CD 5 less compact and irregular in shape.

29. Once again, it is important to note that Dr. Johnson's map of Rapides Parish on page 6 includes areas with VTDs below 40% Black within CD 5. Other VTDs can be seen which are included in CD 5 and are under 50% and above 40% Black. The inclusion of these non-majority Black areas, as well as the generalized matching of CD 5's configuration to socioeconomic configuration, contradicts Dr. Johnson's implied allegation of race predominating.

Lafayette Parish

30. Dr. Johnson, on page 9, paragraph 27 of his report discusses the split of Lafayette Parish. He states, “The VTDs pulled into CD5 in Lafayette Parish match much more precisely with race than they are for education and CRE.”

31. Figure 6 displays all six socioeconomic variables overlayed on top of each other with a transparency for each layer. The figure displays a significant amount of area within Lafayette that matches the combined six socioeconomic variables that have been added to CD 5. A much more stark boundary division can be seen by reviewing the No High School Education and the >3 CRE Risk Factors together.

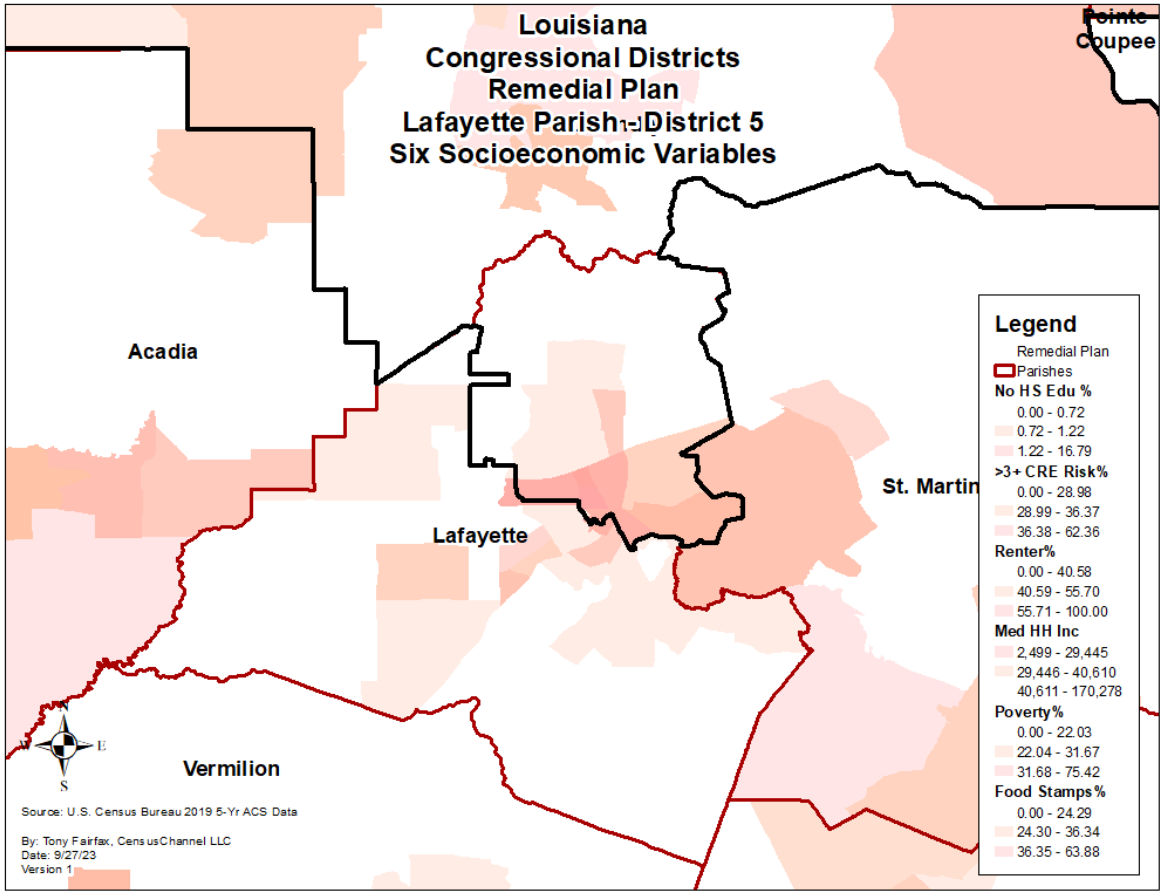


Figure 6 – Lafayette Parish Zoom of Six Socioeconomic Variables for Remedial CD 5

32. On page 9, paragraph 26, Dr. Johnson states that "None of the VTDs pulled from Lafayette Parish into CD5 show up in either the red or the orange categories shown on Mr. Fairfax's 'No High School Education %' map."

33. The statement by Dr. Johnson is inaccurate. Although all six socioeconomic variables form a general boundary for the Lafayette split, the census tracts with the top two quintiles of the percentages of no High School Education display an almost identical southern district border and are included in CD 5 (See Figure 7).

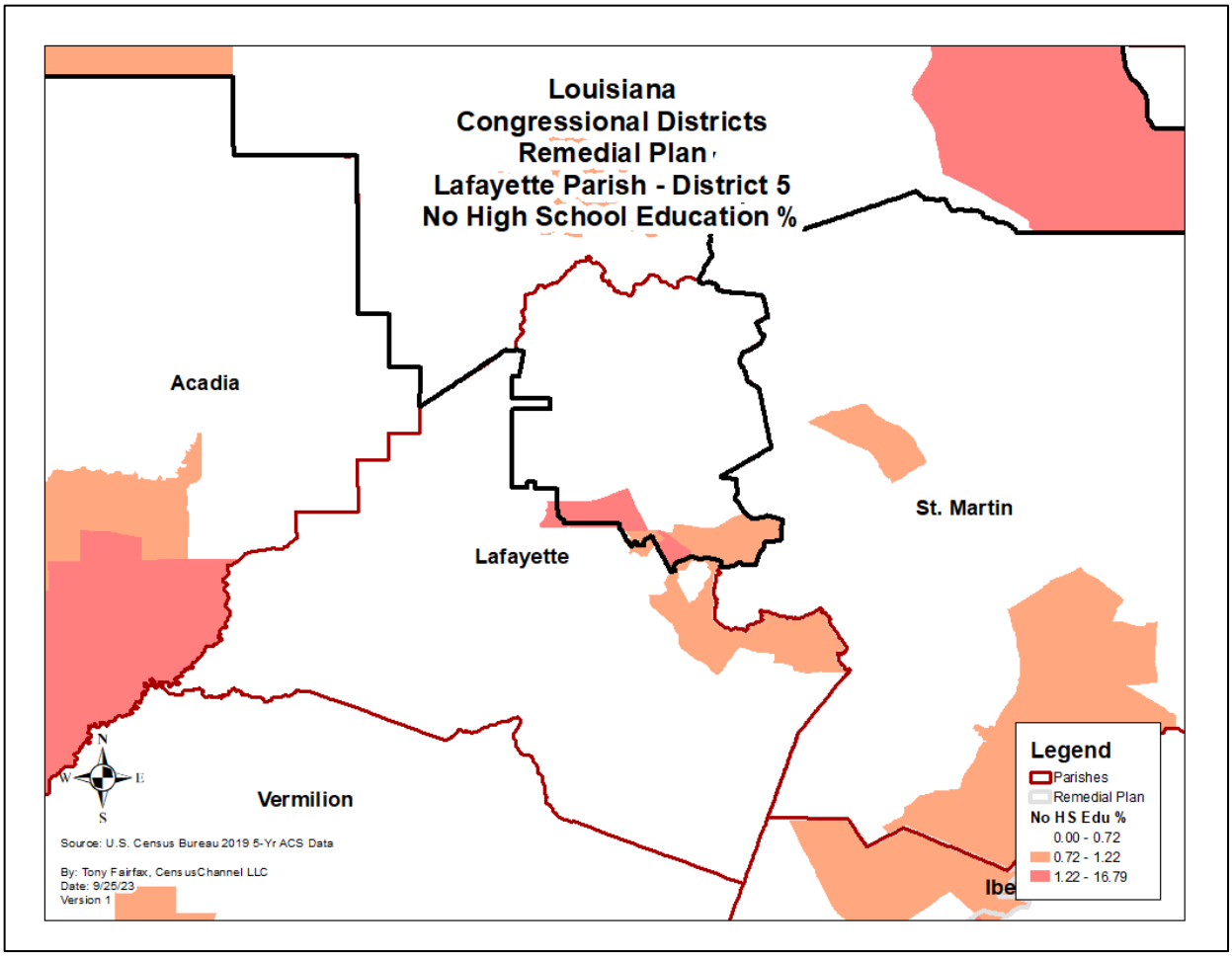


Figure 7 – Lafayette Parish Zoom of % No HS Education for Remedial CD 5

34. CD 5 extends down south from St. Landry and adds the relevant VTDs that are in common with CD 5. Also, if the area to the southeast below the district line was added to CD 5 the district would become significantly less compact with a hook configuration.

35. When integrating these VTDs into CD 5, the area in Lafayette was added in a manner that preserved multiple census places. Figure 8 shows how the extension into Lafayette also preserves the city of Carencro and Ossun CDP whole by placing the boundary between the two.

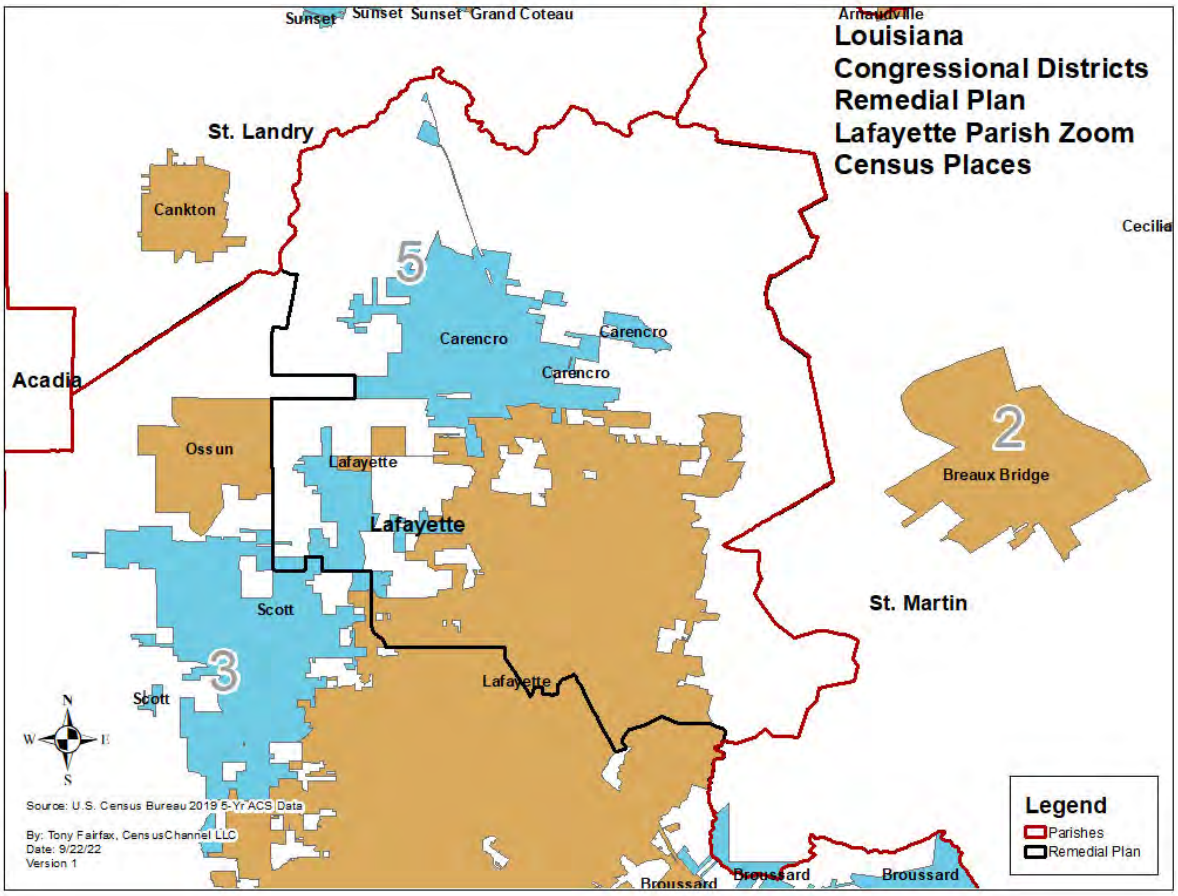


Figure 8 – Lafayette Parish Zoom of Census Places of the Remedial Plan CD 5

36. The corresponding configuration of the socioeconomic areas and the configuration to wholly include select cities contradicts Dr. Johnson's implied allegation of race predominating.

<u>Iberia Parish</u>

37. In this instance, the boundary lines shown in the Iberia Parish thematic maps in Dr. Johnson's report display a different boundary than the Remedial Plan. This causes some confusion when matching his comments to the maps. That said, Dr. Johnson, on page 11, paragraph 30 of his report discusses the split of Iberia Parish. He states, "None of the VTDs pulled into CD2 show up either in the red or orange on the No High School education % map."

38. Once again, this is an inaccurate statement by Dr. Johnson. A review of Figure 9 shows that a portion of New Ibera contained in CD 2 clearly has census tracts in the top two quintiles of the No HS Education % map.

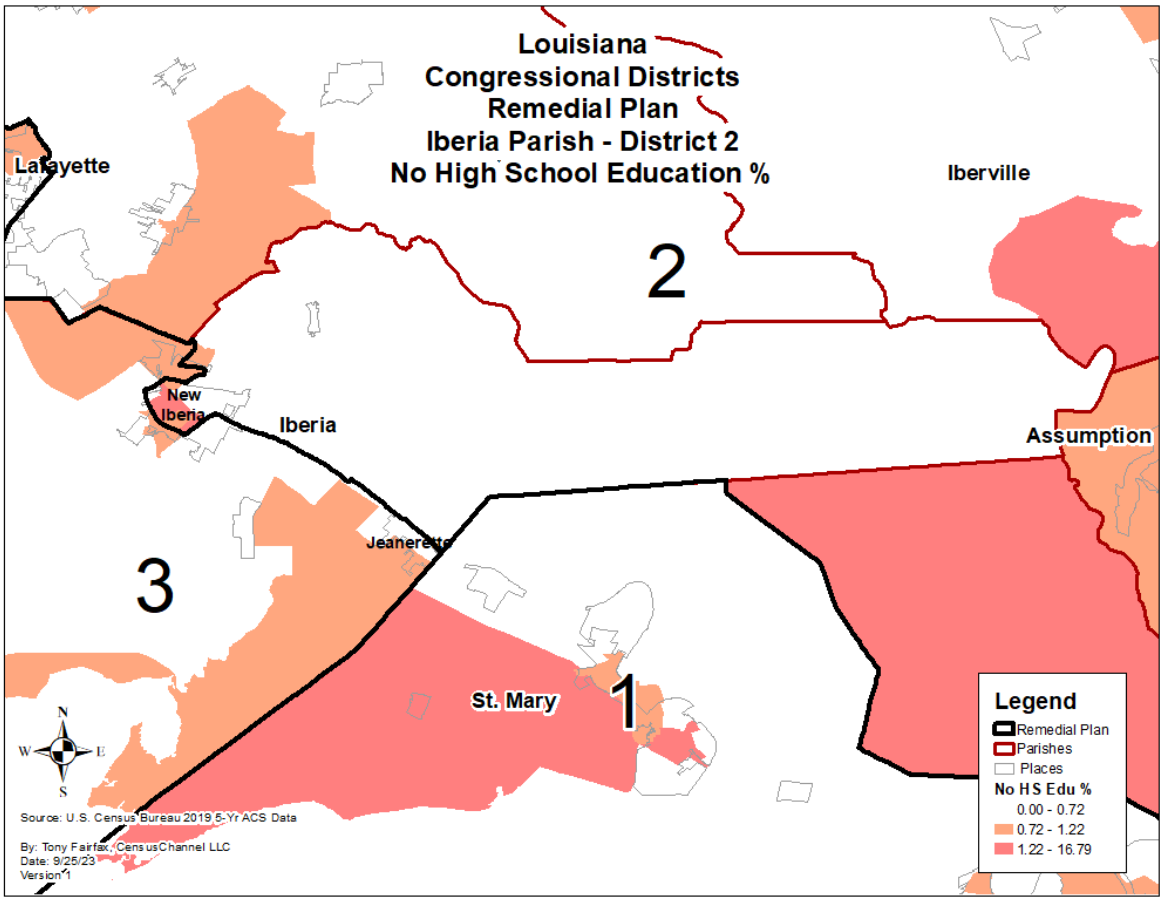


Figure 9 – Iberia Parish Zoom of No High School Education % of the Remedial Plan CD 2

39. In addition, the map at the top of page 10 of Dr. Johnson's report shows two areas on the district border in Iberia that are majority Black. Dr. Johnson focuses on the area to the west, New Iberia, but not the area to the east in Jeanerette. The area from New Iberia is included in CD 2, however, the majority-Black area corresponding to Jeanerette is not. Also, surrounding the majority Black area to the east are several VTDs that are between 40% to 50% Black. If

race was a predominant factor, these VTDs could have been easily added to CD 2 as well. However, race was not a predominant factor in the development of the Remedial Plan

40. Unlike the other parish splits, the Iberia split was accomplished to make CD 2 more compact (See Figure 9). If the entire area of Iberia was left out of CD2, the district boundary near St. Martin would be noticeably less compact. Furthermore, that portion of Iberia added to CD 2 is only 35.5% Black VAP (See Appendix B), which validates the rationale for the addition being influenced by compactness and not by race.

41. Thus, Iberia was split in an almost straight line. The exception was the VTDs that aligned with several socioeconomic attributes that were used to generally define CD 5 (See Figure 10).

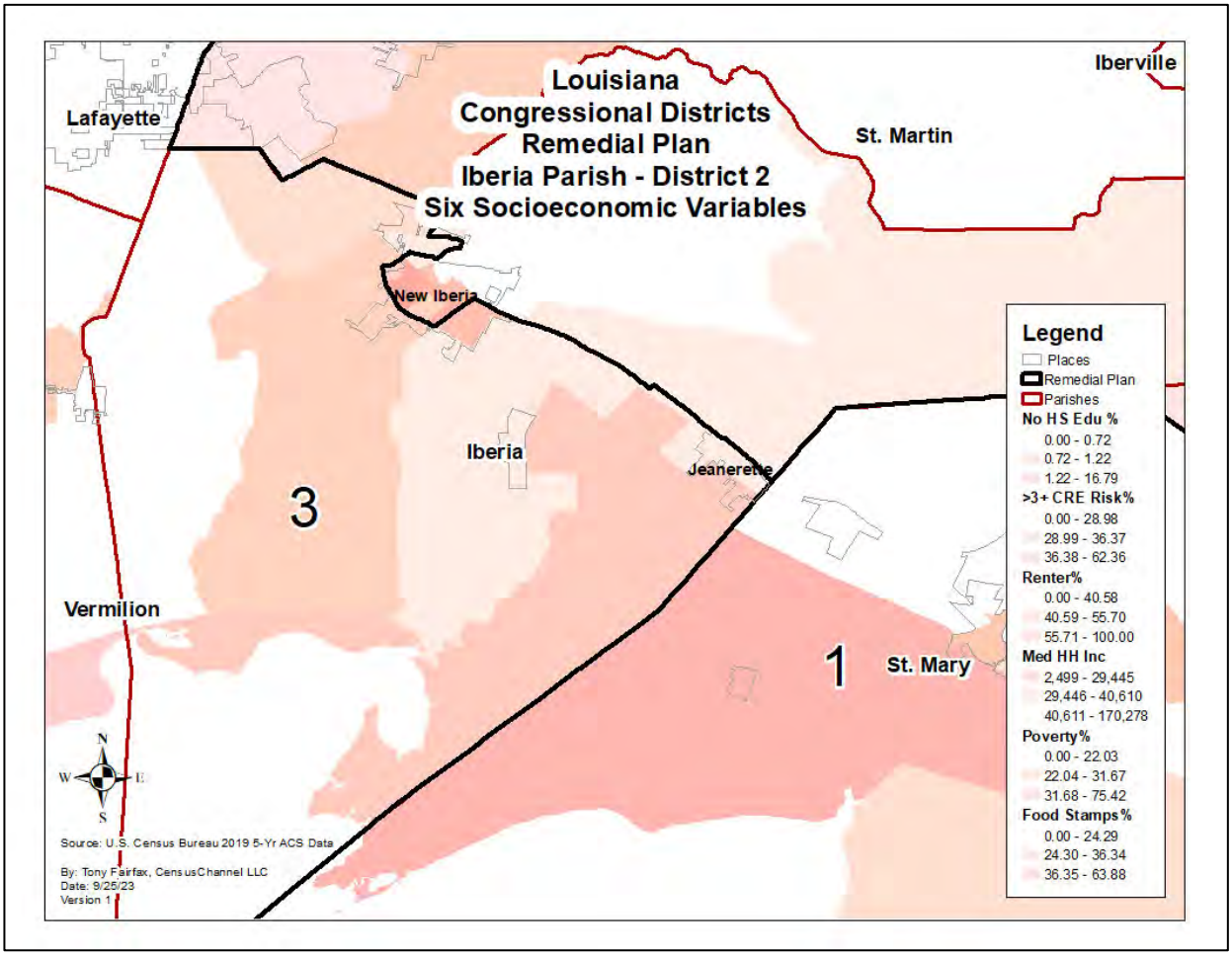


Figure 10 – Iberia Parish Zoom of Six Socioeconomic Variables of the Remedial Plan CD 2

42. Figure 10 shows that the area in New Iberia that is added to CD 5 displays a concentration of all six socioeconomic variables with a darker shade. Also, it is notable that Jeanerette does not reflect the same concentration of the socioeconomic variables, although it is majority Black.

43. The division of Iberia in an almost perfectly straight line and the corresponding configuration associated with socioeconomic aspects contradicts Dr. Johnson's implied allegation of race predominating. Finally, other socioeconomic attributes also generally reflect the configuration of the Iberia split, including education and income.

Jefferson Parish

44. Dr. Johnson, on page 13, paragraph 33 of his report discusses the split of Jefferson Parish. He states, "As the images above show, the portion of Jefferson Parish carved out for inclusion in proposed Remedial Congressional District 2 includes 100% of the majority-Black VTDs in the Parish, while including just 40.9% of the total VTDs in the Parish."

45. Dr. Johnson states several times in his report that CD 2 does not follow one or more of the socioeconomic variables discussed in his report, namely, HS Education % and CRE Risk Factors. However, CD 2 of the Remedial Plan was purposely developed to essentially follow the Enacted Plan, which followed closely with the 2011 Plan in Jefferson and Orleans Parish areas. Figure 11 shows the Enacted Plan in the blue color for CD 2, while the Remedial Plan is shown in the black boundary lines. Examining the boundaries for Jefferson Parish, the Remedial Plan lines, except for a slight difference, clearly follow the Enacted Plan. The changes made in the Remedial Plan were achieved to improve the compactness of CD 2.

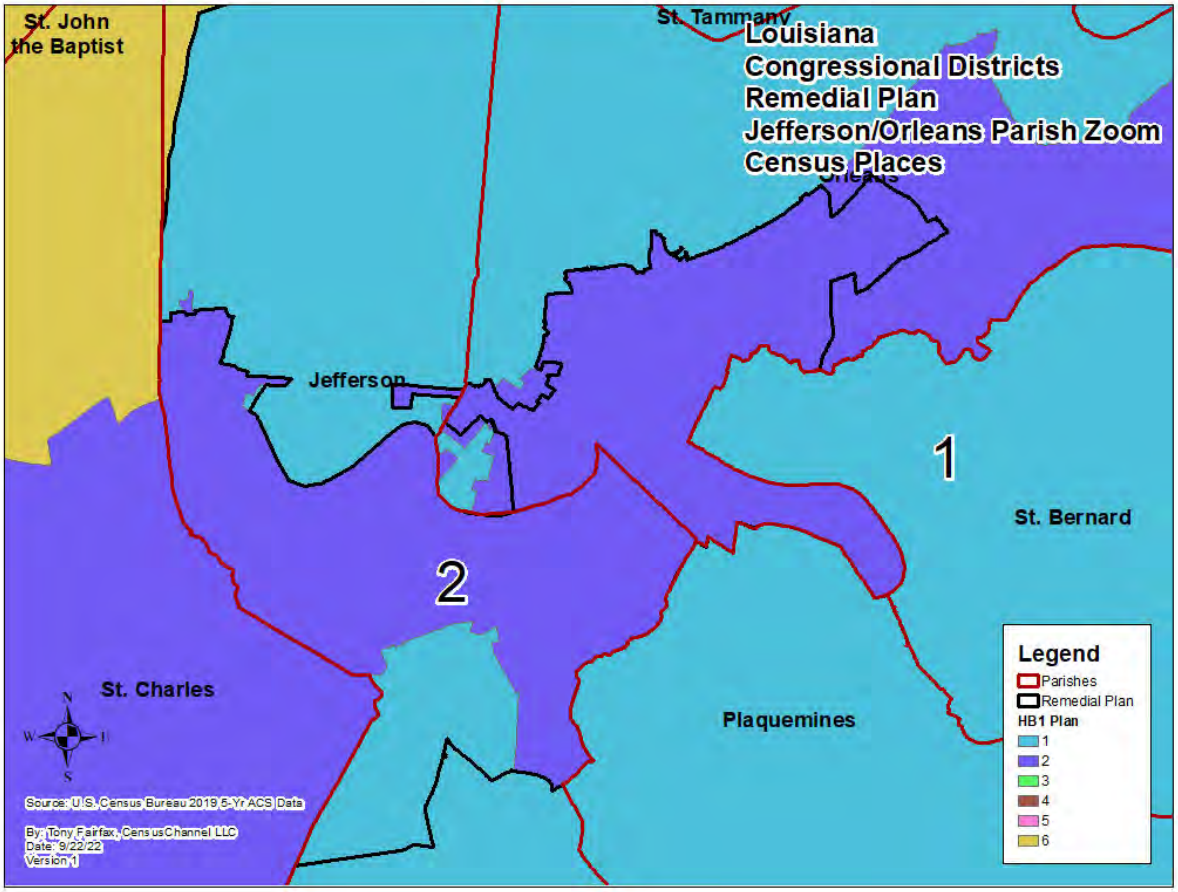


Figure 11 – Jefferson/Orleans Parish Zoom of Remedial Plan CD 2

46. On page 13 in paragraph 35, Dr. Johnson also states, "Areas north and south of the proposed Remedial CD 2 southern border in Jefferson Parish show up in the highest (red) category of the '>3 CRE Risk Factors' maps, but those areas are not majority-Black and were not included in proposed Remedial CD 2."

47. This statement by Dr. Johnson is not true. A review of the area in the west part of Jefferson Parish that is located in CD 2 can be seen to have multiple census tracts with dark red shading reflecting the top two quintiles in >3 CRE Risk Factors, as shown in Figure 12. Many of these areas are shown in light blue and green in Dr. Johnson's map, located at the bottom of page 12.

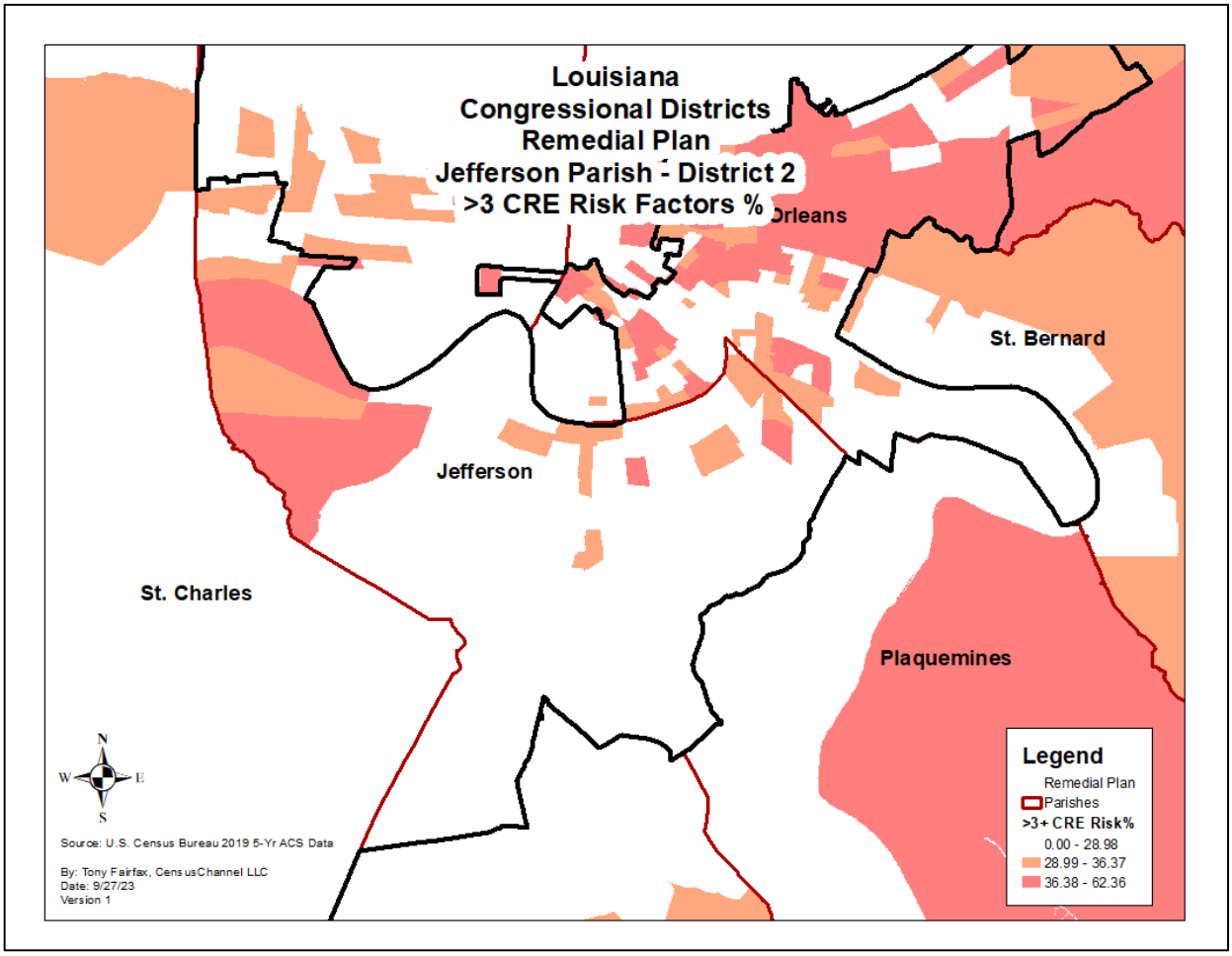


Figure 12 – Jefferson Parish >3 CRE Risk Factors % of Remedial Plan CD 2

48. The almost exact duplication of the Jefferson Parish boundaries in the Remedial and Enacted Plans contradicts Dr. Johnson's implied allegation of race predominating.

<u>Orleans Parish</u>

49. Dr. Johnson, on page 16, paragraph 40 of his report discusses the split of Orleans Parish. He states, "The VTDs pulled into CD 2 in Orleans Parish match much more precisely with race than they do with the Education and CRE Risk Factors maps."

50. As with Jefferson Parish, CD 2 of the Remedial Plan was purposely developed to essentially follow the Enacted Plan which followed closely with the 2011 Plan. Once again, the figure

below (Figure 13) shows the Enacted Plan in the blue color for CD 2, while the Remedial Plan is shown in the black boundary lines. Examining the boundaries for Jefferson Parish, the lines, except for the removal of two VTDs on the east, clearly follow the Enacted Plan. Once again, the changes made in the Remedial Plan were achieved mostly to improve the compactness of CD 2. Changes were also made in part due to the alterations from the Illustrative Plan to the Remedial Plan.

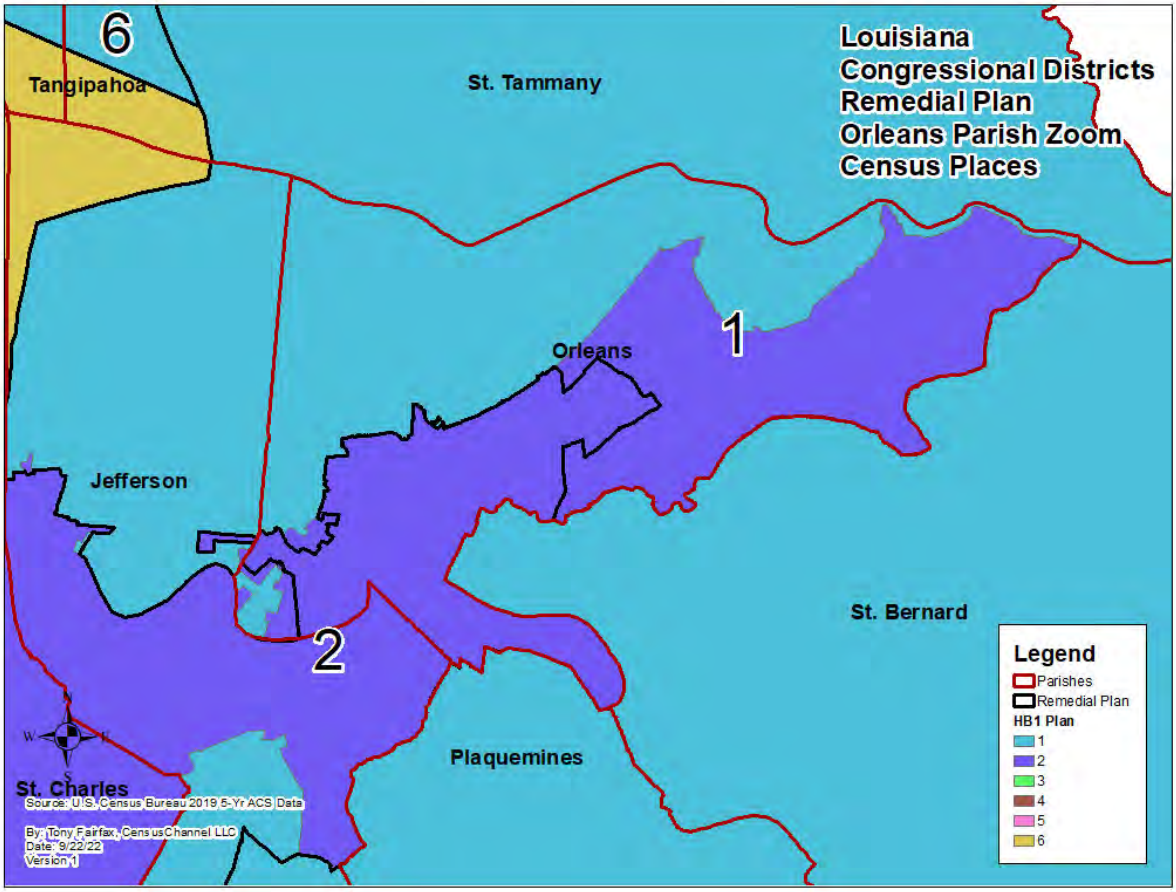


Figure 13 – Orleans Parish Zoom of Remedial Plan CD 2

51. The Remedial Plan is based on the Illustrative Plan 2A. The original Illustrative Plan 2A extended into East Baton Rouge Parish. However, when this extension was removed St. Martin, Iberia, and Iberville were added with the population exceeding the acceptable

deviation. Thus, to compensate for the removal in East Baton Rouge, the population was removed from Orleans Parish in a compact manner.

52. Also, the Remedial Plan removes the Orleans Parish area to the east in order to make CD 1 more compact. Since Orleans Parish is already split, it does not increase the number of Parish splits. Figure 14 shows CD 1 with the thin connection that exists in the Enacted Plan. However, the Remedial Plan removes two relatively low-populated VTDs (a total of 1,028 persons combined) from the east of Orleans Parish in order to make CD 1 more compact.

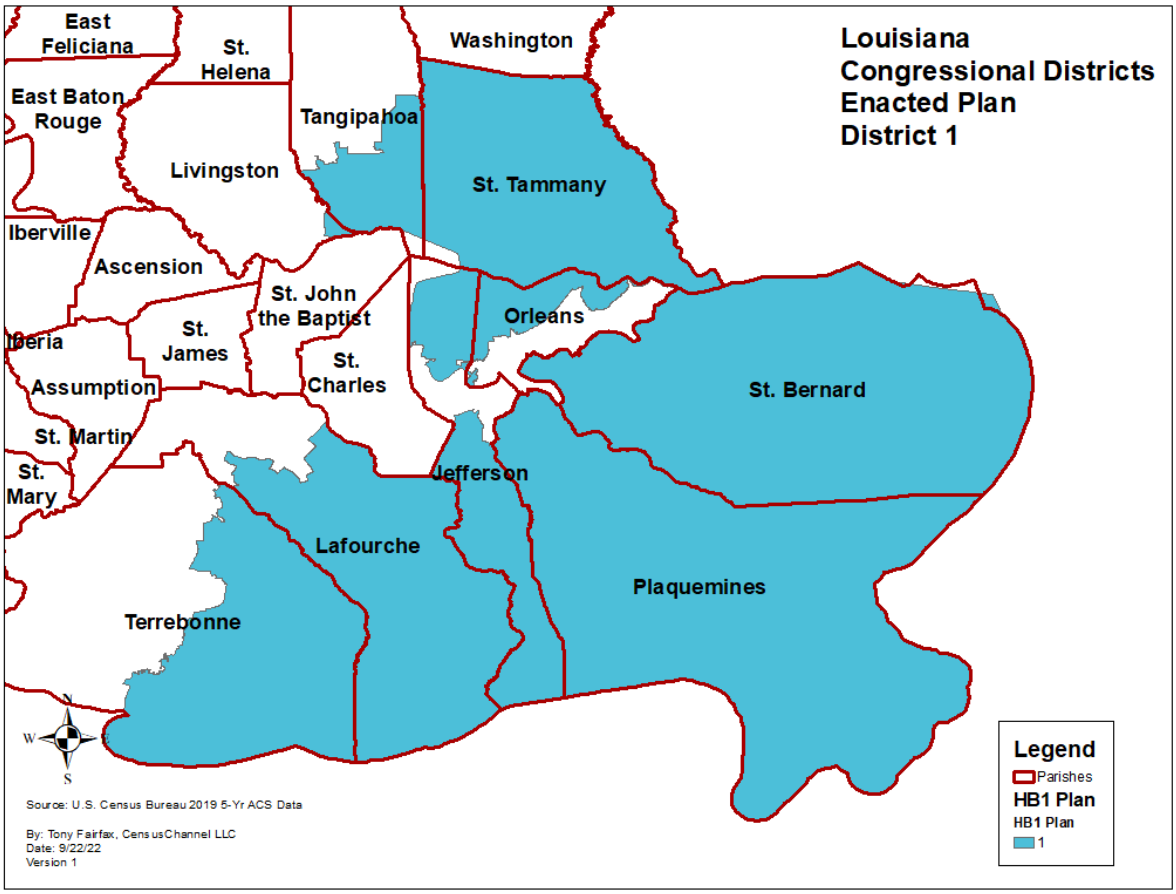


Figure 14 – Enacted Plan CD 1

53. The result of these VTDs removed from CD 2 and added to CD 1 is a much more compact district for CD 1 in the east Orleans area (See Figure 15).

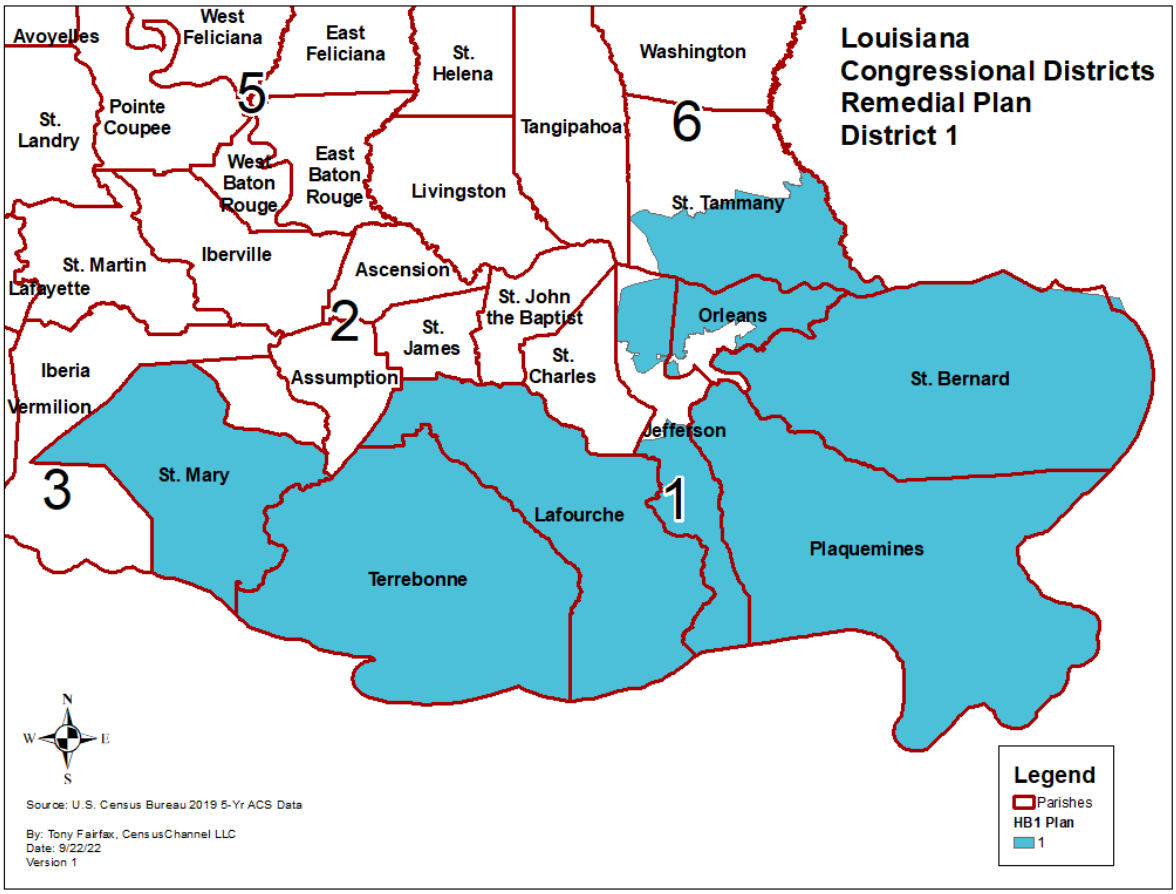


Figure 15 – Remedial Plan CD 1

54. Remedial CD-2 thus mirrors Enacted CD-2 except for changes to make the district more compact, undermining Dr. Johnson's implied allegation of race predominating.

<u>Ascension Parish</u>

55. Dr. Johnson, on page 18, paragraph 44 of his report discusses the split of Ascension Parish. He states, "The VTDs pulled into CD 2 in Ascension Parish match much more precisely with race than they are for Education and CRE."

56. Similar to Jefferson and Orleans Parishes, Ascension was developed to follow the Enacted Plan boundaries. Figure 16 shows how the Remedial Plan follows the Enacted Plan except

for two additional VTDs that make CD 2 more compact. The blue color represents the Enacted Plan, while the black boundary is the Remedial Plan.

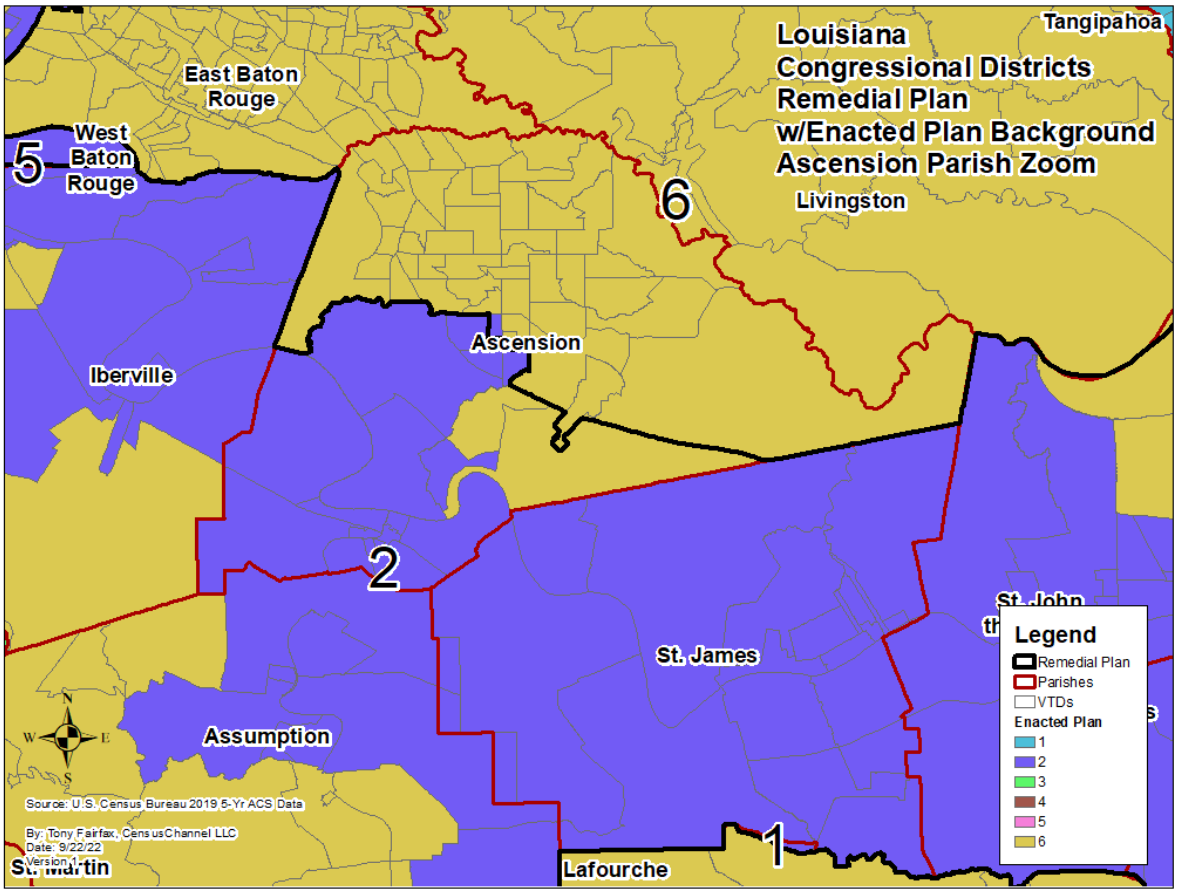


Figure 16 – Ascension Parish Zoom of the Remedial Plan CD 2

57. Once again, it is important to note that Dr. Johnson's map of Ascension Parish on page 17 of his report shows the added areas to CD 2 are non-majority Black VTDs. One VTD is below 40% Black, and the other is between 40% and 50% Black. The inclusion of these non-majority Black areas, as well as essentially mimicking the Enacted Plan boundaries, contradicts Dr. Johnson's implied allegation of race predominating.

East Baton Rouge Parish

58. Dr. Johnson, on page 20, paragraph 47 of his report discusses the split of East Baton Rouge Parish. He states, "While the correlation is not as close as it is in the other divided parishes, the VTDs pulled into CD 5 in East Baton Rouge Parish match more precisely with race than they do with Education and CRE Risk Factors maps."

59. Once again reviewing all six socioeconomic variables mostly outline a significant amount of the configuration of CD 5 within East Baton Rouge (See Figure 17). The boundaries of CD 5 extend down from East Feliciana and West Baton Rouge to add the portions in East Baton Rouge that are common to the six socioeconomic variables of CD 5.

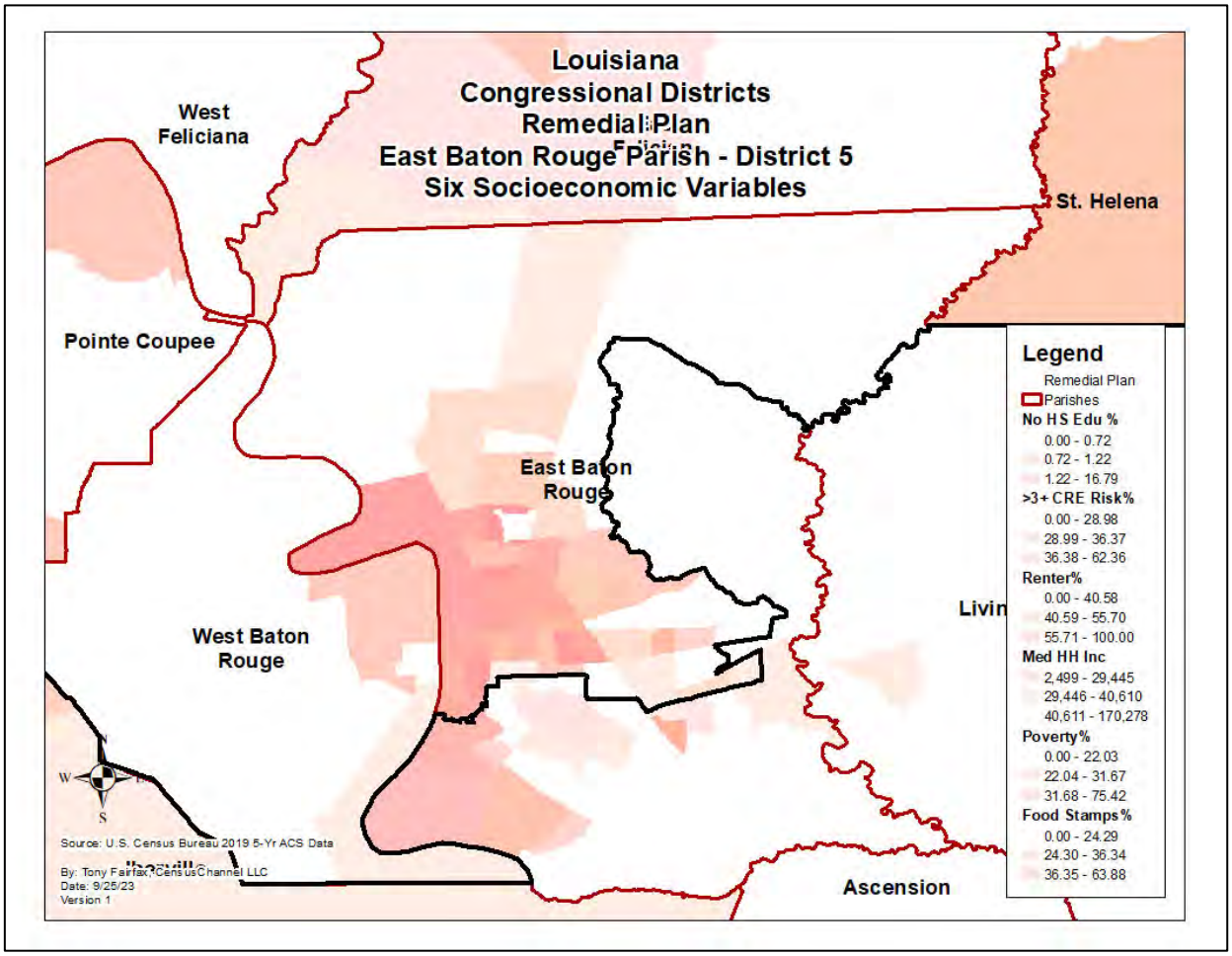


Figure 17 – East Baton Rouge Parish Six Socioeconomic Variables for Remedial CD 5

60. The exception is the portion below the southeast border in East Baton Rouge. However, a more defined depiction of CD 5 in East Baton Rouge can be seen when viewing the No High School Education % and the > 3 CRE Risk Factor %.

61. Similar to the segment in Lafayette, overlaying both the top two quintiles for No High School Education % and the CRE Risk Factor % generally define the bulk of the configuration of CD 5 within East Baton Rouge (See Figure 18).

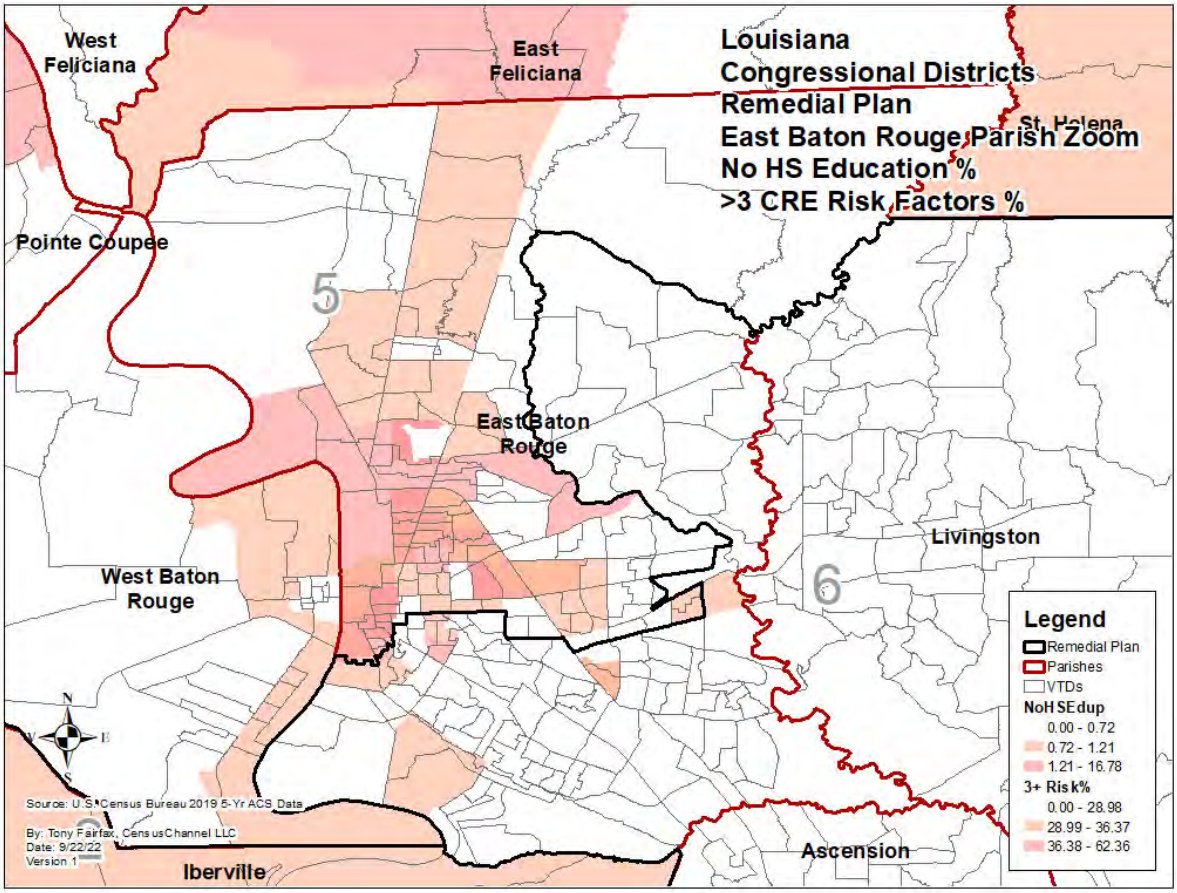


Figure 18 – East Baton Rouge Parish % No HS Edu/> 3 CRE Risk Factor % for Remedial CD 5

62. Second, the boundaries of CD 5 become more apparent when considering census places. The eastern boundary of CD 5 in East Baton Rouge generally follows census places. The removal of the city of Central creates the top eastern boundary. Central fits socioeconomically better

with CD 6 than CD 2. The removal of Central results in the majority-Black VTDs becoming the border of CD 5 in East Baton Rouge, as shown in Dr. Johnson's figure on page 20. The stark difference in racial makeup on the border of the city is most likely due to long-time segregated patterns.

63. In addition, the boundaries on the southern east end of CD 5 in East Baton Rouge generally follow the boundaries of census places as well (See Figure 19).

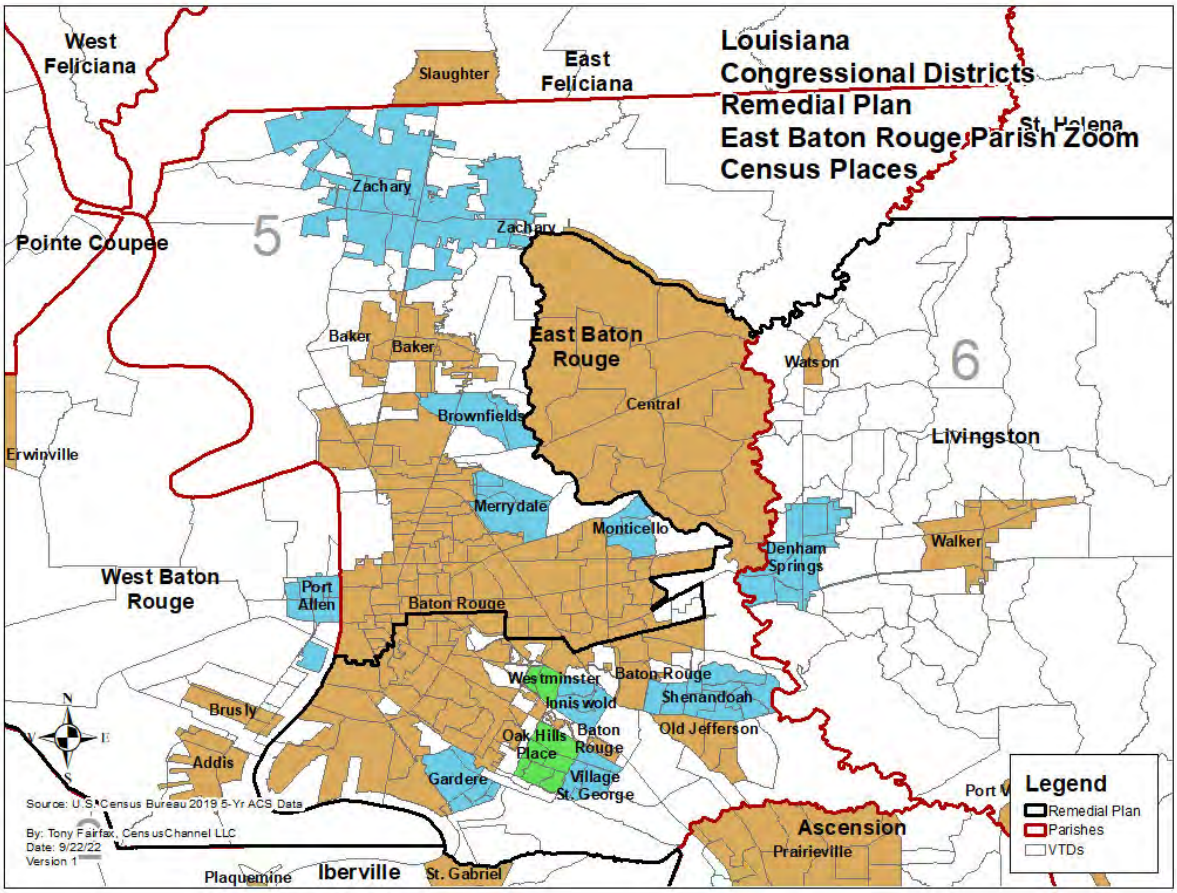


Figure 19 – East Baton Rouge Parish Zoom of the Remedial Plan CD 2 with Census Places

64. With the exception of one VTD, the city of Baton Rouge, the CDP of Monticello, and the No High School Education/CRE aspects define the eastern boundaries. Figure 19 clearly shows the census places that create the eastern boundary of CD 5 in East Baton Rouge Parish.

65. Again, it is important to note that Dr. Johnson's map of East Baton Rouge Parish on page 19 shows that CD 5 includes many VTDs that are below 40% Black. In addition, Dr. Johnson states on page 20, paragraph 48, "The Enacted map also divides East Baton Rouge Parish, but not along the strictly racial lines of the Remedial Map." He then provides a map on page 21 that shows that the Enacted Plan included only majority-Black VTDs in East Baton Rouge Parish within CD 2.

66. The inclusion of these non-majority Black areas, the inclusion of socioeconomic/CRE aspects, and the boundaries of CD 5 following census places contradict Dr. Johnson's implied allegation of race predominating.

Tangipahoa Parish

67. Dr. Johnson, on page 23, paragraph 23 of his report discusses the split of Tangipahoa Parish. He states, "With the exception of just on VTD, the southern boundary of the portion of Tangipahoa Parish pulled into CD 5 follows the boundaries of the VTDs that are 40% Black or higher." Although the No High School Education and the >3 CRE Risk Factors maps do show alignment with the Tangipahoa area added, the most important aspect of Dr. Johnson's comments is that he failed to mention the group of VTDs that are below 50% Black. The area in CD 5 that is added has a significant amount of VTDs below 50% Black as seen in his map on page 22 of his report.

68. The inclusion of these non-majority Black areas as well as the generalized matching of CD 5's configuration to socioeconomic factors contradicts Dr. Johnson's implied allegation of race predominating.

Vernon Parish

69. Dr. Johnson, on page 25 paragraph 58 of his report discusses the split of Vernon Parish. He states, "In contrast, the Proposed Remedial Map splits the relatively small Vernon Parish (less than 50,000 in total population) and puts Fort Polk (now Fort Johnson) in District 3 with the Gulf Coast."

70. The explanation for the purported issue raised by Dr. Johnson is very simple. Vernon Parish was used to bring the population of CD 3 and 4 down to acceptable deviation. The State choosing to not split VTDs in the congressional plan limits the choices to equalize the population of the districts. Also, there is no requirement that prohibits a military base from being included in a district that touches the Gulf Coast.

71. Dr. Johnson also writes in his report that "the proposed boundaries closely follow racial differences among the VTDs." This is a curious comment since CD 3 or CD 4 are not one of the majority Black districts and would not benefit one way or another by including a few VTDs with only several hundred people.

St. Tammany

72. Dr. Johnson on page 26 paragraph 60 report discusses the split of St. Tammany Parish. He states, "Another example of an unexplained Parish split in the Proposed Remedy Map is in St. Tammany Parish. The split there does not follow city boundaries nor Mr. Fairfax's Education and High-Risk factor maps, but at least for once this split is not a clear racial division."

73. St. Tammany Parish was split to bring the population deviation between CD 1 and CD 6 down to an acceptable level. Dr. Johnson mentions that the St. Tammany district boundaries do not follow city boundaries and thus split a city. However, he fails to mention that the Remedial Plan splits fewer cities than the Enacted Plan.

G. BESE Districts Maps

There is precedent for how municipalities and parishes have been split in the state. The State Board of Elementary and School Education (BESE) map that contains eight districts splits some of the same parishes in similar manners as the Remedial Plan. As just two examples, Lafayette and Tangipahoa parishes are split similarly (See Appendix A) and the map combines many of the cities that are contained within CD 5 in the Remedial Plan (e.g., Lafayette, Baton Rouge, and Alexandria).

H. Conclusion

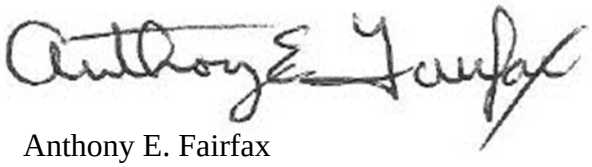
Nothing in Dr. Johnson's reports changes the conclusions expressed in my original report. Building off of Illustrative Plan 2A, the Remedial Plan better adheres to traditional districting principles and portions of the enacted map. Race did not predominate in drawing of the Illustrative Plan or the Remedial Plan, or, more specifically, Remedial CD 2 and CD 5.

I. Appendix

Appendix A - Socioeconomic Maps

Appendix B - Maptitude Data Report

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.



Anthony E. Fairfax

September 28, 2023

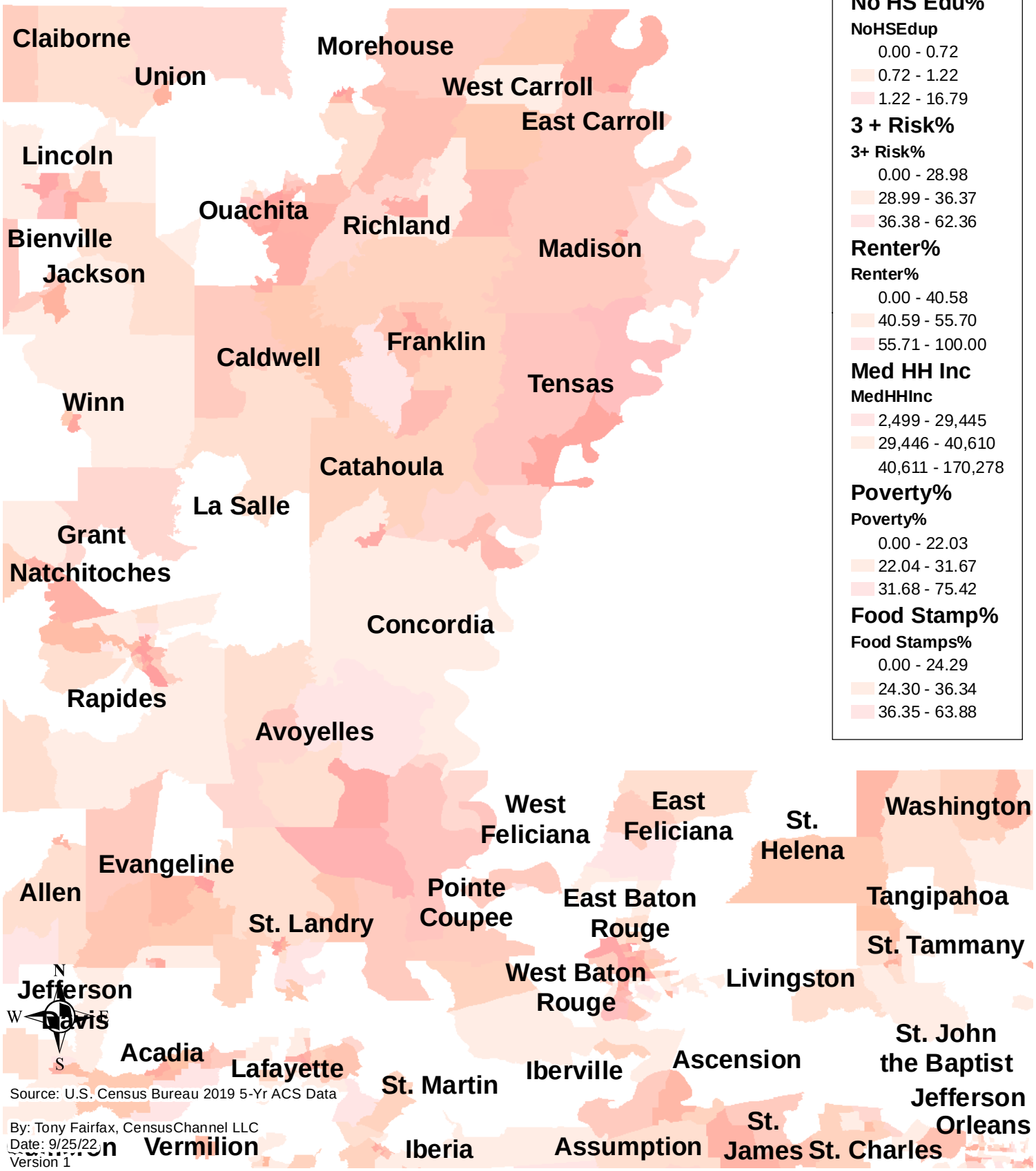
Appendix A
Socioeconomic/Other Maps

Recreation of Maps using 2019 5-Year ACS Census Tract Data of Select Socioeconomic Attributes

1 – All Six Socioeconomic Variables with Remedial Plan w/No Parish Boundaries
2 – All Six Socioeconomic Thematic Variables with Remedial Plan CD 5
3 – Ouachita Parish Zoom of Six Socioeconomic Variables of the Remedial Plan CD 5
4 – Ouachita Parish Zoom of Renter % of the Remedial Plan CD 5
5 – All Six Socioeconomic Variables for Rapides Parish Remedial Plan CD 5
6 – Lafayette Parish Zoom of Six Socioeconomic Variables for Remedial CD 5
7 – Lafayette Parish Zoom of % No HS Education for Remedial CD 5
8 – Lafayette Parish Zoom of Census Places of the Remedial Plan CD 5
9 – Iberia Parish Zoom of No High School Education % of the Remedial Plan CD 2
10 – Iberia Parish Zoom of Six Socioeconomic Variables of the Remedial Plan CD 2
11 – Jefferson/Orleans Parish Zoom of Remedial Plan CD 2
12 – Jefferson Parish >3 CRE Risk Factors % of Remedial Plan CD 2
13 – Orleans Parish Zoom of Remedial Plan CD 2
14 – Enacted Plan CD 1
15 – Remedial Plan CD 1
16 – Ascension Parish Zoom of the Remedial Plan CD 2
17 – East Baton Rouge Parish Six Socioeconomic Variables for Remedial CD 5
18 – East Baton Rouge Parish % No HS Edu/> 3 CRE Risk Factor % for Remedial CD 5
19 – East Baton Rouge Parish Zoom of the Remedial Plan CD 2 with Census Places

2021 BESE District Map

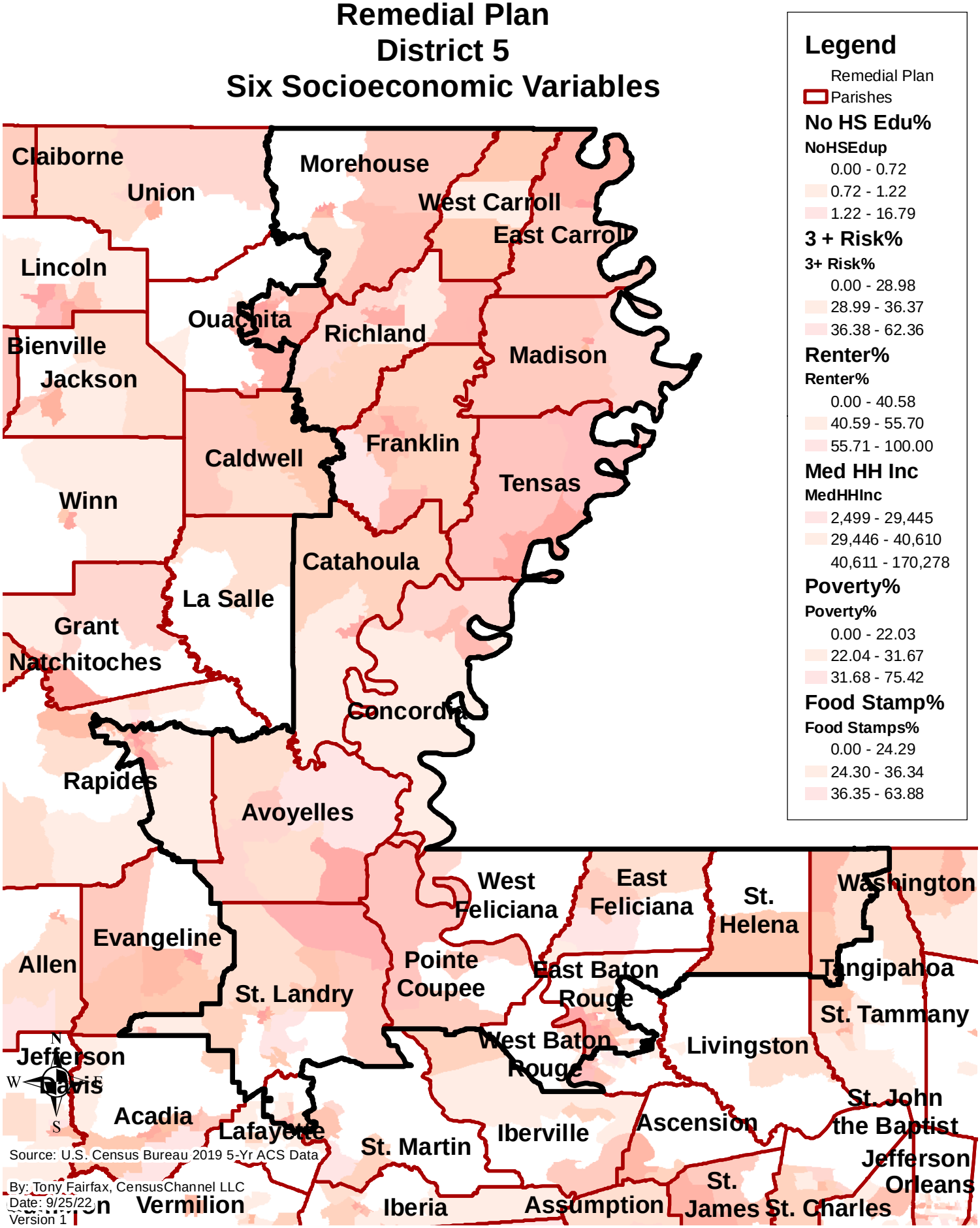
Louisiana
Congressional Districts
Remedial Plan
District 5 Parishes - No Parish Boundaries
Six Socioeconomic Variables



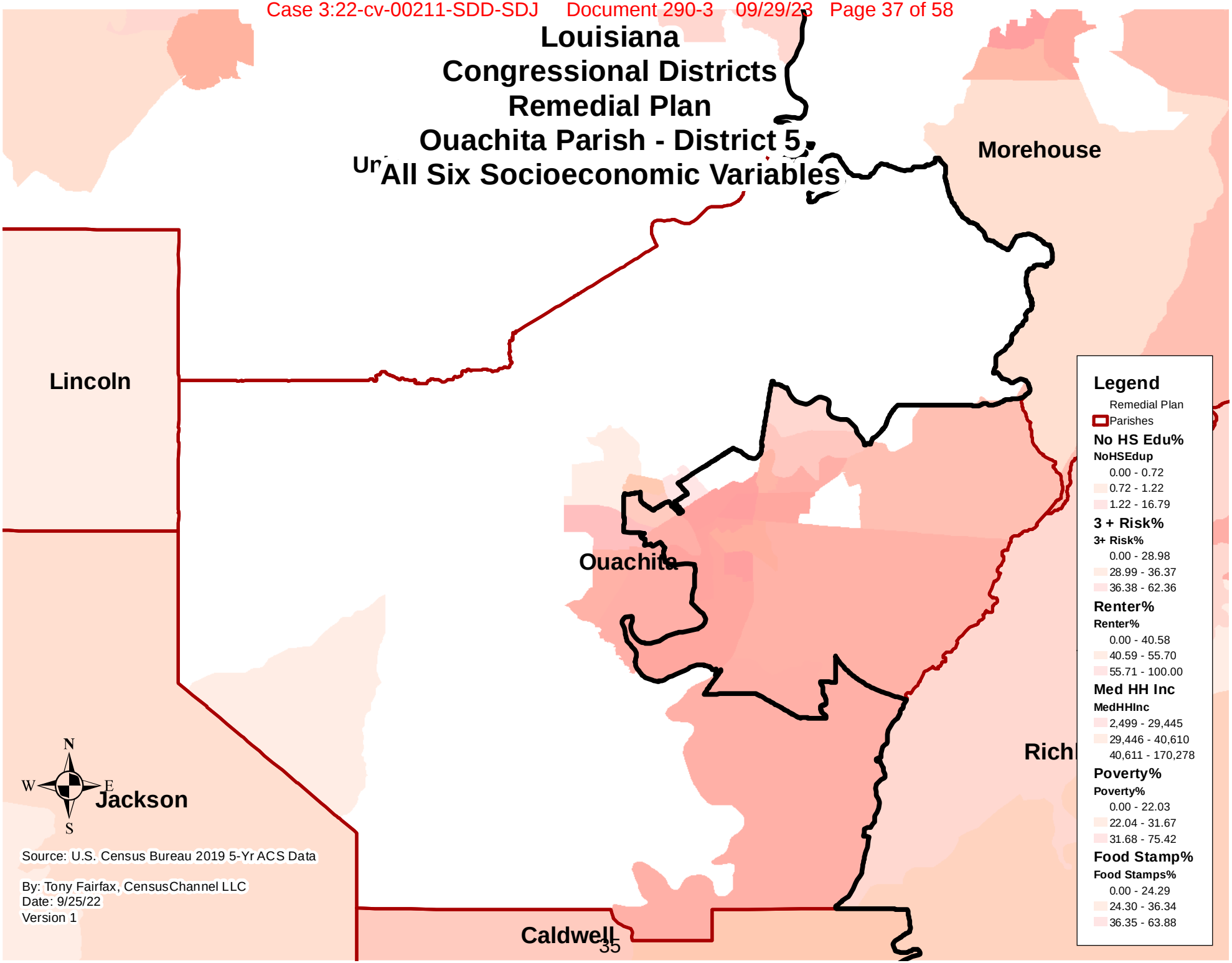
Source: U.S. Census Bureau 2019 5-Yr ACS Data

By: Tony Fairfax, CensusChannel LLC
Date: 9/25/22
Version 1

Louisiana
Congressional Districts
Remedial Plan
District 5
Six Socioeconomic Variables



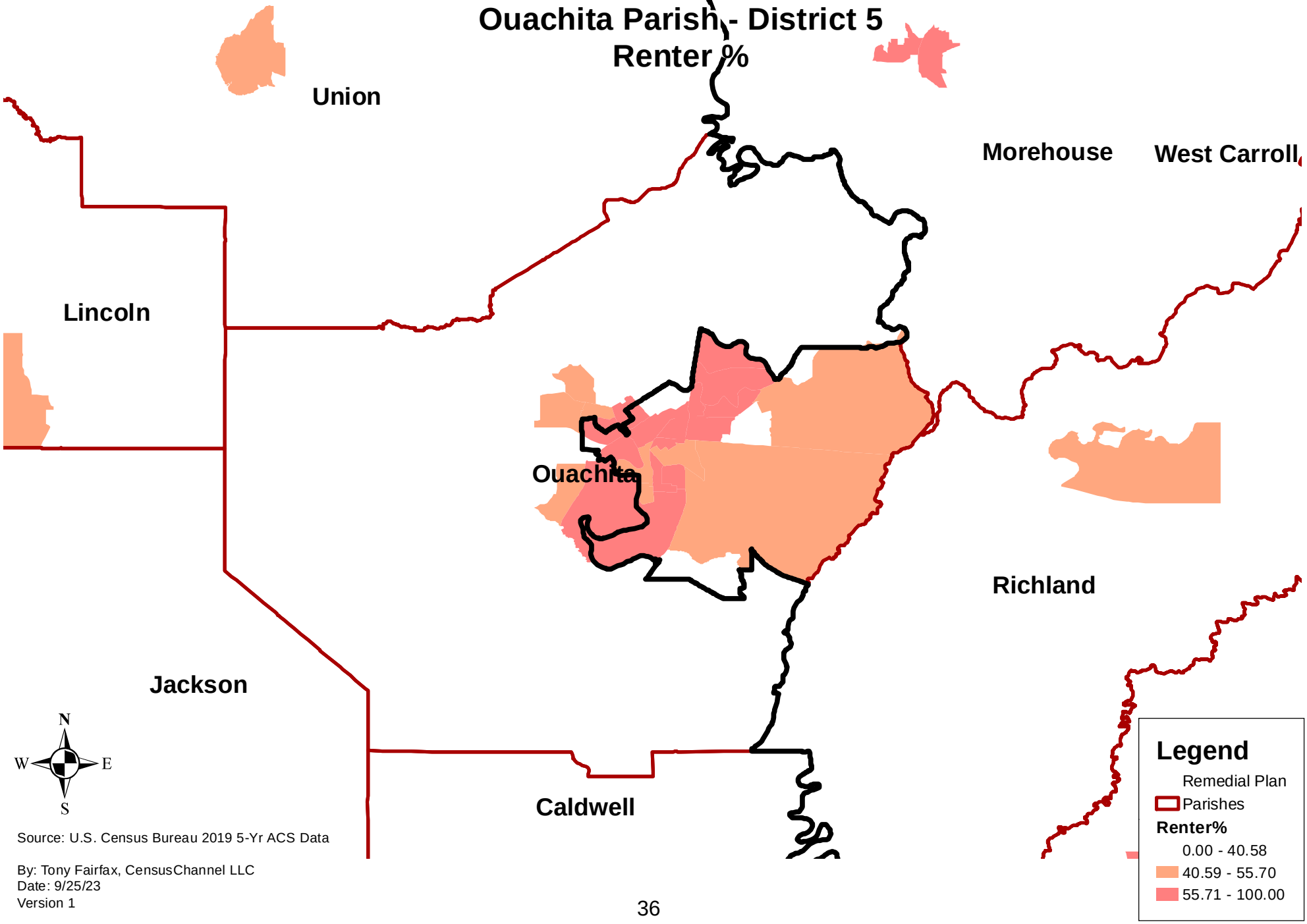
Louisiana
Congressional Districts
Remedial Plan
Ouachita Parish - District 5
All Six Socioeconomic Variables



Source: U.S. Census Bureau 2019 5-Yr ACS Data

By: Tony Fairfax, CensusChannel LLC
Date: 9/25/22
Version 1

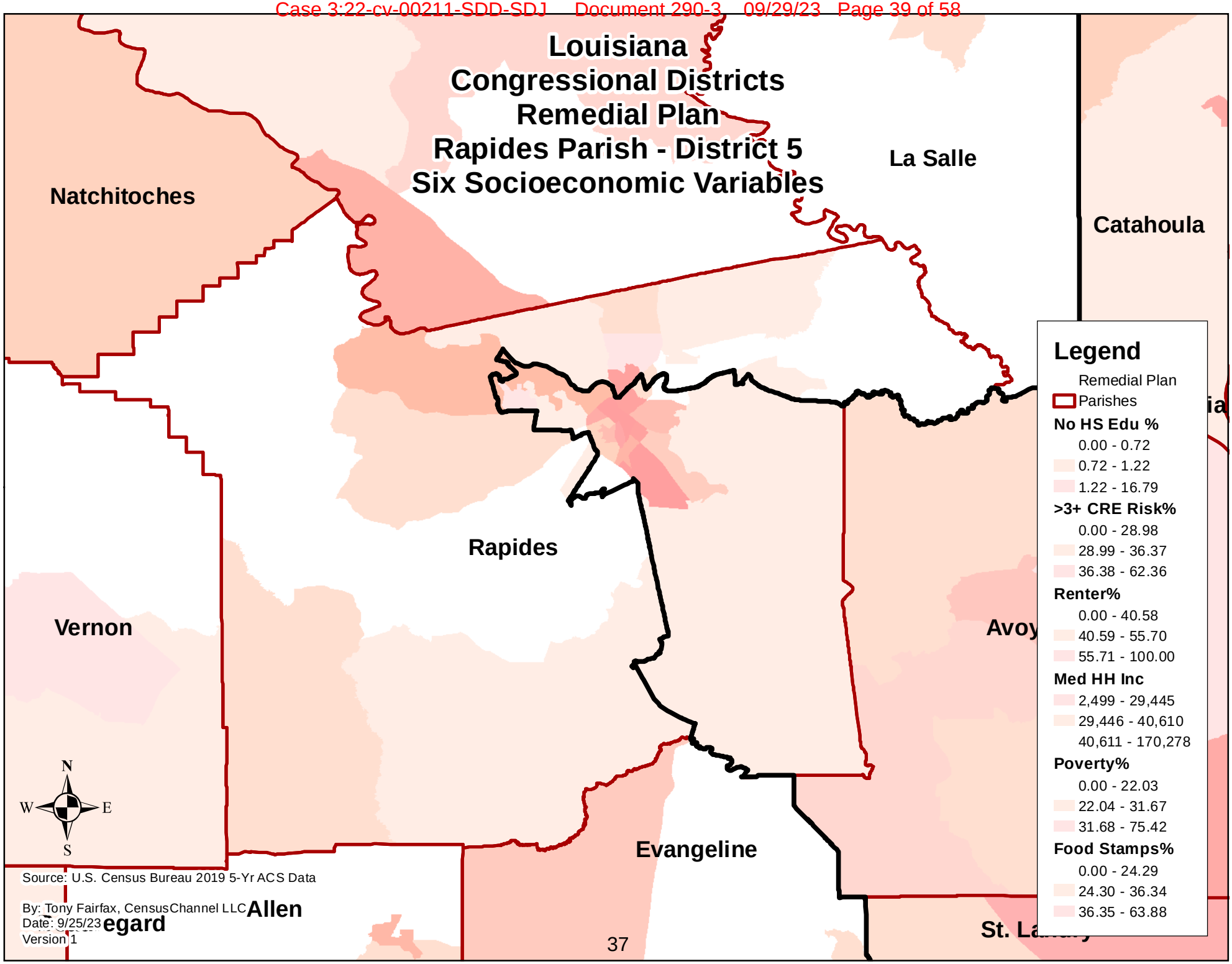
Louisiana
Congressional Districts
Remedial Plan
Ouachita Parish - District 5
Renter %



Source: U.S. Census Bureau 2019 5-Yr ACS Data

By: Tony Fairfax, CensusChannel LLC
Date: 9/25/23
Version 1

Louisiana
Congressional Districts
Remedial Plan
Rapides Parish - District 5
Six Socioeconomic Variables



Source: U.S. Census Bureau 2019 5-Yr ACS Data

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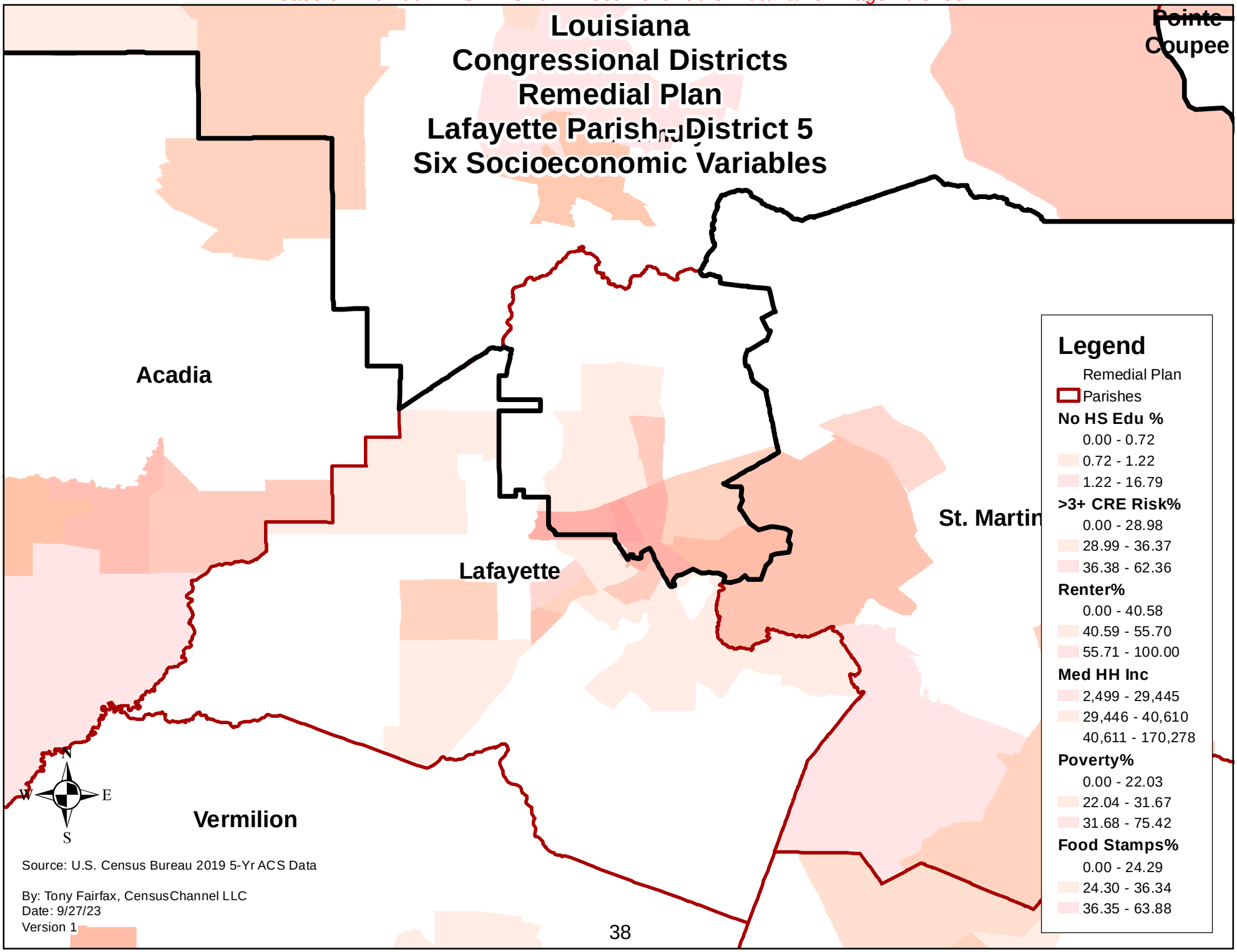
Date: 9/25/23
Version 1

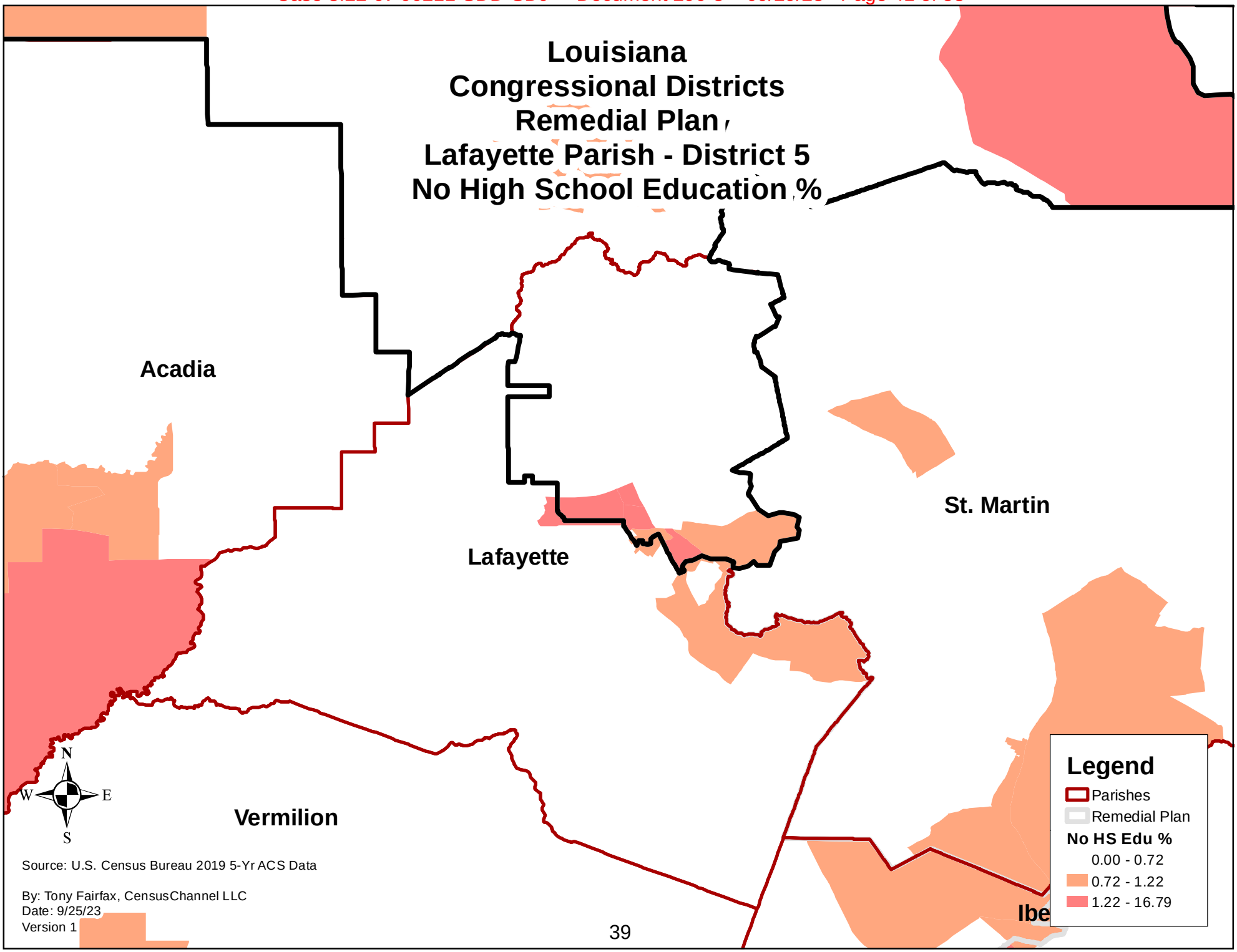
Louisiana
Congressional Districts
Remedial Plan
Lafayette Parish - District 5
Six Socioeconomic Variables



Source: U.S. Census Bureau 2019 5-Yr ACS Data

By: Tony Fairfax, CensusChannel LLC
Date: 9/27/23
Version 1

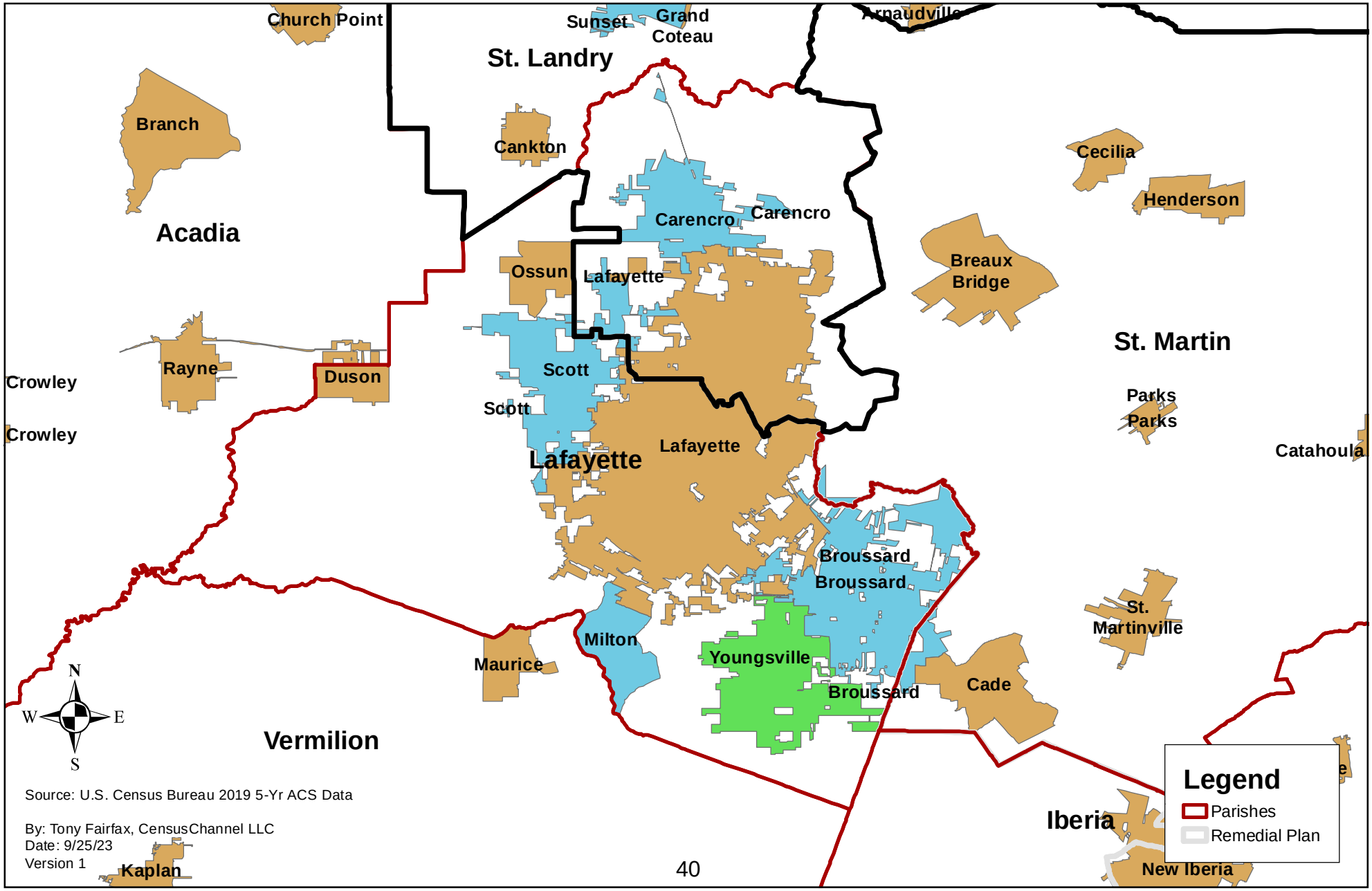
Louisiana Congressional Districts Remedial Plan Lafayette Parish - District 5 No High School Education %



Source: U.S. Census Bureau 2019 5-Yr ACS Data

By: Tony Fairfax, CensusChannel LLC
Date: 9/25/23
Version 1

Louisiana
Congressional Districts
Remedial Plan
Lafayette Parish - District 5
Census Places



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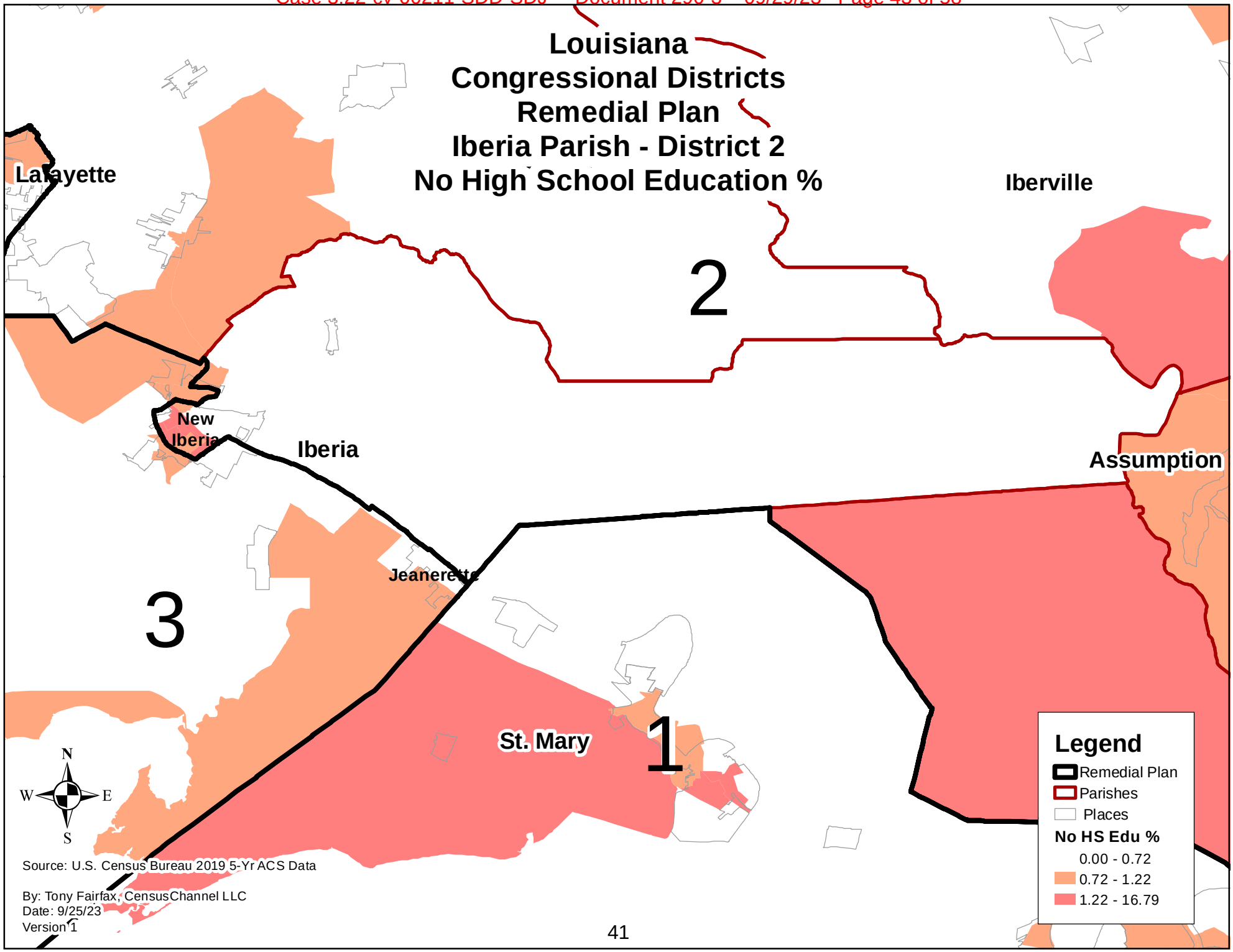
By: Tony Fairfax, CensusChannel LLC
Date: 9/25/23
Version 1


Louisiana
Congressional Districts
Remedial Plan
Iberia Parish - District 2
No High School Education %
Lafayette
Iberville
2
New Iberia
Iberia
Assumption
Jeanerette
3
St. Mary
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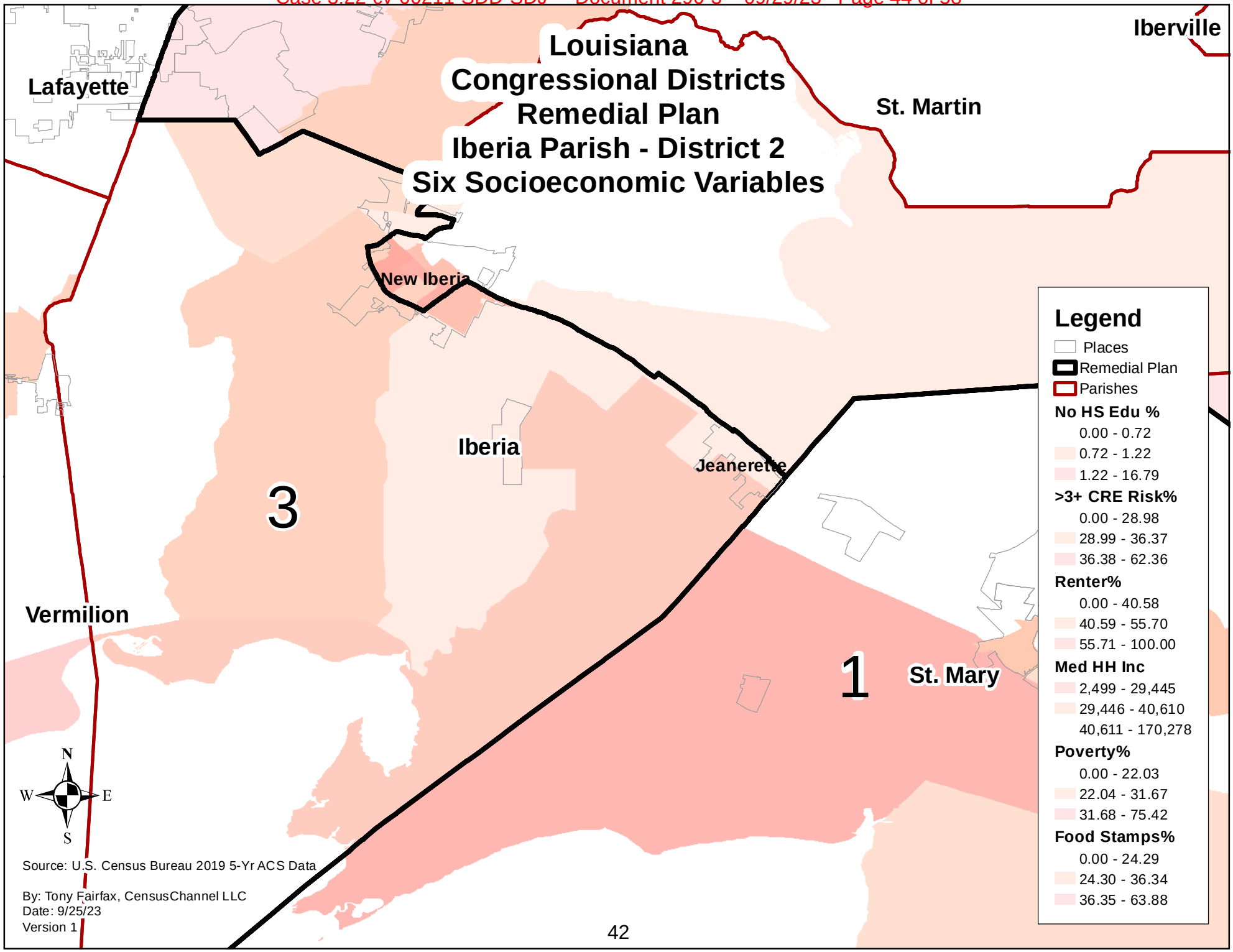
Legend
Remedial Plan
Parishes
Places
No HS Edu %
0.00 - 0.72
0.72 - 1.22
1.22 - 16.79
Source: U.S. Census Bureau 2019 5-Yr ACS Data
By: Tony Fairfax, CensusChannel LLC
Date: 9/25/23
Version 1


Louisiana
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Remedial Plan
Iberia Parish - District 2
Six Socioeconomic Variables
Lafayette
Iberville
St. Martin
New Iberia
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Places
Remedial Plan
Parishes
No HS Edu %
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0.72 - 1.22
1.22 - 16.79
>3+ CRE Risk%
0.00 - 28.98
28.99 - 36.37
36.38 - 62.36
Renter%
0.00 - 40.58
40.59 - 55.70
55.71 - 100.00
Med HH Inc
2,499 - 29,445
29,446 - 40,610
40,611 - 170,278
Poverty%
0.00 - 22.03
22.04 - 31.67
31.68 - 75.42
Food Stamps%
0.00 - 24.29
24.30 - 36.34
36.35 - 63.88
Source: U.S. Census Bureau 2019 5-Yr ACS Data
By: Tony Fairfax, CensusChannel LLC
Date: 9/25/23
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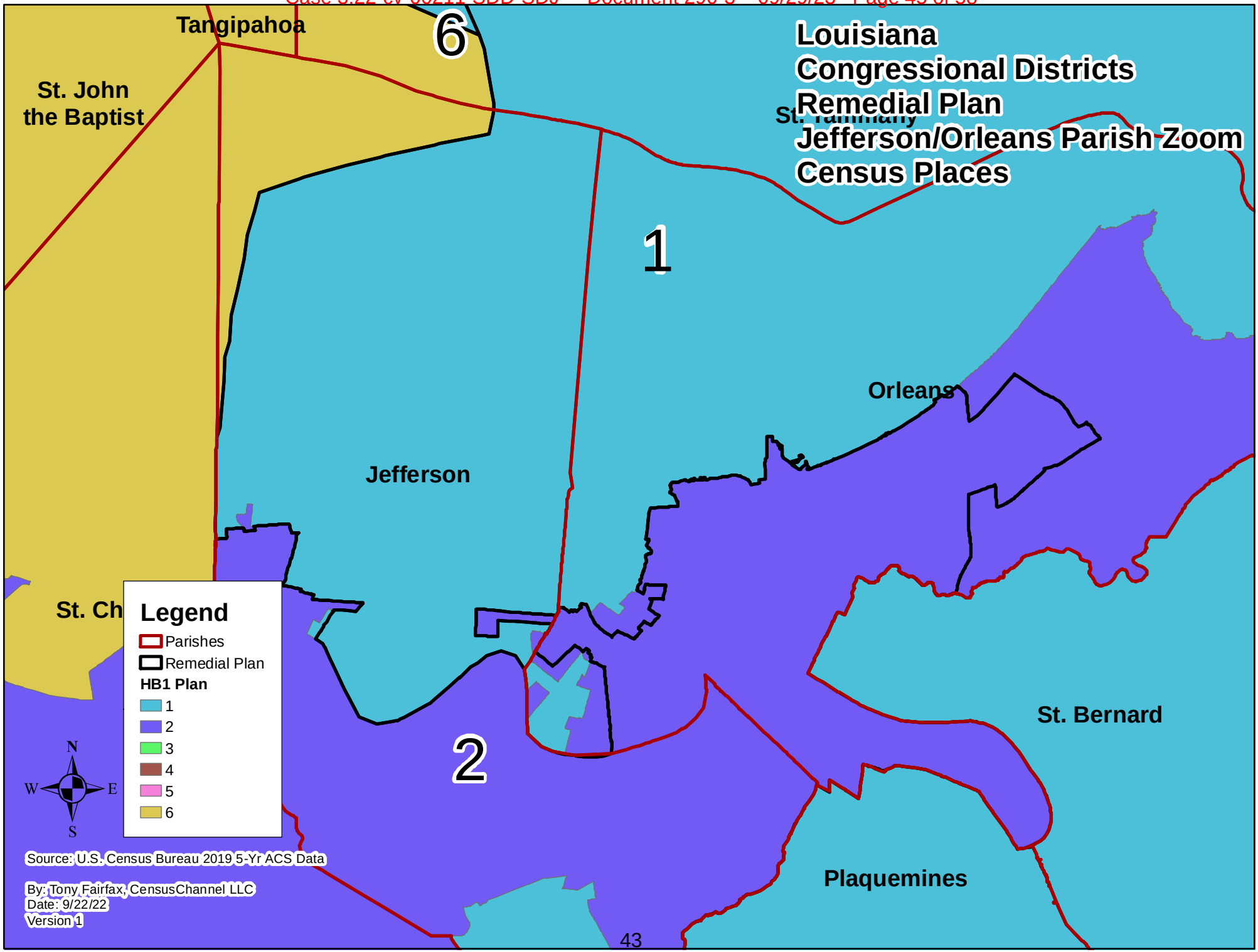
Louisiana
Congressional Districts
Remedial Plan
Jefferson/Orleans Parish Zoom
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St. John
the Baptist
St. Tammany
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Plaquemines
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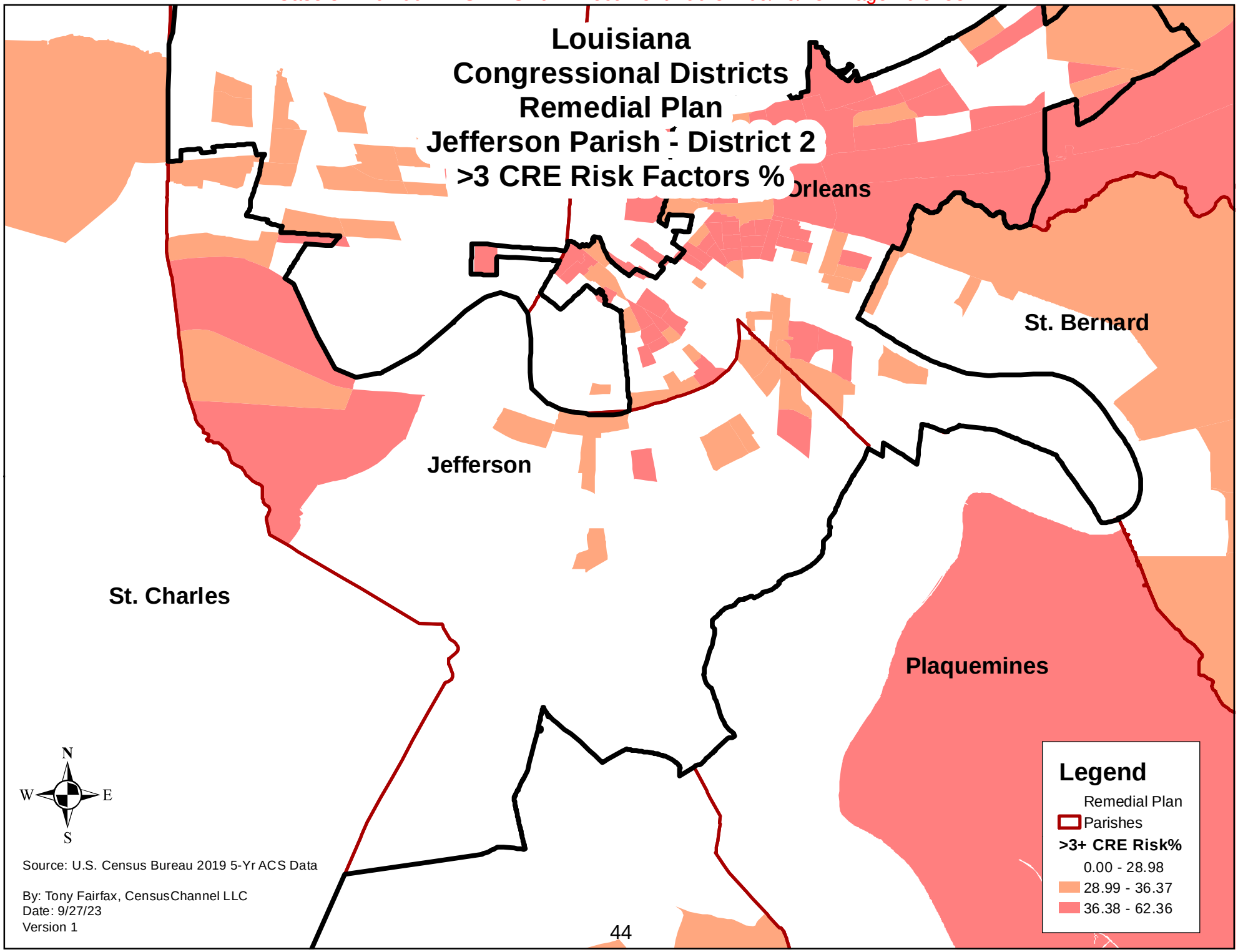
Source: U.S. Census Bureau 2019 5-Yr ACS Data
By: Tony Fairfax, CensusChannel LLC
Date: 9/22/22
Version 1


Louisiana
Congressional Districts
Remedial Plan
Jefferson Parish - District 2
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St. Bernard
Jefferson
St. Charles
Plaquemines
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Remedial Plan
Parishes
>3+ CRE Risk%
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28.99 - 36.37
36.38 - 62.36
Source: U.S. Census Bureau 2019 5-Yr ACS Data
By: Tony Fairfax, CensusChannel LLC
Date: 9/27/23
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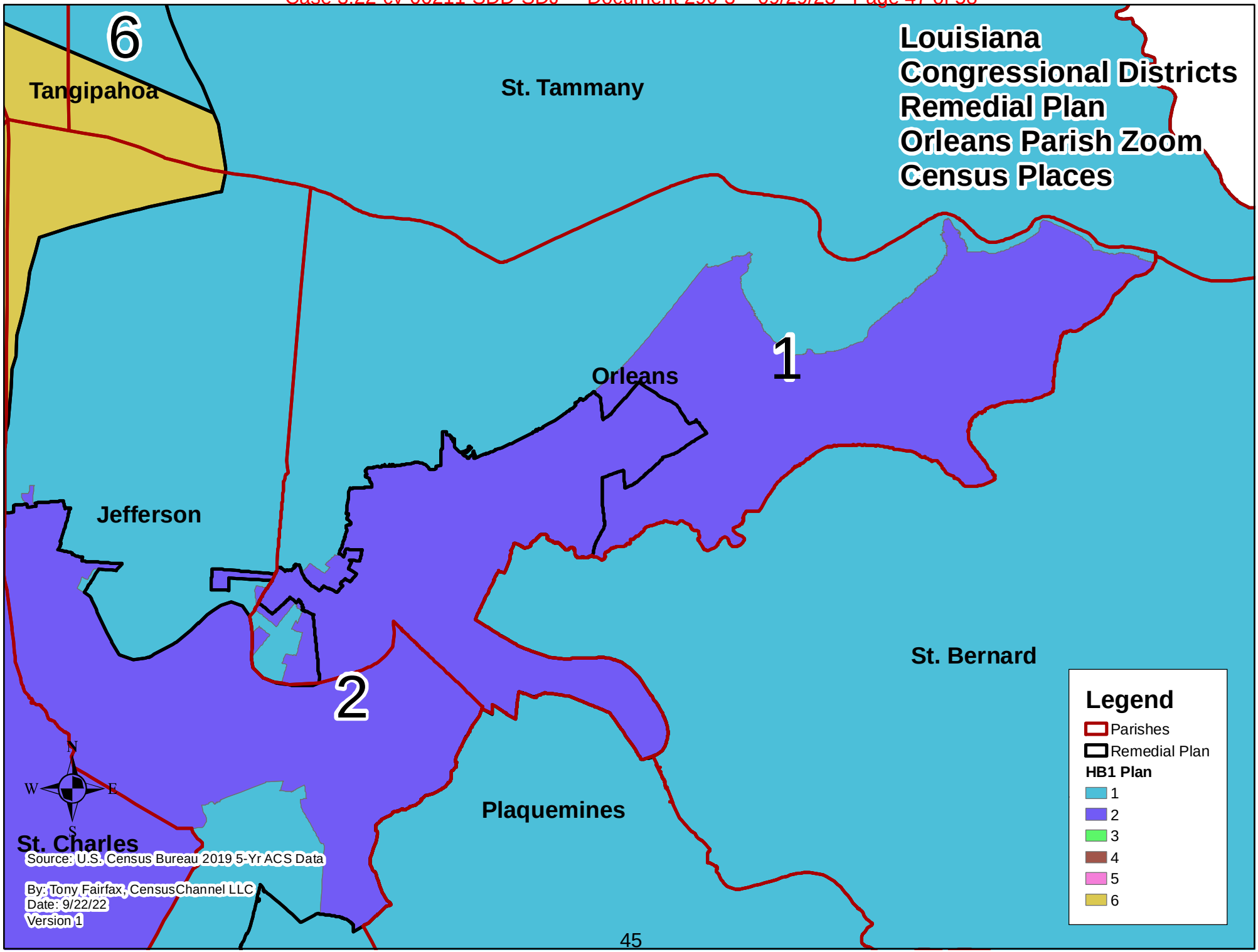
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Orleans Parish Zoom
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St. Tammany
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Jefferson
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St. Bernard
Plaquemines
St. Charles
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Parishes
Remedial Plan
HB1 Plan
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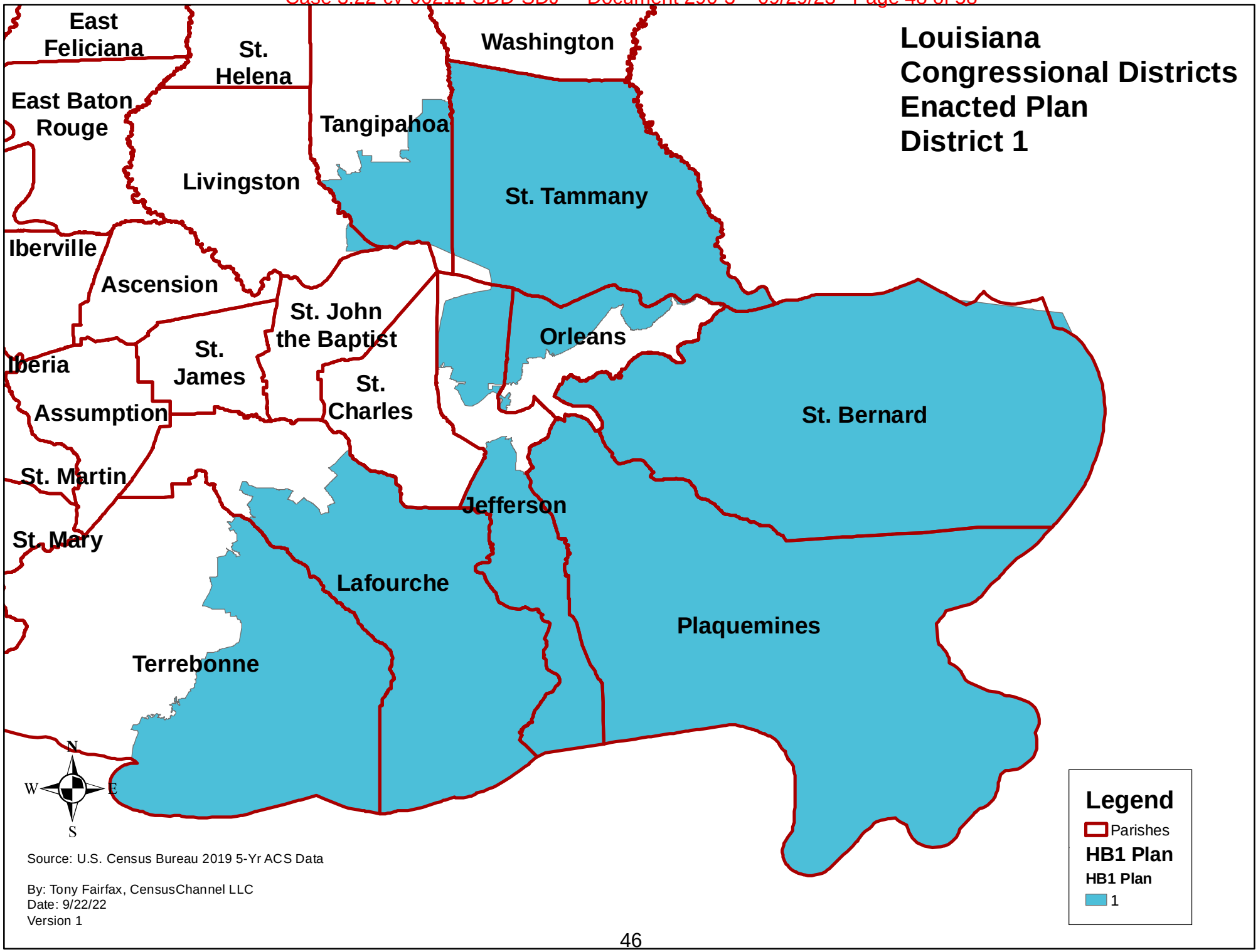
By: Tony Fairfax, CensusChannel LLC
Date: 9/22/22
Version 1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Congressional Districts
Enacted Plan
District 1
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St. Helena
Washington
East Baton Rouge
Tangipahoa
Livingston
St. Tammany
Iberville
Ascension
St. John the Baptist
Orleans
Iberia
St. James
St. Charles
Assumption
St. Bernard
St. Martin
Jefferson
St. Mary
Lafourche
Plaquemines
Terrebonne
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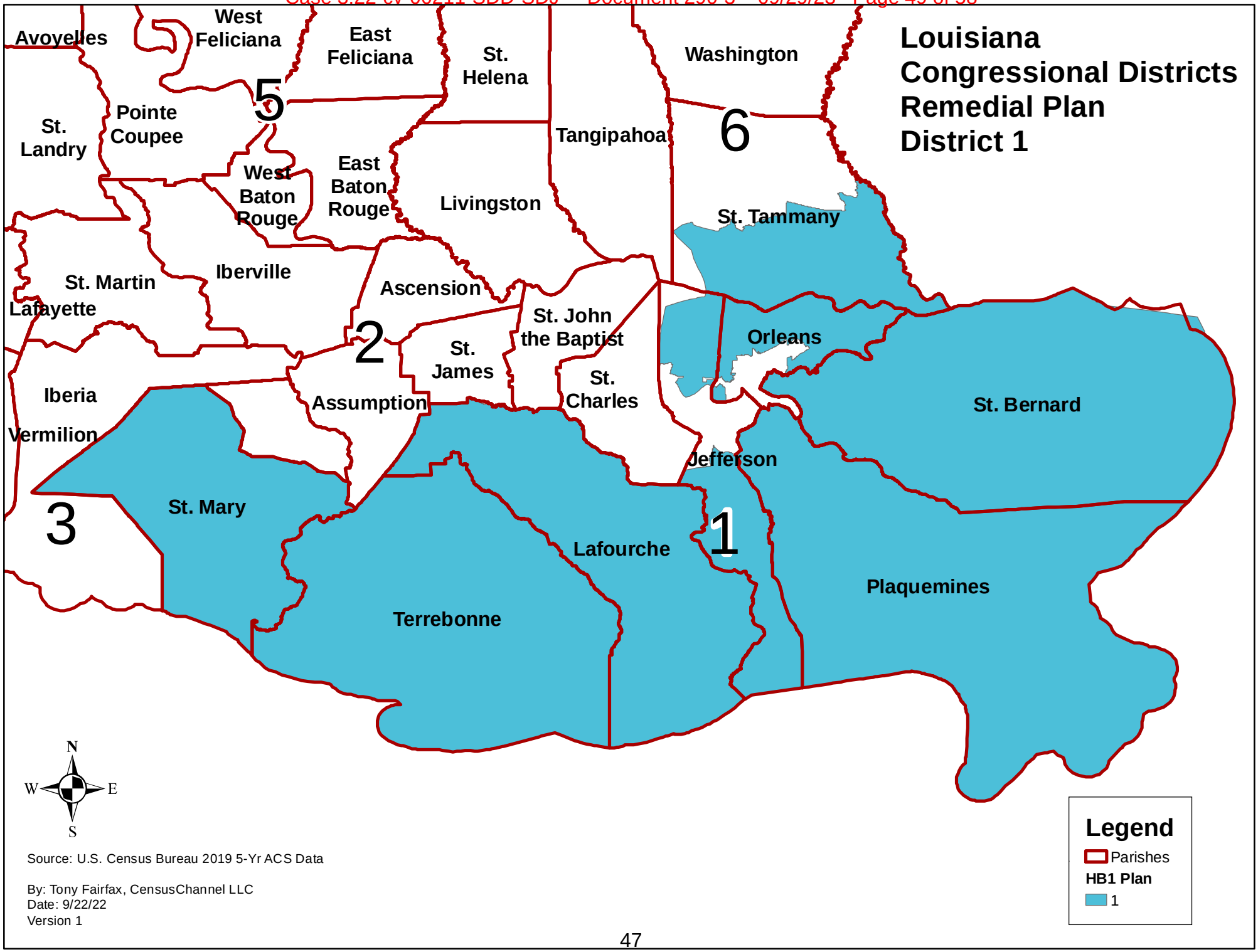
Parishes
HB1 Plan
HB1 Plan
1
Source: U.S. Census Bureau 2019 5-Yr ACS Data
By: Tony Fairfax, CensusChannel LLC
Date: 9/22/22
Version 1



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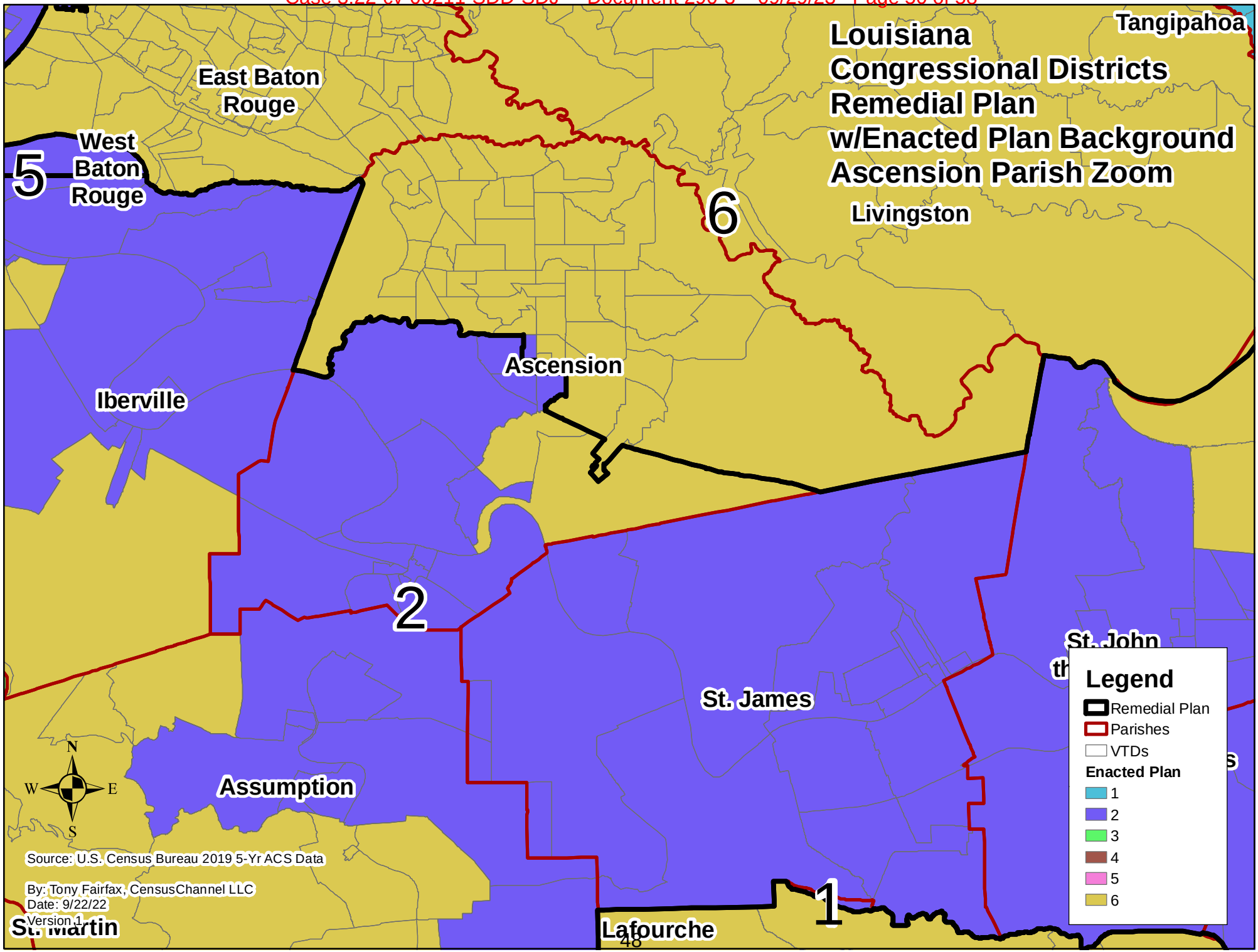
By: Tony Fairfax, CensusChannel LLC
Date: 9/22/22
Version 1


Louisiana
Congressional Districts
Remedial Plan
w/Enacted Plan Background
Ascension Parish Zoom
Tangipahoa
East Baton Rouge
West Baton Rouge
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Livingston
Ascension
Iberville
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St. James
St. John
Assumption
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Lafourche
St. Martin
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Remedial Plan
Parishes
VTDs
Enacted Plan
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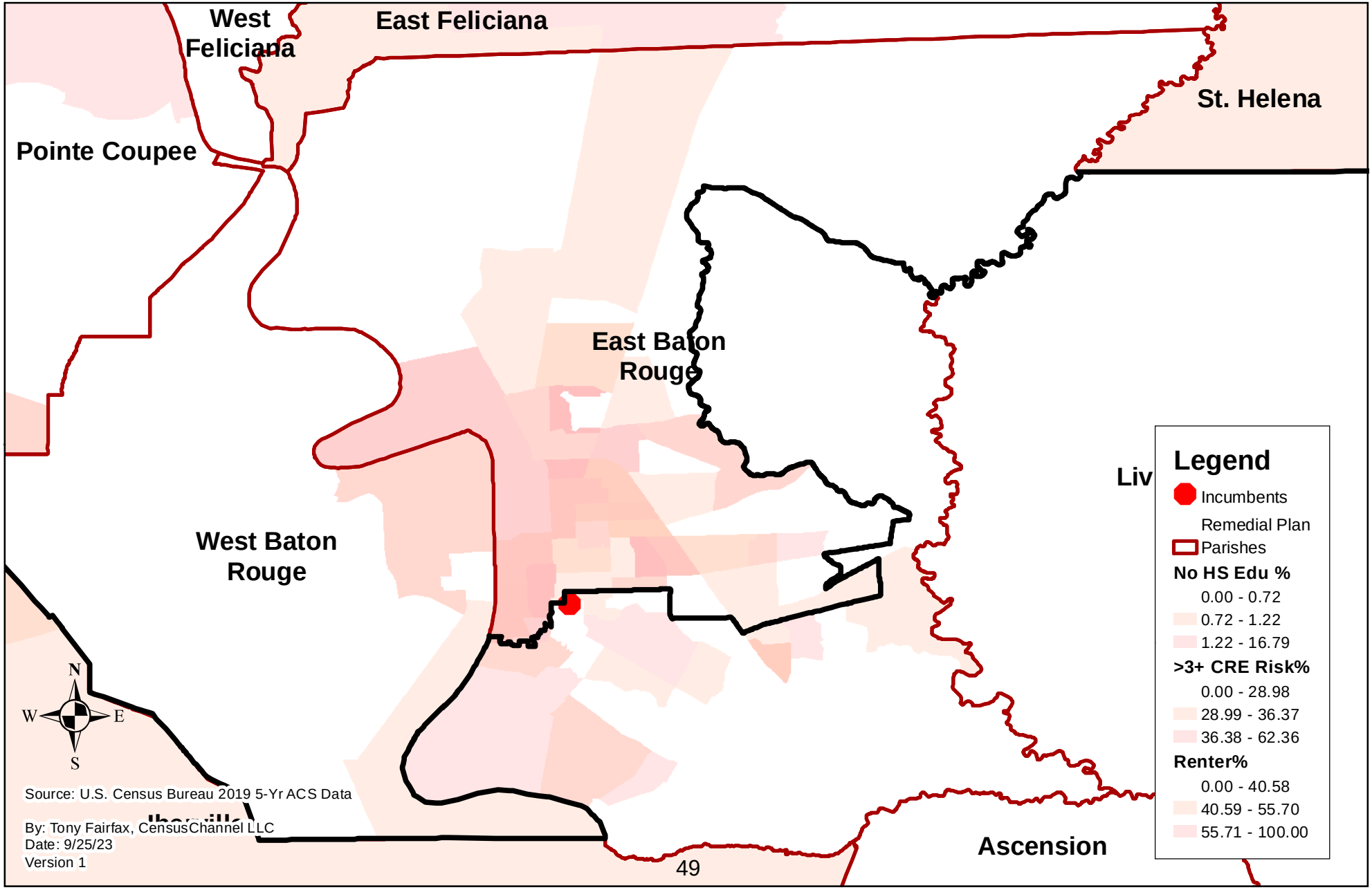
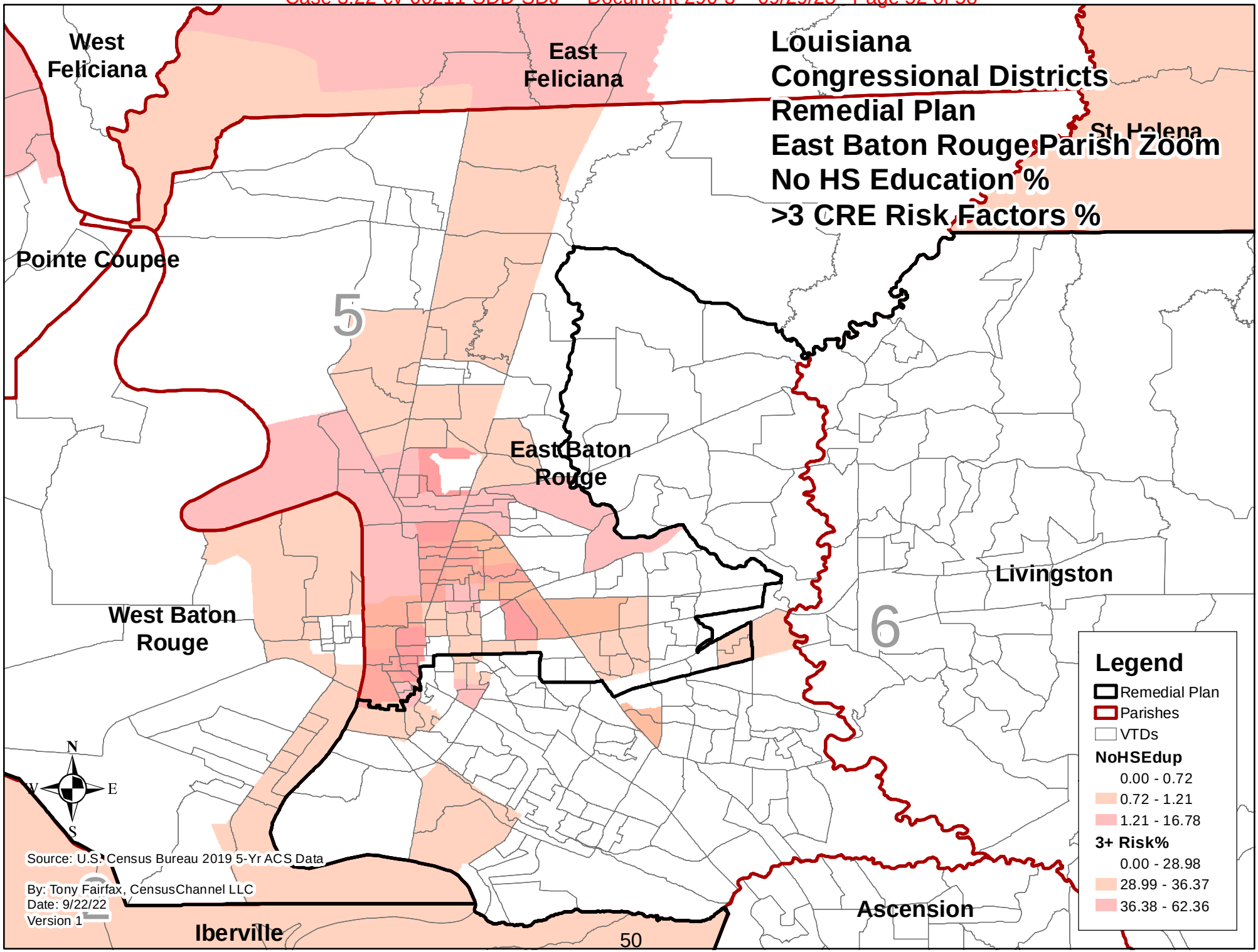
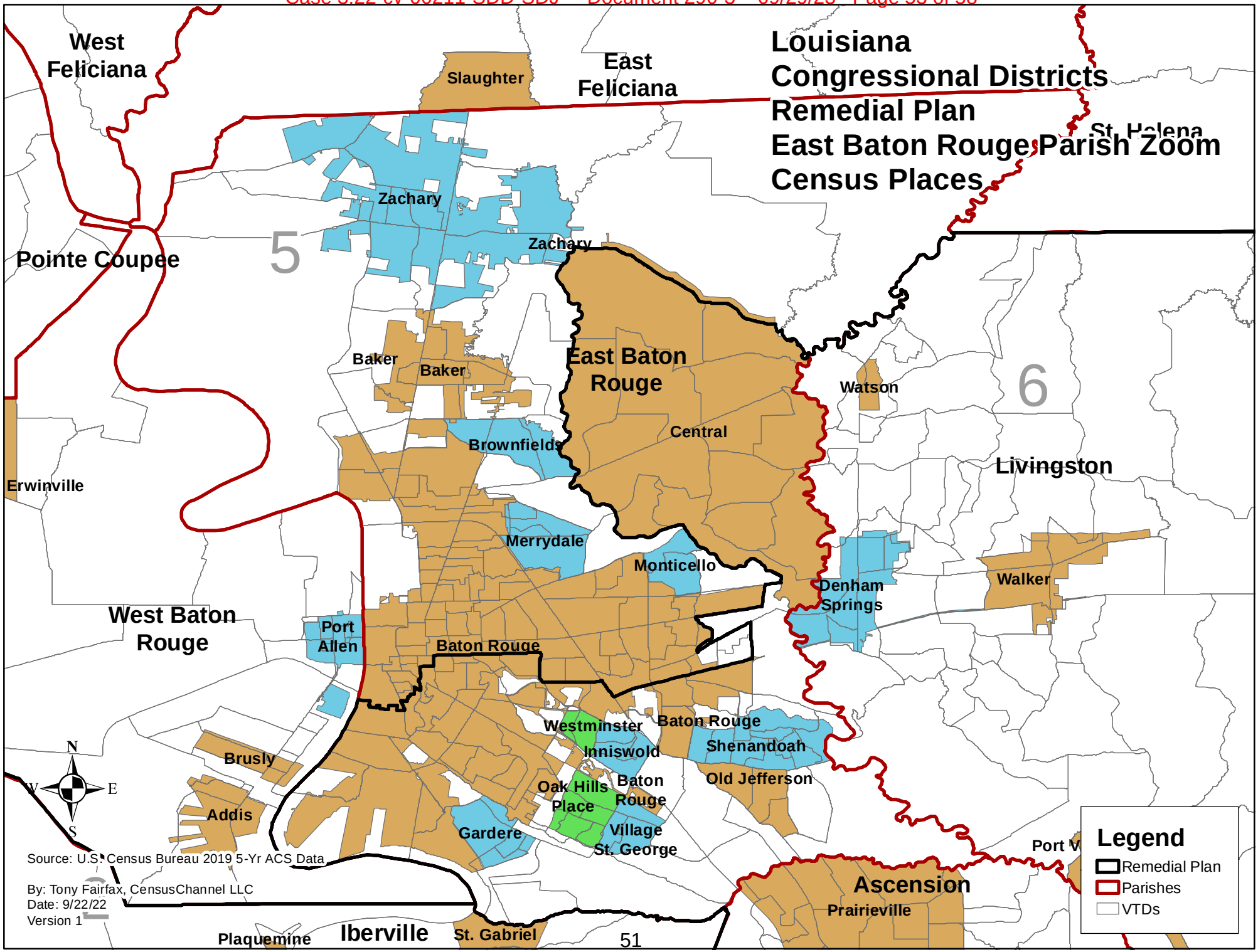
Source: U.S. Census Bureau 2019 5-Yr ACS Data
By: Tony Fairfax, CensusChannel LLC
Date: 9/22/22
Version 1

Louisiana
Congressional Districts
Remedial Plan
East Baton Rouge Parish - District 5
Six Socioeconomic Variables




Louisiana
Congressional Districts
Remedial Plan
East Baton Rouge Parish Zoom
No HS Education %
>3 CRE Risk Factors %
West Feliciana
East Feliciana
St. Helena
Pointe Coupee
5
East Baton Rouge
Livingston
6
West Baton Rouge
Ascension
Iberville
Legend
Remedial Plan
Parishes
VTDs
NoHSEdup
0.00 - 0.72
0.72 - 1.21
1.21 - 16.78
3+ Risk%
0.00 - 28.98
28.99 - 36.37
36.38 - 62.36
N
W
E
S
Source: U.S. Census Bureau 2019 5-Yr ACS Data
By: Tony Fairfax, CensusChannel LLC
Date: 9/22/22
Version 1


Louisiana
Congressional Districts
Remedial Plan
East Baton Rouge Parish Zoom
Census Places
West Feliciana
East Feliciana
St. Helena
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Zachary
Pointe Coupee
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Baker
Baker
East Baton Rouge
Watson
Central
Brownfields
Livingston
Erwinville
Merrydale
Monticello
Denham Springs
Walker
West Baton Rouge
Port Allen
Baton Rouge
Westminster
Baton Rouge
Shenandoah
Inniswold
Brusly
Oak Hills Place
Baton Rouge
Old Jefferson
Addis
Gardere
Village St. George
Port V
Ascension
Prairieville
Plaquemine
Iberville
St. Gabriel
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Source: U.S. Census Bureau 2019 5-Yr ACS Data
By: Tony Fairfax, CensusChannel LLC
Date: 9/22/22
Version 1
Legend
Remedial Plan
Parishes
VTDs

BESE Districts

Appendix B
Maptitude Data Reports

Parish Splits w/Population Data – Enacted Plan

Parish Splits w/Population Data – Remedial Plan

User: Tony Fairfax
Plan Name: LA Cong HB1 Plan
Plan Type: Congressional Districts

County by District and by County

Wednesday, September 20, 2023 7:07 PM

	Population	% of District	[18+_Pop]	% of District	[18+_AP_Blk]	% of District
District 1	776,268		601,559		81,105	
Jefferson LA	245,132	55.61%	196,104	56.90%	23,683	25.69%
Lafourche LA	43,701	44.80%	33,330	44.67%	1,095	9.89%
Orleans LA	48,050	12.51%	39,613	12.94%	3,348	2.02%
Tangipahoa LA	39,681	29.80%	30,157	29.71%	4,838	16.56%
Terrebonne LA	67,855	61.92%	51,018	61.84%	9,579	60.64%
Total District 1	**776,268**		**601,559**		**81,105**	
District 2	776,317		600,203		352,018	
Ascension LA	20,892	16.52%	15,426	16.78%	9,766	44.11%
Assumption LA	6,710	31.89%	5,270	31.72%	2,764	58.72%
East Baton Rouge LA	94,325	20.65%	70,960	19.95%	63,632	40.58%
Iberville LA	21,073	69.68%	16,631	69.05%	8,363	81.73%
Jefferson LA	195,649	44.39%	148,550	43.10%	68,492	74.31%
Orleans LA	335,947	87.49%	266,583	87.06%	162,720	97.98%
St. Charles LA	34,943	66.50%	26,288	66.48%	7,957	80.46%
St. John the Baptist LA	32,678	76.93%	24,826	76.38%	15,831	85.87%
West Baton Rouge LA	13,908	51.13%	10,164	49.52%	5,196	63.76%
Total District 2	**776,317**		**600,203**		**352,018**	
District 3	776,275		586,488		144,434	
St. Martin LA	50,399	97.36%	38,250	97.07%	11,282	99.90%
St. Mary LA	44,607	90.29%	34,054	90.76%	11,013	95.60%
Total District 3	**776,275**		**586,488**		**144,434**	
District 4	776,333		591,095		199,907	
Grant LA	7,473	33.71%	5,801	33.10%	1,133	41.70%
Total District 4	**776,333**		**591,095**		**199,907**	
District 5	776,277		597,389		196,617	
Grant LA	14,696	66.29%	11,726	66.90%	1,584	58.30%
Tangipahoa LA	93,476	70.20%	71,334	70.29%	24,379	83.44%
Total District 5	**776,277**		**597,389**		**196,617**	
District 6	776,287		593,814		141,688	
Ascension LA	105,608	83.48%	76,531	83.22%	12,373	55.89%
Assumption LA	14,329	68.11%	11,346	68.28%	1,943	41.28%
East Baton Rouge LA	362,456	79.35%	284,652	80.05%	93,158	59.42%
Iberville LA	9,168	30.32%	7,455	30.95%	1,869	18.27%
Lafourche LA	53,856	55.20%	41,289	55.33%	9,982	90.11%
St. Charles LA	17,606	33.50%	13,253	33.52%	1,933	19.54%
St. John the Baptist LA	9,799	23.07%	7,677	23.62%	2,606	14.13%

County by District and by County

LA Cong HB1 Plan

	Population	% of District	[18+_Pop]	% of District	[18+_AP_Blk]	% of District
St. Martin LA	1,368	2.64%	1,154	2.93%	11	0.10%
St. Mary LA	4,799	9.71%	3,467	9.24%	507	4.40%
Terrebonne LA	41,725	38.08%	31,487	38.16%	6,217	39.36%
West Baton Rouge LA	13,291	48.87%	10,362	50.48%	2,953	36.24%
Total District 6	**776,287**		**593,814**		**141,688**	

User: Tony Fairfax
Plan Name: LA Cong Remedial Orig
Plan Type: LA Congressional Districts

County by District and by County

Wednesday, September 20, 2023 7:18 PM

	Population	% of District	[18+_Pop]	% of District	[18+_AP_Blk]	% of District
District 1	776,290		604,886		103,146	
Jefferson LA	236,631	53.68%	189,536	54.99%	22,100	23.98%
Orleans LA	87,257	22.72%	72,861	23.80%	10,767	6.48%
St. Tammany LA	128,580	48.60%	98,735	48.82%	20,085	75.05%
Total District 1	**776,290**		**604,886**		**103,146**	
District 2	776,320		598,687		306,288	
Ascension LA	24,459	19.34%	18,078	19.66%	10,347	46.74%
Iberia LA	32,706	46.77%	24,501	46.41%	8,709	51.02%
Jefferson LA	204,150	46.32%	155,118	45.01%	70,075	76.02%
Orleans LA	296,740	77.28%	233,335	76.20%	155,301	93.52%
Total District 2	**776,320**		**598,687**		**306,288**	
District 3	776,259		586,624		108,925	
Iberia LA	37,223	53.23%	28,290	53.59%	8,360	48.98%
Lafayette LA	175,072	72.42%	133,786	72.76%	18,873	41.10%
Rapides LA	69,584	53.52%	53,146	53.80%	5,966	19.75%
Vernon LA	33,144	67.99%	24,477	67.50%	3,320	64.68%
Total District 3	**776,259**		**586,624**		**108,925**	
District 4	776,267		596,355		190,266	
Ouachita LA	90,953	56.72%	68,844	57.27%	7,617	18.01%
Vernon LA	15,606	32.01%	11,784	32.50%	1,813	35.32%
Total District 4	**776,267**		**596,355**		**190,266**	
District 5	776,310		590,113		306,739	
East Baton Rouge LA	217,705	47.66%	164,322	46.21%	113,810	72.59%
Lafayette LA	66,681	27.58%	50,089	27.24%	27,044	58.90%
Ouachita LA	69,415	43.28%	51,356	42.73%	34,673	81.99%
Rapides LA	60,439	46.48%	45,646	46.20%	24,239	80.25%
Tangipahoa LA	21,698	16.30%	16,362	16.12%	8,128	27.82%
Total District 5	**776,310**		**590,113**		**306,739**	
District 6	776,311		593,883		100,405	
Ascension LA	102,041	80.66%	73,879	80.34%	11,792	53.26%
East Baton Rouge LA	239,076	52.34%	191,290	53.79%	42,980	27.41%
St. Tammany LA	135,990	51.40%	103,493	51.18%	6,676	24.95%
Tangipahoa LA	111,459	83.70%	85,129	83.88%	21,089	72.18%
Total District 6	**776,311**		**593,883**		**100,405**	