

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA**

DR. DOROTHY NAIRNE, REV. CLEE
EARNEST LOWE, DR. ALICE
WASHINGTON, STEVEN HARRIS, BLACK
VOTERS MATTER CAPACITY BUILDING
INSTITUTE, and THE LOUISIANA STATE
CONFERENCE OF THE NAACP,

Plaintiffs,

v.

R. KYLE ARDOIN, in his official capacity as
Secretary of State of Louisiana

Defendant.

CIVIL ACTION NO. 3:22-cv-00178
SDD-SDJ

Chief Judge Shelly D. Dick

Magistrate Judge Scott D. Johnson

**PLAINTIFFS’ OPPOSITION TO DEFENDANTS’
MOTION FOR SUMMARY JUDGMENT**

Plaintiffs—four individual voters in Louisiana and two organizations dedicated to furthering the rights of such individual voters—challenge the redistricting plans for the Louisiana House of Representatives and Louisiana Senate because they dilute the voting strength of Black voters, in violation of Section 2 of the Voting Rights Act of 1965 (“VRA”), 52 U.S.C. § 10301. Rather than contending with the merits of this case, Defendants claim that Plaintiffs lack standing to raise this critical challenge, and seek dismissal on that ground. For the reasons set forth below, Defendants’ motion is meritless and should be denied.

Defendants’ standing argument is premised on a misstatement of Plaintiffs’ claims in this action and a misconception of the law. Defendants erroneously claim that, in this action, “Plaintiffs challenge Louisiana’s house and senate districting plans *in their entirety*.” Defs.’ Br. at 1 (emphasis added). Building on this erroneous premise, Defendants go on to argue that “no Plaintiff

has any claim of standing as to most districts.” *Id.* But Defendants’ characterization of Plaintiffs’ claims—and the straw man argument they construct in response—is wrong: Plaintiffs *do not* challenge every district in the House and Senate plans. To the contrary, Plaintiffs seek to create six additional majority-Black House districts and three additional majority Senate districts in specific parts of the state. SMF¹ ¶ 8. Specifically, in the Senate map, the evidence proffered by Plaintiffs shows that the Black vote has been diluted in the Shreveport area, Jefferson Parish, and in the East Baton Rouge area, and Plaintiffs have seek to create one new Senate district in each of these areas, numbered as Senate District 38, 19, and 17 in the illustrative plan prepared by Plaintiffs’ demographic expert Bill Cooper in June 2023. Likewise, in the House map, the Black vote has been diluted in the Shreveport area, the East Baton Rouge area, the Ascension area, the Lake Charles area, and the Natchitoches area, and plaintiffs seek to create one new district in each of the Shreveport, Ascension and Lake Charles areas, and three new districts in the Baton Rouge area, numbered as House District 1, 65, 68, 69, 60, 38, and 23 in Mr. Cooper’s June 2023 illustrative plan. As to *these specific districts in these specific areas*, Plaintiffs have standing to bring their challenges through the four Individual Plaintiffs (who reside in some of the relevant districts) and the two Organizational Plaintiffs (who have standing through the residence of Louisiana NAACP members as well as through the enacted maps’ impact on both organizations’ activities).

Specifically, each of the Individual Plaintiffs have suffered a cognizable injury-in-fact as a result of Louisiana’s state legislative maps, which illegally “crack” or “pack” Black voters into voting districts and dilute the value of their votes. Each Individual Plaintiff’s status as a Black

¹ “SMF” refers to the Plaintiffs’ Opposing Statement of Material Facts filed contemporaneously herewith.

registered voter living in a dilutive district that could be redrawn into a new majority-Black district confers Article III standing. The Louisiana NAACP has associational standing to challenge the redistricting plan through certain of its individual members, Black voters who reside in the relevant districts and are harmed in the same manner as the Individual Plaintiffs. Finally, both the Organizational Plaintiffs have direct organizational standing, as evidenced through the injuries suffered from the diversion of resources, including cancelled program, as a result of the at-issue redistricting.

For these reasons, as more fully set forth herein, Plaintiffs respectfully request that the Court deny Defendants' motion in its entirety.

I. FACTUAL BACKGROUND

Congress enacted the VRA for the “broad remedial purpose of ‘ridding the country of racial discrimination in voting.’” *Chisom v. Roemer*, 501 U.S. 380, 403-404 (1991) (quoting *South Carolina v. Katzenbach*, 383 U.S. 301, 315 (1966)). In 1982, Section 2 of the VRA was amended to prohibit the use of any “voting qualification or prerequisite to voting or standard, practice, or procedure” that “results in a denial or abridgement of the right of any citizen of the United States to vote on account of race or color” 52 U.S.C. § 10301(a). Section 2 outlaws voting practices that “‘interact[] with social and historical conditions’ [to] impair[] the ability” of Black voters to elect their candidates of choice on an equal basis with their fellow voters. *Voinovich v. Quilter*, 507 U.S. 146, 153 (1993) (quoting *Thornburg v. Gingles*, 478 U.S. 30, 47 (1986)).

“Individual Plaintiffs” are four Black citizens and voters in Louisiana who are denied an equal opportunity to elect candidates of their choice by the State Legislative Maps. Plaintiff Dr. Dorothy Nairne is a Black U.S. citizen who is lawfully registered to vote in Louisiana. SMF ¶ 32; Ex. 10 ¶¶ 2–3. Dr. Nairne has lived in House District 60 and Senate District 2 since 2017. SMF ¶ 32. Plaintiff Rev. Clee Earnest Lowe is a Black U.S. citizen who is lawfully registered to vote in

Louisiana. SMF ¶ 33; Ex. 11 ¶¶ 2–3. Rev. Lowe has lived in House District 66 and Senate District 16 since 2007. SMF ¶ 33. Plaintiff Dr. Alice Washington is a Black U.S. citizen who is lawfully registered to vote in Louisiana. SMF ¶ 34; Ex. 12 ¶¶ 2–3. Dr. Washington has lived in House District 66 and Senate District 16 since January 2016. SMF ¶ 34.² Plaintiff Rev. Steven Harris is a Black U.S. citizen who is lawfully registered to vote in Louisiana. SMF ¶ 35; Ex. 13 ¶¶ 2–3. Rev. Harris has lived in House District 25 and Senate District 29 since 2018. SMF ¶ 35.

The “Organizational Plaintiffs”—Black Voters Matter Capacity Building Institute (“Black Voters Matter” or “BVM”) and the Louisiana State Conference of the National Association for the Advancement of Colored People (“Louisiana NAACP”)—are non-profit civic engagement organizations working to empower Black political participation. SMF ¶ 7; Am. Compl. ¶¶ 26, 39. The Louisiana NAACP membership includes Black voters in the State of Louisiana who plan to vote in future State elections. SMF ¶ 19, Ex. 8 at art. II, § 1(b); *see also id.* at art. I, § 1(b); art. III, § 2. BVM’s mission is to “expand Black voter engagement” and “increase power in marginalized, predominantly Black communities.” SMF ¶ 9; Am. Compl. ¶ 26; Ex. 2, BVM-LA-Leg 0005179–81; Ex. 3, Ho-Sang Decl. ¶ 4.

The Louisiana NAACP regularly devotes significant portions of its resources to voter education and outreach efforts. SMF ¶ 31; Ex 9 ¶¶ 3, 9. These efforts take the form of door-to-door canvassing, voter registration efforts, community and candidate forums and other activities. SMF ¶ 31; Ex. 9 ¶¶ 8–9. The effectiveness of these efforts in getting voters registered and to the polls and the resources required are affected by a number of factors that are directly related to the legislature’s districting decisions. First, the amount of voter education and mobilization resources

² Defendants represent that Dr. Washington resides in Senate District 5, but as indicated in her response to the interrogatories, Dr. Washington resides in Senate District 16. *See* SMF ¶ 34.

required of the NAACP depends on the activity levels of others who are also engaged in these efforts, and particularly, the efforts of political parties and political campaigns, which frequently devote substantial resources to voter mobilization in competitive elections. Ex. 9 ¶ 15; SMF ¶ 30. Where elections are not competitive, because districts have been drawn in a way that virtually guarantees that one party's candidate will win, neither party or candidate has the incentive to expend significant resources on voter mobilization. Ex. 9 ¶ 14; SMF ¶ 30. In such cases, organizations like the Louisiana NAACP must step in to fill the gap and ensure voters are registered and have the information they need about the candidates and issues and about how to cast their ballots. Ex. 9 ¶ 16; SMF ¶ 30. This was the case in 2023, the first election after the legislature passed the challenged House and Senate maps. Ex. 9 ¶¶ 15-21; SMF ¶ 30. In the areas where Black voters have been packed and cracked, there have been numerous noncompetitive House and Senate elections this year—with candidates winning outright by not drawing an opponent or not requiring a runoff election after the primary. Ex. 9 ¶ 14. Mr. McClanahan testified to his observations of disinvestment and lack of mobilization among candidates, campaigns, political parties, and other organizations in these areas. Ex. 9 ¶ 15, 20; SMF ¶ 30. In response, the Louisiana NAACP has redirected resources and volunteer efforts away from districts where political campaigns and other organizations are active to meet the needs of voters in these noncompetitive districts and ensure they are aware of the other important elections and constitutional amendments on their ballots, that their registration information is up to date, and that they know where and how to vote. Ex. 9 ¶ 16; SMF ¶ 30.

Second, redistricting affects voters' perception of whether their participation in the political process is meaningful and whether their elected representatives are responsive to their needs. SMF ¶ 31; Ex. 9 ¶¶ 9–11. For example, when volunteers engaged on voter canvassing encounter voters

who feel that their vote does not count, they spend more time educating those voters on the importance of participation, with the result that they are able to speak to fewer voters in a given day. SMF ¶ 31; Ex. 9 at ¶¶ 9–11. After the enactment of the challenged maps, the Louisiana NAACP’s volunteers have faced higher levels of disillusionment among Black voters and as a result the organization has been required to divert significantly greater resources to canvassing, particularly in areas and districts where Black voters routinely see their candidates of choice defeated. SMF ¶ 31; Ex. 9 ¶¶ 9–21. As Mr. McClanahan testified at his deposition, the Louisiana NAACP has had to reallocate its voter engagement resources to specific impacted areas where Black voters are discouraged and less engaged as a result of legislative maps they perceive to be unfair. McClanahan Dep. Tr. at 97:24–101:24.

Mr. McClanahan explained that in order to devote resources such as volunteers and education and outreach materials to those specific areas where Black voters reside in noncompetitive, packed and cracked districts, the Louisiana NAACP was forced to divert them from other areas of the state. SMF ¶ 29; Ex. 9 at ¶¶ 12-18; Ex. 7, McClanahan Dep. Tr. at 103:3–1. Mr. McClanahan also testified that specific events—namely, rallies and town hall sessions to be held in Bogalusa and Orleans—were cancelled or postponed in order to redirect the Louisiana NAACP’s resources to engaging Black voters who would otherwise be ignored as a direct result of the challenged redistricting plans. *See* SMF ¶ 31; Ex. 7, McClanahan Dep. Tr. At 103:1–8, 104:13–21.

Similarly, Omari Ho-Sang, BVM’s senior state organizing manager for Louisiana, detailed resources for her organization that were diverted to respond to the unlawful maps, both during and after the redistricting process unfolded in Louisiana. SMF ¶ 36; Ex. 1, Ho-Sang Dep. Tr., at 10:2–4. During the redistricting process, Ms. Ho-Sang testified that funds that “could have been used

for more general GOTV” across the state were instead diverted and used to pay for activities opposing the proposed redistricting plans. SMF ¶ 15; Ex. 1 at 48:17–25. Ms. Ho-Sang provided concrete examples of these diverted funds, which included funds moved from other aspects of the organization to instead cover: (1) “mini grants to partners that participated in the process,” (2) payments for “lodging for out-of-town partners during redistricting takeover,” (3) a “big bus for the redistricting takeover,” (4) outreach costs, such as broadcast texting, and (5) events and event planners. SMF ¶ 15; Ex. 1 at 50:3–51:22; Ex. 3, ¶¶ 16-19.

Ms. Ho-Sang testified that any funds expended from BVM’s finite budget toward opposing the (then-proposed, now-enacted) legislative maps could instead have been spent toward BVM’s “core” activities, including “more general GOTV to really increase the number of registered voters in a community,” or to “have more teachings” to educate the community on issues that are central to BVM’s mission, SMF ¶ 15; Ex. 1 at 47:21–48:25; and Ms. Ho-Sang’s contemporaneous communications reveal that BVM’s other initiatives were delayed during the period that BVM was devoting resources toward opposing the legislative plans at issue, *see, e.g.*, SMF ¶ 15; Ex. 4 at 0002891–93.

After enactment of the challenged maps, instead of expending its limited resources on voter registration efforts or educating constituents on issues that are important to Black voters in Louisiana, BVM has diverted resources from those core activities toward finding ways to hold elected officials accountable, even in districts where Black voters are unable to elect their candidate of choice and are receiving unfair representation. SMF ¶ 15; Ex. 3, ¶ 25. This accountability strategy includes a campaign to hold legislators accountable for voting against fair maps and diluting Black Louisianans’ votes, and to “mak[e] sure that those who make it to the office uphold their responsibilities in ensuring fair and equal representation in our communities,”

even in the face of that dilution. SMF ¶ 15; Ex. 5 at 0000383-84; *see also* Ex. 6 at 0003053, 0005833–36, 0005840. And like the Louisiana NAACP, *see supra*, BVM has also altered its approach to organizing in response to the effect that dilutive maps have had in Louisiana—including the “increasing sentiment among the people who we want to engage with that their vote does not count” because of the dilutive maps passed during the redistricting process. SMF ¶¶ 14-15; Ex. 1 at 49:3–13; Ex. 3 ¶¶ 21–26.

From the start of this case, Plaintiffs have identified certain areas as the focus of their challenge to Louisiana’s state senate and house redistricting plans, *i.e.*, where the State could have drawn additional voting districts that allowed Black voters to elect Black preferred candidates, but declined to do so. In the Senate map, the Black vote has been diluted in the Shreveport area, Jefferson Parish, and in the East Baton Rouge area. To establish *Gingles* I, Plaintiffs have proffered an illustrative map, which creates new districts that are numbered as Senate District 38, 19, and 17. In the House map, the Black vote has been diluted in the Shreveport area, the East Baton Rouge area, the Ascension area, Lake Charles area, and the Natchitoches area. To establish *Gingles* I, Plaintiffs have proffered an illustrative map, which creates new districts that are numbered as House District 1, 65, 68, 69, 60, 38, and 23. *See* SMF ¶ 8; Am. Compl. ¶¶ 90, 96, 105-108, 112-15; *see also* Am. Compl. Exs. 1-4 (illustrative maps including the additional majority-minority Black opportunity districts that could have, but were not, included in the challenged redistricting plans). Plaintiffs’ responses to written interrogatories similarly focused on the same, unchanging list of areas in which additional majority-minority Black opportunity

districts could be created (but were not created) when asked for data “[a]s to each Louisiana State House and State Senate District *at issue in the Complaint.*”³ SMF ¶ 8 (emphasis added).

II. LEGAL STANDARDS

A. SUMMARY JUDGMENT

The court shall grant summary judgment only “if the movant shows that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law.” Fed. R. Civ. P. 56(a). “When assessing whether a dispute to any material fact exists, we consider all of the evidence in the record but refrain from making credibility determinations or weighing the evidence.” *Delta & Pine Land Co. v. Nationwide Agribusiness Ins. Co.*, 530 F.3d 395, 398–99 (5th Cir. 2008) (citations omitted). The party seeking summary judgment must meet the “exacting burden of demonstrating that there is no actual dispute as to any material fact in the case.” *Impossible Elec. Techs., Inc. v. Wackenhut Protective Sys., Inc.*, 669 F.2d 1026, 1031 (5th Cir. 1982) (citations omitted). In determining whether the movant has met this burden, the court must view the evidence introduced and all factual inferences from the evidence in the light most favorable to the party opposing summary judgment. *See id.* “If the moving party satisfies its burden, the non-moving party must show that summary judgment is inappropriate by setting forth specific facts showing the existence of a genuine issue concerning every essential component of its case.” *Banks v. C.R. Bard, Inc.*, No.17-193, 2022 WL 17490977, at *2 (M.D. La. Dec. 7, 2022) (cleaned up). “If reasonable minds might differ on the resolution of any material fact or even on the inferences arising from undisputed facts, summary judgment must be denied.” *Anthony v.*

³ In an effort to be responsive to Defendants’ interrogatories, which sought information about members in all districts “at issue” (a phrase that the interrogatories did not define), the NAACP provided a list of districts parts of which would be incorporated into new majority-Black districts in Plaintiffs’ illustrative plans and in which specific, identified NAACP members reside in those districts. SMF ¶ 8.

Petroleum Helicopters, Inc., 693 F.2d 495, 496 (5th Cir. 1982) (citing *Impossible Elec. Techs., Inc.*, 669 F.2d at 1031).

B. ARTICLE III STANDING

Standing is a constitutional prerequisite for this Court’s jurisdiction. *See, e.g., Lujan v. Defs. of Wildlife*, 504 U.S. 555, 560 (1992). To demonstrate standing, a plaintiff must show (1) an “injury in fact,” (2) a “causal connection between the injury and the conduct complained of,” and (3) a likelihood that the injury will be “redressed by a favorable decision.” *Id.* at 560–61 (cleaned up). Standing is assessed plaintiff-by-plaintiff and claim-by-claim. *See In re Gee*, 941 F.3d 153, 171 (5th Cir. 2019). Defendants do not contest the causal connection between the enacted maps and the vote dilution alleged by Plaintiffs, nor that this vote dilution could be redressed by alternative maps that create additional majority-Black districts. Instead, their Motion argues solely that the Organizational Plaintiffs have not suffered an injury-in-fact.

“Each element of Article III standing must be supported in the same way as any other matter on which the plaintiff bears the burden of proof, with the same evidentiary requirements of that stage of litigation.” *Legacy Cmty. Health Servs., Inc. v. Smith*, 881 F.3d 358, 366 (5th Cir. 2018) (cleaned up); *see also Lewis v. Casey*, 518 U.S. 343, 357-58 (1996) (quoting *Lujan*, 504 U.S. at 561) (distinguishing between the burden of proof on standing at the summary judgment stage, which requires facts supporting standing be “set forth by affidavit or other evidence . . . , which for purposes of the summary judgment motion will be taken to be true,” and the burden of proof on standing at trial, where “those facts (if controverted) must be supported adequately by the evidence adduced at trial”). Accordingly, where a plaintiff adduces sufficient evidence to demonstrate a genuine issue of material fact concerning standing, summary judgment should be denied. *ACORN v. Fowler*, 178 F.3d 350, 360-61 (5th Cir. 1999).

III. ARGUMENT

The evidence proffered by the Organizational Plaintiffs creates a triable issue as to whether each organization has standing in its own right as a result of the concrete impairment of its activities and ability to achieve its mission caused by the enacted map's impact on its civic engagement efforts. In addition, the NAACP has proffered sufficient evidence to create a triable issue regarding whether at least one identified member in each area of the state in which Plaintiffs seek an additional majority-Black house or senate district would have standing to sue in their own right.

A. The Individual Plaintiffs Have Standing.

Although they question whether the Individual Plaintiffs will be able to prove their standing at trial, Defendants make no argument that Summary Judgment is appropriate as to the Individual Plaintiffs. Mem. at 17-18 (conceding that the case can proceed to trial on the Individual Plaintiffs' claims). Thus, the request in their motion that the Amended Complaint "be dismissed in its entirety," Mot. at 2, cannot be granted.

In any event, the evidence clearly establishes the Individual Plaintiffs have standing. Each is a Black voter who votes regularly. SMF ¶¶ 32-35. Each resides in a House or Senate district in which their vote is diluted, either because Black voters are packed into the district in excess of what is necessary to provide Black voters an opportunity to elect candidates of choice or cracked across their district and surrounding districts, precluding Black voters from being able to elect candidates of choice. *Id.*; see *Allen v. Milligan*, 599 U.S. 1, 43 (2023) (Kavanaugh, J., concurring) (Black voters are harmed when they are drawn into a district that "cracks or packs" the minority population). And in Mr. Cooper's illustrative plan, each would be drawn into a majority-Black House or Senate district. SMF ¶¶ 32-35. This evidence is sufficient to establish that each of them has standing. *Anne Harding v. Cnty. of Dallas*, 948 F.3d 302, 307 (5th Cir. 2020) (standing to

challenging districting plan under Section 2 established where “each voter resides in a district where their vote has been cracked or packed”).

B. The Louisiana NAACP Has Associational Standing.⁴

As Defendants acknowledge, an organization possesses associational standing to assert claims on behalf of its members if the organization satisfies three requirements: “(a) its members would otherwise have standing to sue in their own right; (b) the interests it seeks to protect are germane to the organization’s purpose; and (c) neither the claim asserted nor the relief requested requires the participation of individual members in the lawsuit.” *Hunt v. Wash. State Apple Advert. Comm’n*, 432 U.S. 333, 343 (1977). Defendants challenge only the application of the first factor to the Louisiana NAACP’s associational standing, but as described below, this challenge is baseless.⁵

In service of their mistaken premise that Plaintiffs challenge all 105 state house districts and 39 state senate districts, Defendants point to Plaintiffs’ prayer for relief, which seeks to enjoin the use of the current house and senate redistricting plans. Am. Compl. Prayer for Relief (A-B). But the actual factual allegations in Plaintiffs’ Complaint and allegations throughout this litigation have demonstrated Plaintiffs seek to create six additional majority-Black state house districts and three additional majority-Black state senate districts in certain parts of the state in which Black voters have been packed into few districts with excessively high Black populations or cracked across several districts in a way that dilutes their voting strength. And, as described below,

⁴ Plaintiffs do not assert associational standing arguments on behalf of BVM.

⁵ The Louisiana NAACP also satisfies the second and third prongs of associational standing: (2) “protecting the strength of votes . . . [is] surely germane to the NAACP’s expansive mission,” *Hancock Cnty. Bd. of Supervisors v. Ruhr*, 487 F. App’x 189, 197 (5th Cir. 2012); and (3) “[p]articipation of individual members generally is not required when the association seeks prospective or injunctive relief, as opposed to damages.” *Consumer Data Indus. Ass’n v. Texas*, No. 21–51038, 2023 WL 4744918, at *4 n.7 (5th Cir. 2023).

Plaintiffs have standing to challenge the packing and cracking of Black voters in these areas through the residence of Individual Plaintiffs or of members of the NAACP, who are voters who could be drawn into new non-dilutive majority-Black house or senate districts.

1. The Louisiana NAACP's Membership Structure Supports a Finding of Associational Standing.

The NAACP maintains a multi-tiered membership structure: the national NAACP is made up of state (or state-area) conferences, which are in turn made up of local branches and chapters. *See* SMF ¶ 19; Ex. 8 at art. I, § 1. The state conferences, branches, and chapters are collectively known as “units” of the NAACP. SMF ¶ 19; Ex. 8 at art. I, § 1, art. III, § 2. Units are generally not separately incorporated entities. SMF ¶ 19; Ex. 8 at art. III, § 1. When an individual becomes a member of the NAACP, they become a member of all the units covering the geographic area in which they live or work, that is, the national NAACP, the state conference, and any branch or chapter in their local area. SMF ¶ 19; Ex. 8 at art. IV, §§ 1, 3 (explaining that members of any unit are automatically members of the national NAACP, and that “members of [local units] are members of the State/State-Area Conference”). To be in good standing, each branch is required to have at least 50 adult members. SMF ¶ 22; *see also* SMF ¶ 22; Ex. 8 at art. IV, § 4 (describing membership requirements to join branches). At his deposition in this action, the Louisiana NAACP's President Michael McClanahan repeatedly described this structure (*see* SMF ¶ 20; Ex. 7 at 18:18–24, 32:2–7, 38:16–21, 43:1–5, 49:17–22), which is further confirmed by the Louisiana NAACP's Bylaws. *See* SMF ¶ 20; Ex. 8 at art. I, § 2(d); *see also* SMF ¶ 20, Ex. 8 at art. I, § 1(b); art. III, § 2 (defining a branch to be one type of NAACP Unit).

Defendants argue that the Louisiana NAACP does not have “individual members,” cherry-picking five words from Mr. McClanahan's lengthy deposition testimony regarding the NAACP's membership structure, claiming that Mr. McClanahan said the NAACP Louisiana State conference

does not have “members . . . per se. Not individually.” *See* Dkt. 149-1, at 7. But Defendants tellingly omit the testimony that followed, which clarified that the Louisiana NAACP’s individual members “just have to become a member of the branch” and then that “branch is a member of the State Conference.” *See* SMF ¶ 19; Ex. 7, at 29:11–18. In other words, and contrary to Defendants’ claims, the Louisiana NAACP *has* individual members—those individuals join the Louisiana NAACP’s local branches and those local branches, taken together, make up the Louisiana NAACP. SMF ¶ 19; Ex. 7 at 29:11–18; *see also* Ex. 9 ¶ 4. Moreover, Defendants further omit Mr. McClanahan’s testimony that the NAACP Bylaws constitute the definitive authority governing the organization’s membership structure. SMF ¶ 18; Ex. 7 at 18:20–24, 135:1–10. Those bylaws plainly spell out that the Louisiana NAACP has individual members, who simultaneously belong to the relevant local unit, the state conference, and the National Association. *See supra*; SMF ¶ 20, 22; Ex. 8, art. IV.⁶

Even so, the Fifth Circuit has confirmed that the official membership structure of an organizational plaintiff is irrelevant where “the goals of the constitutional standing requirement” have been fulfilled. *See, e.g., Friends of the Earth, Inc. v. Chevron Chem. Co.*, 129 F.3d 826, 828 (5th Cir. 1997). And both the Supreme Court and the Fifth Circuit have held that an associational standing inquiry should not “exalt form over substance” when analyzing whether an association has “members” for purposes of assessing associational standing. *Id.* (quoting *Hunt*, 432 U.S. at 345). The key inquiry is simply whether the association “provides the means by which [its

⁶ Even if Defendants were correct that, despite the NAACP bylaws, the NAACP Louisiana State Conference lacks individual members and has only local branches as members, the organization would still be able to establish associational standing. The organization must simply have local branches that themselves would have standing. *Hunt*, 432 U.S. at 343. The local branches in turn, would have standing if their individual members would have standing, and Defendants do not contest that the local branches in the challenged regions of the state have individual members on whose behalf they could assert associational standing.

members] express their collective views and protect their collective interests.” *Id.* (quoting *Hunt*, 432 U.S. at 345). And, for the reasons stated above, the Louisiana NAACP has done that. Accordingly, Defendants’ reliance on *American Legal Foundation v. F.C.C.*, 808 F.2d 84, 90 (D.C. Cir. 1987), and *Coalition for Mercury-Free Drugs v. Sebelius*, 725 F. Supp. 2d 1, 9 n.7 (D.D.C. 2010), *aff’d*, 671 F.3d 1275 (D.C. Cir. 2012) is misplaced. Defs.’ Br. at 7. Not only are these cases outside the Fifth Circuit, but they fail to recognize that Louisiana NAACP members “just have to become members of the branch.” McClanahan Dep. Tr., at 29:11–18.

2. The Louisiana NAACP Has Identified Specific Members with Standing to Pursue VRA Claims as to All Challenged Districts.

The evidence proffered by Plaintiffs establishes a triable issue—at the very least—concerning whether the Louisiana NAACP has individual members who would have standing to bring the Section 2 claims alleged in the complaint in their own right. First, two of the individual plaintiffs have identified themselves as members of the NAACP, Dr. Dorothy Nairne and Rev. Steven Harris. In addition, Mr. McClanahan has repeatedly affirmed that the Louisiana NAACP has identified members who currently reside in a Louisiana Senate or House District that is packed or cracked, and who would reside in a newly created majority-Black district in Plaintiffs’ expert Bill Cooper’s June 2023 illustrative plans. *See* SMF ¶ 28; Ex. 9, McClanahan Decl. ¶ 6. Further, at his deposition, Mr. McClanahan testified that he personally knew members of the Louisiana NAACP throughout the State of Louisiana, has visited many of their houses, and possesses personal knowledge as to many of their residences. SMF ¶ 28, Ex. 7 at 82:11–88:15. Moreover, Mr. McClanahan testified that he reviewed maps of the challenged districts and the illustrative districts to identify at least one member of the Louisiana NAACP (by way of its local branches) within each relevant district, zooming in on specific district boundaries where necessary in close cases to identify which district the member resides in. SMF ¶ 28; Ex. 7, at 129:4–14, 131:2–11;

see also Ex. 9 ¶¶ 4-7. This is information Mr. McClanahan can testify to at trial based upon his personal knowledge. Defendants have had the opportunity to test the basis for that knowledge at Mr. McClanahan’s deposition, and they may use that information to challenge the sufficiency of Plaintiff’s standing evidence at trial. SMF ¶ 28; Ex. 7, at 82:11–88:15.⁷

The Supreme Court has endorsed the Louisiana NAACP’s approach to proving associational standing. In *Alabama Legislative Black Caucus v. Alabama* (“ALBC”), the organizational plaintiff’s representative testified that the organization, a statewide political caucus, “ha[d] members in almost every county.” 575 U.S. 254, 269–70 (2015). The Supreme Court held that based on that evidence, it was reversible error for the district court not to draw a “common sense inference” that the organization had members in the relevant districts. *Id.* at 270. Indeed, “[w]here it is relatively clear, rather than merely speculative, that one or more members have been or will be adversely affected by defendant’s action,” and “where the defendant need not know the identity of a particular member to understand and respond to an organization’s claim of injury,” there is “no purpose to be served by requiring an organization to identify by name the member or members injured.” *Nat’l Council of La Raza v. Cegavske*, 800 F.3d 1032, 1041 (9th Cir. 2015). Other courts have similarly held that organizations with unnamed members have standing where standing “depends only on the facts of [the individual’s] existence and residence in a particular jurisdiction.” *New York v. U.S. Dep’t of Com.*, 351 F. Supp. 3d 502, 606 n.48 (S.D.N.Y. 2019)

⁷ Plaintiffs have objected to production of the personally identifiable information of the Louisiana NAACP’s individual members as such information is protected by the First Amendment’s associational privilege, and Judge Johnson denied Defendants’ motion to compel such information on those grounds. Dkt. 136. To the extent this Court concludes that such information is required to establish the Louisiana NAACP’s associational standing (it should not), the Louisiana NAACP should be afforded additional opportunity to present such evidence. *See* Dkt. 136 at 3, n.1 (indicating that, in the event of a change to the procedural posture of the case, “elementary principles of procedural fairness would likely require that the NAACP have an opportunity to present evidence of member residence” consistent with those rulings) (cleaned up)).

(allowing non-governmental organizational plaintiffs to proceed with unnamed members), *aff'd in part and rev'd in part on other grounds*, 139 S. Ct. 2551 (2019) (holding that governmental plaintiffs possessed standing on other grounds and not addressing the naming issue).

Defendants incorrectly assert that *ALBC* requires the production of a membership list when standing is contested. Defs.' Br. at 9. In *ALBC*, the court instructed the district court to consider on remand a membership list that the Plaintiff had already offered into evidence at the Supreme Court pursuant to Supreme Court Rule 32.3. To the extent *ALBC* can be read to require a plaintiff to produce more specific information concerning its members where standing is contested or the district court requests it, the NAACP has done so here. Unlike *ALBC*, in which the plaintiff asserted simply that it had members "in almost every county in Alabama," but did not offer evidence that "it has members ... in any of the specific districts that it challenged," *ALBC*, 575 U.S. at 269–70, here, the NAACP has offered evidence that it has specific, identified members in specific districts that could be used to create new majority-Black House and Senate districts.

Relying on *Summers v. Earth Island Institute*, defendants further argue that the Louisiana NAACP must identify individual members by name to establish the first prong of associational standing. See Defs.' Br. at 7-10 (citing *Summers v. Earth Island Inst.*, 555 U.S. 488 (2009)). In *Summers*, the plaintiff, an environmental organization, had not alleged that *any* specific member had suffered or would suffer injury-in-fact as a result of the challenged project, but had instead offered only a statistical probability that at least one member would be affected. 555 U.S. at 497-98. The Supreme Court rejected this probabilistic assertion of associational standing. *Id.* Thus, when the Court held that a plaintiff asserting associational standing must "establish[] that at least one *identified* member had suffered or would suffer harm," it was distinguishing the facts of that case, in which no such member could be identified at all—only a probability that such a member

existed. *Id.* *Summers* did not hold that identifying such members *by name* is the only way to satisfy plaintiffs' burden. And as explained above, *ALBC*, decided six years *after Summers*, rejects that notion. 575 U.S. at 270; *see also Democratic Party of Va. v. Brink*, 599 F. Supp. 3d 346, 356 & n.10 (E.D. Va. 2022) (discussing *Summers* and *ALBC* and explaining that *ALBC* “*did not* require the organization to point to specific individuals to prove standing” where “a reasonable inference can be drawn that such individuals exist”) (emphasis in original). The other cases Defendants rely on for the proposition that associational standing requires an organization to name names are either inapposite because they do not involve associational standing or because Plaintiffs had failed to meet *Summers*'s requirement of identifying specific members who were harmed (whether by name or otherwise) and fail to grapple with *ALBC*. *E.g., FW/PBS, Inc. v. City of Dallas*, 493 U.S. 215 (1990) (no membership organization as plaintiff and no assertion of associational standing); *Prairie Rivers Network v. Dynegy Midwest Generation, LLC*, 2 F. 4th 1002, 1009 (7th Cir. 2021) (complaint failed to allege sufficient facts to show that any individual member would be harmed and rejecting probabilistic claim of standing under *Summers*); *Chamber of Com. for Greater Phila. v. City of Philadelphia*, No. 17-cv-1548, 2017 WL 11544778, at *1 (E.D. Pa. May 30, 2017) (same); *S. Walk at Broadlands Homeowner's Ass'n, Inc. v. OpenBand at Broadlands, LLC*, 713 F.3d 175, 184 (4th Cir. 2013) (same); *cf. Pen Am. Ctr., Inc. v. Trump*, 448 F. Supp. 3d 309, 320–21 (S.D.N.Y. 2020) (finding standing where complaint voluntarily identified a member by name and mentioning *Summers* in passing). None of these cases stands for the proposition that a plaintiff must name names when other evidence establishes the existence of an identified member who has standing in their own right.

Indeed, Defendants have not cited (and cannot cite) a single case in which personal knowledge such as that relayed by Mr. McClanahan in his deposition and supporting declaration

was deemed insufficient to establish standing, particularly where an organizational representative was able to identify one member with standing in each relevant district. Under Fifth Circuit precedent, this evidence is sufficient to establish the Louisiana NAACP's associational standing to pursue the claims involved in this litigation. *Funeral Consumers All., Inc. v. Serv. Corp. Int'l*, 695 F.3d 330, 343-44 (5th Cir. 2012) (quoting *United Food & Com. Workers Union Local 751 v. Brown Grp., Inc.*, 517 U.S. 544, 555 (1996)) (requiring only that the plaintiff organization prove it has “at least one member with standing to present, in his or her own right, the claim (or the type of claim) pleaded by the association”).⁸

Defendants' motion for summary judgment must fail because the Louisiana NAACP offered undisputed evidence of the existence of members who are Black registered voters in the relevant districts.

C. Both the Louisiana NAACP and BVM Have Direct Organizational Standing.

1. The Record Demonstrates that the Challenged Plans Have Perceptibly Impaired the Organizational Plaintiffs' Activities and Ability to Carry Out Their Purpose, Creating Article III Standing.

An organization suffers an injury sufficient to confer standing under Article III if its ability to pursue its mission is “perceptibly impaired” by the challenged conduct. *Havens Realty Corp. v. Coleman*, 455 U.S. 363, 379 (1982). An organization can prove standing through “a drain on its resources resulting from counteracting the effects of the defendant's actions.” *La. ACORN Fair Hous. v. LeBlanc*, 211 F.3d 298, 305 (5th Cir. 2000) (citing *Fowler*, 178 F.3d at 360). An

⁸ While naming names might be one way of establishing the existence of such members, nothing in *Summers* requires a particular type or quantum of evidence to establish that an identifiable member has been harmed. While some language in *Summers* might suggest that a plaintiff must name names to establish associational standing, *Summers* does not actually go so far. The issue in *Summers* was not whether the members with sufficiently concrete harms had been named, but whether such members could be identified at all beyond a mere probability that they existed. 555 U.S. at 497-99 (rejecting a test that would rely on a statistical probability that at least one member would be harmed by the challenged activity).

organization suffers a drain on its resources where it devotes resources “toward mitigating [the] real-world impact” of the challenged conduct. *OCA-Greater Houston v. Texas*, 867 F.3d 604, 612 (5th Cir. 2017). “[T]he injury alleged as an Article III injury-in-fact need not be substantial; it need not measure more than an identifiable trifle.” *Id.* (cleaned up); *see also United States v. Students Challenging Regul. Agency Procs.*, 412 U.S. 669, 689 n.14 (1973) (explicitly rejecting a requirement that an injury be significant and noting that injuries such as “a fraction of a vote, a \$5 fine and costs, and a \$1.50 poll tax” are sufficient to constitute an injury-in-fact (internal citations omitted)).

Here, as in *OCA*, each of the Organizational Plaintiffs “went out of its way to counteract the effect” of the challenged redistricting map. 867 F.3d at 612. BVM created an entirely new accountability project to hold elected representatives accountable in uncompetitive districts. The NAACP worked to engage Black voters in areas of the state where the plans packed and cracked them, creating uncompetitive districts, reducing planned efforts in other parts of the state and eliminating other planned activities. As in *OCA*, and unlike *City of Kyle*, these voter education efforts were not related to or incurred in the service of litigation. *Id.* at 612-13 (distinguishing *City of Kyle*, 626 F.3d at 238). These diversions of resources are sufficient to establish direct organizational standing. *OCA*, 867 F.3d at 612; *Fowler*, 78 F.3d at 360; *see also Harding v. Edwards*, 484 F. Supp. 3d 299, 316 (M.D. La. 2020) (finding standing where organizations demonstrated “concrete spending changes and new initiatives in response to Defendants’ actions”).

Defendants contend that this reallocation of resources from one part of the state to another part amounts to “‘routine’ strategic ‘activities’ of an advocacy group.” Defs.’ Br. at 12. It is difficult to imagine a starker diversion of resources than a decision not to engage in specific planned activities in one part of the state in order to increase resources devoted to voter engagement

in another part of the state, as Mr. McClanahan described (SMF ¶ 31; Ex. 7 at 103:1–8, 104:1), or as Ms. Ho-Sang described, diverting resources from planned voter education and registration projects to efforts to ensure elected officials in uncompetitive districts are held accountable to Black voters (SMF ¶¶ 14-15; Ex. 1 at 49:3–13; Ex. 3, ¶¶ 21–26). And as this evidence makes clear, Defendants’ contention that Plaintiffs identified no cost increase or concrete activities that were forgone (Defs.’ Br. at 12), is simply false: It is the increased cost of voter engagement in uncompetitive districts forsaken by political campaigns and where elected officials are not accountable that requires a shift of resources from other districts and projects. Moreover, *NAACP v. City of Kyle*, on which Defendants rely for this assertion, dealt with resources dedicated to lobbying, which would have been dedicated to the same activities regardless of the challenged conduct. *See* 626 F.3d 233, 238 (5th Cir. 2010). It provides no support for the notion that an allocation of organizational resources that are directly shaped by the challenged conduct are insufficient to establish standing simply because an organization must make decisions about how to allocate its resources in any event. It is not the fact of allocating organizational resources that is at issue. It is the specific dedication of substantial resources to activities that were not planned and that would not be conducted but for the challenged redistricting plan that constitutes the injury, SMF ¶ 31; Ex. 7 at 103:1–8, Ex. 9 ¶¶ 9–21; Ex. 3, ¶¶ 24–26, and that is sufficient to establish injury-in-fact for standing purposes. *OCA*, 867 F.3d at 612; *Fowler*, 78 F.3d at 360; *Harding*, 484 F. Supp. 3d at 316.

Defendants further argue that “to extent that the Louisiana NAACP claims injury from reduced excitement of Black voters, see, e.g., SMF ¶ 30, that ‘simply’ describes ‘a setback to the organization’s abstract . . . interests.’” Defs.’ Br. at 12 (citing *Havens Realty*, 455 U.S. at 379). But as explained above, Mr. McClanahan described the concrete ways in which “reduced excitement

of Black voters” impacts the organization’s ability to carry out its mission and the increases the resources required to do so. Additionally, apart from voter apathy, Mr. McClanahan explains how the reduced resources expended by other organizations as a result of uncompetitive elections causes an increased burden on the Louisiana NAACP. Those concrete impacts are sufficient to confer organizational standing.

The cases Defendants cite for the proposition that the BVM cannot support standing based on resources expended during the period “when the Louisiana Legislature was deliberating over redistricting plans, but before the challenged plans were adopted” do not support Defendants’ argument. Defs.’ Br. at 13. *Kyle* establishes only that “routine lobbying activities” that of a “dedicated lobbying organization” that are indistinguishable from an organization’s ordinary expenditures cannot establish standing if those activities cannot be shown to “frustrate,” “complicate,” or “curtail” the organization’s other routine activities, or to “perceptibly impair” the organization’s ability to “carry out its purpose.” *OCA-Greater Houston*, 867 F.3d at 610-12 (citing *City of Kyle*, 626 F.3d at 238-39); *see also US Inventor Inc. v. Vidal*, No. 21-40601, 2022 WL 4595001, at *5 (5th Cir. Sept. 30, 2022) (per curiam) (rejecting standing where alleged injury consisted of activities solely connected to the organization’s routine lobbying on behalf of its members). There is at least a genuine dispute of material fact regarding whether the significant resources that BVM expended toward advocating for fair and lawful maps can be described as a routine or ordinary organizational activity. *See infra* at 6-8 (describing BVM’s extensive efforts to fight for fair maps). And there is at least a genuine dispute of material fact regarding whether the diversion of these resources frustrated, complicated, or curtailed BVM’s other activities. *Id.*

In any event, while BVM expended significant resources prior to the plans’ adoption to try to prevent the unlawful maps from taking effect and diluting the votes of Black Louisianans in the

first place, the record makes plain that BVM’s diversion of resources was not *limited* to the period before the legislature passed the challenged maps. Indeed, in her deposition, Ms. Ho-Sang specifically testified that: “there were costs leading into the redistricting, there were costs during the redistricting takeover, *and there were costs after as well*” that were diverted from the BVM’s other activities. SMF ¶ 15; Ex. 1 at 52:1–4. As long as the unlawful maps remain in place, BVM will continue to need to divert resources from its core activities (*i.e.*, voter registration efforts, or educating constituents on issues that are important to Black voters in Louisiana) toward engaging with the elected officials that represent Black voters in unlawfully packed and cracked districts, and toward convincing Black voters who rightfully believe that the maps dilute their power that their votes still matter. SMF ¶¶ 15–16; Ex. 3, ¶¶ 23–26. And the enacted maps’ dilutive effect on BVM’s constituents “frustrates,” “complicates,” and fundamentally impairs BVM’s core mission: to expand Black voter engagement and increase power in marginalized, predominantly Black communities. *OCA-Greater Houston*, 867 F.3d at 610; *US Inventor Inc.*, 2022 WL 4595001, at *5. *See*; SMF ¶ 9; Ex. 2, BVM-LA-Leg 0005178-81; Ex. 3, ¶ 4. This “concrete and demonstrable injury to the organization’s activities” additionally constitutes “far more than simply a setback to the organization’s abstract social interests,” *Havens Realty*, 455 U.S. at 379, and is sufficient to demonstrate standing.

Both of the Organizational Plaintiffs have met their burden of establishing triable issues concerning direct injury they suffered, and summary judgment should be denied.

2. The Organizational Plaintiffs Have Statutory Standing.

As the Supreme Court held in *Morse v. Republican Party of Virginia*, “the existence of the private right of action under Section 2 . . . has been clearly intended by Congress since 1965.” 517 U.S. 186, 232 (1996) (Stevens, J.) (plurality opinion on behalf of two justices) (alteration in original) (quoting S. Rep. No. 97-417, pt. 1, at 30 (1982)); *accord id.* at 240 (Breyer, J., concurring)

(expressly agreeing with Justice Stevens on this point on behalf of three justices). This Court has previously rejected a challenge to Section 2’s private right of action and found it “undisputed that the Supreme Court and federal district courts have repeatedly heard cases brought by private plaintiffs under Section 2.” *Robinson v. Ardoin*, 605 F. Supp. 3d 759, 819 (M.D. La.), *cert. granted before judgment*, 142 S. Ct. 2892, 213 L. Ed. 2d 1107 (2022), and *cert. dismissed as improvidently granted*, 143 S. Ct. 2654 (2023). It is equally true that the federal courts have repeatedly heard cases under Section 2 brought by civic engagement organizations such as the Organizational Plaintiffs here. *See, e.g., OCA-Greater Houston*, 867 F.3d at 610 (finding OCA-Greater Houston had organizational standing to bring Section 2 challenge); *Ne. Ohio Coal. for the Homeless v. Husted*, 837 F.3d 612, 624 (6th Cir. 2016) (“NEOCH has standing for its VRA claims”); *Harding*, 484 F. Supp. 3d at 314-16 (M.D. La. 2020) (finding the Louisiana NAACP had direct organizational standing to pursue a Section 2 claim); *People First of Alabama v. Merrill*, No. 2:20-CV-00619-AKK, 2020 WL 4747641 (N.D. Ala. Aug. 17, 2020); *Veasey v. Perry*, 29 F. Supp. 3d 896, 906 (S.D. Tex. 2014) (rejecting statutory standing argument, stating, “Organizations and private parties have been permitted to enforce Section 2 of the VRA, both before and after the 2001 *Alexander [v. Sandoval]* case on which Defendants rely,” and collecting cases).

In contrast to this substantial authority recognizing the ability of organizations such as the Louisiana NAACP and BVM to bring Section 2 cases, Defendants cite no case holding the contrary, that Section 2’s private right of action does not extend to organizations. Instead, Defendants argue that Organizational Plaintiffs are not “aggrieved persons” within the meaning of the VRA, citing inapposite lawsuits brought by candidates or local governments. Defs.’ Br. at 14-15 (collecting cases brought by candidates or local governments). In *Veasey*, the court rejected statutory standing for local governments under Section 2, but held that voting rights organizations

asserting organizational standing have statutory standing as “aggrieved persons” under the Voting Rights Act. *Veasey*, 29 F.Supp.3d at 902-09. And the legislative history of the VRA is in accord with *Veasey*. The Senate report accompanying the 1975 amendments to the Voting Rights Act, which added the “aggrieved person” language, states clearly that “[a]n ‘aggrieved person’ is *any person* injured by an act of discrimination. It may be an individual *or an organization* representing the interests of injured persons.” S. Rep. No. 94-295, at 40, *reprinted in* 1975 U.S. Code Cong. & Admin. News 774, 806–807 (emphasis added). It is undisputed that both Organizational Plaintiffs brought this litigation to protect the interests of Black voters whose votes are diluted under the enacted redistricting plans. Accordingly, they are aggrieved persons and have “statutory standing” to bring suit under Section 2 of the Voting Rights Act, and the motion for summary judgment should be denied.

IV. CONCLUSION

For the reasons stated above, both the Individual Plaintiffs and the Organizational Plaintiffs have standing to bring their claims rooted in Section 2 of the Voting Rights Act and the Defendants’ motion for summary judgment should be denied in its entirety.

DATED: October 27, 2023

Respectfully submitted,

John Adcock (La. Bar No. 30372)
Adcock Law LLC
Louisiana Bar No. 30372
3110 Canal Street
New Orleans, LA 70119
jnadcock@gmail.com

Ron Wilson (La. Bar No. 13575)
701 Poydras Street, Suite 4100
New Orleans, LA 70139
cabral2@aol.com

Nora Ahmed (N.Y. Bar. No. 5092374)
ACLU Foundation of Louisiana
1340 Poydras St., Suite 2160
New Orleans, LA 70112
NAhmed@laaclu.org

Sarah Brannon*
Megan C. Keenan**
American Civil Liberties Union Foundation
915 15th St. NW
Washington, DC 20005
sbrannon@aclu.org
mkeenan@aclu.org

Michael de Leeuw*
Amanda Giglio*
Cozen O'Connor
3 WTC, 175 Greenwich St.,
55th Floor
New York, NY 10007
MdeLeeuw@cozen.com
AGiglio@cozen.com

Josephine Bahn**
Cozen O'Connor
1200 19th Street NW
Washington, D.C. 20036
JBahn@cozen.com

/s/ I. Sara Rohani

I. Sara Rohani*
NAACP Legal Defense & Educational Fund
700 14th Street, Suite 600
Washington, DC 20005
srohani@naacpldf.org

Leah Aden*
Stuart Naifeh*
Victoria Wenger*
NAACP Legal Defense & Educational Fund
40 Rector Street, 5th Floor
New York, NY 10006
laden@naacpldf.org
snaifeh@naacpldf.org
vwenger@naacpldf.org

Sophia Lin Lakin*
Dayton Campbell-Harris**
Luis Manuel Rico Román**
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004
slakin@aclu.org
dcampbell-harris@aclu.org
lroman@aclu.org

T. Alora Thomas-Lundborg*
Election Law Clinic
Harvard Law School
6 Everett Street, Ste. 4105
Cambridge, MA 02138
tthomaslundborg@law.harvard.edu

Attorneys for Plaintiffs

*Admitted Pro Hac Vice

**Pro Hac Vice Motion Forthcoming

CERTIFICATE OF SERVICE

I certify that on October 27, 2023 this document was filed electronically on the Court's electronic case filing system. Notice of the filing will be served on all counsel of record through the Court's system.

/s/ I. Sara Rohani

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA**

DR. DOROTHY NAIRNE, REV. CLEE
EARNEST LOWE, DR. ALICE
WASHINGTON, STEVEN HARRIS, BLACK
VOTERS MATTER CAPACITY BUILDING
INSTITUTE, and THE LOUISIANA STATE
CONFERENCE OF THE NAACP,

Plaintiffs,

v.

R. KYLE ARDOIN, in his official capacity as
Secretary of State of Louisiana

Defendant.

CIVIL ACTION NO. 3:22-cv-00178
SDD-SDJ

Chief Judge Shelly D. Dick

Magistrate Judge Scott D. Johnson

**PLAINTIFFS' OPPOSING STATEMENT OF
DISPUTED AND UNDISPUTED MATERIAL FACTS**

Pursuant to Local Rule 56(c), Plaintiffs Dr. Dorothy Nairne, Rev. Clee Earnest Lowe, Dr. Alice Washington, Steven Harris, Black Voters Matter Capacity Building Institute, and the Louisiana State Conference of the NAACP (collectively, "Plaintiffs") respectfully submit this Opposing Statement of Material Facts in support of their Opposition to Defendants' Motion for Summary Judgment:

Defendants' Statement of Fact No. 1:

This case involves a single cause of action under Section 2 of the Voting Rights Act challenging the Louisiana house and senate redistricting plans the Legislature enacted in 2022. *See* Amend. Compl., Rec. Doc. 14, at 56–58.

Plaintiffs' Response:

Admitted.

Defendants' Statement of Fact No. 2:

The operative complaint lists six individuals as Plaintiffs: Dr. Dorothy Nairne, Jarrett Lofton, Rev. Clee Earnest Lowe, Dr. Alice Washington, Steven Harris, and Alexis Calhoun. *Id.* at ¶¶ 14–25.

Plaintiffs' Response:

Admitted.

Defendants' Statement of Fact No. 3:

Plaintiffs Lofton and Calhoun have since voluntarily dismissed their claims. *See* Rec. Doc. 133. The four individuals who remain as Plaintiffs are Dr. Nairne, Rev. Lowe, Dr. Washington, and Mr. Harris (the “Individual Plaintiffs”).

Plaintiffs' Response:

Admitted.

Defendants' Statement of Fact No. 4:

The Individual Plaintiffs allege that they reside in HD25, HD60, HD66, and HD69. Amend. Compl., Rec. Doc. 14, at ¶¶ 15, 19, 21, 23.

Plaintiffs' Response:

Qualified. The Individual Plaintiffs have declared under penalty of perjury that, to the best of their knowledge and recollection, they reside in House Districts 25, 60, 66, and 69. ECF No. 149-3, Individual Pls.’ Resp. to Interrogs., at 4, 29, 51, 72.

Defendants’ Statement of Fact No. 5:

The Individual Plaintiffs allege that they reside in SD2, SD5, SD16, and SD29. *See* Ex. 1¹ at 4, 29, 51, 72. No Individual Plaintiff resides in any state legislative district other than HD25, HD60, HD66, HD69, SD2, SD5, SD16, or SD29. *See id.* Several of these districts are already majority-minority districts. *See* Ex. 2² at 1–2.

Plaintiffs’ Response:

Denied. The Individual Plaintiffs have declared under penalty of perjury that, to the best of their knowledge and recollection, they reside in House Districts 25, 60, 66, and 69, and Senate Districts 2, 16, and 29. Individual Pls.’ Resp. to Interrogs., ECF No. 149-3, at 4, 29, 51, 72.

Defendants’ Statement of Fact No. 6:

The operative complaint lists two Entity Plaintiffs, Black Voters Matter Capacity Building Institute (“BVM”) and the Louisiana State Conference of the National Association for the Advancement of Colored People (the “Louisiana NAACP”). Amend. Compl., Rec. Doc. 14, at ¶¶ 26, 39.

Plaintiffs’ Response:

Admitted.

¹ Individual Plaintiffs’ Responses to Def. Ardoin’s First Set of Discovery are attached as Exhibit 1. Citations to the combined discovery responses will be designated as “Ex. 1 at ___”. Pursuant to Fed. R. Civ. P. 5.2, Individual Plaintiffs’ personal home addresses and dates of birth have been redacted in Exhibit 1.

² Attached as Exhibit 2 are Corrected Exhibits H-1 and I-1 to Mr. William S. Cooper’s sworn Corrected Expert Report dated August 11, 2023. Citations to these combined exhibits will be designated as “Ex. 2 at ___”.

Defendants’ Statement of Fact No. 7:

The Entity Plaintiffs are both non-profit corporations. *See* NAACP Dep. Tr.³ 21:10–12; 22:21–23:23; 50:2–4; BVM Dep. Tr.⁴ 12:11–13:7.

Plaintiffs’ Response:

Admitted.

Defendants’ Statement of Fact No. 8:

Plaintiffs ask the Court to declare both house and senate redistricting plans invalid in their entirety and enjoin them in full. *See* Amend. Compl., Rec. Doc. 14, Prayer for Relief ¶¶ A and B.

Plaintiffs’ Response:

Denied. Plaintiffs claim that Defendants violated the mandates of Section 2 by enacting legislative maps for the Louisiana State Senate and Louisiana State House of Representatives that unlawfully deprive Louisiana’s Black voters of a meaningful opportunity to elect candidates of their choice to the State Senate and House of Representatives. In the Senate map, the Black vote has been diluted in the Shreveport area, Jefferson Parish, and in the East Baton Rouge area. To establish *Gingles* I, Plaintiffs have proffered an illustrative map, which creates new districts that are numbered as Senate District 38, 19, and 17. In the House map, the Black vote has been diluted in the Shreveport area, the East Baton Rouge area, the Ascension area, Lake Charles area, and the Natchitoches area. To establish *Gingles* I, Plaintiffs have proffered an illustrative map, which creates new districts that are numbered as House District 1, 65, 68, 69, 60, 38, and 23.

³ Attached as Exhibit 3 are pertinent excerpts from the Louisiana State Conference of the NAACP 30(b)(6) Deposition Transcript, for which President Michael McClanahan served as the 30(b)(6) designee. Citations to these transcript excerpts will be designated as “NAACP Dep. Tr.”

⁴ Attached as Exhibit 4 are pertinent excerpts from Black Voters Matter Capacity Building Institute 30(b)(6) Deposition Transcript, for which Ms. Omari Ho-Sang served as the 30(b)(6) designee. Citations to these transcript excerpts will be designated as “BVM Dep. Tr.”

Plaintiffs have not challenged the maps in their entirety. Plaintiffs’ illustrative districts directly implicate the following enacted districts: House Districts 1, 2, 3, 4, 5, 6, 7, 8, 9, 13, 22, 25, 29, 34, 35, 36, 37, 47, 57, 58, 59, 60, 61, 62, 63, 65, 66, 67, 68, 69, 70, 81, 88, and 101, and Senate Districts 2, 5, 7, 8, 10, 14, 15, 17, 19, 31, 36, 38, and 39. *See* Am. Compl., ECF No. 14, ¶¶ 90, 96, 105–108, 112–115; Am. Compl., Exs. 1–4; NAACP Supp. Resp. to Interrogs., ECF No. 149-7, at 2–3 (focusing on data “[a]s to each Louisiana State House and State Senate District at issue in the Complaint”); Individual Pls.’ Resp. to Interrogs., ECF No. 149-3, at 4, 6, 30, 52–53, 73–74. In addition, in remedying the vote dilution Plaintiffs allege, other districts may be indirectly affected. *See, e.g.*, Ex. 2.

Defendants’ Statement of Fact No. 9:

Headquartered in Atlanta, Georgia, BVM is a general advocacy organization focusing on the goal of increasing the outreach capacity of other organizations engaged in voter participation and increasing black voter turnout. BVM Dep. Tr. 10:22–11:3; 18:7–25; 25:2–23; 27:3–7. BVM operates in twenty-five states across the country. *Id.* at 18:7–25. BVM maintains an office in Shreveport, Louisiana. *Id.* at 19:22–24; 20:14–19.

Plaintiffs’ Response:

Qualified. In addition to increasing voter turnout, BVM supports partners’ missions by increasing capacity to address their concerns and issuing grants. Ex. 1, Ho-Sang Dep. Tr. at 11:3–20. 32. BVM’s core mission is to “expand Black voter engagement” and “increase power in marginalized, predominantly Black communities.” Ex. 2, BVM-LA-Leg 0005179–81; Ex. 3, Ho-Sang Decl. ¶ 4.

Defendants’ Statement of Fact No. 10:

BVM does not have individual members. *Id.* at 24:12–15.

Plaintiffs' Response:

Denied. Although BVM does not have a formal membership structure, BVM has a network of community partners focused on increasing voter participation, and BVM has a significant constituency of individuals and organizations in Louisiana's Black communities who are the primary beneficiaries of BVM's activities. Ho-Sang Dep. Tr. at 11:11–20, 24:12–17; Ho-Sang Decl. ¶¶ 7–11.

Defendants' Statement of Fact No. 11:

BVM works with community “partners,” which it defines as organizations who “work with or around increasing voter participation.” *Id.* at 11:11–20. BVM estimates that it has between 50 to 58 partners in Louisiana. *Id.* at 24:16–18.

Plaintiffs' Response:

Denied. BVM has a significant constituency of individuals and organizations in Louisiana's Black communities who are the primary beneficiaries of BVM's activities. Ho-Sang Decl. ¶¶ 7–11. BVM's constituency consists of its “partners, their communities, and their members.” Ho-Sang Dep. Tr. at 24:10–11; Ho-Sang Decl. ¶¶ 7–11. BVM has approximately 60 partners in Louisiana, and those community partners engage in voter education and on-the-ground efforts to increase voter participation. Ho-Sang Dep. Tr. at 34:17–18; Ho-Sang Decl. ¶ 9.

Defendants' Statement of Fact No. 12:

Partners are entities BVM “support[s]” with financing or assistance “with the planning process” of “partner initiatives.” *Id.* at 27:20–23.

Plaintiffs' Response:

Qualified. A partner is an organization or entity that BVM works with to “increase voter participation.” Ho-Sang Dep. Tr. at 11:12–14; Ho-Sang Decl. ¶ 9. BVM supports partners' missions by increasing their partners capacity to address their concerns, including by issuing grants

and by coordinating with and training their leadership and members. Ho-Sang Dep. Tr. at 11:3–20; Ho-Sang Decl. ¶¶ 9–10.

Defendants’ Statement of Fact No. 13:

BVM does not have partners in every parish in Louisiana. *Id.* at 62:7–10.

Plaintiffs’ Response:

Qualified. BVM does not have partners in every parish in Louisiana, but BVM’s constituents include Black voters in many Parishes where the State’s newly enacted maps dilute the voting strength of Black voters, such as Bossier, Caddo, Jefferson, St. Charles, East Baton Rouge, West Baton Rouge, De Soto, Natchitoches, Red River, Ascension, and East Feliciana. Ho-Sang Dep. Tr. at 59:22–60:6; Ho-Sang Decl. ¶ 7.

Defendants’ Statement of Fact No. 14:

Not all BVM partners are involved with initiatives relating to redistricting or the redistricting cycle. *Id.* at 26:25–27:14.

Plaintiffs’ Response:

Denied. All BVM’s partners are involved in increasing voter participation, Ho-Sang Dep. Tr. at 11:12–20; Ho-Sang Decl. ¶ 9, which now requires a more nuanced approach in response to the unlawful maps passed in Louisiana’s latest redistricting cycle, Ho-Sang Dep. Tr. at 49:3–13. The unlawful maps passed in this redistricting cycle impact and impair BVM’s and its partners’ core mission and activities designed to increase Black voter participation, because maps that dilute Black voting power cause BVM constituents and other voters become disillusioned with the process and become apathetic. Ho-Sang Decl. ¶¶ 23–26. In response to the last redistricting cycle, BVM’s partners will require more resources to encourage participation when voters know the challenges that Black candidates of choice face. *Id.*

Defendants' Statement of Fact No. 15:

BVM claims that, as a result of the redistricting process, it diverted time and funds it might have otherwise used towards funding its partners' non-redistricting purposes and missions. *Id.* at 47:15–48:25. Specifically, BVM points to costs associated with a bus tour it coordinated during the legislative redistricting and related events from before the maps became law. *Id.* at 50:13–52:4.

Plaintiffs' Response:

Qualified. In addition to the costs associated with the bus tour, BVM spent additional staff and partner time responding to Louisiana's redistricting. *Id.* at 47:21–48:1; *see* Ex. 4, BVM-LA-Leg 0002891–93. BVM diverted and expended costs prior to, during, and after redistricting. Ho-Sang Dep. Tr. at 52:1–4.

During the redistricting process, funds were moved from other aspects of BVM to instead cover: (1) “mini grants to partners that participated in the process,” (2) payments for “lodging for out-of-town partners during redistricting takeover,” (3) a “big bus for the redistricting takeover,” (4) outreach costs, such as broadcast texting, and (5) events and event planners. Ho-Sang Dep. Tr. at 50:3–51:22; Ho-Sang Decl. ¶¶ 16–19.

After the Legislature passed S.B. 1 and H.B. 14, BVM has continued to divert resources toward combatting the discriminatory state legislative maps. Ho-Sang Decl. ¶ 21. In addition to calling for the Governor to veto the maps, *id.* ¶ 22, BVM also developed a campaign to hold legislators accountable for voting against fair maps and diluting Black Louisianans' votes and, even in the face of that dilution, to “mak[e] sure that those who make it to the office uphold their responsibilities in ensuring fair and equal representation in our communities.” Ex. 5, BVM-LA-Leg 0000383–84; *see also* Ex. 6, BVM-LA-Leg 0003053, 0005833–36, 0005840.

Thus, as a result of the unlawful maps, BVM will continue to need to divert resources from its core activities (*i.e.*, voter registration efforts, or educating constituents on issues that are

important to Black voters in Louisiana) toward finding ways to hold elected officials accountable, even in districts where Black voters are unable to elect their candidate of choice and are receiving unfair representation. BVM will need to divert resources toward engaging with the candidates that represent Black voters in these parishes, to try to ensure that Black voters have a voice and opportunity to be heard by their elected officials despite being denied political power as a result of the enacted maps. Ho-Sang Decl. ¶¶ 24–25.

Defendants’ Statement of Fact No. 16:

BVM also claims that the redistricting process has created an “increasing sentiment” amongst communities that their votes do not count, which BVM asserts requires a “nuanced approach” to initiatives and events. *Id.* at 49:1–13.

Plaintiffs’ Response:

Qualified. When the Legislature acts to weaken the voices of Black voters, such as by enacting maps that dilute Black voting strength, BVM constituents and other voters become disillusioned with the process and become apathetic. Ho-Sang Decl. ¶ 24. The increased sentiment that a person’s vote does not count due to the redistricting process has affected how BVM organizes, *id.* at 49:8–13, which is how BVM engages with partners and fulfills its mission of increasing voter engagement, *id.* at 26:16–24; Ho-Sang Decl. ¶ 24; Am. Compl., ¶ 26.

In the unlawful districts, more resources will be required to encourage participation when voters know the unfair challenges that Black candidates of choice face as a result of the maps’ dilution of Black voters’ power. Additionally, more resources will be required when advocating for BVM constituents’ preferred positions with elected officials who are not the Black candidate of choice. As long as the discriminatory maps remain in place, BVM will have to redouble its efforts to engage Black voters and convince them that their vote matters, which will require

diversion of more of BVM's resources and will make it more difficult to accomplish other organizational goals. Ho-Sang Decl. ¶¶ 24–26.

Defendants' Statement of Fact No. 17:

BVM has continued funding and providing grants for its partners. Ho-Sang Dep. Tr. at 57:13–58:2. BVM cannot identify any specific grants or grant applications that did not receive funding as a result of the challenged redistricting plans. *Id.* at 58:3–8.

Plaintiffs' Response:

Denied. BVM explained that it provided mini grants to partners that participated in the redistricting process instead of spending that money on “more general [get out the vote efforts] to really increase the number of registered voters in a community” or “more teachings” to educate the community on BVM's core issues. Ho-Sang Dep. Tr. at 47:21–48:25.

Defendants' Statement of Fact No. 18:

The Louisiana NAACP is a volunteer-based 501(c)(4) organization, run by a statewide executive committee. NAACP Dep. Tr. 21:10–12; 22:21–23:23; 50:2–4. Within Louisiana, there are eight NAACP districts. *Id.* at 23:24–24:3.

Plaintiffs' Response:

Qualified. The Louisiana NAACP's membership and organizational structure is set forth in its by-laws. Ex. 7, McClanahan Dep. Tr. at 18:20–24, 135:1–10.

Defendants' Statement of Fact No. 19:

The Louisiana NAACP itself does not have individual members, nor does it maintain membership lists. *Id.* at 29:11–15; 37:9–14; 38:16–21. Instead, individual NAACP members belong to their local chapters, or branches, *id.* at 37:11–38:15, which are separate 501(c)(4) organizations, *id.* at 50:9–11, and those local chapters are monitored by the national NAACP, the

Louisiana NAACP's parent organization, *id.* at 32:5–7; 20:8–20. There are estimated to be roughly 40 branches of the NAACP in Louisiana. *Id.* at 19:18–23.

Plaintiffs' Response:

Denied. The National NAACP is made up of state (or state-area) conferences, which are in turn made up of local branches and chapters. *See* Ex. 8, Louisiana NAACP Bylaws, at art. I, § 1. The state conferences, branches, and chapters are collectively known as “units.” *Id.* at art. I, § 1, art. III, § 2. Units are not separately incorporated entities. *Id.* at art. III, § 1. When an individual becomes a member of the NAACP, they become a member of all the units covering the geographic area in which they live or work as well as the national NAACP, *Id.* at art. VI, §§ 1, 3, and that may include the local branch if one exists in the member's area. McClanahan Dep. Tr. at 29:11–18. The Louisiana NAACP is a membership organization that collects dues from paying members and aims to serve all Black Louisianians regardless of their membership status. *See* Ex. 9, McClanahan Decl. ¶ 4.

Defendants' Statement of Fact No. 20:

The national office of the NAACP is responsible for monitoring which branches and units are deemed out of compliance with any of the organization's standards. *Id.* at 20:8–20. The Louisiana NAACP does not receive lists or rosters of branches or members who are not in good standing, nor does the Louisiana NAACP do anything to independently verify standing status with the national organization. *Id.* at 36:11–37:8.

Plaintiffs' Response:

Denied. The Louisiana NAACP receives membership information from its branches to determine whether each branch is in good standing. McClanahan Dep. Tr. at 35:17–37:4; *see also* NAACP Bylaws, at art. IV, § 4; Louisiana NAACP Bylaws, at art. I, § 2(d), art. I, § 1(b); art. III,

§ 2 (defining a branch to be one type of NAACP Unit). The Louisiana NAACP directly supervises the local branches, which are constituent members of the State Conference. McClanahan Dep. Tr. at 18:18–24, 29:11–18, 32:2–7, 38:16–21, 43:1–5, 49:17–22.

Defendants’ Statement of Fact No. 21:

At least one Louisiana NAACP branch is not in good standing. *Id.* at 30:10–31:6.

Plaintiffs’ Response:

Denied. The testimony of the Louisiana NAACP’s Chapter President, Michael McClanahan, was that at least one Louisiana NAACP branch was not in good standing as of “last year’s state convention,” and that the Louisiana NAACP and President McClanahan actively “try[] to get them all to be in good standing.” McClanahan Dep. Tr. at 30:10–31:6.

Defendants’ Statement of Fact No. 22:

Membership in an NAACP branch simply requires dues payments. *Id.* at 28:11–16. There are no age or race requirements for membership. *Id.* at 28:11–29:1. One does not need to be a registered voter in order to be a member. *Id.* at 29:2–4; 29:11–30:4. Even “a baby” could join an NAACP branch. *Id.* at 28:19–21.

Plaintiffs’ Response:

Qualified. Each branch must have at least 50 adult members. NAACP Bylaws, at art. III, § 3(b)(i) (explaining that members of any unit are automatically members of the national NAACP, and that “members of [local units] are members of the State/State-Area Conference”); *see also id.* at art. IV, § 4 (describing membership requirements to join branches); McClanahan Dep. Tr. at 20:3–7. While the NAACP accepts members of all races and ethnicities, most members of the Louisiana NAACP are Black. McClanahan Decl. ¶ 4.

Defendants’ Statement of Fact No. 23:

The Louisiana NAACP does not receive notices when NAACP members pass away, *id.* at 34:9–21, nor is the organization aware of how—or even if—each branch updates their membership roster when a death occurs, *id.* at 34:21–25.

Plaintiffs’ Response:

Denied. The Louisiana NAACP “regularly” receives notice of its deceased members. McClanahan Dep. Tr. at 34:11–14. Once it receives notice, the Louisiana NAACP attempts to contact the decedent’s family and removes their name from any membership lists. *Id.* at 34:17–25.

Defendants’ Statement of Fact No. 24:

The Louisiana NAACP asserts that its president, Michael McClanahan, has identified branch members in specific house and senate districts challenged in this case. *See* Ex. 5.⁵ The Louisiana NAACP declines to identify branch members or permit discovery concerning them. *See, e.g.,* Rec. Doc. 119.

Plaintiffs’ Response:

Qualified. In response to Defendant Ardoin’s interrogatory seeking personally identifying information of members in each district at issue in this litigation, the Louisiana NAACP provided a list of districts that would be directly involved in the creation of additional majority-Black districts in Mr. Cooper’s June 2023 illustrative plan and in which it had identified individual members. Exh. 5. The Louisiana NAACP did not adopt the Defendants’ undefined conception of “challenged district.” The identity of the Louisiana NAACP’s members is protected by the “associational and privacy rights guaranteed by the First and Fourteenth Amendments.” *Hastings*

⁵ Attached as Exhibit 5 are Louisiana State Conference of the NAACP’s Supplemental Response to Interrogatory No. 3, served on September 1, 2023. Citations to this exhibit will be designated as “Ex. 5 at ____”.

v. Ne. Indep. Sch. Dist., 615 F.2d 628, 631 (5th Cir. 1980). Defendants moved to compel discovery regarding the identity of the Louisiana NAACP's members. ECF No. 132, Defendant's Mtn. to Compel. The Motion was referred to Magistrate Judge Scott D. Johnson. In the order denying the Motion to Compel, Judge Johnson held that "Defendant has not provided any reason to justify its request for the name, address, age, phone number, and occupation of every single member in every challenged district." *Nairne v. Ardoin*, NO. 22-178-SDD-SDJ, at 3 (M.D. La. Sept. 8, 2023), ECF No. 136.

Defendants' Statement of Fact No. 25:

Mr. McClanahan does not know how many senate districts the state of Louisiana has, *id.* at 62:24–63:4, nor can he identify the addresses of any branch members, *id.* at 66:5–68:14.

Plaintiffs' Response:

Denied. Mr. McClanahan testified that he identified at least one member of the NAACP in Senate Districts 2, 7, 15, 17, 19, 38, and 39. McClanahan Dep. Tr. at 90:9–91:5; *see also* Ex. 9, McClanahan Decl. ¶¶ 5-7. Consistent with the Louisiana NAACP's assertion of its members' associational privilege, Mr. McClanahan was instructed not to answer questions seeking personally identifying information of members, including addresses. E.g., McClanahan Dep. Tr. at 66:7-9

Defendants' Statement of Fact No. 26:

Mr. McClanahan does not know how many house districts Louisiana has, *id.* at Tr. 81:12–16.

Plaintiffs' Response:

Denied. Mr. McClanahan testified that he identified at least one member of the NAACP in House Districts 1, 3, 4, 29, 34, 38, 57, 58, 60, 61, 63, 65, 68, 69, and 101. McClanahan Dep. Tr. at 90:9–91:5; *see also* Ex. 9, McClanahan Decl. at ¶¶ 5-7

Defendants' Statement of Fact No. 27:

Mr. McClanahan does not have a membership list for the Louisiana NAACP, nor did he review or reference any list or roster prior to asserting that the Louisiana NAACP has members in the districts challenged in this lawsuit. *Id.* at 74:6–16; 81:24–82:2; 82:11–15; 82:25–83:21

Plaintiffs' Response:

Denied. Mr. McClanahan has reviewed NAACP membership information to confirm at least one member who is eligible to vote resides in each challenged district. *See* Ex. 9, McClanahan Decl. ¶¶ 5-7. Mr. McClanahan stated that he had not reviewed a “list” of members to prepare his answers to the Interrogatories. E.g., McClanahan Dep. Tr. at 74:6–16. He did not testify that no such list exists.

Defendants' Statement of Fact No. 28:

Mr. McClanahan does not know whether branch members have moved since he allegedly became aware of their presence in the specific districts or if the members are registered to vote or are even Black. *Id.* at 84:17–85:14; 89:5–13.

Plaintiffs' Response:

Denied. Mr. McClanahan is aware of the Louisiana NAACP members' presence in specific districts because he either lives near them or “know[s] them personally” and possesses personal knowledge as to many of their residences. McClanahan Dep. Tr. at 82:11–88:15. In preparation for the litigation, Mr. McClanahan reviewed maps of the challenged districts and illustrative districts to identify at least one member of the Louisiana NAACP that resides in each district. McClanahan Dep. Tr. at 129:4–14. In close cases, Mr. McClanahan even went so far as to zoom in on the districts to determine which streets members live on and whether those streets are within the boundaries of the specific districts he identified. *Id.* In addition, Mr. McClanahan is aware of the Louisiana NAACP members' presence in specific districts because he either lives near them

or “know[s] them personally” and possesses personal knowledge as to many of their residences. *Id.* at 82:11–88:15. *See also* Ex. 9, McClanahan Decl. at ¶¶ 4-7. Mr. McClanahan also testified that he spoke to members he identified at quarterly meetings and the state convention. *Id.* at 131:2–11. He has also recently reviewed branch membership lists for the relevant districts, which contain up-to-date member addresses. McClanahan Decl. at ¶ 5.

Defendants’ Statement of Fact No. 29:

The Louisiana NAACP alleges injury from the challenged redistricting plan based on the expenditures of time and money the organization spent to mobilize members to attend events such as the legislative roadshows and get its members “excited” about more majority-minority districts—which occurred before the plans were enacted. *Id.* at 97:19–99:3. The Louisiana NAACP cites the “emotional[] distress” branch members felt when they allegedly realized that the enacted maps were not going to provide them with the additional majority-minority districts the Louisiana NAACP apparently told them to expect. *Id.* at 99:4–101:24.

Plaintiffs’ Response:

Denied. The Louisiana NAACP also asserts injury as a result of harm to its core mission of achieving equitable political representation, diverted resources, and cancelled events due to the redistricting plans that were enacted. McClanahan Dep. Tr. at 56:12–19, 98:24–101:24, 102:25–103:1, 103:1–8. These harms occurred after and as a direct result of the enactment of the challenged redistricting plans. *See* Ex. 9, McClanahan Decl. at ¶¶ 9-22.

Defendants’ Statement of Fact No. 30:

The Louisiana NAACP also asserts it felt compelled “to shift” its “action plan” after the legislative maps included fewer majority-minority than it hoped, *id.* at 97:24–98:2, *see also id.* at 98:11–23, choosing “not to spend” in some places and “to double up” in others, *id.* at 103:1–6.

Plaintiffs' Response:

Qualified. In addition to shifting its action plan, the Louisiana NAACP invested in “radio spots” and “trainings” to engage voters in particular areas. *Id.* at 98:24–99:3. Fewer majority-minority districts also resulted in decreased voter sentiment among the Louisiana NAACP’s constituents, which it had difficulty addressing. *Id.* at 100:9–101:24. The noncompetitive districts enacted under the discriminatory legislative maps has led to disinvestment from candidates, campaigns, political parties, and other organizations, requiring the Louisiana NAACP to fill the gaps and exert extra resources and effort to rally voters to participate in elections in the challenged parts of the State, leaving fewer resources for other work or for voter engagement work in other parts of the state. Ex. 9, McClanahan Decl. at ¶¶ 12-22.

Defendants' Statement of Fact No. 31:

Mr. McClanahan could not identify specific resources diverted because of the challenged plans. *Id.* at 102:15–21; 104:9–21.

Plaintiffs' Response:

Denied. As a result of Defendants’ conduct, the NAACP diverted its “resources,” “finances,” and “manpower” towards areas in Louisiana’s redistricting plans that denied equal voting opportunities to Black voters. McClanahan Dep. Tr. at 102:25–103:1. Mr. McClanahan testified that the Louisiana NAACP needed to “double up” staffing in areas of the state affected by the challenged redistricting; it was also forced to divert and spend budgetary resources on transportation and lodging in those affected districts. *Id.* at 103:3–11. Mr. McClanahan was aware of specific events that were canceled or postponed as a result of the enacted maps, including rallies and town halls. *Id.* at 103:1–8. He identified specific rallies and town halls in Bogalusa and Orleans that the Louisiana NAACP was unable to hold as a result of the diversion of its resources to address the impact of Louisiana’s redistricting plans. *Id.* at 103:1–8, 104:13–21.

The Louisiana NAACP regularly devotes significant portions of its resources to voter education and outreach efforts. *See* Ex 9, McClanahan Decl. ¶¶ 3, 9. These efforts take the form of door-to-door canvassing, voter registration efforts, community and candidate forums and other activities. *Id.* ¶¶ 8–9. The effectiveness of these efforts in getting voters registered and to the polls and the resources required are affected by voters’ perception of whether their participation in the political process is meaningful and whether their elected representatives are responsive to their needs. *Id.* ¶¶ 9–14. For example, when volunteers engaged on voter canvassing encounter voters who feel that their vote does not count, they spend more time educating those voters on the importance of participation, with the result that they are able to speak to fewer voters in a given day. *Id.* After enactment challenged maps, the Louisiana NAACP volunteers have faced higher levels of apathy among Black voters and as a result has been required to divert significantly greater resources to canvassing, particularly in areas and districts where Black voters routinely see their candidates of choice defeated. *Id.* at ¶¶ 9–15, 16–18. As Mr. McClanahan testified at his deposition, the Louisiana NAACP has had to reallocate its voter engagement resources to specific impacted areas where Black voters are disillusioned and less engaged as a result of legislative maps they perceive to be unfair. McClanahan Dep. Tr. at 97:24–101:24.

PLAINTIFFS’ ADDITIONAL MATERIAL FACTS

32. Dr. Dorothy Nairne is a Black U.S. citizen who is lawfully registered to vote in Louisiana. Ex 10, Nairne Decl. ¶¶ 2-4. Dr. Nairne has lived in House District 60 and Senate District 2 since 2017. Individual Pls.’ Resp. to Interros., ECF No. 149-3 at 5. Under the illustrative map prepared by Mr. Bill Cooper in June 2023, Dr. Nairne would reside in House District 58 and Senate District 2. Ex 10, Nairne Decl. ¶ 5. Dr. Nairne is a dues-paying member of the NAACP. Nairne Decl. ¶ 6.

33. Rev. Clee Earnest Lowe is a Black U.S. citizen who is lawfully registered to vote in Louisiana. Ex 11, Lowe Decl. ¶¶ 2-4. Rev. Lowe has lived in House District 66 and Senate District 16 since 2007. Individual Pls.’ Resp. to Interrogs., ECF No. 149-3, at 51. Under the illustrative map prepared by Mr. Bill Cooper in June 2023, Rev. Lowe would reside in House District 101 and Senate District 16. Ex 11, Lowe Decl. ¶ 5.

34. Dr. Alice Washington is a Black U.S. citizen who is lawfully registered to vote in Louisiana. Ex 12, Washington Decl. ¶¶ 2-4. Dr. Washington has lived in House District 66 and Senate District 16 since January 2016. Individual Pls.’ Resp. to Interrogs., ECF No. 149-3, at 29. Under the illustrative map prepared by Mr. Bill Cooper in June 2023, Dr. Washington would reside in House District 101 and Senate District 16. Ex 12, Washington Decl. ¶ 5.

35. Plaintiff Rev. Steven Harris is a Black U.S. citizen who is lawfully registered to vote in Louisiana. Ex 13, Harris Decl. ¶¶ 2-4. Rev. Harris has lived in House District 25 and Senate District 29 since 2018. Individual Pls.’ Resp. to Interrogs., ECF No. 149-3, at 72. Under the illustrative map prepared by Mr. Bill Cooper in June 2023, Rev. Harris would reside in House District 23 and Senate District 29. Ex 13, Harris Decl. ¶ 5. Rev. Harris is a dues-paying member of the NAACP. Harris Decl. ¶ 6.

36. Omari Ho-Sang is the senior state organizing manager for BVM. Ho-Sang Dep. Tr. at 10:2–4. Ho-Sang Decl. ¶ 2.

37. The Louisiana NAACP has a general objective, among other objectives, to “improve the political, educational, social, and economic status of African-Americans.” Louisiana NAACP Bylaws, at art. II, § 1(b)–(c).

38. The Louisiana NAACP identified at least one registered voter member who resides in each of the challenged Louisiana Senate and House Districts, as well as at least one member

who would reside in each of the newly created majority-Black districts or the newly unpacked majority-Black districts in Bill Cooper's June 2023 illustrative plans. *See* Louisiana NAACP's Supp. Resp. to Def. Ardoin's First Set of Interrogatories, at 2.

EXHIBIT 1



Planet Depos[®]
We Make It *Happen*[™]

Transcript of Omari Ho-Sang, Corporate Representative

Date: August 29, 2023

Case: Nairne, et al. -v- Ardoin

Planet Depos

Phone: 888.433.3767

Email: transcripts@planetdepos.com

www.planetdepos.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA

- - - - - x

DR. DOROTHY NAIRNE, :
et al., :
Plaintiffs, : Civil Action No.
v. : 3:22-cv-00178-SDD-SDJ
R. KYLE ARDOIN, in :
his official capacity :
as Secretary of :
Louisiana, :
Defendants. :

- - - - - x

Deposition of Black Voters Matter
By Omari Ho-Sang, Corporate Representative
(Conducted Remotely)
Tuesday, August 29, 2023
10:31 a.m.

Job No.: 504602
Pages: 1 - 68
Reported By: Leonora L. Walker, Court Reporter

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

1 Deposition of OMARI HO-SANG, held at the
2 offices of:

3

4

5 (All parties appeared remotely via Zoom.)

6

7

8

9

10 Pursuant to notice, before Leonora L. Walker,
11 Court Reporter, Notary Public in and for the State
12 of New York.

13

14

15

16

17

18

19

20

21

22

23

24

25

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

3

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

A P P E A R A N C E S

ON BEHALF OF PLAINTIFFS:

MEGAN KEENAN, ESQUIRE

SARAH BRANNON, ESQUIRE

AMERICAN CIVIL LIBERTIES UNION FOUNDATION

915 15th Street, NW

Washington, District of Columbia 20005

202.675.2337

ON BEHALF OF DEFENDANT:

CASSIE HOLT, ESQUIRE

NELSON MULLINS RILEY & SCARBOROUGH, LLP

301 Hillsborough Street, Suite 1400

Raleigh, North Carolina 27603

919.329.3800

Also observing:

Victoria Wagner, NAACP Legal Defense Fund

Dayton Campbell-Harris - ACLU

Amanda LaGroue, Esquire - Louisiana Attorney

General

Stuart Naifeh - NAACP Legal Defense Fund

Sara Rohani - NAACP Legal Defense Fund

John Conine and John Walsh for Defendants

Michael Safee - Technician Specialist

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

C O N T E N T S

EXAMINATION OF OMARI HO-SANG	PAGE
By Ms. Holt	5

E X H I B I T S

HO-SANG DEPOSITION EXHIBIT	PAGE
Exhibit No. 1 - Amended 30(b)(6) Notice	7
Exhibit No. 2 - Nairne Amended Complaint	23
Exhibit No. 3 - Ho-Sang Roadshow Transcript	35
Exhibit No. 4 - BVM-LA-LEG 1012	43
Exhibit No. 5 - BVM-LA-LEG 977	56
Exhibit No. 6 - BVM-LA-LEG 383	64

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

5

1 P R O C E E D I N G S

2

3 O M A R I H O - S A N G

4 Called as the witness, having been duly sworn by a
5 Notary Public, was questioned and testified as
6 follows:

7 E X A M I N A T I O N

8 BY MS. HOLT:

9 Q Good morning. My name is Cassie Holt, as
10 I've been introduced before, and I'm with Nelson
11 Mullins. We represent the defendant, Secretary of
12 State, in the matter of Nairne v. Ardoin that's
13 currently pending in the Middle District of
14 Louisiana.

15 Ms. Ho-Sang, if you could, please, state
16 your name again for the record?

17 A Yes. My name is Omari Ho-Sang.

18 Q And have you ever gone by a different
19 name?

20 A No.

21 Q And what is your current address?

22 A It is 4646 Hilry Huckaby, III, Avenue,
23 Shreveport, Louisiana 71107.

24 Q And I believe you said previously that
25 you've never been deposed before; is that correct?

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

6

1 A Correct.

2 Q And not testified in a court hearing?

3 A I have not.

4 Q So I'm going to quickly go through a few
5 ground rules that will help us and will help the
6 court reporter capture the record of what we
7 discuss today. So if you can, please, make sure
8 to give verbal responses to all of my questions.
9 And to avoid confusion and make it a little
10 easier, I ask that you, please, wait until I
11 finish a question before you give your answer.

12 Does that sound good?

13 A Yes.

14 Q Great. And I'm going to try to ask
15 questions that are as clear and concise as
16 possible. I might not achieve that goal, so if at
17 any point in time there's a question that is
18 unclear, please let me know and I will do my best
19 to rephrase it.

20 Does that sound good?

21 A Yes.

22 Q Great. And this is not an endurance test.
23 So, you know, thank you for your patience with the
24 technical difficulties this morning. If you need
25 a break at any time, please let me know. I just

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

7

1 ask that if I've asked a question you answer it
2 before we go on break.

3 A Yes, I understand. Thank you.

4 Q Great. And do you understand that you're
5 testifying here today under oath as if you were in
6 a real courtroom testifying before a judge or
7 jury?

8 A Yes.

9 Q And is there anything that would prevent
10 you from answering my questions honestly and
11 completely today?

12 A No.

13 Q All right.

14 MS. HOLT: I'm going to ask the tech to
15 please pull up a document called amended 30(b)(6)
16 notice, and if we can have that marked as
17 Exhibit 1.

18 (Whereupon, Exhibit 1 was marked for
19 identification.)

20 BY MS. HOLT:

21 Q Thank you. And Ms. Ho-Sang, I believe you
22 also have some hard copies of a few of the
23 documents that we're going to go over today. If
24 you prefer to reference those, that's completely
25 fine. Just whatever is easier for you to see and

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

8

1 read.

2 Does that sound good?

3 A Yes, thank you.

4 Q Great. No, problem.

5 Ms. Ho-Sang, do you recognize this
6 document?

7 A I do.

8 Q And what is it?

9 A It's the amended notice of rule 30(b)(6)
10 deposition of Black Voters Matter Capacity
11 Building Institute.

12 Q Thank you.

13 Do you understand that you've been asked
14 to testify here today on behalf of the Black
15 Voters Matter Capacity Building Institute?

16 A Yes.

17 Q And if I refer to the organization as BVM
18 to speed things along a little bit here, will you
19 understand what I'm referring to?

20 A I will.

21 Q Great.

22 MS. HOLT: Now, if the tech can, please,
23 go page six of the PDF, the very last page of
24 Exhibit 1.

25 BY MS. HOLT:

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

9

1 Q Ms. Ho-Sang, is it your understanding that
2 you're here today testifying to the topics listed
3 here in Exhibit A?

4 A Yes.

5 Q And what did you do to prepare for this
6 deposition today?

7 A I met with my attorney and reviewed the
8 documents.

9 Q You said reviewed the documents, what
10 documents did you review?

11 A The documents that I reviewed are the one
12 that is on the screen, the amended complaint for
13 declaratory judgment and injunctive relief. I
14 reviewed that document. I also reviewed the
15 interrogatories and responses.

16 Q And when you say interrogatories and
17 responses, I believe there's also a supplemental
18 interrogatory and response. Did you review both
19 of those?

20 A Yes, I reviewed that as well.

21 Q Great. And were there any other documents
22 than those that you reviewed?

23 A No. These are the main documents that I
24 reviewed.

25 Q Ms. Ho-Sang, are you an employee of BVM?

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

10

1 A Yes, I am.

2 Q And what is your current job title?

3 A My current job title is senior state
4 organizing manager for Louisiana.

5 Q Okay. How long have you held that
6 position?

7 A I was first hired in April 2020 as the
8 Louisiana state coordinator which is essentially
9 the same position.

10 Q Okay. So I believe you said there's a
11 senior state organizer now in the title.

12 A Yes.

13 Q When did that title change occur?

14 A We became state organizing managers around
15 2021, and then I became a senior state organizing
16 manager in 2023.

17 Q And is that a full-time job?

18 A Yes.

19 Q And it's paid or unpaid?

20 A It is paid.

21 Q And what are your job duties?

22 A As the state organizing manager, I'm
23 responsible for working with our partners in
24 Louisiana across the state to help them get out
25 the vote, to increase voter participation, and to

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

11

1 also support their work around other community
2 issues that they or their members or constituents
3 or community are concerned about. I'm also
4 responsible for assisting with our mini grant
5 process for our partners and making
6 recommendations around grants and providing
7 training for partners based on their needs.

8 Q And I believe I heard you say a few times
9 the term "partners."

10 A Yes.

11 Q Can you tell me what "partners" means?

12 A A partner is an organization or entity
13 that we work with around increasing voter
14 participation. Many times they are grassroots or
15 community-based organizations that work -- have a
16 specific mission and we provide support around
17 that mission. And we also help them to increase
18 their capacity to address their concerns as well
19 as increase their capacity to get out the vote in
20 their community.

21 Q And in your current role, who do you
22 report to?

23 A I report to my deputy field director.

24 Q And who is that?

25 A Fenika Miller.

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

12

1 Q Would you mind spelling that for the
2 record?

3 A Sure. Fenika, F-E-N-I-K-A; last name
4 Miller, M-I-L-L-E-R.

5 Q Great. Thank you.

6 Do any other BVM employees report to you?

7 A Yes. I have one person who reports to me,
8 and that is the southern regional organizer,
9 Keturah Butler-Reed.

10 Q What is the Black Voters Matter Fund?

11 A The Black Voters Matter Fund is the C4 arm
12 of BVM.

13 Q What is the difference between the fund
14 and the Capacity Building Institute?

15 A The BVM Capacity Building Institute is the
16 C3 nonpartisan arm of Black Voters Matter. And
17 that is -- that represents a bulk of the work that
18 we do. The majority of the work that I do as a
19 state organizing manager is -- concerns BVM
20 Capacity Building Institute function or work. And
21 then the Black Voters Matter Fund is the C4 arm of
22 Black Voters Matter.

23 Q Okay. They are separate entities, but do
24 they have shared staff?

25 A Yes.

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

13

1 Q Okay. Do they have the same board of
2 directors?

3 A Yes.

4 Q And your employment is with the C3 arm; is
5 that correct?

6 A My employment is with Black Voters Matter
7 Fund.

8 Q With the fund, okay. Yeah, I just want to
9 make clear for the record here, but you understand
10 that you're here today testifying for the Capacity
11 Building Institute?

12 A Yes.

13 Q Okay. And I believe you have an e-mail
14 address that's at Black VotersMatterFund.org?

15 A Correct.

16 Q Do you have one that's for the Capacity
17 Building Institute?

18 A No. We utilize our Black Voters Matter
19 Fund address.

20 Q Okay. And what is your role within --
21 well, I believe you said you were employed by the
22 Fund.

23 Is your position within the Fund the same
24 as it is with the Capacity Building Institute?

25 A Yes, it is.

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

14

1 Q Okay. Has it ever been different?

2 A No, it has not.

3 Q All right. So just to clarify here, I'm
4 going to go back to saying BVM, and when I do,
5 it's going to be about the Capacity Building
6 Institute; is that understood?

7 A Understood.

8 Q Okay, great.

9 So did you have a position with BVM before
10 becoming the state organizing manager?

11 A No, I did not.

12 Q What did you do prior to joining BVM?

13 A Prior to joining BVM, I was a community
14 organizer, and I did essentially the same types of
15 work that I do now.

16 Q And was that community organizing in
17 Louisiana?

18 A Yes.

19 Q And was it in Shreveport?

20 A Yes.

21 Q Anywhere outside of Shreveport?

22 A On occasion I would do some work in Baton
23 Rouge because that's our state capitol, but my
24 primary work at that time was in Shreveport.

25 Q And about how long have you lived in

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

15

1 Louisiana?

2 A Since 2013, so ten years.

3 Q And have you lived in Shreveport for that
4 ten-year period?

5 A For a majority of the time I have lived in
6 Shreveport. I technically live in Bossier now
7 which is a sister city of Shreveport.

8 Q So in and around the Shreveport area; is
9 that fair?

10 A Yes.

11 Q Are you registered to vote at your current
12 address?

13 A Yes, I am.

14 Q And at the previous addresses that you
15 lived at in Louisiana, were you registered to vote
16 there?

17 A Yes.

18 Q Did you vote in the 2021 special
19 elections?

20 A Yes.

21 Q And both the primary and the runoff; do
22 you recall?

23 A To my recollection, I think I did, but I
24 would have to -- to even think back to what that
25 election even was because there are so many

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

16

1 elections --

2 Q Yes, yes, there are.

3 A -- but most likely if there is an election
4 in my district where there was something on the
5 ballot for me, I voted.

6 Q Thank you.

7 And are you involved with any other
8 nonprofit organizations?

9 A I do work with other nonprofit
10 organizations, yes.

11 Q And what are those organizations?

12 A All Streets All People, ASAP, is one of
13 the organizations that I work with. And I work
14 with lots of other organizations. I mean, within
15 my role, we are partner with nonprofit
16 organizations so there are many that I can name.
17 So I don't know if you want me to list all of
18 those organizations, but I do work with them.

19 Q We don't need to go into to that right
20 now. But ASAP is All Streets, All People, what
21 does that organization do?

22 A All Streets, All People works with every
23 day people to engage them in systems change, what
24 we refer to as systems change.

25 Q And did you found that organization?

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

17

1 A Yes.

2 Q And what do you mean by systems change?

3 A So systems, say, for example, like the
4 electoral system that has historical
5 disenfranchised and disengaged individuals, we
6 work to change that system to make it more
7 accessible to more people.

8 There are other systems that we work with
9 such as our food system so that all people can
10 have access to healthy food, clean water, and
11 other things. And so when I refer to systems, I
12 mean the functions of society and helping or
13 working with every day people, not just advocates
14 or professionals, but, you know, our every day
15 citizen to help them be empowered to impact those
16 systems positively.

17 Q Where does All Streets, All People operate
18 within Louisiana?

19 A It's based out of Shreveport.

20 Q Based out of Shreveport.

21 Does All Streets, All People have any
22 members?

23 A No members.

24 Q No members, okay.

25 And what parish -- are there any other

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

18

1 parishes outside of Shreveport that All Streets,
2 All People works in?

3 A We've organized across the state in
4 various parishes.

5 Q I'd like to switch gears a little bit and
6 ask you a few questions about BVM's operations.

7 Where is BVM's corporate office?

8 A BVM's corporate office is in Atlanta,
9 Georgia.

10 Q And what states does BVM operate in?

11 A It operates in 25-plus states. There are
12 core states, which Louisiana is one of the core
13 states. There are about 12 of those states.
14 Louisiana, Mississippi, Texas, Georgia, Florida,
15 North Carolina, Pennsylvania, Michigan. Tennessee
16 I believe is a core state, but I'm not absolutely
17 sure about Tennessee. And then are -- so maybe
18 that's not 12 that I've just named. And then are
19 what we call light states that does not have
20 dedicated staff. Like Louisiana has a -- two
21 dedicated staff. Those are light states, and
22 there are many more. I'm not completely aware of
23 all of the light states that we have, but those
24 states have a deputy director that runs those
25 light states.

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

19

1 Q What makes a state a core state?

2 A So as mentioned, a core state is defined
3 by having a permanent staff member or a team that
4 is employed by Black Voters Matter, and -- I mean,
5 that's one of the key -- the key markings, and I
6 would say that they're -- because of having
7 personnel there, there's a budget that is
8 dedicated to funding partners in the core states.
9 Whereas, with light states, there's not a core
10 staff person dedicated to that state alone.

11 Q And who decides if a state is a core state
12 or a light state?

13 A Our effective leadership.

14 Q And who is your executive leadership?

15 A Cliff Albright is our executive director
16 as well as LaTosha Brown, our chief doer is her
17 title, and April Albright our legal counsel. They
18 comprise our executive leadership.

19 Q Does BVM have physical offices in all of
20 its core states?

21 A So I'm not absolutely sure about physical
22 offices in all the core states. Now, we have a
23 physical office that I utilize in Shreveport, in
24 Louisiana, and we have a physical office
25 headquartered in Atlanta. Those are the two I

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

20

1 know for sure about.

2 Q And you said utilize that physical office
3 in Shreveport.

4 Do you report to that office every day --

5 A No.

6 Q -- for work?

7 A No. All of BVM's employees work remote,
8 so...

9 Q So Ms. Butler-Reed does she report to that
10 physical office?

11 A She's our southern regional organizer, so
12 she works in the southern half of the state, so
13 no.

14 Q I see. And how long has BVM had that
15 Shreveport office space?

16 A I've utilized it since 2021.

17 Q Do you know if BVM had the office before
18 then?

19 A No, it did not.

20 Q So I believe you said previously that you
21 and Ms. Butler-Reed are the BVM employees in
22 Louisiana.

23 Are there any other BVM employees in the
24 state?

25 A No.

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

21

1 Q And do you know if BVM has a certificate
2 of authority to do business in Louisiana?

3 A I'm not aware of a certificate of
4 authority or familiar with what that is.

5 Q Okay. How did you BVM become involved in
6 this case?

7 MS. KEENAN: At this time I'm going to
8 object just to the attorney-client privilege just
9 to make sure that none of that answer that Omari
10 gives invites the conversations that she or BVM
11 has had with counsel.

12 But you can go ahead and answer as long as
13 you avoid those conversations.

14 THE WITNESS: Okay. All right. So we
15 were involved with redistricting since around
16 2021, and overtime, as the process went forward,
17 and our partners began to engage and see the maps
18 that were going to be produced there became a
19 concerned sentiment around what was being produced
20 and what was actually voted on, and from there we
21 got involved in this case.

22 BY MS. HOLT:

23 Q And I'm not looking for any discussions
24 you've had with counsel for these next couple of
25 questions, but generally, does the board need to

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

22

1 approve before BVM becomes involved in litigation?

2 MS. KEENAN: I will also object to
3 privilege to the extent this involves
4 conversations with your in-house counsel and not
5 just with the ACLU.

6 So I defer to you on any conversations
7 that you may have had with your in-house counsel
8 and avoiding those in answering this question,
9 Omari.

10 THE WITNESS: Okay. So can you repeat the
11 question?

12 BY MS. HOLT:

13 Q Absolutely.

14 Before BVM becomes involved in litigation,
15 does the executive board need to approve that
16 action?

17 A So in terms of -- I can only answer the
18 question -- so the legal counsel approved us being
19 apart of this litigation.

20 Q Okay. Do you know if any funding was set
21 aside or allocated for the cost of this
22 litigation?

23 A No, I'm not aware.

24 Q Is it your understanding that BVM is
25 challenging the entire state house and state

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

23

1 senate plans?

2 A That is my understanding.

3 MS. HOLT: So I'd like for the tech to,
4 please, pull up a document called Nairne amended
5 complaint, which I'd ask be marked as Exhibit 2,
6 please.

7 (Whereupon, Exhibit 2 was marked for
8 identification.)

9 BY MS. HOLT:

10 Q Ms. Ho-Sang, do you recognize this
11 document?

12 A Yes, I do.

13 Q And I believe you said this is one of the
14 documents you've reviewed in preparation for
15 today; is that correct?

16 A Yes.

17 Q Great. And again, if you want to refer to
18 a hard copy that you might have, that's completely
19 fine as well. Whatever is easiest for you.

20 If we could, please, turn to page nine of
21 this document, and I'm going to refer you to
22 paragraph 28 that begins with "BVM has a
23 significant constituency."

24 Do you see that paragraph?

25 A I see it.

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

24

1 Q Okay, great.

2 So if you can read that first sentence to
3 yourself, and I'm going to ask you a couple of
4 questions about that. If you can just let me know
5 once you're done reviewing.

6 A Okay. I've read it.

7 Q What does a constituency of individuals
8 and organizations mean in the context of this
9 case?

10 A Yes. So a constituency is essentially our
11 partners, their communities, their members.

12 Q Okay. Does BVM have any individual
13 members?

14 A No, we don't have members. We just have
15 partners.

16 Q And how many partners does BVM have?

17 A Roughly, based on my last count, around
18 50, in the upper 50s, or around 57 or 58 partners.

19 Q Is there a criteria to become a partner
20 organization?

21 A So there is a process to become a partner
22 that individual groups would go through and it
23 looks different each time. Kind of how that
24 partnership happens. But Louisiana has a process
25 where we meet with our potential partners, and we

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

25

1 kind of do an assessment of their capacity.

2 Because again, you know, a majority of the work
3 that we do is capacity building, and so we assess
4 their needs of our resources.

5 Q And when you say "we assess," is that you
6 personally that's doing that assessment?

7 A So it's staff. So either myself or
8 Keturah, the southern regional organizer, we'll
9 conduct assessment or partner intake as we call
10 the process.

11 Q Now, to become an official -- well, I'm
12 going to say official partner in the sense that
13 you're using the term.

14 Does an organization have to have members?

15 A No. You know, sometimes an organization
16 will not have been formed yet, but they would like
17 to build an organization because again we are a
18 capacity building institute, and so we have the
19 resources to help a group become an organization,
20 so there are no requirements necessarily of what
21 that organization has to look like. We do have
22 organizations that are members, that do have
23 members rather.

24 Q Okay. So if I was interested in becoming
25 a partner with BVM and I didn't have an

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

26

1 organization yet, what would you look for, like,
2 for me to come into this assessment process? What
3 would I need to have?

4 A You would really just need to understand
5 what do you want to focus on, what is your
6 community concern, and then we build from there.
7 You know, capacity kind of looks different for
8 different people and it can be defined in
9 different ways. And so, you know, do you have the
10 people or the access to people to help volunteer
11 for a cause. You know, how easily will you be
12 able to address the issue that you're most
13 concerned about. We start there and then we help
14 them build to be able to address the concern that
15 they bring to the table.

16 A majority of the organizations that we
17 work with are focused on increasing voter
18 engagement in their community, and so that is a
19 majority of what we deal with. However, there are
20 a lot of community concerns and issues that are
21 brought to us, and so we want -- our end goal is
22 to be able to help an organization or a group be
23 able to meaningfully and substantively address
24 their issue of concern.

25 Q Now, does it have to be a specific issue

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

27

1 of concern in order to be granted partnership
2 status?

3 A No. It could be just a general concern
4 about the state of their community. Or it could
5 just -- they want to lend their talents or skills
6 or time to helping our general mission, right, of
7 increasing black voter turnout.

8 So, you know, as I mentioned earlier, it
9 looks different, you know, based on the community
10 or the group or the issue, and our end goal is to
11 help them to address whatever general concern
12 however they want to engage in helping us reach
13 our ultimate goal or objective of increasing black
14 voter turnout as well as black civic engagement.

15 Q So speaking about the overall mission of
16 BVM, and I believe you've used the phrase engaging
17 with the community.

18 What does BVM do to engage with its
19 communities?

20 A So we support partner initiatives or
21 events that they're planning, we help with the
22 planning process if needed by the partner
23 organization. One of our most well-known
24 engagements is our bus tour that we conduct across
25 the country. That looks different again. And so

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

28

1 our most recent bus tour we had a variety of
2 events that took place that allow opportunities
3 for community education. We did a community
4 Caravan. We did a rally, block party, but we had
5 the bus there with us to really draw attention and
6 bring awareness to what we were doing. We -- so
7 we do Caravans, we do bus tours, and we support
8 partner events, and so, of course, there's a
9 diversity of events and a diversity of approaches
10 that our partners have, you know, to engage their
11 community. And so sometimes it also looks like
12 canvassing where we knock on doors and have
13 conversations with people in their community. So
14 we go to the community and have those
15 conversations. And we also phone bank, so we call
16 people and have conversations with community
17 members.

18 Q Okay. And I believe you mentioned earlier
19 mini grants?

20 A Yes.

21 Q The mini grant process. And is that way
22 BVM supports its partners?

23 A Yes, it is.

24 Q Where does the funding for those grants
25 come from?

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

29

1 A The funding that we receive comes from
2 either foundation grants, individual donations, or
3 fundraising, digital fundraising.

4 Q So are the grants from the Capacity
5 Building Institute or the Fund?

6 A SO both organizations can receive grant
7 funding. A majority of our funding is through our
8 C3, and hence, a majority of our work is C3.

9 Q I believe we discussed this a little bit
10 previously, but who decides which partners receive
11 grants?

12 A So the staff in the state is a part of the
13 additional recommendation process. We typically
14 meet with our partner before they submit, and then
15 we provide a recommendation. If the grant comes
16 out of the southern region, Keturah will provide a
17 recommendation in addition to my recommendation.
18 And then from there our deputy field director, who
19 I report to, will review the recommendation and
20 ask any questions or ask for additional
21 information that may need to be provided by the
22 partner. And then from there a decision is made
23 around the grant whether the organization will
24 receive it and how much they will receive. And
25 then from there, a memorandum of understanding is

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

30

1 sent to our partner to sign which our executive
2 director once our partner has signed will review
3 and execute. And then from there, the grant goes
4 to our finance department for disbursement to the
5 partner.

6 Q And who makes that -- I believe you said a
7 decision is made to grant the funding.

8 Who makes that decision specifically?

9 A The final call is our executive director.

10 Q Do you know if the executive director has
11 any criteria in making that final call?

12 A Yes. We have a grants manual that
13 internally guides our process.

14 Q I believe you said that you give or help
15 give the initial recommendations?

16 A Yes.

17 Q Have you ever had -- have you ever given a
18 recommendation and it not succeed through the
19 grant process?

20 A Yes.

21 Q Do you know about how many times that's
22 happened?

23 A It doesn't happen often.

24 Q Okay. And when we were talking about
25 BVM's activities you mentioned the bus tour.

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

31

1 A Yes.

2 Q And one of those tours was related to the
3 2022 redistricting cycle; is that correct?

4 A Yes.

5 Q And was that -- how long was that event?

6 A So that was a two-day event. It was two
7 or three days because it was kind of in two
8 different parts. We had the mobilization portion
9 of the event where people were mobilizing from
10 different parts of the state into Baton Rouge, and
11 then we had a rally event and kind of teaching,
12 and then we went to the state capitol and did a
13 press conference and then participated in the
14 actual hearings or the legislative session and
15 provided testimony.

16 Q So is it fair to say the majority of that
17 event or two to three-day event was in Baton
18 Rouge?

19 A Yes.

20 Q And about how many people attended?

21 A We had at least a hundred people in the
22 hearing across the state. I mean, across the
23 senate and the house. So everyone didn't attend
24 one hearing at one time.

25 Q I see?

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

32

1 A We engaged at least a hundred individuals
2 during that process.

3 Q When you say "engaged," what do you mean
4 by that?

5 A So there was a Caravan mobilization where
6 we stopped in difference cities along the way, and
7 there were individuals who came to those stops,
8 kind of as a send off, but did not come to the
9 other events in Baton Rouge, so I'm counting those
10 folks that we engaged in addition to those who
11 attended our rally the day before the session,
12 those who attended our press conference as well as
13 those who attended the redistricting session.

14 Q And could anyone attend any of these
15 events that made up the two day --

16 A Yes. They were open to the public. We
17 did request for people to register so we would
18 have a sense of who was participating, but
19 everyone who attended didn't register.

20 Q Did you keep an attendance list?

21 A So people did sign in. People did sign in
22 at our pep rally and we had our registration ahead
23 of the event. So those were the two -- I think
24 those were the two places where we took attendance
25 was the pep rally and then a registration for the

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

33

1 overall mobilization.

2 Q So with those attendance lists for the pep
3 rally and the overall registration amount to over
4 one hundred individuals?

5 A Yes, I think so. I think so. I don't
6 want to give you an exact number because I haven't
7 looked at that registration list since 2022, nor
8 the supplemented lists.

9 Q So I'm trying to get a sense of how many
10 people there were record for and how many people
11 joined and others, but we can move on from that.

12 Does BVM have meetings with its partner
13 organizations?

14 A Yes.

15 Q And how often are those meetings?

16 A We meet at least once a month with our
17 entire partner network. We call those statewide
18 partner calls. And we also have one-on-one and
19 group meetings with our partners as needed. Our
20 goal is to meet with, you know, a majority of our
21 partners at least once a month. But, you know,
22 sometimes we meet with our partners more often,
23 more frequently based on what's happening in the
24 community.

25 Q Those monthly calls, are they in person or

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

34

1 virtual?

2 A They are virtual.

3 Q Do you keep an attendance list for those
4 monthly calls?

5 A There's a registration list, yes.

6 Q Are those meetings open to the public?

7 A They're for our partners.

8 Q For your partners.

9 So they're closed meetings, not open to
10 the public?

11 A They are not open to the public, no.

12 Q I'd like to switch gears a little bit.

13 Ms. Ho-Sang, are you aware that the
14 legislature hosted road show hearings across the
15 state ahead of the 2022 redistricting cycle?

16 A Yes.

17 Q And actually, we've been going for about
18 45 minutes now. Before jumping in full force to
19 this new topic, is now a good time for a comfort
20 break?

21 A Sure. I'll take it.

22 MS. HOLT: Let's do a five-minute comfort
23 break and come back at 11:20 -- it's 11:20 a.m. my
24 time. I believe it's 10:20 a.m. your time. Does
25 that sound good?

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

35

1 THE WITNESS: 10:20 it is.

2 (Whereupon, a break was taken at
3 11:15 a.m.)

4 MS. HOLT: So we're back on the record
5 now.

6 BY MS. HOLT:

7 Q Ms. Ho-Sang, right before we went on a
8 quick break I asked if you were familiar with the
9 road show hearings that the legislature held
10 across the state?

11 A Yes.

12 Q Did you ever attend any of those hearings?

13 A I did. I attended one.

14 Q And which one did you attend?

15 A I attended the road show hearing that took
16 place in Shreveport.

17 Q Did you offer any testimony at that
18 roadshow hearing?

19 A Yes.

20 MS. HOLT: And I'd ask the tech to,
21 please, pull up a document called Ho-Sang roadshow
22 transcript which will be marked as Exhibit 3, I
23 believe, please.

24 (Whereupon, Exhibit 3 was marked for
25 identification.)

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

36

1 BY MS. HOLT:

2 Q Ms. Ho-Sang, I'm going to represent to you
3 that this is a transcript that's been produced by
4 one of the plaintiffs in this matter, the
5 Louisiana NAACP, of the October 21st roadshow
6 hearing, and it has some Bates labels at the
7 bottom that show NAACP LA Legislature 702. So
8 I'll let you read through the first little bit,
9 but do you generally recall testifying at this
10 roadshow hearing?

11 A Yes, I do.

12 Q Okay. And in what capacity were you
13 testifying?

14 A I was testifying in multiple capacities.

15 Q Okay. And what were those multiple
16 capacities?

17 A As a Louisiana resident, citizen, as the
18 founder of All Streets, All People, ASAP, as well
19 as the state organizing manager for Black Voters
20 Matter.

21 Q And if we can turn to page three of the
22 PDF, please.

23 And Ms. Ho-Sang, are you familiar with how
24 these transcripts work? We have the lines on the
25 left-hand side with the numbers, and then at the

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

37

1 very top right is the page number; do you see
2 that?

3 A Yes, I do.

4 Q So starting on line five, there's a
5 sentence that begins "I'm sure a lot of people."

6 MS. KEENAN: I'm going to object for just
7 a moment.

8 MS. HOLT: Sure.

9 MS. KEENAN: Omari, you have a chance to
10 read the second page and would you like for the
11 full context where you read for page three?

12 THE WITNESS: Sure. That would be
13 helpful.

14 MS. HOLT: Yes. We're in this virtual
15 zoom process, so if we can ask the tech to,
16 please, go back to page two and just let us know
17 once you've finished reading that.

18 THE WITNESS: Okay. Thank you.

19 BY MS. HOLT:

20 Q No problem.

21 A Okay. I'm ready for the next page phase.

22 Q And if we can get the tech to, please, go
23 to page three.

24 And you can go ahead and read the full
25 paragraph on that page and let me know once you're

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

38

1 done.

2 A Okay.

3 Okay. I'm ready.

4 Q Thank you. So starting on line five -- on
5 page three of the PDF, yes -- line five, I'm going
6 to read a sentence out loud, and let's see. It
7 starts with: I'm sure a lot of people in this
8 room have heard it "my vote doesn't count," and
9 who am I to tell any marginalized Louisianian any
10 different? In a state that has never, never,
11 never had a non racist map.

12 Did I read that correctly?

13 A Yes, you did.

14 Q Now, I believe there's a potentially typo
15 in there. I believe "none" should be "non"; is
16 that your understanding?

17 A Correct.

18 Q Now, what did you mean by Louisiana has
19 never had a non racist map?

20 A To my understanding, from many trainings
21 that I attended during this process, subject
22 matter experts and historians demonstrated that
23 throughout history Louisiana has not produced --
24 and I'm not sure on, like, which map, because I
25 know that there are two different kind of entities

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

39

1 that were talked about during that process, but
2 that there's never been a map that has been
3 produced by the state of Louisiana that adequately
4 represents black citizens, black voters.

5 Q And when you say "adequately represents,"
6 what do you mean by that?

7 MS. KEENAN: Objection to the extent that
8 questions calls for a legal conclusion, but you
9 can answer, Omari.

10 THE WITNESS: So when I say "adequate," I
11 mean that the map represents in a proportion to
12 the population, to the black population in a
13 particular district or geographic area.

14 BY MS. HOLT:

15 Q Okay. And you said to the black
16 population and a specific geographic area?

17 A Yes.

18 Q Does that include any other racial
19 minorities?

20 A When I say black or?

21 Q Or the proportionality to the community?

22 MS. KEENAN: Again, objection to the
23 extent that calls for a legal conclusion, but
24 Omari, you can answer.

25 THE WITNESS: So I just want to make sure

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

40

1 that I answer correctly based on the question that
2 you're asking me. So are you asking me when I say
3 geographic area, do I mean all -- all non white
4 citizens?

5 BY MS. HOLT:

6 Q So let me back up a little bit. That was
7 a poor question. Let me rephrase that for you.
8 I'm not trying to make it too much of a bubble.

9 So how would one draw a non racist map?

10 MS. HOLT: Objection to the extent that
11 calls for a legal conclusion, but you can answer.

12 THE WITNESS: How would one draw a non
13 racist map? They would a draw map that is
14 proportional to the population where all people in
15 a geographic location can have the opportunity to
16 elect somebody who represents them.

17 BY MS. HOLT:

18 Q So does it matter who is drawing the map?

19 MS. KEENAN: Objection again, but you can
20 answer.

21 THE WITNESS: Does it matter who is
22 drawing the map? So in my experience as a state
23 organizing manager with Black Voters Matter, there
24 have been instances where who has drawn the map
25 has impacted the process.

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

41

1 BY MS. HOLT:

2 Q Okay. So to achieve the proportion to the
3 population that you mentioned earlier, does it
4 make a difference who or what entity draws the map
5 to achieve that result?

6 MS. KEENAN: Objection, but you can
7 answer.

8 THE WITNESS: I think that as long as the
9 person is drawing a legal map, it doesn't matter.

10 BY MS. HOLT:

11 Q Okay. So does that person have to
12 consider race when drawing the proportionality of
13 a specific population?

14 MS. KEENAN: Objection to form and to the
15 extent it calls for a legal conclusion.

16 You can answer.

17 THE WITNESS: I really -- you know, so --
18 and even here in this transcript throughout the
19 process we leaned on experts to make those types
20 of decisions. And our main focus was ensuring
21 that whatever the law said and whatever
22 preconditions were required by law, whatever
23 information was necessary and important to this
24 redistricting process that our partners knew that.
25 So I'm not very comfortable answering questions

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

42

1 that we leaned on -- we lean on experts to answer.

2 BY MS. HOLT:

3 Q Okay. And who are those experts?

4 A So the NAACP, LDF, and other organizations
5 listed in the transcript like Power Coalition and
6 those that they were working with to provide and
7 teach and inform the community around the
8 redistricting process, what to look for, and then
9 later on, who provided information on the
10 redistricting session.

11 Q Is it BVM's position today that Louisiana
12 has never had a non racist map?

13 MS. KEENAN: Objection to form and the
14 legal conclusion.

15 You can answer.

16 THE WITNESS: In terms of the
17 organization, there is -- that has not been a part
18 of our external facing messaging that we've put
19 out to my understanding. However, what I will say
20 organizationally we have signed onto letters and
21 we did send as an organization in agreement with,
22 you know, put the governor's veto of the maps that
23 were produced. So I can -- yes, that's what I
24 will say. That is my response to your question.

25 BY MS. HOLT:

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

43

1 Q When you gave this testimony at the
2 roadshow hearing, you were giving it in part as a
3 representative of BVM, correct?

4 A Correct.

5 Q Now, I believe you testified earlier --
6 and we can take this Exhibit 3 down, thank you.

7 I believe you testified earlier about
8 BVM's redistricting initiative takeover, I
9 believe, was the term; is that correct?

10 A Yes.

11 MS. HOLT: I'd ask the tech to, please,
12 pull up a document that's previously been labeled
13 BVM LA LEG 1012 which has been produced in
14 discovery in this matter, and I'd ask be marked as
15 Exhibit 4, please.

16 (Whereupon, Exhibit 4 was marked for
17 identification.)

18 BY MS. HOLT:

19 Q Ms. Ho-Sang, can you see this okay? Do we
20 need to zoom in a little bit?

21 A I can see it good. Thank you.

22 Q And I'll give you a minute to review and
23 familiarize yourself with this document?

24 A Okay.

25 Okay.

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

44

1 Q What is this document?

2 A These are talking points produced by our
3 COMMS department for the redistricting takeover.

4 Q And they're contained within an e-mail,
5 correct?

6 A Correct.

7 Q And it looks like the e-mail is from --
8 the main body of the e-mail is from you?

9 A Yes.

10 Q And what is the date of this e-mail?

11 A February 7, 2022.

12 Q You said these are talking points. Did
13 you draft these talking points?

14 A I collaborated on the talking points, but
15 they were officially produced in their format by
16 our COMMS team.

17 Q And if we could, please, turn to page two
18 of this PDF, and I'll give you some time to review
19 again. And I'm specifically going to be asking
20 you about the fifth bullet point down.

21 A Okay. I've read number five.

22 Q Great. Can you, please, read that bullet
23 point out loud for the record?

24 A Yes. In the spirit of making the process
25 more inclusive, the legislature held roadshow

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

45

1 hearings across the state to inform voters about
2 the redistricting process, but these hearings
3 never came for many black communities even though
4 these communities would be most impacted by this
5 process.

6 Q What black communities is this referring
7 to that the hearings never came for?

8 A So from my recollection, I remember
9 specifically Jefferson. I heard from a lot of
10 partners they were concerned about the roadshow
11 hearing not coming there. And there are some
12 other specific communities that our partners were
13 concerned that the roadshow hearing was not coming
14 to their community. I cannot at this time list
15 those communities because I don't remember, but I
16 know Jefferson was -- because we have a very vocal
17 partner from there that was really concerned about
18 the lack of roadshow there.

19 Q Who was that local partner that was
20 concerned?

21 A It's one of the partners that's listed on
22 our list, the Jeremiah Group is the one that I'm
23 referring to.

24 Q Does the Jeremiah Group have individual
25 members?

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

46

1 A Yes, they do.

2 Q And Jefferson parish is a suburb of New
3 Orleans, correct?

4 A My understanding is that it's a different
5 parish. I'm not originally from Louisiana, so I
6 don't -- I don't know if they consider it a
7 suburb, but I know -- I know it as a separate
8 parish. That's how I view Jefferson.

9 Q But it's generally close to New Orleans?

10 A Yes, it's close to New Orleans.

11 Q We discussed earlier the Caravans and
12 things of that nature that BVM organized.

13 Does BVM know if any of its attendees are
14 registered voters?

15 A Any of the attendees of the bus tour or
16 the redistricting takeover?

17 Q Both.

18 A Yes.

19 Q We can do one at a time?

20 A Yes. There were registered voters that
21 participated, yes.

22 Q And how many?

23 A How many of them were registered voters?

24 Q Yes.

25 A I don't have that number.

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

47

1 Q It wasn't all of them; it was part?

2 A So in terms of, like, our partner leaders
3 that helped us to lead the mobilization, all of
4 them are registered voters. However, you know,
5 earlier we talked about, like, engagement and how
6 we engage with people at the pep rally, we engage
7 with people along the way. There are many people
8 who we come into contact with who are not yet
9 registered which is a part of the purpose of our
10 tours is to come into contact with those who are
11 not register, educate them, and register them to
12 vote.

13 MS. HOLT: You can take down this exhibit.

14 BY MS. HOLT:

15 Q Ms. Ho-Sang, how has BVM been harmed by
16 the legislative maps in this case?

17 MS. KEENAN: Objection to the extent it
18 calls for a legal conclusion, but you can answer.

19 THE WITNESS: So, you know, there are a
20 few ways that I view, you know, harm. And, you
21 know, one way is that we had to spend a lot of
22 time that we did not foresee on redistricting.
23 And so my time, staff time, partner time, in
24 addition, because of the outcome of the special
25 session, we, you know, spend additional time

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

48

1 really responding to that. You know, even before
2 the maps became law and we -- our partners started
3 to see them and became concerned about them, that
4 is where the redistricting takeover and
5 mobilization was born out of those concerns. That
6 was not something that we entered 2022 saying,
7 hey, we're going to do this massive mobilization
8 to the capitol in the way that it happened. So,
9 you know, we had to take away our focus from,
10 like, our core, you know, our core mission which
11 is increase black voter turnout to the polls to
12 really focus on redistricting which there was a
13 huge learning curve for me and our team around
14 redistricting to begin with.

15 So I think apart of the harm is, you know,
16 a diversion of our attention, our focus, and our
17 resources because we did provide mini grants to
18 partners that participated in the process. So
19 there's kind of a financial harm in a way, too,
20 because those funds could have been used for more
21 general GOTV to really increase the number of
22 registered voters in a community or to have more
23 teachings, or, you know, kind of, like, really
24 focus on that core piece, and so there's the
25 financial aspect of it as well.

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

49

1 And then another way is that when we go --
2 you know, it was referenced in the transcript,
3 when we talk to people a lot of people talk about
4 how they feel that their vote does not count. The
5 outcome of this redistricting process has made
6 that sentiment even worse because now people --
7 especially because the awareness has increased
8 around it. Now people are like, well, now my vote
9 really doesn't count, and so we have to really
10 have a nuanced approach to how we organize because
11 there is an increasing sentiment among the people
12 who we want to engage with that their vote does
13 not count, so...

14 BY MS. HOLT:

15 Q Okay. So I'm going to try to break those
16 down in the same three ways that I heard you break
17 them down.

18 The first, what specific funding has been
19 diverted due to these legislative maps?

20 A So we provided mini grants to our partners
21 to participate in the redistricting takeover
22 because we did a mobilization from their home
23 cities into Baton Rouge. Many of the partners
24 that attended were not local to Baton Rouge, and
25 so we wanted to make sure that they had the funds

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

50

1 necessary to transport themselves, their members,
2 and their community members that wanted to
3 participate. We also brought the big bus for the
4 redistricting takeover and there are expenses that
5 are associated with rolling the bus because it's
6 not headquartered -- it doesn't live in Louisiana,
7 so there are expenses that are associated with
8 that.

9 In addition to also lodging partners and
10 we took on some of the responsibility of paying
11 for lodging for our out-of-town partners during
12 the redistricting takeover as well.

13 And so just to be kind of more concise,
14 the mini grant funding that went to partners
15 specific to the redistricting takeover, the
16 expenses associated with the big bus rolling to
17 Baton Rouge for the tour as well as the cost
18 associated with lodging our partners, and the food
19 and, you know, the cost of the events, and, you
20 know, the event planners that we worked with to
21 make sure that the event took place. So there
22 were a lot of expenses, you know, around just that
23 one mobilization, but there were also other events
24 that we took part in with other partners leading
25 up to the event where we did some cost sharing as

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

51

1 well.

2 Q So all of the items you just listed are
3 for that one two-day event in Baton Rouge,
4 correct?

5 A Except for the latter half of what I just
6 said, like leading into it.

7 Q Leading into it.

8 A Yes. There were a lot of expenses. And
9 then when we give a grant, or when we provide a
10 grant to our partner there, of course, within that
11 was a line item for this particular event, but
12 also just general outreach in their community
13 around redistricting, the utilized those funds for
14 that as well. And so I couldn't say that all of
15 the funding went just specifically to the
16 mobilization. There was a significant amount that
17 did, but there were also expenses associated with
18 just the whole redistricting process. The more we
19 got involved, the more resolve. We had to do more
20 outreach, more awareness. We even sent a
21 broadcast text, which of course there are costs
22 associated with broadcast texting, to get people
23 engaged around the session. But also the
24 follow-up after when we -- when our partners were
25 urging the governor to veto the maps, so, you

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

52

1 know, there were costs leading into the
2 redistricting, there were costs during the
3 redistricting takeover, and then there were costs
4 after as well.

5 Q You mentioned a broadcast text.

6 A Yes.

7 MS. HOLT: And I'm going to ask the
8 technician to, please, pull up document that's
9 been previously marked as BVM LA LEG 977.

10 BY MS. HOLT:

11 Q Ms. Ho-Sang, is this that campaign that
12 you were mentioning previously?

13 A This is a -- this is the text campaign
14 that we did for the redistricting takeover.

15 Q Okay. And do you see the event date?

16 A Event date, February 8, 2022.

17 Q And was that before the legislative maps
18 were passed?

19 A Yes.

20 Q And the launch date was for this campaign
21 was February 2, 2022; is that correct?

22 A Yes.

23 MS. HOLT: Now, I'd like the tech to,
24 please, turn to the second page of this PDF, and
25 I'll give you a chance to review.

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

53

1 THE WITNESS: Okay.

2 BY MS. HOLT:

3 Q Ms. Ho-Sang, do you see the target for --
4 the targeting for the campaign?

5 A Yes.

6 Q And that includes both active and
7 registered voters and unregistered voters; is that
8 correct?

9 A Correct.

10 MS. HOLT: Now, I'd like the tech to,
11 please, turn to the third page of this PDF, and
12 I'll give you a chance to review again.

13 THE WITNESS: Okay.

14 BY MS. HOLT:

15 Q Okay. And if we can look at the
16 additional -- any additional notes, you'll see a
17 text box down there?

18 A Yes.

19 Q I believe you entered in this information;
20 is that correct?

21 A Yes.

22 Q And if you can read that first sentence
23 out loud for the record, please.

24 A The focus for these events is in Baton
25 Rouge rather than the stops on the way.

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

54

1 Q Okay. And I apologize for flipping
2 around, but if we can turn back to the second page
3 of this PDF, please.

4 And do you see the additional targeting
5 paragraph?

6 A Yes.

7 Q Do you see where it lists New Orleans and
8 then there's two parishes in parentheses?

9 A Yes.

10 Q The Jefferson parish is part and parcel of
11 New Orleans; is that correct?

12 MS. KEENAN: Objection to the
13 characterization, but you can answer.

14 THE WITNESS: For the sake of targeting --
15 when we put in a request with our text vendor at
16 that time, it was important to distinguish if
17 there are different areas within New Orleans that
18 we wanted to focus on because our text vendor is
19 from outside of the state, so, yes.

20 BY MS. HOLT:

21 Q And right above this additional targeting
22 paragraph there's something called an activist
23 score.

24 What is an activist score? Do you see
25 that?

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

55

1 A Yes. So an activist score is just a
2 measure of how frequently someone may engage, or
3 it measures kind of a letter of engagement. So if
4 we send a text and, you know, they respond, and
5 then we send a follow-up text and they would like
6 to volunteer and they say yes, and they sign up to
7 volunteer, you know, that would increase their
8 activist score. And it really gives our vendor
9 and us an opportunity to really target and say,
10 hey, we want to reach out to people with higher
11 activist scores or just people who are more likely
12 to engage.

13 Q So the target for this campaign was an
14 activist score above 50 percent or 50. Excuse me,
15 I shouldn't say percent.

16 A Yes. And to be honest with you, that
17 activist score was -- that was an internal process
18 with our vendor. We don't really deal as much
19 with that. But, you know, during this process,
20 like, when we put in a request, we have a
21 conversation, a follow-up conversation with the
22 vendor who kind of digs deeper into what our needs
23 are because they're more familiar with the
24 software, and kind of, you know, who are you
25 really trying to reach, and then they go in and

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

56

1 adjust the targeting based on our -- based on our
2 initial request, but also based on our follow-up
3 conversation.

4 Q And who is your vendor?

5 A At that time it was Movement Labs.

6 Q And you said at that time, who is your
7 vendor now?

8 A We no longer have a vendor. Our texting
9 is now internal.

10 MS. HOLT: We can take this exhibit down
11 for now.

12 I wanted to make sure that exhibit was
13 marked as Exhibit 5.

14 (Whereupon, Exhibit 5 was marked for
15 identification.)

16 BY MS. HOLT:

17 Q All right. So Ms. Ho-Sang, let's go back
18 to some of the harm that we had been discussing.

19 You also mentioned mini grants going
20 towards redistricting.

21 In order for an organization to get a mini
22 grant, does it have to share the same goals as
23 BVM?

24 A With our partners, there is a clear
25 alignment with our mission and our focus, yes.

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

57

1 Q Is that alignment a condition to receiving
2 a grant?

3 A Yes. We grant to organizations that, from
4 one perspective or another, will help to increase
5 the black voter engagement and black civic
6 participation.

7 Q Were there any specific grants that were
8 not awarded due to these legislative maps?

9 MS. KEENAN: Objection to form.

10 MS. HOLT: Yeah, let me ask that a
11 different way. That was a poor question.

12 BY MS. HOLT:

13 Q So were there any mini grant applications
14 for other goals of BVM that were diverted to
15 redistricting?

16 A Oh, I think I understand your question.
17 We have a finite granting budget. When we grant
18 money, that money is gone, and so that means less
19 money for our other key purposes. And so there
20 was a significant amount, I don't have an exact
21 figure of how much we granted for redistricting,
22 but there was a significant amount of granting
23 that did go towards redistricting.

24 Q And you said there is a specific granting
25 amount. Does that change from year to year?

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

58

1 A Insignificantly, but it does change. It
2 has changed during my time.

3 Q Do you have an example of a specific grant
4 that wasn't -- that didn't make it through the
5 process because the funds were already fully
6 disbursed?

7 A No, I don't have a grant that I can refer
8 to, no.

9 Q Okay. Now, in terms of a generally
10 diversion of resources that you've talked about,
11 has BVM's -- (connectivity interruption.)

12 So in terms of a general diversion of
13 resources, has BVM's Get Out The Vote initiatives
14 continued?

15 A Yes.

16 Q So they haven't ceased because this
17 lawsuit is pending?

18 A No, they have not.

19 Q And has BVM started new Get Out The Vote
20 initiatives in Louisiana as this lawsuit has been
21 pending?

22 A Yes.

23 Q And what are those initiatives?

24 A So we are conducting GOTV for our upcoming
25 gubernatorial election, and we've had one bus tour

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

59

1 so far to get out the vote. That took place early
2 August. We have another that will be taking place
3 in early September, and then we have our last bus
4 tour that will take place in late September, early
5 October.

6 Q Okay. How have BVM's -- we talked about
7 BVM's harm, but how have BVM's partners been
8 harmed as a result of these maps?

9 A I would say in many of the same ways that
10 we've been harmed. They've had to dedicate, you
11 know -- even if that funding comes from us through
12 our mini granting process, they have to dedicate
13 that funding, or they've had to dedicate it toward
14 educating their community around the
15 redistricting, mobilizing them around
16 redistricting, paying for the events, the food,
17 you know, all of the expenses that are associated
18 with educating and mobilizing and organizing in
19 community. They've also had to, you know, divert
20 their investment of time in some of their core
21 mission areas to really focus in and hone in on
22 redistricting. Then, of course, there's like the
23 lived impact because many of our partners live in
24 the districts that have been impacted by this
25 process. And so, you know, just their everyday,

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

60

1 day-to-day lived experiences have been harmful.
2 And, you know, it is through our partners that we
3 really learned about the ways that this
4 redistricting process and redistricting processes
5 in the past have impacted their lives, their
6 families' lives, and their communities.

7 Q Is it BVM's position that its partners
8 have been harmed in every parish of Louisiana in
9 this way?

10 MS. KEENAN: Objection to the extent it
11 calls for a legal conclusion, but, Omari, you can
12 answer.

13 THE WITNESS: To my understanding, BVM has
14 not taken a position on that particular statement.

15 MS. HOLT: Okay. So if we can go back,
16 I'd ask the tech to, please, pull up Exhibit 2.

17 MS. KEENAN: Cassie, would you mind if we
18 went off the record for a second just to talk
19 about the next break.

20 MS. HOLT: Yes, sure. Absolutely. That's
21 no problem.

22 (Whereupon, a lunch break was taken at
23 12:06 p.m.)

24 MS. KEENAN: I think we're ready to go
25 back on the record.

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

61

1 EXAMINATION RESUMED

2 BY MS. HOLT:

3 Q Ms. Ho-Sang, before the break we were
4 discussing the alleged harm to BVM's partners.

5 How many parishes do BVM's partners
6 operate in?

7 A So BVM has target parishes that we
8 prioritize. Bossier, Cato, Wichita, Rapides,
9 Lafayette, Lake Charles or Calcasieu, East Baton
10 Rouge, and Orleans and Iberia parishes. Those are
11 our target parishes. However, through the course
12 of our work in Louisiana we have also acquired
13 partners in additional parishes outside of our
14 target areas, and so that's -- those parishes
15 include Jefferson, St. Mary, St. Martin, Jackson,
16 other parishes outside of our target area, but we
17 really prioritize our target focus parishes.

18 Q Why are certain parishes targeted?

19 A So those parishes are highlighted based on
20 their black voting age population and their black
21 population. The parishes that I named as our
22 target areas had the largest concentration of
23 black people in them, so they are targeted.
24 However, we want to be able to support our partner
25 communities. So, for example, I live in Bossier,

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

62

1 but it's part of the Shreveport community. So
2 there are many places that are target areas across
3 the state that contain partners, and our partners
4 are involved in the work that happens in those
5 areas. And so as a matter of supporting our
6 partners, we expanded to those areas as well.

7 Q Okay. So you've listed certain parishes
8 for me. Does BVM operate in every single parish
9 in Louisiana?

10 A No.

11 Q How many parishes are covered in full?

12 A Approximately inclusive of our target,
13 plus the additional parishes that we picked up,
14 we're -- we most likely have partners in at least
15 25 parishes that we work with.

16 Q Okay. So 25 --

17 A That's an approximate number.

18 Q All right. Now, switching to the mini
19 grants, has All Streets, All People received
20 grants from the BVM?

21 A Yes.

22 Q About how many grant?

23 A ASAP has received three to five grants
24 from BVM.

25 Q And what years were those received?

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

63

1 MS. KEENAN: I'm going to object because I
2 think this is outside the scope of the deposition
3 or at least we're getting close to it. I'll let
4 it go a little longer with Omari answering, but
5 I'm going to object to them.

6 THE WITNESS: So prior my becoming an
7 employee with BVM, ASAP was a partner. We were a
8 partner just like our partners that we engage
9 with. So our first grant was received in 2019
10 from BVM, and we have received a grant from BVM
11 each year to the present.

12 BY MS. HOLT:

13 Q Okay. How many of those of grants were
14 related to redistricting?

15 A One.

16 Q So one out of the five?

17 A Yes.

18 Q And what year was that grant related to
19 redistricting dispersed to ASAP?

20 A 2022.

21 Q And you said through the present. Has
22 ASAP received any grants in 2023?

23 A Yes.

24 Q And were those related to redistricting?

25 A Not directly, no.

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

64

1 Q One of the things that we've talked about
2 or that you've mentioned previously is BVM's Veto
3 The Map campaign.

4 MS. HOLT: I'm going to ask the tech to,
5 please, pull up a document that's been previously
6 produced in discovery as BVM LA LEG number 383,
7 which I would like to have marked as Exhibit 6.

8 (Whereupon, Exhibit 6 was marked for
9 identification.)

10 BY MS. HOLT:

11 Q And Ms. Ho-Sang, I'm going to give you a
12 little bit to review this document, and then I'm
13 going to ask you some questions specifically about
14 that second main paragraph.

15 A Okay. Thank you.

16 Okay.

17 Q Do you recognize this e-mail
18 correspondence?

19 A Yes, I do.

20 Q And what is the date on that e-mail?

21 A March 7, 2022.

22 Q Okay. And the second paragraph -- well,
23 first it looks like this e-mail discusses two
24 initiatives; is that correct?

25 A Yes.

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

65

1 Q And it looks like the second paragraph is
2 about the Veto The Maps campaign?

3 A Yes.

4 Q And can you, please, read the last
5 sentence of the second paragraph for the record
6 starting with "we are reminding."

7 A Okay. We are reminding him that the black
8 community stood behind him during the last
9 gubernatorial election and are asking him to stand
10 behind us at this time.

11 Q And is "him" referring to Governor
12 Edwards?

13 A Correct.

14 Q And what do you think that sentence means?

15 A That sentence means that black voters
16 played a significant role in the election and the
17 re-election of Governor John Bel Edwards, and we
18 are requesting him to stand behind us in our time
19 of need in terms of the maps.

20 Q Does it mean that Governor Edwards could
21 have been the candidate of choice for the black
22 community in the last gubernatorial election?

23 MS. KEENAN: Objection to the extent this
24 calls for a legal conclusion.

25 Omari, you can answer.

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

66

1 THE WITNESS: Yes.

2 MS. HOLT: Ms. Ho-Sang, thank you so much
3 for your time today. I have no further questions.

4 THE WITNESS: Thank you.

5 MS. KEENAN: Can we take a quick
6 five-minute break. We need time just to go off
7 the record and chat.

8 MS. HOLT: Absolutely.

9 (Whereupon, a break was taken at
10 1:26 p.m.)

11 MS. KEENAN: If there's nothing else from
12 the defendants, the plaintiffs don't have any
13 questions, Ms. Ho-Sang, so I think we are ready to
14 close the deposition.

15 MS. HOLT: Okay. Let's close the
16 deposition. Thank you.

17 Megan, do you want to read and sign?

18 MS. KEENAN: Sure, yes.

19 THE COURT REPORTER: May I have the orders
20 for the transcript, if there are any.

21 MS. HOLT: Allison has our standard order
22 for defendant, Secretary of State.

23 MS. KEENAN: The plaintiffs would like to
24 put in an order for a rush transcript as soon as
25 it's available.

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

(Whereupon, the deposition concluded at
1:32 p.m.)

--oo0oo--

STATE OF _____)

)

COUNTY OF _____)

I, OMARI HO-SANG, the witness herein,
having read the foregoing testimony of the pages
of this deposition, do hereby certify it to be a
true and correct transcript, subject to the
corrections, if any, shown on the attached page.

OMARI HO-SANG

Transcript of Omari Ho-Sang, Corporate Representative
Conducted on August 29, 2023

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

C E R T I F I C A T E

I, Leonora L. Walker, a Notary Public, the officer before whom the foregoing deposition was taken, do hereby certify that the foregoing transcript is a true and correct record of the testimony given; that said testimony was taken by me stenographically and thereafter reduced to typewriting under my supervision; that reading and signing was requested; and that I am neither counsel for or related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this 29th day of August 2023.

My commission expires May 17, 2024.

Leonora Walker

NOTARY PUBLIC IN AND FOR THE
STATE OF NEW YORK
Notary Registration No. 01WA6109670

Transcript of Omari Ho-Sang, Corporate Representative
 Conducted on August 29, 2023

A			
able	active	agreement	50:9, 50:23,
26:12, 26:14,	53:6	42:21	51:12, 51:17,
26:22, 26:23,	activist	ahead	51:23, 56:2,
61:24	54:22, 54:24,	21:12, 32:22,	56:19, 59:19,
about	55:1, 55:8,	34:15, 37:24	61:12
11:3, 14:5,	55:11, 55:14,	al	amanda
14:25, 18:6,	55:17	1:5	3:20
18:13, 18:17,	activities	albright	amended
19:21, 20:1,	30:25	19:15, 19:17	4:8, 4:9, 7:15,
24:4, 26:13,	actual	alignment	8:9, 9:12, 23:4
27:4, 27:15,	31:14	56:25, 57:1	american
30:21, 30:24,	actually	all	3:5
31:20, 34:17,	21:20, 34:17	2:5, 6:8, 7:13,	among
39:1, 43:7,	addition	14:3, 16:12,	49:11
44:20, 45:1,	29:17, 32:10,	16:17, 16:20,	amount
45:10, 45:17,	47:24, 50:9	16:22, 17:9,	33:3, 51:16,
47:5, 48:3,	additional	17:17, 17:21,	57:20, 57:22,
49:3, 58:10,	29:13, 29:20,	18:1, 18:2,	57:25
59:6, 60:3,	47:25, 53:16,	18:23, 19:19,	another
60:19, 62:22,	54:4, 54:21,	19:22, 20:7,	49:1, 57:4,
64:1, 64:13,	61:13, 62:13	21:14, 36:18,	59:2
65:2	address	40:3, 40:14,	answer
above	5:21, 11:18,	47:1, 47:3,	6:11, 7:1,
54:21, 55:14	13:14, 13:19,	51:2, 51:14,	21:9, 21:12,
absolutely	15:12, 26:12,	56:17, 59:17,	22:17, 39:9,
18:16, 19:21,	26:14, 26:23,	62:18, 62:19	39:24, 40:1,
22:13, 60:20,	27:11	alleged	40:11, 40:20,
66:8	addresses	61:4	41:7, 41:16,
access	15:14	allison	42:1, 42:15,
17:10, 26:10	adequate	66:21	47:18, 54:13,
accessible	39:10	allocated	60:12, 65:25
17:7	adequately	22:21	answering
achieve	39:3, 39:5	allow	7:10, 22:8,
6:16, 41:2,	adjust	28:2	41:25, 63:4
41:5	56:1	alone	any
aclu	advocates	19:10	6:17, 6:25,
3:19, 22:5	17:13	along	9:21, 12:6,
acquired	affixed	8:18, 32:6,	16:7, 17:21,
61:12	68:15	47:7	17:25, 20:23,
across	after	already	21:23, 22:6,
10:24, 18:3,	51:24, 52:4	58:5	22:20, 24:12,
27:24, 31:22,	again	also	29:20, 30:11,
34:14, 35:10,	5:16, 23:17,	3:17, 7:22,	32:14, 35:12,
45:1, 62:2	25:2, 25:17,	9:14, 9:17,	35:17, 38:9,
action	27:25, 39:22,	11:1, 11:3,	39:18, 46:13,
1:6, 22:16	40:19, 44:19,	11:17, 22:2,	46:15, 53:16,
	53:12	28:11, 28:15,	57:7, 57:13,
	age	33:18, 50:3,	63:22, 66:12,
	61:20		

Transcript of Omari Ho-Sang, Corporate Representative

Conducted on August 29, 2023

70

66:20, 67:14, 68:11 anyone 32:14 anything 7:9 anywhere 14:21 apart 22:19, 48:15 apologize 54:1 appeared 2:5 applications 57:13 approach 49:10 approaches 28:9 approve 22:1, 22:15 approved 22:18 approximate 62:17 approximately 62:12 april 10:7, 19:17 ardoin 1:8, 5:12 area 15:8, 39:13, 39:16, 40:3, 61:16 areas 54:17, 59:21, 61:14, 61:22, 62:2, 62:5, 62:6 arm 12:11, 12:16, 12:21, 13:4 around 10:14, 11:1, 11:6, 11:13, 11:16, 15:8, 21:15, 21:19,	24:17, 24:18, 29:23, 42:7, 48:13, 49:8, 50:22, 51:13, 51:23, 54:2, 59:14, 59:15 asap 16:12, 16:20, 36:18, 62:23, 63:7, 63:19, 63:22 aside 22:21 asked 7:1, 8:13, 35:8 asking 40:2, 44:19, 65:9 aspect 48:25 assess 25:3, 25:5 assessment 25:1, 25:6, 25:9, 26:2 assisting 11:4 associated 50:5, 50:7, 50:16, 50:18, 51:17, 51:22, 59:17 atlanta 18:8, 19:25 attached 67:14 attend 31:23, 32:14, 35:12, 35:14 attendance 32:20, 32:24, 33:2, 34:3 attended 31:20, 32:11, 32:12, 32:13, 32:19, 35:13, 35:15, 38:21, 49:24	attendees 46:13, 46:15 attention 28:5, 48:16 attorney 3:20, 9:7 attorney-client 21:8 august 1:18, 59:2, 68:16 authority 21:2, 21:4 available 66:25 avenue 5:22 avoid 6:9, 21:13 avoiding 22:8 awarded 57:8 aware 18:22, 21:3, 22:23, 34:13 awareness 28:6, 49:7, 51:20 away 48:9	27:9, 33:23, 40:1, 56:1, 56:2, 61:19 bates 36:6 baton 14:22, 31:10, 31:17, 32:9, 49:23, 49:24, 50:17, 51:3, 53:24, 61:9 became 10:14, 10:15, 21:18, 48:2, 48:3 because 14:23, 15:25, 19:6, 25:2, 25:17, 31:7, 33:6, 38:24, 45:15, 45:16, 47:24, 48:17, 48:20, 49:6, 49:7, 49:10, 49:22, 50:5, 54:18, 55:23, 58:5, 58:16, 59:23, 63:1 become 21:5, 24:19, 24:21, 25:11, 25:19 becomes 22:1, 22:14 becoming 14:10, 25:24, 63:6 been 5:4, 5:10, 5:25, 8:13, 14:1, 25:16, 34:17, 36:3, 39:2, 40:24, 42:17, 43:12, 43:13, 47:15, 48:20, 49:18, 52:9, 56:18, 58:20, 59:7,
		B	
		b) (6 4:8, 7:15, 8:9 back 14:4, 15:24, 34:23, 35:4, 37:16, 40:6, 54:2, 56:17, 60:15, 60:25 ballot 16:5 bank 28:15 based 11:7, 17:19, 17:20, 24:17,	

Transcript of Omari Ho-Sang, Corporate Representative

Conducted on August 29, 2023

71

59:10, 59:24, 60:1, 60:8, 64:5, 65:21 before 2:10, 5:10, 5:25, 6:11, 7:2, 7:6, 14:9, 20:17, 22:1, 22:14, 29:14, 32:11, 34:18, 35:7, 48:1, 52:17, 61:3, 68:4 began 21:17 begin 48:14 begins 23:22, 37:5 behalf 3:2, 3:10, 8:14 behind 65:8, 65:10, 65:18 being 21:19, 22:18 bel 65:17 believe 5:24, 7:21, 9:17, 10:10, 11:8, 13:13, 13:21, 18:16, 20:20, 23:13, 27:16, 28:18, 29:9, 30:6, 30:14, 34:24, 35:23, 38:14, 38:15, 43:5, 43:7, 43:9, 53:19 best 6:18 between 12:13 big 50:3, 50:16 bit 8:18, 18:5,	29:9, 34:12, 36:8, 40:6, 43:20, 64:12 black 1:15, 8:10, 8:14, 12:10, 12:11, 12:16, 12:21, 12:22, 13:6, 13:14, 13:18, 19:4, 27:7, 27:13, 27:14, 36:19, 39:4, 39:12, 39:15, 39:20, 40:23, 45:3, 45:6, 48:11, 57:5, 61:20, 61:23, 65:7, 65:15, 65:21 block 28:4 board 13:1, 21:25, 22:15 body 44:8 born 48:5 bossier 15:6, 61:8, 61:25 both 9:18, 15:21, 29:6, 46:17, 53:6 bottom 36:7 box 53:17 brannon 3:4 break 6:25, 7:2, 34:20, 34:23, 35:2, 35:8, 49:15, 49:16, 60:19, 60:22, 61:3, 66:6, 66:9	bring 26:15, 28:6 broadcast 51:21, 51:22, 52:5 brought 26:21, 50:3 brown 19:16 bubble 40:8 budget 19:7, 57:17 build 25:17, 26:6, 26:14 building 8:11, 8:15, 12:14, 12:15, 12:20, 13:11, 13:17, 13:24, 14:5, 25:3, 25:18, 29:5 bulk 12:17 bullet 44:20, 44:22 bus 27:24, 28:1, 28:5, 28:7, 30:25, 46:15, 50:3, 50:5, 50:16, 58:25, 59:3 business 21:2 butler-reed 12:9, 20:9, 20:21 bvm 8:17, 9:25, 12:6, 12:12, 12:15, 12:19, 14:4, 14:9, 14:12, 14:13, 18:10, 19:19, 20:14, 20:17, 20:21, 20:23,	21:1, 21:5, 21:10, 22:1, 22:14, 22:24, 23:22, 24:12, 24:16, 25:25, 27:16, 27:18, 28:22, 33:12, 43:3, 43:13, 46:12, 46:13, 47:15, 52:9, 56:23, 57:14, 58:19, 60:13, 61:7, 62:8, 62:20, 62:24, 63:7, 63:10, 64:6 bvm's 18:6, 18:7, 18:8, 20:7, 30:25, 42:11, 43:8, 58:11, 58:13, 59:6, 59:7, 60:7, 61:4, 61:5, 64:2 bvm-la-leg 4:11, 4:12, 4:13 <hr/> C <hr/> c3 12:16, 13:4, 29:8 c4 12:11, 12:21 calcasieu 61:9 call 18:19, 25:9, 28:15, 30:9, 30:11, 33:17 called 5:4, 7:15, 23:4, 35:21, 54:22 calls 33:18, 33:25, 34:4, 39:8, 39:23, 40:11,
--	---	--	--

Transcript of Omari Ho-Sang, Corporate Representative
 Conducted on August 29, 2023

<p>41:15, 47:18, 60:11, 65:24 came 32:7, 45:3, 45:7 campaign 52:11, 52:13, 52:20, 53:4, 55:13, 64:3, 65:2 campbell-harris 3:19 candidate 65:21 cannot 45:14 canvassing 28:12 capacities 36:14, 36:16 capacity 1:9, 8:10, 8:15, 11:18, 11:19, 12:14, 12:15, 12:20, 13:10, 13:16, 13:24, 14:5, 25:1, 25:3, 25:18, 26:7, 29:4, 36:12 capitol 14:23, 31:12, 48:8 capture 6:6 caravan 28:4, 32:5 caravans 28:7, 46:11 carolina 3:14, 18:15 case 21:6, 21:21, 24:9, 47:16, 68:12 cassie 3:11, 5:9, 60:17</p>	<p>cato 61:8 cause 26:11 ceased 58:16 certain 61:18, 62:7 certificate 21:1, 21:3 certify 67:12, 68:5 challenging 22:25 chance 37:9, 52:25, 53:12 change 10:13, 16:23, 16:24, 17:2, 17:6, 57:25, 58:1 changed 58:2 characterization 54:13 charles 61:9 chat 66:7 chief 19:16 choice 65:21 cities 32:6, 49:23 citizen 17:15, 36:17 citizens 39:4, 40:4 city 15:7 civic 27:14, 57:5 civil 1:6, 3:5 clarify 14:3</p>	<p>clean 17:10 clear 6:15, 13:9, 56:24 cliff 19:15 close 46:9, 46:10, 63:3, 66:14, 66:15 closed 34:9 coalition 42:5 collaborated 44:14 columbia 3:7 come 26:2, 28:25, 32:8, 34:23, 47:8, 47:10 comes 29:1, 29:15, 59:11 comfort 34:19, 34:22 comfortable 41:25 coming 45:11, 45:13 commission 68:17 comms 44:3, 44:16 communities 24:11, 27:19, 45:3, 45:4, 45:6, 45:12, 45:15, 60:6, 61:25 community 11:1, 11:3, 11:20, 14:13, 14:16, 26:6, 26:18, 26:20, 27:4, 27:9,</p>	<p>27:17, 28:3, 28:11, 28:13, 28:14, 28:16, 33:24, 39:21, 42:7, 45:14, 48:22, 50:2, 51:12, 59:14, 59:19, 62:1, 65:8, 65:22 community-based 11:15 complaint 4:9, 9:12, 23:5 completely 7:11, 7:24, 18:22, 23:18 comprise 19:18 concentration 61:22 concern 26:6, 26:14, 26:24, 27:1, 27:3, 27:11 concerned 11:3, 21:19, 26:13, 45:10, 45:13, 45:17, 45:20, 48:3 concerns 11:18, 12:19, 26:20, 48:5 concise 6:15, 50:13 concluded 67:1 conclusion 39:8, 39:23, 40:11, 41:15, 42:14, 47:18, 60:11, 65:24 condition 57:1 conduct 25:9, 27:24 conducted 1:17 conducting 58:24</p>
--	---	--	---

Transcript of Omari Ho-Sang, Corporate Representative
 Conducted on August 29, 2023

<p>conference 31:13, 32:12</p> <p>confusion 6:9</p> <p>conine 3:24</p> <p>connectivity 58:11</p> <p>consider 41:12, 46:6</p> <p>constituency 23:23, 24:7, 24:10</p> <p>constituents 11:2</p> <p>contact 47:8, 47:10</p> <p>contain 62:3</p> <p>contained 44:4</p> <p>context 24:8, 37:11</p> <p>continued 58:14</p> <p>conversation 55:21, 56:3</p> <p>conversations 21:10, 21:13, 22:4, 22:6, 28:13, 28:15, 28:16</p> <p>coordinator 10:8</p> <p>copies 7:22</p> <p>copy 23:18</p> <p>core 18:12, 18:16, 19:1, 19:2, 19:8, 19:9, 19:11, 19:20, 19:22, 48:10, 48:24, 59:20</p> <p>corporate 1:16, 18:7, 18:8</p>	<p>correct 5:25, 6:1, 13:5, 13:15, 23:15, 31:3, 38:17, 43:3, 43:4, 43:9, 44:5, 44:6, 46:3, 51:4, 52:21, 53:8, 53:9, 53:20, 54:11, 64:24, 65:13, 67:13, 68:6</p> <p>corrections 67:14</p> <p>correctly 38:12, 40:1</p> <p>correspondence 64:18</p> <p>cost 22:21, 50:17, 50:19, 50:25</p> <p>costs 51:21, 52:1, 52:2, 52:3</p> <p>could 5:15, 23:20, 27:3, 27:4, 32:14, 44:17, 48:20, 65:20</p> <p>couldn't 51:14</p> <p>counsel 19:17, 21:11, 21:24, 22:4, 22:7, 22:18, 68:11</p> <p>count 24:17, 38:8, 49:4, 49:9, 49:13</p> <p>counting 32:9</p> <p>country 27:25</p> <p>county 67:7</p> <p>couple 21:24, 24:3</p>	<p>course 28:8, 51:10, 51:21, 59:22, 61:11</p> <p>court 1:1, 1:25, 2:11, 6:2, 6:6, 66:19</p> <p>courtroom 7:6</p> <p>covered 62:11</p> <p>criteria 24:19, 30:11</p> <p>current 5:21, 10:2, 10:3, 11:21, 15:11</p> <p>currently 5:13</p> <p>curve 48:13</p> <p>cycle 31:3, 34:15</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>date 44:10, 52:15, 52:16, 52:20, 64:20</p> <p>day 16:23, 17:13, 17:14, 20:4, 32:11, 32:15, 68:15</p> <p>day-to-day 60:1</p> <p>days 31:7</p> <p>dayton 3:19</p> <p>deal 26:19, 55:18</p> <p>decides 19:11, 29:10</p> <p>decision 29:22, 30:7, 30:8</p>	<p>decisions 41:20</p> <p>declaratory 9:13</p> <p>dedicate 59:10, 59:12, 59:13</p> <p>dedicated 18:20, 18:21, 19:8, 19:10</p> <p>deeper 55:22</p> <p>defendant 3:10, 5:11, 66:22</p> <p>defendants 1:12, 3:24, 66:12</p> <p>defense 3:18, 3:22, 3:23</p> <p>defer 22:6</p> <p>defined 19:2, 26:8</p> <p>demonstrated 38:22</p> <p>department 30:4, 44:3</p> <p>deposed 5:25</p> <p>deposition 1:15, 2:1, 4:7, 8:10, 9:6, 63:2, 66:14, 66:16, 67:1, 67:12, 68:4</p> <p>deputy 11:23, 18:24, 29:18</p> <p>difference 12:13, 32:6, 41:4</p> <p>different 5:18, 14:1, 24:23, 26:7, 26:8, 26:9, 27:9, 27:25,</p>
---	--	--	--

Transcript of Omari Ho-Sang, Corporate Representative

Conducted on August 29, 2023

74

31:8, 31:10, 38:10, 38:25, 46:4, 54:17, 57:11 difficulties 6:24 digital 29:3 digs 55:22 directly 63:25 director 11:23, 18:24, 19:15, 29:18, 30:2, 30:9, 30:10 directors 13:2 disbursed 58:6 disbursement 30:4 discovery 43:14, 64:6 discuss 6:7 discussed 29:9, 46:11 discusses 64:23 discussing 56:18, 61:4 discussions 21:23 disenfranchised 17:5 disengaged 17:5 dispersed 63:19 distinguish 54:16 district 1:1, 1:2, 3:7, 5:13, 16:4, 39:13 districts 59:24	diversion 48:16, 58:10, 58:12 diversity 28:9 divert 59:19 diverted 49:19, 57:14 document 7:15, 8:6, 9:14, 23:4, 23:11, 23:21, 35:21, 43:12, 43:23, 44:1, 52:8, 64:5, 64:12 documents 7:23, 9:8, 9:9, 9:10, 9:11, 9:21, 9:23, 23:14 doer 19:16 doing 25:6, 28:6 donations 29:2 done 24:5, 38:1 doors 28:12 dorothy 1:4 down 43:6, 44:20, 47:13, 49:16, 49:17, 53:17, 56:10 dr 1:4 draft 44:13 draw 28:5, 40:9, 40:12, 40:13 drawing 40:18, 40:22,	41:9, 41:12 drawn 40:24 draws 41:4 due 49:19, 57:8 duly 5:4 during 32:2, 38:21, 39:1, 50:11, 52:2, 55:19, 58:2, 65:8 duties 10:21 <hr/> E <hr/> e-mail 13:13, 44:4, 44:7, 44:8, 44:10, 64:17, 64:20, 64:23 each 24:23, 63:11 earlier 27:8, 28:18, 41:3, 43:5, 43:7, 46:11, 47:5 early 59:1, 59:3, 59:4 easier 6:10, 7:25 easiest 23:19 easily 26:11 east 61:9 educate 47:11 educating 59:14, 59:18 education 28:3 edwards 65:12, 65:17,	65:20 effective 19:13 either 25:7, 29:2 elect 40:16 election 15:25, 16:3, 58:25, 65:9, 65:16, 65:22 elections 15:19, 16:1 electoral 17:4 else 66:11 employed 13:21, 19:4, 68:11 employee 9:25, 63:7 employees 12:6, 20:7, 20:21, 20:23 employment 13:4, 13:6 empowered 17:15 end 26:21, 27:10 endurance 6:22 engage 16:23, 21:17, 27:12, 27:18, 28:10, 47:6, 49:12, 55:2, 55:12, 63:8 engaged 32:1, 32:3, 32:10, 51:23 engagement 26:18, 27:14, 47:5, 55:3, 57:5 engagements 27:24 engaging 27:16
---	--	--	--

Transcript of Omari Ho-Sang, Corporate Representative

Conducted on August 29, 2023

75

<p>ensuring 41:20</p> <p>entered 48:6, 53:19</p> <p>entire 22:25, 33:17</p> <p>entities 12:23, 38:25</p> <p>entity 11:12, 41:4</p> <p>especially 49:7</p> <p>esquire 3:3, 3:4, 3:11, 3:20</p> <p>essentially 10:8, 14:14, 24:10</p> <p>et 1:5</p> <p>even 15:24, 15:25, 41:18, 45:3, 48:1, 49:6, 51:20, 59:11</p> <p>event 31:5, 31:6, 31:9, 31:11, 31:17, 32:23, 50:20, 50:21, 50:25, 51:3, 51:11, 52:15, 52:16</p> <p>events 27:21, 28:2, 28:8, 28:9, 32:9, 32:15, 50:19, 50:23, 53:24, 59:16</p> <p>ever 5:18, 14:1, 30:17, 35:12</p> <p>every 16:22, 17:13, 17:14, 20:4, 60:8, 62:8</p> <p>everyday 59:25</p>	<p>everyone 31:23, 32:19</p> <p>exact 33:6, 57:20</p> <p>examination 4:2</p> <p>example 17:3, 58:3, 61:25</p> <p>except 51:5</p> <p>excuse 55:14</p> <p>execute 30:3</p> <p>executive 19:14, 19:15, 19:18, 22:15, 30:1, 30:9, 30:10</p> <p>exhibit 4:7, 4:8, 4:9, 4:10, 4:11, 4:12, 4:13, 7:17, 7:18, 8:24, 9:3, 23:5, 23:7, 35:22, 35:24, 43:6, 43:15, 43:16, 47:13, 56:10, 56:12, 56:13, 56:14, 60:16, 64:7, 64:8</p> <p>expanded 62:6</p> <p>expenses 50:4, 50:7, 50:16, 50:22, 51:8, 51:17, 59:17</p> <p>experience 40:22</p> <p>experiences 60:1</p> <p>experts 38:22, 41:19, 42:1, 42:3</p> <p>expires 68:17</p>	<p>extent 22:3, 39:7, 39:23, 40:10, 41:15, 47:17, 60:10, 65:23</p> <p>external 42:18</p> <hr/> <p style="text-align: center;">F</p> <hr/> <p>f-e-n-i-k-a 12:3</p> <p>facing 42:18</p> <p>fair 15:9, 31:16</p> <p>familiar 21:4, 35:8, 36:23, 55:23</p> <p>familiarize 43:23</p> <p>families 60:6</p> <p>far 59:1</p> <p>february 44:11, 52:16, 52:21</p> <p>feel 49:4</p> <p>fenika 11:25, 12:3</p> <p>few 6:4, 7:22, 11:8, 18:6, 47:20</p> <p>field 11:23, 29:18</p> <p>fifth 44:20</p> <p>figure 57:21</p> <p>final 30:9, 30:11</p> <p>finance 30:4</p> <p>financial 48:19, 48:25, 68:13</p>	<p>fine 7:25, 23:19</p> <p>finish 6:11</p> <p>finished 37:17</p> <p>finite 57:17</p> <p>first 10:7, 24:2, 36:8, 49:18, 53:22, 63:9, 64:23</p> <p>five 37:4, 38:4, 38:5, 44:21, 62:23, 63:16</p> <p>five-minute 34:22, 66:6</p> <p>flipping 54:1</p> <p>florida 18:14</p> <p>focus 26:5, 41:20, 48:9, 48:12, 48:16, 48:24, 53:24, 54:18, 56:25, 59:21, 61:17</p> <p>focused 26:17</p> <p>folks 32:10</p> <p>follow-up 51:24, 55:5, 55:21, 56:2</p> <p>follows 5:6</p> <p>food 17:9, 17:10, 50:18, 59:16</p> <p>force 34:18</p> <p>foregoing 67:11, 68:4, 68:5</p> <p>foresee 47:22</p>
--	---	--	---

Transcript of Omari Ho-Sang, Corporate Representative

Conducted on August 29, 2023

<p>form 41:14, 42:13, 57:9 format 44:15 formed 25:16 forward 21:16 found 16:25 foundation 3:5, 29:2 founder 36:18 frequently 33:23, 55:2 full 34:18, 37:11, 37:24, 62:11 full-time 10:17 fully 58:5 function 12:20 functions 17:12 fund 3:18, 3:22, 3:23, 12:10, 12:11, 12:13, 12:21, 13:7, 13:8, 13:19, 13:22, 13:23, 29:5 funding 19:8, 22:20, 28:24, 29:1, 29:7, 30:7, 49:18, 50:14, 51:15, 59:11, 59:13 fundraising 29:3 funds 48:20, 49:25, 51:13, 58:5</p>	<p>further 66:3 <hr/>G<hr/>gave 43:1 gears 18:5, 34:12 general 3:21, 27:3, 27:6, 27:11, 48:21, 51:12, 58:12 generally 21:25, 36:9, 46:9, 58:9 geographic 39:13, 39:16, 40:3, 40:15 georgia 18:9, 18:14 getting 63:3 give 6:8, 6:11, 30:14, 30:15, 33:6, 43:22, 44:18, 51:9, 52:25, 53:12, 64:11 given 30:17, 68:7 gives 21:10, 55:8 giving 43:2 go 6:4, 7:2, 7:23, 8:23, 14:4, 16:19, 21:12, 24:22, 28:14, 37:16, 37:22, 37:24, 49:1, 55:25, 56:17, 57:23, 60:15, 60:24, 63:4, 66:6 goal 6:16, 26:21,</p>	<p>27:10, 27:13, 33:20 goals 56:22, 57:14 goes 30:3 going 6:4, 6:14, 7:14, 7:23, 14:4, 14:5, 21:7, 21:18, 23:21, 24:3, 25:12, 34:17, 36:2, 37:6, 38:5, 44:19, 48:7, 49:15, 52:7, 56:19, 63:1, 63:5, 64:4, 64:11, 64:13 gone 5:18, 57:18 good 5:9, 6:12, 6:20, 8:2, 34:19, 34:25, 43:21 gotv 48:21, 58:24 governor 51:25, 65:11, 65:17, 65:20 governor's 42:22 grant 11:4, 28:21, 29:6, 29:15, 29:23, 30:3, 30:7, 30:19, 50:14, 51:9, 51:10, 56:22, 57:2, 57:3, 57:13, 57:17, 58:3, 58:7, 62:22, 63:9, 63:10, 63:18 granted 27:1, 57:21</p>	<p>granting 57:17, 57:22, 57:24, 59:12 grants 11:6, 28:19, 28:24, 29:2, 29:4, 29:11, 30:12, 48:17, 49:20, 56:19, 57:7, 62:19, 62:20, 62:23, 63:13, 63:22 grassroots 11:14 great 6:14, 6:22, 7:4, 8:4, 8:21, 9:21, 12:5, 14:8, 23:17, 24:1, 44:22 ground 6:5 group 25:19, 26:22, 27:10, 33:19, 45:22, 45:24 groups 24:22 gubernatorial 58:25, 65:9, 65:22 guides 30:13 <hr/>H<hr/>half 20:12, 51:5 hand 68:15 happen 30:23 happened 30:22, 48:8 happening 33:23 happens 24:24, 62:4 hard 7:22, 23:18</p>
---	--	--	--

Transcript of Omari Ho-Sang, Corporate Representative

Conducted on August 29, 2023

77

<p>harm 47:20, 48:15, 48:19, 56:18, 59:7, 61:4</p> <p>harmed 47:15, 59:8, 59:10, 60:8</p> <p>harmful 60:1</p> <p>headquartered 19:25, 50:6</p> <p>healthy 17:10</p> <p>heard 11:8, 38:8, 45:9, 49:16</p> <p>hearing 6:2, 31:22, 31:24, 35:15, 35:18, 36:6, 36:10, 43:2, 45:11, 45:13</p> <p>hearings 31:14, 34:14, 35:9, 35:12, 45:1, 45:2, 45:7</p> <p>held 2:1, 10:5, 35:9, 44:25</p> <p>help 6:5, 10:24, 11:17, 17:15, 25:19, 26:10, 26:13, 26:22, 27:11, 27:21, 30:14, 57:4</p> <p>helped 47:3</p> <p>helpful 37:13</p> <p>helping 17:12, 27:6, 27:12</p> <p>hence 29:8</p> <p>here 7:5, 8:14, 8:18, 9:2, 9:3,</p>	<p>13:9, 13:10, 14:3, 41:18</p> <p>hereby 67:12, 68:5</p> <p>herein 67:10</p> <p>hereunto 68:14</p> <p>hey 48:7, 55:10</p> <p>higher 55:10</p> <p>highlighted 61:19</p> <p>hillsborough 3:13</p> <p>hilry 5:22</p> <p>hired 10:7</p> <p>historians 38:22</p> <p>historical 17:4</p> <p>history 38:23</p> <p>ho-sang 1:16, 2:1, 4:2, 4:7, 4:10, 5:15, 5:17, 7:21, 8:5, 9:1, 9:25, 23:10, 34:13, 35:7, 35:21, 36:2, 36:23, 43:19, 47:15, 52:11, 53:3, 56:17, 61:3, 64:11, 66:2, 66:13, 67:10, 67:19</p> <p>holt 3:11, 4:3, 5:8, 5:9, 7:14, 7:20, 8:22, 8:25, 21:22, 22:12, 23:3, 23:9, 34:22, 35:4, 35:6, 35:20,</p>	<p>36:1, 37:8, 37:14, 37:19, 39:14, 40:5, 40:10, 40:17, 41:1, 41:10, 42:2, 42:25, 43:11, 43:18, 47:13, 47:14, 49:14, 52:7, 52:10, 52:23, 53:2, 53:10, 53:14, 54:20, 56:10, 56:16, 57:10, 57:12, 60:15, 60:20, 61:2, 63:12, 64:4, 64:10, 66:2, 66:8, 66:15, 66:21</p> <p>home 49:22</p> <p>hone 59:21</p> <p>honest 55:16</p> <p>honestly 7:10</p> <p>hosted 34:14</p> <p>house 22:25, 31:23</p> <p>however 26:19, 27:12, 42:19, 47:4, 61:11, 61:24</p> <p>huckaby 5:22</p> <p>huge 48:13</p> <p>hundred 31:21, 32:1, 33:4</p> <hr/> <p style="text-align: center;">I</p> <hr/> <p>iberia 61:10</p> <p>identification 7:19, 23:8,</p>	<p>35:25, 43:17, 56:15, 64:9</p> <p>iii 5:22</p> <p>impact 17:15, 59:23</p> <p>impacted 40:25, 45:4, 59:24, 60:5</p> <p>important 41:23, 54:16</p> <p>in-house 22:4, 22:7</p> <p>include 39:18, 61:15</p> <p>includes 53:6</p> <p>inclusive 44:25, 62:12</p> <p>increase 10:25, 11:17, 11:19, 48:11, 48:21, 55:7, 57:4</p> <p>increased 49:7</p> <p>increasing 11:13, 26:17, 27:7, 27:13, 49:11</p> <p>individual 24:12, 24:22, 29:2, 45:24</p> <p>individuals 17:5, 24:7, 32:1, 32:7, 33:4</p> <p>inform 42:7, 45:1</p> <p>information 29:21, 41:23, 42:9, 53:19</p> <p>initial 30:15, 56:2</p> <p>initiative 43:8</p> <p>initiatives 27:20, 58:13, 58:20, 58:23,</p>
---	--	---	--

Transcript of Omari Ho-Sang, Corporate Representative
 Conducted on August 29, 2023

64:24 injunctive 9:13 insignificantly 58:1 instances 40:24 institute 8:11, 8:15, 12:14, 12:15, 12:20, 13:11, 13:17, 13:24, 14:6, 25:18, 29:5 intake 25:9 interest 68:12 interested 25:24 internal 55:17, 56:9 internally 30:13 interrogatories 9:15, 9:16 interrogatory 9:18 interruption 58:11 introduced 5:10 investment 59:20 invites 21:10 involved 16:7, 21:5, 21:15, 21:21, 22:1, 22:14, 51:19, 62:4 involves 22:3 issue 26:12, 26:24, 26:25, 27:10 issues 11:2, 26:20	item 51:11 items 51:2 <hr/> <p style="text-align: center;">J</p> <hr/> jackson 61:15 jefferson 45:9, 45:16, 46:2, 46:8, 54:10, 61:15 jeremiah 45:22, 45:24 job 1:23, 10:2, 10:3, 10:17, 10:21 john 3:24, 65:17 joined 33:11 joining 14:12, 14:13 judge 7:6 judgment 9:13 jumping 34:18 jury 7:7 <hr/> <p style="text-align: center;">K</p> <hr/> keenan 3:3, 21:7, 22:2, 37:6, 37:9, 39:7, 39:22, 40:19, 41:6, 41:14, 42:13, 47:17, 54:12, 57:9, 60:10, 60:17, 60:24, 63:1, 65:23, 66:5, 66:11, 66:18, 66:23 keep 32:20, 34:3	keturah 12:9, 25:8, 29:16 key 19:5, 57:19 kind 24:23, 25:1, 26:7, 31:7, 31:11, 32:8, 38:25, 48:19, 48:23, 50:13, 55:3, 55:22, 55:24 knew 41:24 knock 28:12 know 6:18, 6:23, 6:25, 16:17, 17:14, 20:1, 20:17, 21:1, 22:20, 24:4, 25:2, 25:15, 26:7, 26:9, 26:11, 27:8, 27:9, 28:10, 30:10, 30:21, 33:20, 33:21, 37:16, 37:25, 38:25, 41:17, 42:22, 45:16, 46:6, 46:7, 46:13, 47:4, 47:19, 47:20, 47:21, 47:25, 48:1, 48:9, 48:10, 48:15, 48:23, 49:2, 50:19, 50:20, 50:22, 52:1, 55:4, 55:7, 55:19, 55:24, 59:11, 59:17, 59:19, 59:25, 60:2 kyle 1:8	<hr/> <p style="text-align: center;">L</p> <hr/> la 36:7, 43:13, 52:9, 64:6 labeled 43:12 labels 36:6 labs 56:5 lack 45:18 lafayette 61:9 lagroue 3:20 lake 61:9 largest 61:22 last 8:23, 12:3, 24:17, 59:3, 65:4, 65:8, 65:22 late 59:4 later 42:9 latosha 19:16 latter 51:5 launch 52:20 law 41:21, 41:22, 48:2 lawsuit 58:17, 58:20 ldf 42:4 lead 47:3 leaders 47:2 leadership 19:13, 19:14,
--	--	---	---

Transcript of Omari Ho-Sang, Corporate Representative

Conducted on August 29, 2023

<p>19:18 leading 50:24, 51:6, 51:7, 52:1 lean 42:1 leaned 41:19, 42:1 learned 60:3 learning 48:13 least 31:21, 32:1, 33:16, 33:21, 62:14, 63:3 left-hand 36:25 leg 43:13, 52:9, 64:6 legal 3:18, 3:22, 3:23, 19:17, 22:18, 39:8, 39:23, 40:11, 41:9, 41:15, 42:14, 47:18, 60:11, 65:24 legislative 31:14, 47:16, 49:19, 52:17, 57:8 legislature 34:14, 35:9, 36:7, 44:25 lend 27:5 leonora 1:25, 2:10, 68:3 less 57:18 let's 34:22, 38:6, 56:17, 66:15 letter 55:3</p>	<p>letters 42:20 liberties 3:5 light 18:19, 18:21, 18:23, 18:25, 19:9, 19:12 likely 16:3, 55:11, 62:14 line 37:4, 38:4, 38:5, 51:11 lines 36:24 list 16:17, 32:20, 33:7, 34:3, 34:5, 45:14, 45:22 listed 9:2, 42:5, 45:21, 51:2, 62:7 lists 33:2, 33:8, 54:7 litigation 22:1, 22:14, 22:19, 22:22 little 6:9, 8:18, 18:5, 29:9, 34:12, 36:8, 40:6, 43:20, 63:4, 64:12 live 15:6, 50:6, 59:23, 61:25 lived 14:25, 15:3, 15:5, 15:15, 59:23, 60:1 lives 60:5, 60:6 llp 3:12</p>	<p>local 45:19, 49:24 location 40:15 lodging 50:9, 50:11, 50:18 long 10:5, 14:25, 20:14, 21:12, 31:5, 41:8 longer 56:8, 63:4 look 25:21, 26:1, 42:8, 53:15 looked 33:7 looking 21:23 looks 24:23, 26:7, 27:9, 27:25, 28:11, 44:7, 64:23, 65:1 lot 26:20, 37:5, 38:7, 45:9, 47:21, 49:3, 50:22, 51:8 lots 16:14 loud 38:6, 44:23, 53:23 louisiana 1:2, 1:11, 3:20, 5:14, 5:23, 10:4, 10:8, 10:24, 14:17, 15:1, 15:15, 17:18, 18:12, 18:14, 18:20, 19:24, 20:22, 21:2, 24:24, 36:5, 36:17, 38:18, 38:23, 39:3,</p>	<p>42:11, 46:5, 50:6, 58:20, 60:8, 61:12, 62:9 louisianian 38:9 lunch 60:22</p> <hr/> <p style="text-align: center;">M</p> <hr/> <p>m-i-l-l-e-r 12:4 made 29:22, 30:7, 32:15, 49:5 main 9:23, 41:20, 44:8, 64:14 majority 12:18, 15:5, 25:2, 26:16, 26:19, 29:7, 29:8, 31:16, 33:20 make 6:7, 6:9, 13:9, 17:6, 21:9, 39:25, 40:8, 41:4, 41:19, 49:25, 50:21, 56:12, 58:4 makes 19:1, 30:6, 30:8 making 11:5, 30:11, 44:24 manager 10:4, 10:16, 10:22, 12:19, 14:10, 36:19, 40:23 managers 10:14 manual 30:12 many 11:14, 15:25,</p>
---	---	--	---

Transcript of Omari Ho-Sang, Corporate Representative
 Conducted on August 29, 2023

<p>16:16, 18:22, 24:16, 30:21, 31:20, 33:9, 33:10, 38:20, 45:3, 46:22, 46:23, 47:7, 49:23, 59:9, 59:23, 61:5, 62:2, 62:11, 62:22, 63:13 map 38:11, 38:19, 38:24, 39:2, 39:11, 40:9, 40:13, 40:18, 40:22, 40:24, 41:4, 41:9, 42:12, 64:3 maps 21:17, 42:22, 47:16, 48:2, 49:19, 51:25, 52:17, 57:8, 59:8, 65:2, 65:19 march 64:21 marginalized 38:9 marked 7:16, 7:18, 23:5, 23:7, 35:22, 35:24, 43:14, 43:16, 52:9, 56:13, 56:14, 64:7, 64:8 markings 19:5 martin 61:15 mary 61:15 massive 48:7 matter 1:15, 5:12, 8:10, 8:15,</p>	<p>12:10, 12:11, 12:16, 12:21, 12:22, 13:6, 13:18, 19:4, 36:4, 36:20, 38:22, 40:18, 40:21, 40:23, 41:9, 43:14, 62:5 maybe 18:17 mean 16:14, 17:2, 17:12, 19:4, 24:8, 31:22, 32:3, 38:18, 39:6, 39:11, 40:3, 65:20 meaningfully 26:23 means 11:11, 57:18, 65:14, 65:15 measure 55:2 measures 55:3 meet 24:25, 29:14, 33:16, 33:20, 33:22 meetings 33:12, 33:15, 33:19, 34:6, 34:9 megan 3:3, 66:17 member 19:3 members 11:2, 17:22, 17:23, 17:24, 24:11, 24:13, 24:14, 25:14, 25:22, 25:23, 28:17, 45:25, 50:1, 50:2 memorandum 29:25</p>	<p>mentioned 19:2, 27:8, 28:18, 30:25, 41:3, 52:5, 56:19, 64:2 mentioning 52:12 messaging 42:18 met 9:7 michael 3:25 michigan 18:15 middle 1:2, 5:13 might 6:16, 23:18 miller 11:25, 12:4 mind 12:1, 60:17 mini 11:4, 28:19, 28:21, 48:17, 49:20, 50:14, 56:19, 56:21, 57:13, 59:12, 62:18 minorities 39:19 minute 43:22 minutes 34:18 mission 11:16, 11:17, 27:6, 27:15, 48:10, 56:25, 59:21 mississippi 18:14 mobilization 31:8, 32:5, 33:1, 47:3, 48:5, 48:7, 49:22, 50:23,</p>	<p>51:16 mobilizing 31:9, 59:15, 59:18 moment 37:7 money 57:18, 57:19 month 33:16, 33:21 monthly 33:25, 34:4 more 17:6, 17:7, 18:22, 33:22, 33:23, 44:25, 48:20, 48:22, 50:13, 51:18, 51:19, 51:20, 55:11, 55:23 morning 5:9, 6:24 most 16:3, 26:12, 27:23, 28:1, 45:4, 62:14 move 33:11 movement 56:5 much 29:24, 40:8, 55:18, 57:21, 66:2 mullins 3:12, 5:11 multiple 36:14, 36:15 myself 25:7</p> <hr/> <p style="text-align: center;">N</p> <hr/> <p>naacp 3:18, 3:22, 3:23, 36:5, 36:7, 42:4 naifeh 3:22</p>
---	--	--	--

Transcript of Omari Ho-Sang, Corporate Representative

Conducted on August 29, 2023

<p>nairne 1:4, 4:9, 5:12, 23:4 name 5:9, 5:16, 5:17, 5:19, 12:3, 16:16 named 18:18, 61:21 nature 46:12 necessarily 25:20 necessary 41:23, 50:1 need 6:24, 16:19, 21:25, 22:15, 26:3, 26:4, 29:21, 43:20, 65:19, 66:6 needed 27:22, 33:19 needs 11:7, 25:4, 55:22 neither 68:10 nelson 3:12, 5:10 network 33:17 never 5:25, 38:10, 38:11, 38:19, 39:2, 42:12, 45:3, 45:7 new 2:12, 34:19, 46:2, 46:9, 46:10, 54:7, 54:11, 54:17, 58:19, 68:21 next 21:24, 37:21, 60:19 nine 23:20</p>	<p>non 38:11, 38:19, 40:3, 40:9, 40:12, 42:12 non" 38:15 none 21:9, 38:15 nonpartisan 12:16 nonprofit 16:8, 16:9, 16:15 north 3:14, 18:15 notarial 68:15 notary 2:11, 5:5, 68:3, 68:20, 68:22 notes 53:16 nothing 66:11 notice 2:10, 4:8, 7:16, 8:9 nuanced 49:10 number 33:6, 37:1, 44:21, 46:25, 48:21, 62:17, 64:6 numbers 36:25 nw 3:6</p> <hr/> <p style="text-align: center;">O</p> <hr/> <p>oath 7:5 object 21:8, 22:2, 37:6, 63:1, 63:5 objection 39:7, 39:22,</p>	<p>40:10, 40:19, 41:6, 41:14, 42:13, 47:17, 54:12, 57:9, 60:10, 65:23 objective 27:13 observing 3:17 occasion 14:22 occur 10:13 october 36:5, 59:5 offer 35:17 office 18:7, 18:8, 19:23, 19:24, 20:2, 20:4, 20:10, 20:15, 20:17 officer 68:4 offices 2:2, 19:19, 19:22 official 1:9, 25:11, 25:12 officially 44:15 often 30:23, 33:15, 33:22 oh 57:16 okay 10:5, 10:10, 12:23, 13:1, 13:8, 13:13, 13:20, 14:1, 14:8, 17:24, 21:5, 21:14, 22:10, 22:20, 24:1, 24:6, 24:12, 25:24,</p>	<p>28:18, 30:24, 36:12, 36:15, 37:18, 37:21, 38:2, 38:3, 39:15, 41:2, 41:11, 42:3, 43:19, 43:24, 43:25, 44:21, 49:15, 52:15, 53:1, 53:13, 53:15, 54:1, 58:9, 59:6, 60:15, 62:7, 62:16, 63:13, 64:15, 64:16, 64:22, 65:7, 66:15 omari 1:16, 2:1, 4:2, 5:17, 21:9, 22:9, 37:9, 39:9, 39:24, 60:11, 63:4, 65:25, 67:10, 67:19 once 24:5, 30:2, 33:16, 33:21, 37:17, 37:25 one 9:11, 12:7, 13:16, 16:12, 18:12, 19:5, 23:13, 27:23, 31:2, 31:24, 33:4, 35:13, 35:14, 36:4, 40:9, 40:12, 45:21, 45:22, 46:19, 47:21, 50:23, 51:3, 57:4, 58:25, 63:15, 63:16, 64:1 one-on-one 33:18 only 22:17</p>
--	---	--	---

Transcript of Omari Ho-Sang, Corporate Representative

Conducted on August 29, 2023

82

<p>open 32:16, 34:6, 34:9, 34:11 operate 17:17, 18:10, 61:6, 62:8 operates 18:11 operations 18:6 opportunities 28:2 opportunity 40:15, 55:9 order 27:1, 56:21, 66:21, 66:24 orders 66:19 org 13:14 organization 8:17, 11:12, 16:21, 16:25, 24:20, 25:14, 25:15, 25:17, 25:19, 25:21, 26:1, 26:22, 27:23, 29:23, 42:17, 42:21, 56:21 organizationally 42:20 organizations 11:15, 16:8, 16:10, 16:11, 16:13, 16:14, 16:16, 16:18, 24:8, 25:22, 26:16, 29:6, 33:13, 42:4, 57:3 organize 49:10 organized 18:3, 46:12 organizer 10:11, 12:8,</p>	<p>14:14, 20:11, 25:8 organizing 10:4, 10:14, 10:15, 10:22, 12:19, 14:10, 14:16, 36:19, 40:23, 59:18 originally 46:5 orleans 46:3, 46:9, 46:10, 54:7, 54:11, 54:17, 61:10 other 9:21, 11:1, 12:6, 16:7, 16:9, 16:14, 17:8, 17:11, 17:25, 20:23, 32:9, 39:18, 42:4, 45:12, 50:23, 50:24, 57:14, 57:19, 61:16 others 33:11 otherwise 68:13 out 10:24, 11:19, 17:19, 17:20, 29:16, 38:6, 42:19, 44:23, 48:5, 53:23, 55:10, 58:13, 58:19, 59:1, 63:16 out-of-town 50:11 outcome 47:24, 49:5, 68:13 outreach 51:12, 51:20 outside 14:21, 18:1,</p>	<p>54:19, 61:13, 61:16, 63:2 over 7:23, 33:3 overall 27:15, 33:1, 33:3 overtime 21:16</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>page 4:2, 4:7, 8:23, 23:20, 36:21, 37:1, 37:10, 37:11, 37:16, 37:21, 37:23, 37:25, 38:5, 44:17, 52:24, 53:11, 54:2, 67:14 pages 1:24, 67:11 paid 10:19, 10:20 paragraph 23:22, 23:24, 37:25, 54:5, 54:22, 64:14, 64:22, 65:1, 65:5 parcel 54:10 parentheses 54:8 parish 17:25, 46:2, 46:5, 46:8, 54:10, 60:8, 62:8 parishes 18:1, 18:4, 54:8, 61:5, 61:7, 61:10, 61:11, 61:13, 61:14, 61:16, 61:17, 61:18, 61:19, 61:21,</p>	<p>62:7, 62:11, 62:13, 62:15 part 29:12, 42:17, 43:2, 47:1, 47:9, 50:24, 54:10, 62:1 participate 49:21, 50:3 participated 31:13, 46:21, 48:18 participating 32:18 participation 10:25, 11:14, 57:6 particular 39:13, 51:11, 60:14 parties 2:5, 68:12 partner 11:12, 16:15, 24:19, 24:21, 25:9, 25:12, 25:25, 27:20, 27:22, 28:8, 29:14, 29:22, 30:1, 30:2, 30:5, 33:12, 33:17, 33:18, 45:17, 45:19, 47:2, 47:23, 51:10, 61:24, 63:7, 63:8 partners 10:23, 11:5, 11:7, 11:9, 11:11, 19:8, 21:17, 24:11, 24:15, 24:16, 24:18, 24:25, 28:10, 28:22, 29:10, 33:19, 33:21, 33:22, 34:7, 34:8, 41:24, 45:10,</p>
--	--	--	---

Transcript of Omari Ho-Sang, Corporate Representative

Conducted on August 29, 2023

<p>45:12, 45:21, 48:2, 48:18, 49:20, 49:23, 50:9, 50:11, 50:14, 50:18, 50:24, 51:24, 56:24, 59:7, 59:23, 60:2, 60:7, 61:4, 61:5, 61:13, 62:3, 62:6, 62:14, 63:8 partnership 24:24, 27:1 parts 31:8, 31:10 party 28:4 passed 52:18 past 60:5 patience 6:23 paying 50:10, 59:16 pdf 8:23, 36:22, 38:5, 44:18, 52:24, 53:11, 54:3 pending 5:13, 58:17, 58:21 pennsylvania 18:15 people 16:12, 16:20, 16:22, 16:23, 17:7, 17:9, 17:13, 17:17, 17:21, 18:2, 26:8, 26:10, 28:13, 28:16, 31:9, 31:20, 31:21, 32:17, 32:21, 33:10, 36:18, 37:5,</p>	<p>38:7, 40:14, 47:6, 47:7, 49:3, 49:6, 49:8, 49:11, 51:22, 55:10, 55:11, 61:23, 62:19 pep 32:22, 32:25, 33:2, 47:6 percent 55:14, 55:15 period 15:4 permanent 19:3 person 12:7, 19:10, 33:25, 41:9, 41:11 personally 25:6 personnel 19:7 perspective 57:4 phase 37:21 phone 28:15 phrase 27:16 physical 19:19, 19:21, 19:23, 19:24, 20:2, 20:10 picked 62:13 piece 48:24 place 28:2, 35:16, 50:21, 59:1, 59:2, 59:4 places 32:24, 62:2 plaintiffs 1:6, 3:2, 36:4,</p>	<p>66:12, 66:23 planners 50:20 planning 27:21, 27:22 plans 23:1 played 65:16 please 5:15, 6:7, 6:10, 6:18, 6:25, 7:15, 8:22, 23:4, 23:6, 23:20, 35:21, 35:23, 36:22, 37:16, 37:22, 43:11, 43:15, 44:17, 44:22, 52:8, 52:24, 53:11, 53:23, 54:3, 60:16, 64:5, 65:4 plus 18:11, 62:13 point 6:17, 44:20, 44:23 points 44:2, 44:12, 44:13, 44:14 polls 48:11 poor 40:7, 57:11 population 39:12, 39:16, 40:14, 41:3, 41:13, 61:20, 61:21 portion 31:8 position 10:6, 10:9, 13:23, 14:9, 42:11, 60:7, 60:14</p>	<p>positively 17:16 possible 6:16 potential 24:25 potentially 38:14 power 42:5 preconditions 41:22 prefer 7:24 preparation 23:14 prepare 9:5 present 63:11, 63:21 press 31:13, 32:12 prevent 7:9 previous 15:14 previously 5:24, 20:20, 29:10, 43:12, 52:9, 52:12, 64:2, 64:5 primary 14:24, 15:21 prior 14:12, 14:13, 63:6 prioritize 61:8, 61:17 privilege 21:8, 22:3 problem 8:4, 37:20, 60:21 process 11:5, 21:16, 24:21, 24:24, 25:10, 26:2, 27:22, 28:21,</p>
--	---	---	---

Transcript of Omari Ho-Sang, Corporate Representative

Conducted on August 29, 2023

84

29:13, 30:13, 30:19, 32:2, 37:15, 38:21, 39:1, 40:25, 41:19, 41:24, 42:8, 44:24, 45:2, 45:5, 48:18, 49:5, 51:18, 55:17, 55:19, 58:5, 59:12, 59:25, 60:4 processes 60:4 produced 21:18, 21:19, 36:3, 38:23, 39:3, 42:23, 43:13, 44:2, 44:15, 64:6 professionals 17:14 proportion 39:11, 41:2 proportional 40:14 proportionality 39:21, 41:12 provide 11:16, 29:15, 29:16, 42:6, 48:17, 51:9 provided 29:21, 31:15, 42:9, 49:20 providing 11:6 public 2:11, 5:5, 32:16, 34:6, 34:10, 34:11, 68:3, 68:20 pull 7:15, 23:4, 35:21, 43:12, 52:8, 60:16, 64:5 purpose 47:9	purposes 57:19 pursuant 2:10 put 42:18, 42:22, 54:15, 55:20, 66:24 <hr/> Q <hr/> question 6:11, 6:17, 7:1, 22:8, 22:11, 22:18, 40:1, 40:7, 42:24, 57:11, 57:16 questioned 5:5 questions 6:8, 6:15, 7:10, 18:6, 21:25, 24:4, 29:20, 39:8, 41:25, 64:13, 66:3, 66:13 quick 35:8, 66:5 quickly 6:4 <hr/> R <hr/> race 41:12 racial 39:18 racist 38:11, 38:19, 40:9, 40:13, 42:12 raleigh 3:14 rally 28:4, 31:11, 32:11, 32:22, 32:25, 33:3, 47:6 rapides 61:8	rather 25:23, 53:25 re-election 65:17 reach 27:12, 55:10, 55:25 read 8:1, 24:2, 24:6, 36:8, 37:10, 37:11, 37:24, 38:6, 38:12, 44:21, 44:22, 53:22, 65:4, 66:17, 67:11 reading 37:17, 68:9 ready 37:21, 38:3, 60:24, 66:13 real 7:6 really 26:4, 28:5, 41:17, 45:17, 48:1, 48:12, 48:21, 48:23, 49:9, 55:8, 55:9, 55:18, 55:25, 59:21, 60:3, 61:17 recall 15:22, 36:9 receive 29:1, 29:6, 29:10, 29:24 received 62:19, 62:23, 62:25, 63:9, 63:10, 63:22 receiving 57:1 recent 28:1 recognize 8:5, 23:10, 64:17	recollection 15:23, 45:8 recommendation 29:13, 29:15, 29:17, 29:19, 30:18 recommendations 11:6, 30:15 record 5:16, 6:6, 12:2, 13:9, 33:10, 35:4, 44:23, 53:23, 60:18, 60:25, 65:5, 66:7, 68:6 redistricting 21:15, 31:3, 32:13, 34:15, 41:24, 42:8, 42:10, 43:8, 44:3, 45:2, 46:16, 47:22, 48:4, 48:12, 48:14, 49:5, 49:21, 50:4, 50:12, 50:15, 51:13, 51:18, 52:2, 52:3, 52:14, 56:20, 57:15, 57:21, 57:23, 59:15, 59:16, 59:22, 60:4, 63:14, 63:19, 63:24 reduced 68:8 refer 8:17, 16:24, 17:11, 23:17, 23:21, 58:7 reference 7:24 referenced 49:2 referring 8:19, 45:6, 45:23, 65:11 region 29:16
---	--	--	---

Transcript of Omari Ho-Sang, Corporate Representative
 Conducted on August 29, 2023

<p>regional 12:8, 20:11, 25:8 register 32:17, 32:19, 47:11 registered 15:11, 15:15, 46:14, 46:20, 46:23, 47:4, 47:9, 48:22, 53:7 registration 32:22, 32:25, 33:3, 33:7, 34:5, 68:22 related 31:2, 63:14, 63:18, 63:24, 68:11 relief 9:13 remember 45:8, 45:15 reminding 65:6, 65:7 remote 20:7 remotely 1:17, 2:5 repeat 22:10 rephrase 6:19, 40:7 report 11:22, 11:23, 12:6, 20:4, 20:9, 29:19 reported 1:25 reporter 1:25, 2:11, 6:6, 66:19 reports 12:7 represent 5:11, 36:2 representative 1:16, 43:3</p>	<p>represents 12:17, 39:4, 39:5, 39:11, 40:16 request 32:17, 54:15, 55:20, 56:2 requested 68:10 requesting 65:18 required 41:22 requirements 25:20 resident 36:17 resolve 51:19 resources 25:4, 25:19, 48:17, 58:10, 58:13 respond 55:4 responding 48:1 response 9:18, 42:24 responses 6:8, 9:15, 9:17 responsibility 50:10 responsible 10:23, 11:4 result 41:5, 59:8 review 9:10, 9:18, 29:19, 30:2, 43:22, 44:18, 52:25, 53:12, 64:12 reviewed 9:7, 9:9, 9:11, 9:14, 9:20, 9:22, 9:24, 23:14</p>	<p>reviewing 24:5 right 7:13, 14:3, 16:19, 21:14, 27:6, 35:7, 37:1, 54:21, 56:17, 62:18 riley 3:12 road 34:14, 35:9, 35:15 roadshow 4:10, 35:18, 35:21, 36:5, 36:10, 43:2, 44:25, 45:10, 45:13, 45:18 rohani 3:23 role 11:21, 13:20, 16:15, 65:16 rolling 50:5, 50:16 room 38:8 rouge 14:23, 31:10, 31:18, 32:9, 49:23, 49:24, 50:17, 51:3, 53:25, 61:10 roughly 24:17 rule 8:9 rules 6:5 runoff 15:21 runs 18:24 rush 66:24</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>safee 3:25</p>	<p>said 5:24, 9:9, 10:10, 13:21, 20:2, 20:20, 23:13, 30:6, 30:14, 39:15, 41:21, 44:12, 51:6, 56:6, 57:24, 63:21, 68:7 sake 54:14 same 10:9, 13:1, 13:23, 14:14, 49:16, 56:22, 59:9 sara 3:23 sarah 3:4 say 9:16, 11:8, 17:3, 19:6, 25:5, 25:12, 31:16, 32:3, 39:5, 39:10, 39:20, 40:2, 42:19, 42:24, 51:14, 55:6, 55:9, 55:15, 59:9 saying 14:4, 48:6 scarborough 3:12 scope 63:2 score 54:23, 54:24, 55:1, 55:8, 55:14, 55:17 scores 55:11 screen 9:12 seal 68:15</p>
---	---	---	--

Transcript of Omari Ho-Sang, Corporate Representative
 Conducted on August 29, 2023

<p>second 37:10, 52:24, 54:2, 60:18, 64:14, 64:22, 65:1, 65:5 secretary 1:10, 5:11, 66:22 see 7:25, 20:14, 21:17, 23:24, 23:25, 31:25, 37:1, 38:6, 43:19, 43:21, 48:3, 52:15, 53:3, 53:16, 54:4, 54:7, 54:24 senate 23:1, 31:23 send 32:8, 42:21, 55:4, 55:5 senior 10:3, 10:11, 10:15 sense 25:12, 32:18, 33:9 sent 30:1, 51:20 sentence 24:2, 37:5, 38:6, 53:22, 65:5, 65:14, 65:15 sentiment 21:19, 49:6, 49:11 separate 12:23, 46:7 september 59:3, 59:4 session 31:14, 32:11, 32:13, 42:10, 47:25, 51:23 set 22:20, 68:14</p>	<p>share 56:22 shared 12:24 sharing 50:25 should 38:15 shouldn't 55:15 show 34:14, 35:9, 35:15, 36:7 shown 67:14 shreveport 5:23, 14:19, 14:21, 14:24, 15:3, 15:6, 15:7, 15:8, 17:19, 17:20, 18:1, 19:23, 20:3, 20:15, 35:16, 62:1 side 36:25 sign 30:1, 32:21, 55:6, 66:17 signature-mig2k 68:18 signed 30:2, 42:20 significant 23:23, 51:16, 57:20, 57:22, 65:16 signing 68:10 since 15:2, 20:16, 21:15, 33:7 single 62:8 sister 15:7 six 8:23</p>	<p>skills 27:5 society 17:12 software 55:24 some 7:22, 14:22, 36:6, 44:18, 45:11, 50:10, 50:25, 56:18, 59:20, 64:13 somebody 40:16 someone 55:2 something 16:4, 48:6, 54:22 sometimes 25:15, 28:11, 33:22 soon 66:24 sound 6:12, 6:20, 8:2, 34:25 southern 12:8, 20:11, 20:12, 25:8, 29:16 space 20:15 speaking 27:15 special 15:18, 47:24 specialist 3:25 specific 11:16, 26:25, 39:16, 41:13, 45:12, 49:18, 50:15, 57:7, 57:24, 58:3 specifically 30:8, 44:19, 45:9, 51:15,</p>	<p>64:13 speed 8:18 spelling 12:1 spend 47:21, 47:25 spirit 44:24 st 36:5, 61:15 staff 12:24, 18:20, 18:21, 19:3, 19:10, 25:7, 29:12, 47:23 stand 65:9, 65:18 standard 66:21 start 26:13 started 48:2, 58:19 starting 37:4, 38:4, 65:6 starts 38:7 state 2:11, 5:12, 5:15, 10:3, 10:8, 10:11, 10:14, 10:15, 10:22, 10:24, 12:19, 14:10, 14:23, 18:3, 18:16, 19:1, 19:2, 19:10, 19:11, 19:12, 20:12, 20:24, 22:25, 27:4, 29:12, 31:10, 31:12, 31:22, 34:15, 35:10, 36:19, 38:10, 39:3, 40:22, 45:1, 54:19,</p>
--	---	---	---

Transcript of Omari Ho-Sang, Corporate Representative
 Conducted on August 29, 2023

<p>62:3, 66:22, 67:5, 68:21 statement 60:14 states 1:1, 18:10, 18:11, 18:12, 18:13, 18:19, 18:21, 18:23, 18:24, 18:25, 19:8, 19:9, 19:20, 19:22 statewide 33:17 status 27:2 stenographically 68:8 stood 65:8 stopped 32:6 stops 32:7, 53:25 street 3:6, 3:13 streets 16:12, 16:20, 16:22, 17:17, 17:21, 18:1, 36:18, 62:19 stuart 3:22 subject 38:21, 67:13 submit 29:14 substantively 26:23 suburb 46:2, 46:7 succeed 30:18 suite 3:13 supervision 68:9 supplemental 9:17</p>	<p>supplemented 33:8 support 11:1, 11:16, 27:20, 28:7, 61:24 supporting 62:5 supports 28:22 sure 6:7, 12:3, 18:17, 19:21, 20:1, 21:9, 34:21, 37:5, 37:8, 37:12, 38:7, 38:24, 39:25, 49:25, 50:21, 56:12, 60:20, 66:18 switch 18:5, 34:12 switching 62:18 sworn 5:4 system 17:4, 17:6, 17:9 systems 16:23, 16:24, 17:2, 17:3, 17:8, 17:11, 17:16</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>table 26:15 take 34:21, 43:6, 47:13, 48:9, 56:10, 59:4, 66:5 taken 35:2, 60:14, 60:22, 66:9, 68:5, 68:7 takeover 43:8, 44:3,</p>	<p>46:16, 48:4, 49:21, 50:4, 50:12, 50:15, 52:3, 52:14 taking 59:2 talents 27:5 talk 49:3, 60:18 talked 39:1, 47:5, 58:10, 59:6, 64:1 talking 30:24, 44:2, 44:12, 44:13, 44:14 target 53:3, 55:9, 55:13, 61:7, 61:11, 61:14, 61:16, 61:17, 61:22, 62:2, 62:12 targeted 61:18, 61:23 targeting 53:4, 54:4, 54:14, 54:21, 56:1 teach 42:7 teaching 31:11 teachings 48:23 team 19:3, 44:16, 48:13 tech 7:14, 8:22, 23:3, 35:20, 37:15, 37:22, 43:11, 52:23, 53:10, 60:16, 64:4 technical 6:24</p>	<p>technically 15:6 technician 3:25, 52:8 tell 11:11, 38:9 ten 15:2 ten-year 15:4 tennessee 18:15, 18:17 term 11:9, 25:13, 43:9 terms 22:17, 42:16, 47:2, 58:9, 58:12, 65:19 test 6:22 testified 5:5, 6:2, 43:5, 43:7 testify 8:14 testifying 7:5, 7:6, 9:2, 13:10, 36:9, 36:13, 36:14 testimony 31:15, 35:17, 43:1, 67:11, 68:7 texas 18:14 text 51:21, 52:5, 52:13, 53:17, 54:15, 54:18, 55:4, 55:5 texting 51:22, 56:8 th 3:6, 68:15 thank 6:23, 7:3, 7:21, 8:3, 8:12,</p>
---	--	--	--

Transcript of Omari Ho-Sang, Corporate Representative
 Conducted on August 29, 2023

12:5, 16:6, 37:18, 38:4, 43:6, 43:21, 64:15, 66:2, 66:4, 66:16 themselves 50:1 thereafter 68:8 things 8:18, 17:11, 46:12, 64:1 think 15:23, 15:24, 32:23, 33:5, 41:8, 48:15, 57:16, 60:24, 63:2, 65:14, 66:13 third 53:11 three 31:7, 36:21, 37:11, 37:23, 38:5, 49:16, 62:23 three-day 31:17 through 6:4, 24:22, 29:7, 30:18, 36:8, 58:4, 59:11, 60:2, 61:11, 63:21 throughout 38:23, 41:18 time 6:17, 6:25, 14:24, 15:5, 21:7, 24:23, 27:6, 31:24, 34:19, 34:24, 44:18, 45:14, 46:19, 47:22, 47:23, 47:25, 54:16, 56:5, 56:6, 58:2, 59:20, 65:10,	65:18, 66:3, 66:6 times 11:8, 11:14, 30:21 title 10:2, 10:3, 10:11, 10:13, 19:17 today 6:7, 7:5, 7:11, 7:23, 8:14, 9:2, 9:6, 13:10, 23:15, 42:11, 66:3 took 28:2, 32:24, 35:15, 50:10, 50:21, 50:24, 59:1 top 37:1 topic 34:19 topics 9:2 tour 27:24, 28:1, 30:25, 46:15, 50:17, 58:25, 59:4 tours 28:7, 31:2, 47:10 toward 59:13 towards 56:20, 57:23 training 11:7 trainings 38:20 transcript 4:10, 35:22, 36:3, 41:18, 42:5, 49:2, 66:20, 66:24, 67:13, 68:6	transcripts 36:24 transport 50:1 true 67:13, 68:6 try 6:14, 49:15 trying 33:9, 40:8, 55:25 tuesday 1:18 turn 23:20, 36:21, 44:17, 52:24, 53:11, 54:2 turnout 27:7, 27:14, 48:11 two 18:20, 19:25, 31:6, 31:7, 31:17, 32:15, 32:23, 32:24, 37:16, 38:25, 44:17, 54:8, 64:23 two-day 31:6, 51:3 types 14:14, 41:19 typewriting 68:9 typically 29:13 typo 38:14 <hr/> <p style="text-align: center;">U</p> <hr/> ultimate 27:13 unclear 6:18 under 7:5, 68:9 understand 7:3, 7:4, 8:13,	8:19, 13:9, 26:4, 57:16 understanding 9:1, 22:24, 23:2, 29:25, 38:16, 38:20, 42:19, 46:4, 60:13 understood 14:6, 14:7 union 3:5 united 1:1 unpaid 10:19 unregistered 53:7 until 6:10 upcoming 58:24 upper 24:18 urging 51:25 using 25:13 utilize 13:18, 19:23, 20:2 utilized 20:16, 51:13 <hr/> <p style="text-align: center;">V</p> <hr/> variety 28:1 various 18:4 vendor 54:15, 54:18, 55:8, 55:18, 55:22, 56:4, 56:7, 56:8 verbal 6:8 veto 42:22, 51:25,
--	--	--	--

Transcript of Omari Ho-Sang, Corporate Representative

Conducted on August 29, 2023

<p>64:2, 65:2 via 2:5 victoria 3:18 view 46:8, 47:20 virtual 34:1, 34:2, 37:14 vocal 45:16 volunteer 26:10, 55:6, 55:7 vote 10:25, 11:19, 15:11, 15:15, 15:18, 38:8, 47:12, 49:4, 49:8, 49:12, 58:13, 58:19, 59:1 voted 16:5, 21:20 voter 10:25, 11:13, 26:17, 27:7, 27:14, 48:11, 57:5 voters 1:15, 8:10, 8:15, 12:10, 12:11, 12:16, 12:21, 12:22, 13:6, 13:18, 19:4, 36:19, 39:4, 40:23, 45:1, 46:14, 46:20, 46:23, 47:4, 48:22, 53:7, 65:15 votersmatterfund 13:14 voting 61:20</p> <hr/> <p style="text-align: center;">W</p> <hr/> <p>wa 68:22</p>	<p>wagner 3:18 wait 6:10 walker 1:25, 2:10, 68:3 walsh 3:24 want 13:8, 16:17, 23:17, 26:5, 26:21, 27:5, 27:12, 33:6, 39:25, 49:12, 55:10, 61:24, 66:17 wanted 49:25, 50:2, 54:18, 56:12 washington 3:7 water 17:10 way 28:21, 32:6, 47:7, 47:21, 48:8, 48:19, 49:1, 53:25, 57:11, 60:9 ways 26:9, 47:20, 49:16, 59:9, 60:3 we'll 25:8 we're 7:23, 35:4, 37:14, 48:7, 60:24, 62:14, 63:3 we've 18:3, 34:17, 42:18, 58:25, 59:10, 64:1 well-known 27:23 went 21:16, 31:12,</p>	<p>35:7, 50:14, 51:15, 60:18 whatever 7:25, 23:19, 27:11, 41:21, 41:22 whereas 19:9 whereof 68:14 whereupon 7:18, 23:7, 35:2, 35:24, 43:16, 56:14, 60:22, 64:8, 66:9, 67:1 whether 29:23 white 40:3 whole 51:18 wichita 61:8 within 13:20, 13:23, 16:14, 17:18, 44:4, 51:10, 54:17 witness 5:4, 21:14, 22:10, 35:1, 37:12, 37:18, 39:10, 39:25, 40:12, 40:21, 41:8, 41:17, 42:16, 47:19, 53:1, 53:13, 54:14, 60:13, 63:6, 66:1, 66:4, 67:10, 68:14 work 11:1, 11:13, 11:15, 12:17, 12:18, 12:20, 14:15, 14:22, 14:24, 16:9,</p>	<p>16:13, 16:18, 17:6, 17:8, 20:6, 20:7, 25:2, 26:17, 29:8, 36:24, 61:12, 62:4, 62:15 worked 50:20 working 10:23, 17:13, 42:6 works 16:22, 18:2, 20:12 worse 49:6</p> <hr/> <p style="text-align: center;">Y</p> <hr/> <p>yeah 13:8, 57:10 year 57:25, 63:11, 63:18 years 15:2, 62:25 york 2:12, 68:21 yourself 24:3, 43:23</p> <hr/> <p style="text-align: center;">Z</p> <hr/> <p>zoom 2:5, 37:15, 43:20</p> <hr/> <p style="text-align: center;">.</p> <hr/> <p>.2337 3:8 .3800 3:15</p> <hr/> <p style="text-align: center;">0</p> <hr/> <p>00 26:11 00178 1:7 01 68:22</p>
---	---	---	---

Transcript of Omari Ho-Sang, Corporate Representative
 Conducted on August 29, 2023

<p>06 60:23</p> <hr/> <p style="text-align: center;">1</p> <hr/> <p>1 66:10, 67:2</p> <p>10 1:19, 34:24, 35:1</p> <p>1012 4:11, 43:13</p> <p>11 34:23, 35:3</p> <p>12 18:13, 18:18, 60:23</p> <p>1400 3:13</p> <p>15 3:6, 35:3</p> <p>17 68:17</p> <hr/> <p style="text-align: center;">2</p> <hr/> <p>20 34:23, 34:24, 35:1</p> <p>20005 3:7</p> <p>2013 15:2</p> <p>2019 63:9</p> <p>202.675 3:8</p> <p>2020 10:7</p> <p>2021 10:15, 15:18, 20:16, 21:16</p> <p>2022 31:3, 33:7, 34:15, 44:11, 48:6, 52:16, 52:21, 63:20, 64:21</p> <p>2023 1:18, 10:16,</p>	<p>63:22, 68:16</p> <p>2024 68:17</p> <p>21 36:5</p> <p>22 1:7</p> <p>23 4:9</p> <p>25 18:11, 62:15, 62:16</p> <p>26 66:10</p> <p>27603 3:14</p> <p>28 23:22</p> <p>29 1:18, 68:15</p> <hr/> <p style="text-align: center;">3</p> <hr/> <p>30 4:8, 7:15, 8:9</p> <p>301 3:13</p> <p>31 1:19</p> <p>32 67:2</p> <p>35 4:10</p> <p>383 4:13, 64:6</p> <p>3:-cv--sdd-sdj 1:7</p> <hr/> <p style="text-align: center;">4</p> <hr/> <p>43 4:11</p> <p>45 34:18</p> <p>4646 5:22</p> <hr/> <p style="text-align: center;">5</p> <hr/> <p>50 24:18, 55:14</p>	<p>504602 1:23</p> <p>56 4:12</p> <p>57 24:18</p> <p>58 24:18</p> <hr/> <p style="text-align: center;">6</p> <hr/> <p>6109670 68:22</p> <p>64 4:13</p> <p>68 1:24</p> <hr/> <p style="text-align: center;">7</p> <hr/> <p>702 36:7</p> <p>71107 5:23</p> <hr/> <p style="text-align: center;">9</p> <hr/> <p>915 3:6</p> <p>919.329 3:15</p> <p>977 4:12, 52:9</p>	
--	---	---	--

EXHIBIT 2

BVM Capacity Building Institute and the Rural Focus



One of BVM's Five Core Beliefs is "Black voters matter everywhere." With this in mind, we seek to build capacity of community-based organizations with a primary focus on rural communities, NOT only in urban communities. We follow such a strategy for a variety of reasons, including:

- a. We have a deep respect for civil rights history, and we recognize that many of the organizing campaigns that changed this nation took place in rural communities. The examples of Selma and the Alabama Black Belt, or Fannie Lou Hamer and the Mississippi Delta, support this point.
- b. Rural communities often experience the most harsh and blatant manifestations of voter suppression and institutional racism. This pattern exists largely because of the extreme isolation of rural communities and the difficulty of gaining media exposure. Discriminatory practices which start in rural areas eventually expand and are replicated throughout a state.
- c. Rural communities rarely have access to whatever state-level support is available for social justice organizing and capacity development. We believe in bringing the mountain to the people, rather than forcing the people to travel to the mountain.
- d. We believe that the energy from successful rural organizing has a positive impact on urban organizing as well, creating a virtuous cycle where communities in different parts of the state reinforce one another. This is the nature of "movement": stringing together actions and victories in a critical mass of locations.

BVM's Relationship with Network Partners

We seek to deepen our relationships with community-based partners by staying in touch with them and offering resources (funding, tools, training) throughout the year, not only when there are marquee elections taking place. In addition to providing training on outreach strategies, other areas where we will help to expand capacity include communications and fundraising, so that network partners can more effectively tell their stories and seek the resources to continue their work. In addition, we view our role as a connector, helping network partners within a state to stay in touch with one another via regular conference calls and in-person convenings.

Although we provide funding and resources to partner groups, we do not see our role primarily as funders; nor do our partners see us in that role. Instead, they view BVM as fellow organizers and thought partners who share a common love for our communities. We often use the analogy that we are not sponsoring a picnic and inviting our partners; we are the cousins from down the road who are attending a picnic organized by our extended family, and we are bringing a little sauce or a dessert to help out!

Electoral Organizing and Power Building

At BVM, we often explain to friends and stakeholders that we are NOT an electoral organization. We are first and foremost, a power building organization, and while we firmly believe that voting and electoral organizing is *one* way to build power, it is by no means the *only* way.

Within the space of electoral organizing, we do not measure our success on electoral "wins". We take this position not only because of our status as a 501c3 organization, but because philosophically we strongly believe that in order to truly build power, we must begin to redefine what a "win" is. The traditional approach of defining wins based on whether a particular person has won a certain office is far too limited given the obstacles that our communities face. Instead, we believe in centering a community-defined agenda and the process by which a community seeks to implement that agenda. With this in mind, we seek to increase the capacity of community-based organizations working on a wide range of issues: from mass incarceration to gentrification, from health care to education and more.



PURPOSE AND CORE VALUES

Our goal is to increase power in marginalized, predominantly Black communities. Effective voting allows a community to determine its own destiny. We agree with the words of Dr. Martin Luther King, Jr. when he said, “Power at its best is love implementing the demands of justice, and justice at its best is power correcting everything that stands against love.”

We seek to achieve our goals with the following 5 core beliefs in mind:

- The key to effective civic engagement and community power is understanding, respecting and supporting local infrastructure.
- Black voters matter not only on election day, but on the 364 days between election days as well. This means we must support individuals and organizations that are striving to obtain social justice throughout the year.
- Black voters matter **everywhere**, including rural counties and smaller cities/towns that are often ignored by candidates, elected officials, political parties and the media.
- In order for Black voters to matter, we must utilize authentic messaging which speaks to our issues, connects with our hopes and affirms our humanity.
- The leadership, talent and commitment demonstrated by Black women in particular must receive recognition and, more importantly, **investment** in order to flourish and multiply.

MOVEMENT BUILDING

Relational Organizing And What’s Left After Election Day

An important aspect of BVM’s core beliefs (mentioned above) is an approach that emphasizes relational organizing. We prioritize local infrastructure because we know existing organizations have authentic relationships with community members in general, and voters more specifically. While some experts look at communities critically for lacking infrastructure, our approach is that **relationships are infrastructure**. For these reasons, BVM seeks to intentionally build on existing relationships via our door-to-door canvassing, texting, phone banking, social media and radio messaging.

Similarly, while organizational relationships are important, so are the relationships that each community member has with other friends and family members. We regularly incorporate efforts to have each person contacted to reach five other friends/family, and to then ask those five contacts to each reach five more.

Our emphasis on relational organizing and local organizations has several long-term effects. First, by investing in local organizations instead of working around them, we build capacity, introduce tools and connect them with partners (national, state and other counties) in ways that benefit their ongoing work throughout the year. Second, by enabling local organization to hire local canvassers themselves (rather than simply extracting their local knowledge to hire through outside organizations), we strengthen their relationships with community members rather than undermining those relationships. And third, using a relational organizing approach inherently poses greater potential for **accountability**, compared with the results of a transactional process.

BVM Capacity Building Institute (www.bvmcapacitybuilding.org)

POWER

At BVM, we often explain to friends and stakeholders that we are NOT an electoral organization. We are first and foremost, a power building organization, and while we firmly believe that voting and electoral organizing is *one* way to build power, it is by no means the *only* way.

Within the space of electoral organizing, we do not measure our success on electoral “wins”. We take this position not only because of our status as a 501c3 organization, but because philosophically we strongly believe that in order to truly build power, we must begin to redefine what a “win” is. The traditional approach of defining wins based on whether a particular person has won a certain office is far too limited given the obstacles that our communities face. Instead, we believe in centering a community-defined agenda and the process by which a community seeks to implement that agenda. With this in mind, we seek to increase the capacity of community-based organizations working on a wide range of issues: from mass incarceration to gentrification, from health care to education and more.

Intersection of Political and Economic Power

We believe that independent political power requires independent economic power, and we are sensitive to the many forms of economic coercion which often discourage community members from fully participating in civic life. We also believe that political victories that lack a strong economic base are simply not sustainable. As we explore the intersection of political and economic power, we strive to uplift economic models and policies which support the equitable distribution of wealth rather than deepening economic disparities.

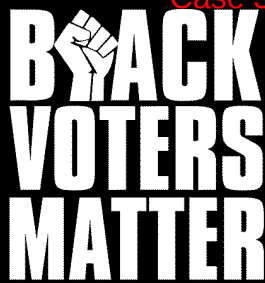
ACCOUNTABILITY

Internally, our primary level of accountability is to our board of directors, which includes social justice leaders with deep experiences in the fields of racial, gender, political and economic justice. In addition to subject matter expertise, we prioritize recruiting board members with the governance and functional organizational development knowledge necessary to lead a growing organization such as BVM. In addition to board accountability, our internal accountability includes accountability to each other at the staff level.

Externally, we are accountable to our partners, including local community-based partners, regional and national partners, as well as funding partners. We seek to track accountability with local partners via periodic partner surveys, which we are in the process of refining.

JUSTICE

Much of the vision discussed above has outlined the ways we address racial and economic justice. One of our five core beliefs addresses our emphasis on investing in female leadership as one aspect of gender justice, but our vision extends beyond that. We believe our efforts must also elevate *issues* in addition to leadership, and we have been proud to support groups who organize around issues such as reproductive justice, Black maternal health and ending sexual violence. Regarding environmental justice, we believe that pollution, wasteful and inequitable utility policies and crumbling infrastructure have disproportionately impacted Black communities. Just as a healthy environment is not possible without healthy civic engagement, healthy civic engagement is limited without a healthy environment. One of the first local campaigns in which BVM engaged was in a county which had been devastated by a coal ash landfill.



SPREADING LOVE, BUILDING POWER, TRANSFORMING DEMOCRACY

<https://www.blackvotersmatterfund.org>

www.bvmcapacitybuilding.org

BLACK VOTERS MATTER is dedicated to expanding Black voter engagement and increasing our political power. Together with partners on the ground and people of good faith everywhere, we are transforming our nation. We are changing the narrative that often marginalizes our communities by instead centering Black love, Black culture and Black-led organizing.

BLACK VOTERS MATTER EVERYWHERE

We believe that Black voters matter not just in urban areas, but everywhere, including the South, rural areas, and small towns that candidates, elected officials, and political parties often ignore.

Black Voters Matter was born in late 2017 when funders overlooked Alabama's rural Black Belt during the U.S. Senate race between Doug Jones and Roy Moore. We invested in 32 community-based organizations, brought Black voter turnout to Obama election levels, and helped surprise the nation.

VOTING RIGHTS

In 2018, about 40 Black senior citizens in Georgia got on the Black Voters Matter bus to go vote when government officials ordered them off the bus. This incident drew nationwide attention to voter suppression and intimidation.

We stand with our partners in fighting voter suppression and advocating for policies that expand voting rights, including increasing early voting, resisting voter ID laws, and restoring voting rights to people who were formerly incarcerated.

BLACK VOTERS MATTER 365

Increasing voter turnout is critical, but it is just the beginning of building power in our communities. We also support policies that promote economic justice, better health care, a more fair criminal justice system, and greater equity in all aspects of American life.

BVM SUPPORTS LOCAL PARTNERS

BLACK VOTERS MATTER supports our partners at election time and all year round. We develop and help strengthen state and local infrastructure.

Our support for local partners includes:

- Mini-grant funding for GOTV efforts as well as general capacity building
- Tools for base-building and voter mobilization efforts include: Texting, Phonebanking Canvassing Apps, Bus Tours and other communications support
- Connectivity and relationship building with local, state and national networks
- Strategic planning

Co-founded by nationally recognized political strategists Cliff Albright and LaTosha Brown

EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA**

DR. DOROTHY NAIRNE, JARRETT
LOFTON, REV. CLEE EARNEST LOWE, DR.
ALICE WASHINGTON, STEVEN HARRIS,
ALEXIS CALHOUN, BLACK VOTERS
MATTER CAPACITY BUILDING
INSTITUTE, and THE LOUISIANA STATE
CONFERENCE OF THE NAACP,

Plaintiffs,

v.

R. KYLE ARDOIN, in his official capacity as
Secretary of State of Louisiana

Defendant.

CIVIL ACTION NO. 3:22-cv-00178
SDD-SDJ

**DECLARATION OF OMARI HO-SANG IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO SUMMARY JUDGMENT**

Pursuant to 28 U.S.C. § 1746, I, Omari J. Ho-Sang, declare as follows:

1. My name is Omari J. Ho-Sang. I am over the age of 18 and competent to make this declaration.
2. I am the Senior State Organizing Manager in Louisiana of the Black Voters Matter Capacity Building Institute ("BVM"). BVM is a Plaintiff in this case.

Black Voters Matter Capacity Building Institute

3. BVM is a nonprofit organization organized under Section 501(c)(3) of the Internal Revenue Code.
4. BVM's core mission is to expand Black voter engagement and increase power in marginalized, predominantly Black communities. BVM works primarily in Black communities and other communities of color that face unique barriers to voting. BVM focuses on removing

those barriers and increasing voter registration and turnout by providing voter education and encouragement, advocating for policies to expand voting rights and access, and providing assistance and financial grants that enable its partner organizations to engage in on-the-ground efforts to mobilize voters.

5. In conducting this work, BVM's guiding principles include understanding, respecting, and supporting local infrastructure in pursuing civic engagement and community power; supporting individuals and organizations that strive for social justice throughout the year and not just on Election Day; and ensuring that Black voters and communities of color in rural counties and smaller cities and towns, who are often ignored, have their voices heard.

6. While BVM seeks to empower voters and improve the voting efficacy of Black communities nationally, it focuses most of its work on a handful of states, including Louisiana. BVM focuses its efforts on Louisiana because it contains some of the most under-resourced and neglected communities in the country.

7. Although BVM does not have a formal membership structure, BVM has a significant constituency of individuals and organizations in Louisiana's Black communities who are the primary beneficiaries of BVM's activities. BVM's constituents include Black voters in many Parishes where the State's newly enacted maps dilute the voting strength of Black voters, such as Bossier, Caddo, Jefferson, St. Charles, East Baton Rouge, West Baton Rouge, De Soto, Natchitoches, Red River, Ascension, and East Feliciana. BVM's constituents and supporters, and BVM's community partners and their members, include registered voters in the State of Louisiana who live in these areas and plan to vote in future State House and Senate elections.

8. BVM carries out much of its work through and in coordination with community partners. BVM believes it is more effective and efficient to invest in community groups to engage

in voter education and turnout efforts because those groups are familiar to and trusted by local voters. Further, providing grants to partner organizations helps increase partner organizations' long-term capacity to serve their communities in the region.

9. BVM partners with approximately 60 local organizations in Louisiana. BVM regularly provides mini-grants to its partners, who themselves engage in voter education and on-the-ground efforts to increase voter participation. Many of these local organizational partners are membership organizations comprised of individuals residing in parishes across the State who are directly affected by Louisiana's newly enacted maps for the election of the Louisiana State Legislature.

10. In addition to providing grants, BVM regularly communicates with its community partners, including through regular monthly calls, to coordinate with and train their leadership and members. Specifically, in Louisiana, BVM has provided training for its partners on redistricting, digital organizing, and other capacity-building tools. BVM also operates a regular bus tour to help its constituents and partners to raise awareness about voting issues. In the last three years, the BVM bus has held at least seven tours that included stops in Louisiana. BVM also provides technical support, including with social media, and other support to community partners on an as-needed basis.

11. BVM works on behalf of its constituents and partners. These individuals and organizations help inform the issues BVM seeks to address, assist with local organizational strategy, participate in BVM-organized efforts like text-message voter mobilization, and volunteer at these events.

**Effect of Louisiana's Discriminatory Maps on
BVM's Constituents and Mission**

12. In the discriminatory maps enacted in S.B. 1 and H.B. 14, many Black voters are packed in certain districts where they constitute a disproportionate majority, and Black voters are dispersed, or cracked, across other districts. These packed and cracked districts deprive Black people of meaningful representation and opportunities to elect our preferred candidates, despite making up nearly one-third of Louisiana's population. If elections proceed under the discriminatory maps enacted in S.B. 1 and H.B. 14, the voting strength of Black voters in Louisiana will continue to be diluted, and BVM constituents living in the affected districts will be directly impacted.

13. The State's maps dilute votes of individuals who are constituents and supporters of BVM, and who are members of the organizations in BVM's network. These individuals reside throughout Louisiana, including in many House and Senate Districts at issue here. This includes individuals who live in areas of Louisiana where Black voters tend to support the same candidates and where the Black community is sufficiently large and geographically compact to constitute a majority of voters in a legislative district, but those Black voters will not be able to elect their candidate of choice under the State's redistricting plan because their candidate of choice will typically be outvoted by the white majority.

14. Because Louisiana's unfair and discriminatory redistricting diminishes the voices and dilutes the voting strength of the Black Louisianans who BVM works to empower and engage, the discriminatory maps frustrate and impede BVM's mission to achieve equitable political representation and voting efficacy for Black voters across the entire state.

15. BVM's involvement in the redistricting process has been a multi-year effort. With the passage of the unlawful maps, BVM has diverted resources from its core organizational efforts

to educate and mobilize voters and build capacity in its community partners, toward targeting the Legislature and Governor with advocacy against these unlawful maps, as well as trying to counteract the negative effects of vote dilution to ensure its constituents and members are able to engage with the political process on equal footing with those in other districts, now that the maps have taken effect.

16. When the Legislature first introduced the discriminatory state legislative maps, BVM shifted its efforts from educating and mobilizing voters and building capacity in its community partners toward redistricting education and advocacy around S.B. 1 and H.B. 14.

17. During the 2022 redistricting cycle, BVM hosted trainings and community meetings to raise awareness about the redistricting process and advocate for maps that more accurately represent the state's Black population. This effort on redistricting included one training conducted entirely by BVM and three others who worked to convene its partners and members, and partner organizations delivered the content. *See, e.g., Ashley White, Want to Learn More About Redistricting? Black Voters Matter, Other Groups Host Meeting, Lafayette Daily Advertiser* (Jan. 25, 2022), <https://www.theadvertiser.com/story/news/2022/01/25/lafayettegroups-offer-information-louisiana-redistricting/9212785002/>.

18. BVM was also involved in the formal legislative redistricting process. During the Legislature's February 2022 special session on redistricting, BVM launched a "Redistricting Takeover": a statewide effort that included an outreach caravan from Monroe to Baton Rouge, a pep rally at Southern University, and a press conference on the steps of the Louisiana State Capitol. BVM launched the Redistricting Takeover to raise awareness and understanding of the State's redistricting efforts, and to encourage the public to attend committee meetings and testify before the joint committee on redistricting. BVM's organizers and constituents made their voices heard,

submitting hundreds of testimonies on public record throughout the course of the Redistricting Takeover.

19. BVM also participated in a coordinated advocacy campaign against the State's now-enacted maps. Before the Legislature passed S.B. 1 and H.B. 14, BVM signed onto a January 19, 2022 letter to the Legislature advocating for additional majority-minority districts.

20. Despite the significant efforts and resources that BVM and its partners devoted to advocating for representative state legislative maps, the Louisiana Legislature insisted on enacting maps that violate federal law and deprive Black voters an equal opportunity to participate in the political process and elect their candidate of choice, especially in the parishes of Bossier, Caddo, Jefferson, St. Charles, East Baton Rouge, West Baton Rouge, De Soto, Natchitoches, Red River, Ascension, and East Feliciana.

21. After the Legislature passed S.B. 1 and H.B. 14, BVM has continued to divert resources toward combatting the discriminatory state legislative maps.

22. In the initial aftermath of the passage of S.B. 1 and H.B. 14, BVM signed onto a February 22, 2022 press release calling for the Governor to veto S.B. 1 and H.B. 14.

23. Now that the discriminatory state legislative maps have taken effect, BVM has shifted our efforts toward fighting against the effects of voter dilution in the parishes where the State's maps dilute the voting strength of Black voters, such as Bossier, Caddo, Jefferson, St. Charles, East Baton Rouge, West Baton Rouge, De Soto, Natchitoches, Red River, Ascension, and East Feliciana. BVM will need to devote more of its own resources to engage with the candidates that represent Black voters in these parishes, to ensure that Black voters have a voice and opportunity to be heard by their elected officials despite being denied political power as a result of the enacted maps.

24. In particular, BVM has continued to devote significant time and resources to educating people on what redistricting means and how to engage in the process. When the Legislature acts to weaken the voices of Black voters, such as by enacting maps that dilute Black voting strength, BVM constituents and other voters become disillusioned with the process and become apathetic. Political participation is a cornerstone of BVM's mission. But in these unlawful districts, more resources will be required to encourage participation when voters know the challenges that Black candidates of choice face. Additionally, more resources will be required when advocating for their preferred positions with elected officials who are not the Black candidate of choice. Now, under the discriminatory maps, BVM will have to redouble its efforts to engage Black voters and convince them that their vote matters, which will require more resources and will make it more difficult to accomplish other organizational goals.

25. For example, instead of expending its limited resources on voter registration efforts or educating constituents on issues that are important to Black voters in Louisiana, BVM has diverted resources from its core activities toward developing an accountability strategy. Because we believe that Black voters matter, we are trying to find ways to hold elected officials we have accountable, even when we know the representation Black voters are receiving is unfair. We are hosting a virtual freedom school to train our partner organizations on how to engage regularly with elected officials and educate constituents about who their representatives are, what their record is, and how they're impacting the community they represent. This accountability strategy is designed to raise awareness of and push back on harmful changes being made by elected officials who do not represent our communities.

26. As long as the new maps remain in effect, BVM will continue to be injured because it will be forced to divert resources from its broader voter registration and community

empowerment initiatives toward protecting the representation and interests of its constituents and its partners' members in the affected districts. The discriminatory maps will impede BVM's mission to achieve equitable political representation for Black voters across the entire state.

Importance of Fair and Representative Maps

27. The state legislative maps that the Legislature enacted in 2022 did not expand the number of majority-minority opportunity districts for Black voters over the previous maps in the Senate and added just one additional district in the House that is majority Black, despite the fact that the Black population in Louisiana has grown since 2010. For Louisiana to have fair and representative state legislative maps, there must be a meaningful expansion of the number of majority-minority opportunity districts for Black voters.

28. Under the configuration of state legislative maps, and without meaningful expansion of the number of majority-minority opportunity districts for Black voters, Black Louisianans do not have an equal opportunity to elect candidates of their choice and Black Louisianans do not have equal access to their legislative representatives.

29. During the legislative session, the Redistricting Takeover, and the campaign seeking the Governor's veto, BVM has advocated for fair and representative state legislative maps that would add new majority-minority opportunity districts for Black voters, in order to give Black voters throughout Louisiana an equal opportunity to participate in the political process and elect their candidates of choice.

30. Additional majority-minority opportunity districts for Black voters should be added to the Senate in Jefferson Parish, the Baton Rouge area, and Shreveport area to provide Black voters in those areas of the State an equal opportunity to participate in the political process and elect their candidates of choice.

31. Additional majority-minority opportunity districts for Black voters should be added to the House in the Baton Rouge area, Shreveport area, Natchitoches area, and Lake Charles area to provide Black voters in those areas of the State an equal opportunity to participate in the political process and elect their candidates of choice.

32. I believe that fair and representative state legislative maps are needed in Louisiana to combat the impact of racial discrimination and give Black people in Louisiana a voice and an opportunity for equal access to representation to combat the longstanding effects of racial discrimination in Louisiana.

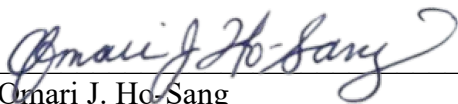
33. Racism is alive and well in the state of Louisiana. In my experience as BVM's Senior State Organizing Manager, I have personally witnessed the effects of institutional racism in Louisiana. Black people in Louisiana experience discrimination in all aspects of everyday life, including housing, economic development, healthcare, environmental justice, and criminal justice.

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

35. Fair and representative state legislative maps would help move the state of Louisiana in the right direction and address this history of discrimination by finally giving Louisiana's Black residents an equal voice and opportunity to participate in the political process.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 27, 2023.



Omari J. Ho-Sang

EXHIBIT 4

To: cjwilliamsphd@gmail.com[cjwilliamsphd@gmail.com]
Cc: Keturah Butler-Reed[keturah@blackvotersmatterfund.org]
From: Omari Ho-Sang[omari@blackvotersmatterfund.org]
Sent: Wed 4/6/2022 5:57:52 PM (UTC)
Subject: Re: State Partner Call Reminder - Tonight at 6pm

Hi Dr. Chris,

I hope all is well!!! I apologize about not getting back to you sooner to get your teams set up for the Issue Mining Phone Banks in Lafayette. Now that things have slowed down a bit for us here, I wanted to set up a quick data training with your team either Monday at 4:30pm (which is the time for our standing data trainings), or another day next week that works best for your team. Once the training is complete, your issue mining phone bank will be activated. Unless you would like to target specific precincts, we'll request a phone bank for the entire parish. Let me know if you have any questions!

Omari



Omari J. Ho-Sang, State Organizing Manager

Black Voters Matter Fund

DIRECT: (470) 653-0004

EMAIL: omari@blackvotersmatterfund.org

WEBSITE: www.blackvotersmatterfund.org

SCHEDULE A CALL: <https://tinyurl.com/OmariCall>

[facebook.com/blackvotersmtr](https://www.facebook.com/blackvotersmtr) | twitter.com/blackvotersmtr | [instagram.com/blackvotersmtr](https://www.instagram.com/blackvotersmtr) | <https://www.linkedin.com/company/black-voters-matter/>

NOTE: Please consider the environment before printing this email. This e-mail message is intended only for the recipient(s) named above and for use consistent with the business discussed in this transmission. The information contained in this message is privileged and confidential and protected from disclosure. If the reader of this message is not the intended recipient, you are hereby notified that any review, dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify me immediately by replying to the message and deleting it from your computer. Thank you.

From: Chris Williams <cjwilliamsphd@gmail.com>
Sent: Saturday, March 19, 2022 5:30 PM
To: Omari Ho-Sang <omari@blackvotersmatterfund.org>
Subject: Re: State Partner Call Reminder - Tonight at 6pm

I have teams ready to go.
Tuesday Wednesday or Thursday next week for training.

Thank you

On Thu, Mar 17, 2022, 5:15 PM Chris Williams <cjwilliamsphd@gmail.com> wrote:

Ok Thank you Sister.
Have a lonnnng discussion with Representative Bryant

Will update you when you have some time.

Peace

On Thu, Mar 17, 2022, 2:33 PM Omari Ho-Sang <omari@blackvotersmatterfund.org> wrote:

Good Afternoon Dr. Chris,

I will be able to provide more direction on your issue mining campaigns in Lafayette, St. Martin and St. Landry in the next 24 hours. However, please prep your teams for the campaigns. Also, we will conduct a phone banking training to get your team connected to the VAN. Let me know which dates work for each of you. Thanks so much!

Sincerely,
Omari

Omari J. Ho-Sang, State Organizing Manager

Black Voters Matter Fund

DIRECT: (470) 653-0004

EMAIL: omari@blackvotersmatterfund.org

WEBSITE: www.blackvotersmatterfund.org

SCHEDULE A CALL: <https://tinyurl.com/OmariCall>

[facebook.com/blackvotersmtr](https://www.facebook.com/blackvotersmtr) | twitter.com/blackvotersmtr | [instagram.com/blackvotersmtr](https://www.instagram.com/blackvotersmtr) | <https://www.linkedin.com/company/black-voters-matter/>

NOTE: Please consider the environment before printing this email. This e-mail message is intended only for the recipient(s) named above and for use consistent with the business discussed in this transmission. The information contained in this message is privileged and confidential and protected from disclosure. If the reader of this message is not the intended recipient, you are hereby notified that any review, dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify me immediately by replying to the message and deleting it from your computer. Thank you.

From: Chris Williams <cjwilliamsphd@gmail.com>

Sent: Wednesday, March 16, 2022 8:20 PM

To: Omari Ho-Sang <omari@blackvotersmatterfund.org>

Subject: Re: State Partner Call Reminder - Tonight at 6pm

Thank you and Katurah for a great call this week.

As per our discussion

I am requesting the following guidance...

1. Issue harvesting Lafayette Parish now thru March 31th. UNITED BALLOT PAC!
2. St Martin Parish Brandy Alexander GOTV APRIL
3. Lead Louisiana Sharon Patterson GOTV APRIL

THANK YOU

On Mon, Mar 14, 2022, 5:32 PM Omari Ho-Sang <omari@blackvotersmatterfund.org> wrote:

Good Evening Partners!

We look forward to seeing you all in 30 minutes. Here's the link to register: <https://tinyurl.com/BVMMarch22>

Agenda:

- Governor's Veto/ Point'emOut Campaign
- GOTV
- Grants
- Statewide Convening
- Movement Around the State

See you soon!

Sincerely,
Omari

Omari J. Ho-Sang, *State Organizing Manager*

Black Voters Matter Fund

DIRECT: (470) 653-0004

EMAIL: omari@blackvotersmatterfund.org

WEBSITE: www.blackvotersmatterfund.org

SCHEDULE A CALL: <https://tinyurl.com/OmariCall>

[facebook.com/blackvotersmtr](https://www.facebook.com/blackvotersmtr) | twitter.com/blackvotersmtr | [instagram.com/blackvotersmtr](https://www.instagram.com/blackvotersmtr) | <https://www.linkedin.com/company/black-voters-matter/>

NOTE: Please consider the environment before printing this email. This e-mail message is intended only for the recipient(s) named above and for use consistent with the business discussed in this transmission. The information contained in this message is privileged and confidential and protected from disclosure. If the reader of this message is not the intended recipient, you are hereby notified that any review, dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify me immediately by replying to the message and deleting it from your computer. Thank you.

EXHIBIT 5

To: La Southern Region Partners[lasouthernregionpartners@blackvotersmatterfund.org]
Cc: Omari Ho-Sang[omari@blackvotersmatterfund.org]
From: Keturah Butler-Reed[keturah@blackvotersmatterfund.org]
Sent: Mon 3/7/2022 8:42:42 PM (UTC)
Subject: #VetoTheMaps & #PointEmOut Campaign

Good afternoon, Partners

We are so excited to be continuing the work with you all as we shift gears into **#AccountabilitySeason**. This year we are encouraging all our partners to join us in not only turning out Black Voters to the polls but making sure that those who make it to the office uphold their responsibilities in ensuring fair and equal representation in our communities.

The first actions towards our Accountability Initiative of the year will center around Redistricting. Our campaigns will consist of **phone-banking, emailing, and utilizing our social media toolkits** to urge Governor Edwards to Veto the maps. Using those same methods, we will also reach out to all six Legislative Black Caucus members that voted against fair and equitable maps. We are starting with the **#VetoTheMap** Campaign. For our **#VetoTheMaps** campaign we are **urging Governor Bel Edwards to Veto the Congressional, House and Senate Legislative, and BESE School Board Maps**. We are reminding him that the Black community stood behind him during the last Gubernatorial election and are asking him to stand behind us at this time.

Our other actions towards our Accountability initiative are the **#PointEm'Out** Campaign. We are shedding a deeper light on the **six members of the Legislative Black Caucus who voted with conservatives against Fair and Equitable maps that increased Black Voting Power in our communities**. As members of the Black community across the state of Louisiana that are impacted by the voting decisions of every Black Legislator during the Special Session irrespective of district, we are asking why **they voted against** adding additional Majority-Minority Districts.

Campaign Instructions:

- **Choose a day between March 7th and 14th to organize your volunteers to make calls for 1 hour shifts from 8am - 5pm.**
- **Fill out this form to register your organization:** <https://tinyurl.com/BVMLAForm>
- **Share the flyers on social media using our social media toolkit**
- **Use this link to access the Scripts for phone-banking AND Flyers for social media toolkits** <https://tinyurl.com/VetoAndPointEmOut>

For any additional questions do not hesitate to reach out to myself or Omari. Have a great day!

Keturah Butler-Reed, She/her/hers
Louisiana Regional Organizer
Black Voters Matter Fund

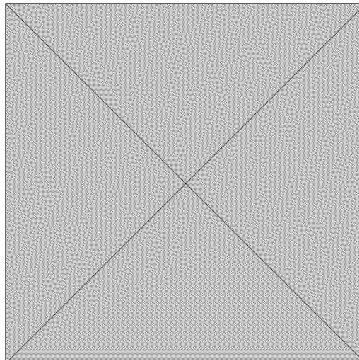
EMAIL: keturah@blackvotersmatterfund.org

DIRECT: (470) 249-9022

CALENDLY LINK: <https://calendly.com/keturah-bvm-la>

WEBSITE: www.blackvotersmatterfund.org

[facebook.com/blackvotersmtr](https://www.facebook.com/blackvotersmtr) | twitter.com/blackvotersmtr | [instagram.com/blackvotersmtr](https://www.instagram.com/blackvotersmtr) |
<https://www.linkedin.com/company/black-voters-matter/> | <https://www.facebook.com/groups/329283305545394/?ref=share>



NOTE: Please consider the environment before printing this email. This e-mail message is intended only for the personal use of the recipient(s) named above. The information contained in this message is privileged and confidential and protected from disclosure. If the reader of this message is not the intended recipient, you are hereby notified that any review, dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify me immediately by replying to the message and deleting it from your computer. Thank you.

EXHIBIT 6






Omari Ho-Sang
March 9, 2022 · 🌐

...

Here's an example post for folks! But making it your own is what will move the people! Let me know if you have any questions!

<p>#PointEmOut Join us in holding our elected officials accountable!</p> <p>Call and email Senator Regina Barrow and ask her why she voted against fair maps!</p>  <p>(225)359-9400 BARROW@LEGIS.LA.GOV</p>	<p>#PointEmOut Join us in holding our elected officials accountable!</p> <p>Call and email Representative Travis Johnson and ask him why he voted against fair maps!</p>  <p>(225) 308-4269 HSE021@LEGIS.LA.GOV</p>
---	---

<p>#PointEmOut Join us in holding our elected officials accountable!</p> <p>Call and email Representative Marcus Anthony Bryant and ask him why he voted against fair maps!</p>  <p>(337) 373-9380 HSE096@LEGIS.LA.GOV</p>	<p>#PointEmOut Join us in holding our elected officials accountable!</p> <p>Call and email Representative Ken Brass and ask him why he voted against fair maps!</p>  <p>(225) 265-9005 BRASSK@LEGIS.LA.GOV</p>	<p>#PointEmOut Join us in holding our elected officials accountable!</p> <p>Call and email Representative Jason Hughes and ask him why he voted against fair maps!</p>  <p>(504) 246-9707 HSE100@LEGIS.LA.GOV</p>
---	---	--



Omari Ho-Sang is with Demetrius Norman and 5 others.
March 9, 2022 · 🌐

In Louisiana we've been fighting for fair maps during this Redistricting session. Fair maps for black people have never happened in this state.

Last month, we had an opportunity to finally have maps that represented Black people and give us an opportunity to elect people who look like us. That's in the Congressional, Supreme Court, House and Senate Legislative, and Board of Elementary and Secondary maps.

And in true form, Conservatives in the Louisiana Legislature fought against representation for Black people, but they didn't do it alone.

Republicans were joined by a handful of members of the Black Legislative Caucus who also voted against Fair Maps. We are pointing them out and asking you to join us in calling them and asking them WHY.

We are also demanding the Governor to Veto the Maps. Give his office a call now, as he only has until Sunday, March 14th to get his Veto in before the racist maps become law!

#PointEmOut #vetothemaps

👍❤️ 3

Seen by 16

#PointEmOut

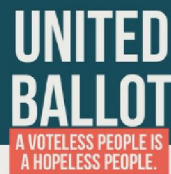
Join us in holding our elected officials accountable!

Call and email Representative Jason Hughes and ask him why he voted against fair maps!

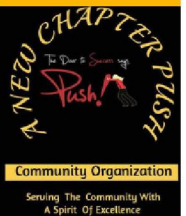
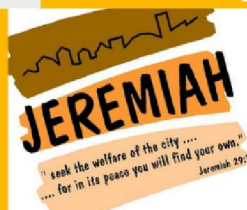


(504) 246-9707

HSE100@LEGIS.LA.GOV



The People's Promise



#PointEmOut

Join us in holding our elected officials accountable!

Call and email Representative

Marcus

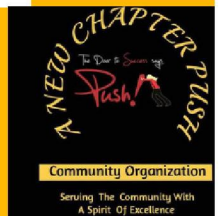
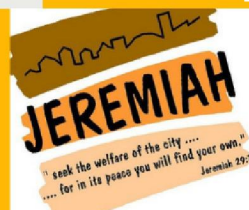
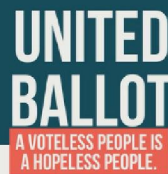
Anthony

Bryant and ask him why he voted against fair maps!



(337) 373-9380

HSE096@LEGIS.LA.GOV



#PointEmOut

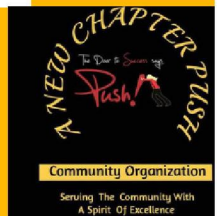
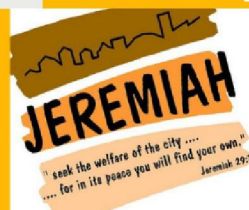
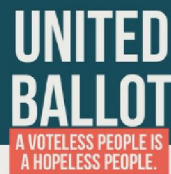
Join us in holding our elected officials accountable!

Call and email Representative Travis Johnson and ask him why he voted against fair maps!



(225) 308-4269

HSE021@LEGIS.LA.GOV



#PointEmOut

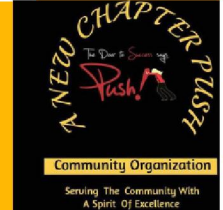
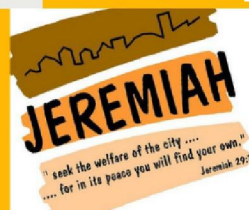
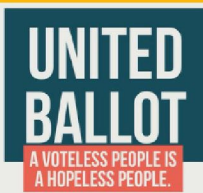
Join us in holding our elected officials accountable!

Call and email
Senator
Regina Barrow
and ask her
why she voted
against fair
maps!



(225)359-9400

BARROWR@LEGIS.LA.GOV



#PointEmOut

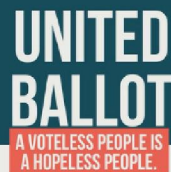
Join us in holding our elected officials accountable!

Call and email Representative Adrian Fisher and ask him why he voted against fair maps!

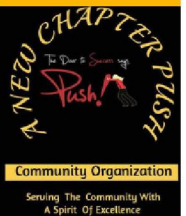
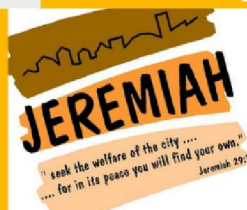


(318) 556-7001

HSE016@LEGIS.LA.GOV



The People's Promise



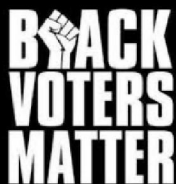
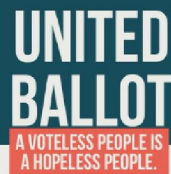
#PointEmOut

Join us in holding our elected officials accountable!

Call and email Representative Ken Brass and ask him why he voted against fair maps!



(225) 265-9005
BRASSK@LEGIS.LA.GOV



The People's Promise

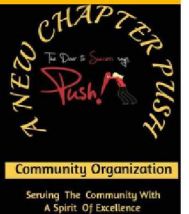
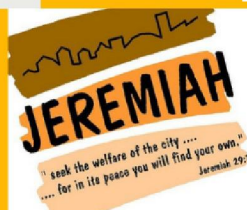


EXHIBIT 7



Planet Depos[®]
We Make It *Happen*[™]

Transcript of Michael McClanahan, Designated Representative

Date: September 8, 2023
Case: Nairne, et al. -v- Ardoin

Planet Depos
Phone: 888.433.3767
Email: transcripts@planetdepos.com
www.planetdepos.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA

DR. DOROTHY NAIRNE, : CIVIL ACTION NO. :
et al., : 3:22-cv-00178-SDD-SDJ
Plaintiffs, :
v. : Chief Judge
R. KYLE ARDOIN, in his : Shelly D. Dick
official capacity as : Magistrate Judge
Secretary of State of : Scott D. Johnson
Louisiana, :
Defendant. :

-----x

30 (b) (6) DEPOSITION
OF LOUISIANA STATE CONFERENCE OF THE NAACP
through their representative
MICHAEL McCLANAHAN
CONDUCTED VIRTUALLY
FRIDAY, SEPTEMBER 8, 2023
10:04 a.m. EST

Job No.: 506194
Pages 1 - 137
Reported by: APRIL REID

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

1 Deposition of MICHAEL McCLANAHAN, held
2 virtually. All appeared remotely.

3

4 A P P E A R A N C E S

5

6 ON BEHALF OF THE NAACP LEGAL DEFENSE AND
7 EDUCATIONAL FUND, INC.:

8 VICTORIA "TORI" WENGER, ESQ.

9 SARA ROHANI, ESQ.

10 STUART NAIFEH, ESQ.

11 40 Rector Street

12 Fifth Floor

13 New York, NY 10006

14

15 ON BEHALF OF THE DEFENDANT:

16 CASSIE HOLT, ESQ.

17 ALYSSA M. RIGGINS, ESQ.

18 NELSON MULLINS RILEY & SCARBOROUGH, LLP

19 301 Hillsborough Street

20 Suite 1400

21 Raleigh, NC 27603

22 (919) 877-3800

23

24

25

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

3

1 A P P E A R A N C E S cont'd

2

3 ALSO ON BEHALF OF THE DEFENDANT:

4 JOHN C. WALSH, ESQ.

5 JOHN C. CONINE, JR., ESQ.

6 SHOWS, CALL & WALSH, L.L.P.

7 628 St. Louis Street

8 Baton Rouge, LA 70802

9 (225) 346-1461

10

11 ON BEHALF OF LEGISLATIVE INTERVENORS:

12 ERIKA PROUTY, ESQ.

13 BAKER HOSTETLER

14 200 Civic Center Drive

15 Suite 1200

16 Columbus, OH 43215

17 (614) 462-4710

18

19

20

21

22

23

24

25

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

1 A P P E A R A N C E S cont'd

2

3 ALSO PRESENT:

4

5 AMANDA LAGROUE,

6 Louisiana Attorney General's Office

7

8 ROB CLARK, ESQ.

9 AMANDA GIGLIO, ESQ.

10 DAKOTA KNEHANS, ESQ.

11 Cozen O'Connor - observing only

12

13 ALORA THOMAS-LUNDBORG, ESQ.

14 ACLU

15

16 JACK ADCOCK

17

18 JACKSON SCHUELER,

19 Remote Technician

20

21

22

23

24

25

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

5

	I N D E X		
1			
2	MICHAEL MCCLANAHAN		PAGE
3	Examination by Ms. Holt		7
4	Examination by Ms. Prouty		121
5	Examination by Ms. Rohani		134
6			
7		E X H I B I T S	
8	NUMBER	DESCRIPTION	PAGE
9	Exhibit 1	Second Amended 30(b)(6)	15
10		Notice of Deposition	
11	Exhibit 2	Printout of the Executive	25
12		Committee page of the	
13		Louisiana NAACP Website	
14	Exhibit 3	Amended Complaint for	39
15		Declaratory Judgment and	
16		Injunctive Relief	
17	Exhibit 4	Plaintiff NAACP Louisiana	60
18		State Conference's	
19		Supplemental Responses &	
20		Objections to Defendant	
21		Ardoin's First Set of	
22		Interrogatories and First Set	
23		of Requests for Production of	
24		Documents to the	
25		Organizational Plaintiffs	

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

E X H I B I T S

NUMBER	DESCRIPTION	PAGE
Exhibit 5	NAACP's Responses to Defendant's First Set of Discover	95

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

7

1 P R O C E E D I N G S

2 THE COURT REPORTER: Good morning, Mr.
3 McClanahan. If you will please raise your
4 right hand.

5 THEREUPON:

6 MICHAEL MCCLANAHAN

7 being first duly sworn or affirmed to
8 testify to the truth, the whole truth, and
9 nothing but the truth, was examined and
10 testified as follows:

11 THE COURT REPORTER: Thank you, sir.
12 We may begin.

13 EXAMINATION

14 BY MS. HOLT:

15 Q. Good morning. My name is Cassie Holt,
16 and I'll be taking your deposition today. I'm
17 with the law firm Nelson Mullins, and we represent
18 the defendant, Kyle Ardoin in his official
19 capacity as the Louisiana Secretary of State,
20 styled as Nairne v. Ardoin, pending in the United
21 States District Court for the Middle District of
22 Louisiana.

23 Mr. McClanahan, I appreciate you making
24 yourself available today so I can ask you a few
25 questions.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

8

1 (Amanda Giglio, Esq. entered the virtual
2 deposition room.)

3 A. Okay.

4 Q. Can you please state your full name, for
5 the record.

6 A. My name is Michael Wayne McClanahan.

7 Q. Have you gone by any other name?

8 A. I'm in Louisiana, so they have nicknames
9 for everybody here.

10 Q. All right. Well -- but not officially?

11 A. No, ma'am.

12 Q. No official -- okay.

13 What is your current address?

14 A. Business address or personal address?

15 Q. Let's do -- let's do both. What's your
16 personal address?

17 A. My personal address is 1473 South
18 Redondo Drive, Baton Rouge, Louisiana 70815, and
19 my business address is 7600 Airline Highway, Baton
20 Rouge, Louisiana 70814.

21 Q. Great.

22 And are you registered to vote at your
23 current personal address?

24 A. Yes, I am.

25 (Dakota Knehans, Esq. entered the

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

9

1 virtual deposition room.)

2 Q. Have you ever been deposed or testified
3 in court before?

4 A. Yes, I have.

5 Q. Okay. In what matters have you
6 testified?

7 A. Recently, I had a deposition in a -- and
8 testified in a suit which me and some plaintiffs
9 sued the City of Baton Rouge.

10 Q. And do you recall when that was?

11 A. Last year or the year before. One of
12 the two.

13 Q. And you said sued the City of -- or
14 Baton Rouge?

15 A. Baton Rouge, right.

16 Q. Okay. And what was that case about
17 generally?

18 A. Well, the City of Baton Rouge had --
19 during its council meeting, me and some others
20 went there to talk about the Alton Sterling
21 murder, and the council did not want to -- want to
22 let us speak, and so they had the police to escort
23 us out.

24 Q. Okay. And as we get started today, I
25 know you're a little -- you're familiar with --

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

10

1 you've had -- you've been deposed and testified.

2 Were there -- actually, let me ask you this: Were
3 there any other matters in which you testified?

4 A. Probably. You know, probably over my
5 lifetime, my professional lifetime, probably so.

6 Q. Okay. And do you recall any of those
7 today?

8 A. Not like I recall the last one.

9 Q. That's fair enough.

10 So as we get started today, I'm going to
11 just remind you of a few ground rules that will
12 help us move through this process.

13 Since we do need to make sure that the
14 court reporter can record all of your responses,
15 can you please make sure to -- or try to give a
16 verbal response to all my questions today?

17 A. Yes.

18 Q. Okay. And to avoid confusion on the
19 record and to make it a little easier on the court
20 reporter, I ask if you could please wait until I
21 finish a question before you give your answer.
22 And I will try to do the same for you, let you
23 finish speaking before I ask the next question.
24 Does that sound good?

25 A. Sounds good to me.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

11

1 Q. Great.

2 And I'm going to try to ask you
3 questions that are clear and concise. I don't
4 always do a good job of that, so if you don't
5 understand one of my questions, please let me know
6 and I will do my best to rephrase it. Does that
7 sound good?

8 A. Sure.

9 You're going to be all right. I know
10 that already. You're ready.

11 Q. All right. Well, you know, this --
12 these things can go on. This is not an endurance
13 test. So if you need a comfort break or anything
14 like that, please let me know. I just ask that
15 you let me finish my question and then I'm happy
16 to oblige.

17 A. Thank you.

18 Q. And -- yeah. No problem.

19 And -- let's see. And lastly, do you
20 understand that you are testifying here today
21 under oath, just as if you were in a real
22 courtroom testifying before a judge or jury?

23 A. Yes.

24 Q. Okay. And is there anything that would
25 prevent you from answering any of my questions

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

12

1 today honestly and completely?

2 A. No.

3 Q. Great.

4 Mr. McClanahan, are you a member of the
5 NAACP?

6 A. Yes.

7 Q. And how long have you been a member?

8 A. Over ten years, I would imagine.

9 Q. Do you pay dues?

10 A. I don't anymore. I'm a life member.

11 Q. Okay. Life member.

12 Are you -- when you say you're a "life
13 member," does that -- are you a life member of the
14 Louisiana NAACP?

15 A. No. You're just -- you're a member of
16 the NAACP period. There's no -- you don't pay
17 membership to anything but the national office.

18 Q. Okay. Do you belong to any local
19 branches or units?

20 A. Yes. I'm a member of the Baton Rouge
21 branch.

22 Q. Do you pay any dues to the Baton Rouge
23 branch?

24 A. No.

25 Q. Do you have any positions with the Baton

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

13

1 Rouge branch?

2 A. No.

3 Q. And what is your current title with the
4 Louisiana -- Louisiana State Conference of the
5 NAACP?

6 A. I'm the president.

7 Q. And if I shorten that down to "State
8 Conference" or "Louisiana NAACP," will you know
9 what I'm referring to?

10 A. I would.

11 Q. Great.

12 How long have you been president?

13 A. Seems like forever. Probably about
14 five, six years now, it looks like.

15 Q. Okay. And is that an elected position?

16 A. It is.

17 Q. And is it a paid position?

18 A. No. No. No.

19 Q. All right. Well, that answers my
20 question for that.

21 Well, is it -- so you're not an employee
22 of the State Conference?

23 A. No.

24 Q. So do you have any other work that you
25 do for income?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

14

1 A. Yes, I do.

2 Q. And what is that?

3 A. I'm -- I am a home manager for a company
4 here in Baton Rouge called Harmony Center, and
5 then I -- I have -- I'm a political consultant,
6 and then I have a little small home repair
7 company.

8 Q. And your role as a political consultant,
9 is that for a company?

10 A. Yes.

11 Q. And what's the name of that company?

12 A. The Sharp Group.

13 Q. And out of those three that you just
14 gave me, what would you say is your primary form
15 of income?

16 A. Probably the Harmony Center.

17 Q. Did you hold any positions with the
18 State Conference before being elected president?

19 A. No.

20 Q. And what are your duties as state
21 president?

22 A. My duties is to continue to promote the
23 mission of the NAACP through the state of
24 Louisiana. I facilitate and coordinate work with
25 the branches and -- the adult branches and the

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

15

1 youth and college chapters, and -- and --
2 throughout the state of Louisiana.

3 Q. Do you report to anyone?

4 A. No.

5 Q. Does anyone report to you?

6 A. Yes.

7 Q. And -- and who reports to you?

8 A. So my -- I have district vice
9 presidents, they report to me, and/or the
10 presidents of the various branches.

11 Q. Okay. Now I'm going to ask the tech to
12 pull up a document called the Second Amended
13 Notice of 30(b)(6), which I would like to be
14 marked as Exhibit 1, please.

15 (Exhibit 1 was marked for identification
16 and is attached to the transcript.)

17 MS. HOLT: Excellent. Thank you.

18 BY MS. HOLT:

19 Q. And, Mr. McClanahan, if you have hard
20 copies that would -- that you'd like to look at,
21 if that's easier than looking at the computer
22 screen, that's completely fine.

23 I'm just going to ask you a couple
24 questions about this Exhibit 1.

25 Do you recognize this document?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

16

1 A. Yes, I do.

2 Q. And what is it?

3 A. It's Amended Notice of a deposition
4 of -- of the State -- the State Conference.

5 Q. So you understand that you've been asked
6 here to testify today on behalf of the State
7 Conference?

8 A. Yes.

9 Q. And do you understand that as the
10 30(b)(6) designee, your answers are binding on the
11 State Conference?

12 A. Yes.

13 Q. Okay.

14 MS. HOLT: And if we can turn to the
15 very last page of the exhibit. Excellent.

16 Q. Mr. McClanahan, is it your understanding
17 that you're here today to testify regarding the
18 topics listed in this Exhibit A?

19 A. Yes.

20 Q. And what did you do to prepare for this
21 deposition?

22 A. Well, I looked over the Exhibit A and
23 became familiar with -- that you talked about,
24 went over the responses to the interrogatories,
25 read -- then I read the constitution and by-laws,

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

17

1 you know, just consulted with my lawyers and sat
2 down and prepared to go ahead today.

3 Q. Great.

4 And when you say "interrogatory
5 responses," are you referring to both the initial
6 interrogatory responses and supplemental
7 interrogatory responses?

8 A. Yes.

9 Q. Okay. Great.

10 And did you -- besides the interrogatory
11 responses, this exhibit, the constitution, and the
12 by-laws, did you review any other documents?

13 A. Yes. Yes, I did.

14 Q. And do you recall what those are?

15 A. Yeah. I looked at the illegal maps
16 passed by the state of Louisiana, and then I
17 looked at the illustrative maps that we had
18 introduced.

19 Q. And when you say "the illustrative maps
20 we had" produced [sic], what are you referring to?

21 A. The maps that our demographer had
22 produced.

23 Q. And is that an expert in this case?

24 A. I don't know.

25 Q. Is it William Cooper?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

18

1 A. Yeah, Bill Cooper, right, uh-huh.

2 Q. Okay. Great.

3 And were -- and were there any other
4 documents that you looked at?

5 A. I'm -- I don't think so. I'm -- yeah,
6 I'm quite sure that's pretty much it. But if
7 something else comes to mind, I'll let you know.

8 Q. All right. Thanks. I appreciate that.

9 So I believe you mentioned the
10 constitution.

11 MS. HOLT: And we can take down this
12 Exhibit 1. Thank you.

13 Q. So, Mr. McClanahan, you reviewed the
14 by-laws and constitution of the NAACP.

15 Are you familiar with the organizational
16 structure of the NAACP?

17 A. Yes.

18 Q. And what is the purpose of the
19 constitution and by-laws?

20 A. The constitution and by-laws set the
21 groundwork and the framework for the headquartered
22 association and its members, member of state
23 conferences, and its member branches, as well as
24 its members.

25 Q. And would you agree with me that as

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

19

1 state president, you're expected to follow the
2 constitution and by-laws?

3 A. Yes.

4 MS. ROHANI: Objection.

5 Q. What is the -- now, you said "branches."
6 Is there a difference between branches and units?

7 A. In my mind, no.

8 Q. Okay. Why -- why do you say in your
9 mind?

10 A. Because -- you know, because we use
11 those terms here in Louisiana interchangeable, you
12 know, unit, branches.

13 Q. Okay. Great.

14 Do all branches or units have to report
15 to the State Conference?

16 A. All do. In the State of Louisiana, they
17 do.

18 Q. Okay. How many adult branches does the
19 Louisiana State Conference have?

20 A. About -- about 40. About 40 or so, I
21 would imagine.

22 Q. And is that the same number for units?

23 A. Yes.

24 Q. Okay. Great.

25 And what -- what do the branches or

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

20

1 units have to do to stay in good standing with the
2 State Conference?

3 A. They have to maintain a membership --
4 registered membership of at least 50 members.
5 They have to file an annual financial report, pay
6 the national assessment, and pay the state
7 assessment.

8 Q. And who monitors whether branches meet
9 those requirements?

10 A. Well, the national office has -- has an
11 office that assigns it. If they fall below it,
12 then they're -- if they file below 50 members,
13 then they're deemed to be out of compliance first.
14 But if they don't file the AFR or pay the
15 assessment, then they're out of compliance that
16 way, too.

17 Q. Now, the -- you mentioned the annual
18 financial reports. Who are those sent to?

19 A. They're sent to the financial department
20 for the international office.

21 Q. Does the State Conference have a
22 physical office?

23 A. Yes.

24 Q. And where is that office?

25 A. We -- we recently moved this year to

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

21

1 7600 Airline Highway.

2 Q. And do you report to that office?

3 A. Yes, I do.

4 Q. Do you go there daily?

5 A. It all depends, you know, because it's
6 not a paid position, so...

7 Q. Right.

8 A. You know. As the need arises, I -- I
9 will stop by.

10 Q. Okay. Does the State Conference have
11 any paid employees?

12 A. No, we don't.

13 Q. And how is the State Conference funded?

14 A. It's funded by -- we have a -- we have a
15 convention and a Freedom Fund banquet. We -- by
16 that way. Or if we have -- host any type of
17 events, like a prayer breakfast, we receive funds
18 that way.

19 Q. You mentioned the convention. Who can
20 attend the convention?

21 A. Anyone. It's open and free to the
22 public.

23 Q. And are you having the convention this
24 year?

25 A. Yes.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

22

1 And we would like to have all of you
2 come attend. Go to our website and register and
3 come down and look at what we're doing and have a
4 great time.

5 Q. Well, where is it at? Let me ask you
6 that.

7 A. I'm glad you asked. I like you.

8 It's going to be dinner at Paragon
9 Casino. And we're going to have a great time.
10 It's a three-day event, Thursday, Friday, and
11 Saturday. And you're welcome to -- we have
12 trainings for all kinds of activities. And you
13 will love it.

14 (Alora Thomas-Lundborg, Esq. entered the
15 virtual deposition room.)

16 Q. Thank you very much.

17 All right. So getting back to the
18 organization, does the State Conference have a
19 board of directors?

20 A. No.

21 Q. Does the State Conference have an
22 executive committee?

23 A. Yes.

24 Q. And what is the role of the Executive
25 Committee?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

23

1 A. Executive Committee is really the -- the
2 brain trust of the State Conference. They -- the
3 Executive Committee acts as, lack of a better
4 term, the board. But there's only one board in
5 the NAACP, which is the national board, which I
6 serve on also. So the committee sets the tone for
7 anything; the new business, the old business,
8 anything that we do.

9 Q. And who is on the Executive Committee
10 for the State Conference?

11 A. All of the officers. You know, all of
12 the officers. That means vice presidents,
13 secretary, the treasurer, they make up -- and the
14 committee chairs make up the Executive Committee.

15 Q. Does someone have to be a member of the
16 NAACP to be on the Executive Committee?

17 A. Yes.

18 Q. Does the State Conference have any other
19 officers?

20 I believe you mentioned VP, president,
21 but are there -- are there other officers?

22 A. Not at the State Conference. There are
23 no officers other than those, that I'm aware of.

24 Q. Now, I believe you mentioned district
25 vice presidents. Do you know how many the

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

1 Louisiana State Conference has?

2 A. I want to say eight. I want to say
3 eight.

4 Q. And does someone have to be a member of
5 the NAACP to be a district vice president?

6 A. Yes.

7 Q. Does that person have to live in a
8 particular place?

9 A. Has to live in that particular district
10 that that position comes from.

11 Q. Okay. And the -- I'm going to call it
12 the jurisdiction of the VPs, because that's the
13 way that I think about it, but please correct me
14 if you'd like to call it something different.

15 Does the jurisdiction of the VPs cover
16 multiple parishes?

17 A. Yes.

18 Q. So is it fair to say that a district VP
19 needs to live in one of the parishes in their
20 jurisdiction?

21 A. Right.

22 Q. And, Mr. McClanahan, I believe you
23 mentioned that the State Conference has a website.

24 A. Yes.

25 Q. And that website is publicly available?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

25

1 A. Yes.

2 MS. HOLT: I'd like to pull up a
3 document called "Louisiana NAACP Website,"
4 which I'd like to be marked as Exhibit 2,
5 please.

6 (Exhibit 2 was marked for identification
7 and is attached to the transcript.)

8 BY MS. HOLT:

9 Q. Okay. Can you see that, Mr. McClanahan?

10 A. Yes.

11 Q. And do you recognize this document?

12 A. Yes.

13 Q. Okay. I'll represent to you that it is
14 a printout of the Executive Committee page of the
15 Louisiana NAACP website. Do you have any reason
16 to dispute that?

17 A. Could you raise it up from the top to
18 the bottom --

19 Q. Sure.

20 MS. HOLT: Let's do that.

21 A. -- so I can see it.

22 Okay. Okay. All right.

23 Q. All right. Now, does this page contain
24 the names and pictures of the members of the
25 Executive Committee?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

26

1 A. Yes.

2 MS. HOLT: And if we can scroll back
3 down to the second page.

4 Q. Does this -- does this --

5 MS. HOLT: If we can go up just a little
6 bit so we can get the end. Right there.
7 Perfect.

8 Q. Does this contain the names and contact
9 information for the Louisiana State Conferences
10 district vice presidents?

11 A. It's more than that. I see four of
12 them. It should be probably about eight of them
13 listed.

14 Q. Okay.

15 MS. HOLT: And we can scroll -- we can
16 scroll down. I just wanted to get that
17 title. If we could -- let's see.

18 Q. It might have cut off in the printing.
19 But do you recognize these six people to
20 be some of the district vice presidents?

21 A. I do.

22 Q. All right. Now, do you see e-mail
23 addresses under each of these six names?

24 A. Yes, I do.

25 Q. Do you know if those are personal e-mail

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

27

1 addresses?

2 A. I don't.

3 Q. Okay. Are you concerned that someone
4 could identify these persons as members by posting
5 this information on the publicly-available
6 website?

7 A. I'm not.

8 Q. Why not?

9 MS. ROHANI: Objection.

10 Q. You can answer.

11 A. I'm not because it's -- because the
12 website itself is public. And so, you know, if
13 anybody want to know anything about Mr. Coleman,
14 they can look to the website. If we wanted to be
15 anything other than that, then we would have done
16 something other than this.

17 Q. Is Mr. Coleman -- did Mr. Coleman give
18 you permission to post this information on the
19 website?

20 A. He gave -- yes, he gave that to the
21 secretary.

22 Q. Have any of these people listed on the
23 website waived their First Amendment standing
24 privilege in this litigation?

25 A. I don't understand what you're asking.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

28

1 Q. Sure.

2 So my understanding of the Louisiana
3 NAACP's position is that its members' identities
4 are protected by First Amendment associational
5 standing or First Amendment -- First Amendment
6 privilege. I -- excuse me.

7 MS. ROHANI: Objection. This calls for
8 legal conclusion.

9 MS. HOLT: Okay. I'm going to move --
10 move on from that.

11 Q. What are the qualifications for
12 membership in the NAACP?

13 A. Membership, all I know -- all I'm
14 familiar with is you have to pay your membership
15 dues, for lack of a better term, and you can
16 become a member of the NAACP.

17 MS. HOLT: And we can take down that
18 Exhibit 2. Thank you.

19 Q. Is there a minimum age for someone to
20 become a member?

21 A. No. You can be a baby.

22 Q. Do you have to be a certain race?

23 A. No. You could be -- we're all
24 inclusive.

25 Q. That includes nationality as well?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

29

1 A. We are all inclusive.

2 Q. Do you have to be a registered voter?

3 A. Not to my knowledge, it's not -- not --
4 it's not a requirement.

5 Q. Once an adult becomes a member, what
6 does he or she have to do to remain in good
7 standing?

8 A. We would like to hope that you keep your
9 membership dues paid up. As long as your
10 membership dues is paid up, then you're good.

11 Q. And how does someone become a member of
12 the State Conference?

13 A. Well, they don't become members of the
14 State Conference, per se. Not individually. They
15 just have to become a member of the branch.

16 Q. Okay.

17 A. The branch is a member of the State
18 Conference.

19 Q. Great.

20 So if someone becomes a member of a
21 particular branch in Louisiana, is it fair to say
22 they're automatically a member of the State
23 Conference?

24 (Jack Adcock entered the virtual
25 deposition room.)

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

30

1 A. Per se. Per se. But the branch has to
2 be in good standing. So if not, then they're not
3 in -- then the branch is not really technically a
4 member unless it stays in good standing.

5 Q. How does the State Conference monitor
6 whether a branch is in good standing?

7 A. Goes back to what I said earlier, the
8 national office keeps track and lets us know who's
9 in compliance and who's not.

10 Q. Are there any branches in Louisiana
11 currently that are not in good standing?

12 A. I haven't checked recently because, you
13 know, my staff -- I mean, the secretaries and
14 those persons keep -- kind of keep that stuff up.
15 But as it gets closer to our state convention,
16 they'll let me know.

17 Q. Do you recall during last year's state
18 convention if there were any branches that weren't
19 in good standing?

20 A. You're asking a 58-year-old some
21 questions that I -- I -- just -- I don't know the
22 number, if you're asking for a number. I wouldn't
23 know a number.

24 Q. Well, I don't need a number, per se, but
25 what's -- do you recall there being at least one

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

31

1 branch not in good standing?

2 A. At least one branch not in good
3 standing.

4 Q. Do you remember what that branch was?

5 A. I don't. Because I'm trying to get them
6 all to be in good standing, so...

7 Q. That's fair.

8 So what does the State Conference do to
9 make sure its members and the members of the
10 branches, by explanation, are in good standing?

11 A. Repeat that.

12 Q. Sure.

13 So let -- let me rephrase that. You
14 said that members pay dues; right?

15 A. Right.

16 Q. If you can audibly say that for the
17 record, that would be great.

18 A. Right. Right. Right.

19 Q. And they need to pay dues to continue to
20 be in good standing, I believe is what you --

21 A. Right.

22 Q. How does the State Conference track
23 whether or not a member has paid their dues?

24 A. The national office does that because
25 all membership fees, dues, goes to the national

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

32

1 office.

2 Q. Does the national office send you
3 reports on which members have and haven't paid
4 their dues?

5 A. It would probably go to the branch as
6 opposed to coming to me. Branches look after the
7 members, and I look after the branches.

8 Q. And how often does the national office
9 send reports?

10 A. I don't know. I don't know if they send
11 them monthly, quarterly, I don't know that, but
12 they send them. They send them periodically, I
13 know that.

14 Q. And what happens when a nonpaying member
15 is identified?

16 A. Well, if he's a nonpaying member -- what
17 you mean by "nonpaying member"?

18 Q. Well, to pay his dues.

19 A. Okay. If he failed to pay his dues,
20 then I would imagine -- I would imagine the branch
21 would get some type of notification. I
22 wouldn't -- I don't really look at memberships.
23 Those things go to the branches. I deal with the
24 branches.

25 Q. And do you know who in the branches

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

33

1 would be in charge of overseeing who pays and who
2 doesn't pay dues?

3 A. That's probably -- it's probably two,
4 two person. They should have a membership chair
5 and a secretary.

6 Q. To be a member of a particular branch,
7 do you have to be a permanent resident in the area
8 that the branch is located?

9 A. No.

10 Q. So if I live in Baton Rouge, I could be
11 a member of the New Orleans branch?

12 A. Yes, but -- you can, but you -- to be a
13 member of a particular branch, you have to either
14 live -- live where that branch is located or work
15 where that branch is located.

16 Q. Okay. And who determines -- do you know
17 who determines if somebody lives or works within
18 the branch?

19 A. I don't.

20 Q. Do you belong to -- to one branch at a
21 time or multiple branches?

22 A. Just one. One is enough.

23 Q. All right. Fair.

24 Sir, what happens if a member passes
25 away? How is that -- how is that -- or how is

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

34

1 that recorded?

2 A. It's not recorded, per se. Only when we
3 have -- only when the branch has memorial services
4 and they would notify -- identify that that member
5 has more or less transitioned to -- to be with the
6 Lord. But outside of that, I don't think there's
7 nothing that is recorded officially. I'm not
8 familiar with it, if it is.

9 Q. Does the State Conference know when a
10 member has passed away?

11 A. Not all. Not all persons that pass away
12 I would get a notice of, you know. But I pretty
13 much get notices, you know, regularly, but I may
14 not get all notices.

15 Q. And what do you do with those notices
16 when you get them?

17 A. Well, what we do is try to find out --
18 talk to the family and probably send a -- some
19 type of flower or some type of plant, or I may
20 attend the service, the services for the -- for
21 the fallen soldier, transitioned soldier.

22 Q. And is their name removed from any
23 membership list?

24 A. It is. I don't know if -- I don't know
25 where the removing part starts that, but it is.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

35

1 Q. So when a new member is added, does the
2 State Conference know about that?

3 A. No, not everyone.

4 Q. Do you know when the new membership of a
5 new member become effective?

6 A. It can become effective one of two ways,
7 at a regular general invited meeting, they can
8 become a member that day, or when they send the
9 application up to the national office, they become
10 a member then.

11 Q. I know previously you mentioned deceased
12 members being removed from a list. Are new
13 members added to a list?

14 A. I don't know, but I'm quite sure at some
15 point they are. I don't know at what point that
16 happens and who's responsible for that.

17 Q. Does the State Conference get periodic
18 membership updates from the National?

19 A. No, I don't because those things go
20 through to the branches. The branches would --
21 should get those lists. I don't.

22 Q. Do the branches send you periodic
23 updates on their membership?

24 A. They may not send me names. They might
25 send me numbers. So I -- I would look at -- I

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

36

1 wouldn't look at names.

2 Q. Do you compile those numbers?

3 A. Depends. Depends if we're getting ready
4 to go to the national convention or the state
5 convention.

6 Q. And those numbers they send to you, are
7 they numbers to be added, numbers to be removed?

8 A. No. They're just numbers.

9 Q. They're just numbers.

10 So what do you do with those numbers?

11 A. Well, if -- if there's a branch -- if
12 there's a branch, I look at the numbers because
13 the numbers -- they have to be above 50. So 50 is
14 their trigger number, that they're in
15 compliance -- at least in compliance with that
16 aspect. And so when we preparing for, you know,
17 the state convention, the national convention,
18 those numbers -- anything above 50 is a check, a
19 check mark because they're at least complying in
20 terms of membership.

21 Q. Okay. So do they just tell you there's
22 50 or do you personally -- or do they provide a --
23 a list of the 50 for you to check?

24 A. No, I never receive a list of anything
25 other than each branch may send me a -- their

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

37

1 number, how many -- how many persons they have on
2 their roll. And that -- for me, that means that
3 they're complying in terms of membership. That's
4 the only thing that that number there means.

5 Q. So just to be clear, you don't -- do you
6 do anything to verify that number?

7 A. No, I don't do anything to verify that
8 number.

9 Q. And how many members does the Louisiana
10 NAACP currently have?

11 A. You say the NAACP -- repeat that
12 question.

13 Q. The State Conference. Excuse me.

14 A. We don't have members, per se, because
15 we are the -- we are the -- for lack of a better
16 term, we're the corporate office for the state --
17 for the state of Louisiana. So we don't have
18 members. The members are made up in the branches.

19 Q. Okay. I see.

20 And do you know how many members of the
21 branches there are in Louisiana?

22 A. So if you're asking how many branches we
23 have statewide, from all the branches, probably --
24 the number's in the thousands.

25 Q. And the number of individual NAACP

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

38

1 members in the State of Louisiana, do you know
2 that number?

3 A. I haven't added the number up, but I
4 know it's in the thousands because we have --
5 because, you know, we have large branches and
6 there are small numbers. So the number, it's
7 all -- it's probably in the thousands, thousands
8 of members.

9 Q. And when you say "in the thousands," are
10 you relying on the representations of the branches
11 as to their numbers?

12 A. Yes. If -- if a branch tells me that
13 they have 50 or so -- and also, the national
14 office tells you. So between those two bodies,
15 safe to say that we're in the thousands.

16 Q. So just -- just so I'm understanding you
17 correctly, is it your testimony that the Louisiana
18 State Conference of the NAACP does not have any
19 members?

20 A. We have -- our members are branches,
21 they're not persons.

22 Q. Okay. And the -- and the thousands of
23 members, are all of those registered to vote, do
24 you know?

25 A. I don't know.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

39

1 MS. HOLT: I'd like to pull up a
2 document called the Amended Complaint, which
3 I would like to be marked as Exhibit 3,
4 please.

5 (Exhibit 3 was marked for identification
6 and is attached to the transcript.)

7 BY MS. HOLT:

8 Q. Okay. Mr. McClanahan, do you recognize
9 this document?

10 A. If you kind of let me see the entire
11 page, I can kind of give you --

12 Q. Sure.

13 MS. HOLT: If you can kind of scroll
14 through.

15 Q. And if you have a hard copy of the
16 Amended Complaint that you would prefer to look
17 at, that is completely fine.

18 A. Yes. Okay.

19 Q. And what is -- what is this document?

20 A. It's the Amended Complaint for
21 Declaratory Judgment and Injunctive Relief.

22 Q. Okay. Great.

23 And did you review this document in
24 preparation for your deposition today?

25 A. Yes.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

40

1 MS. HOLT: And if we can scroll up a
2 little bit on this first page or -- a little
3 more, so we can see the red font.

4 BY MS. HOLT:

5 Q. What is the date of this filing?

6 A. That'd be 4/4/22.

7 Q. Great.

8 And how did the Louisiana State
9 Conference become involved in this lawsuit?

10 A. We became involved in the lawsuit
11 because we represent the people of the state of
12 Louisiana.

13 Q. Can you explain that a little bit more.

14 A. Well, this is dealing with the
15 redistricting process and it said that 2021
16 redistricting cycle, in that we knew there were
17 going to be some shift in the boundaries. And so
18 we represent the entire state of Louisiana as the
19 NAACP. And when we realized that there may be
20 some illegal stuff going on in the State of
21 Louisiana -- Louisiana, whatever, we knew we had
22 to take action because the people demand that we
23 take action.

24 Q. And who made the decision to join this
25 litigation?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

41

1 A. I did. I did.

2 We consulted with -- we consulted with
3 our -- with our Office of General Counsel and the
4 NAACP State Conference became a party to this
5 litigation.

6 Q. Did you consult with any other members?

7 A. Oh, every Monday -- every Monday night
8 we talk to members about actions that we take
9 throughout the state of Louisiana on various
10 issues, and this is one of them.

11 Q. So these Monday night calls, who can
12 attend those?

13 A. Members can attend. And if you're not a
14 member, you're -- you're a guest, and you have to
15 be brought in as a guest.

16 Q. Is there an attendance list?

17 A. No.

18 Q. So how do you determine if someone is a
19 member or a guest?

20 MS. ROHANI: Objection.

21 You can answer.

22 A. Well, the parties that control the --
23 it's -- they're via Zoom, so the party that
24 controls the Zoom would ask. And members that
25 they're familiar with, they'll let us know that

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

42

1 they are a member of this particular branch and
2 say they can come in.

3 Q. Did you consult with the president of
4 the local or any -- the presidents of the local
5 branches before bringing this lawsuit?

6 MS. ROHANI: Objection, to the extent
7 that this may seek information protected by
8 attorney-client privilege.

9 We just want to make sure that none of
10 the answers are from discussions or
11 conversations with counsel.

12 But you may answer.

13 A. When you say "consult," what do you mean
14 by "consult"?

15 Q. Did you talk to any of the presidents of
16 the local branches before filing this litigation?

17 A. I talked to some.

18 When you say "local branches," I'm
19 probably sure you mean the entire state, the state
20 of Louisiana. Because the local branch here is
21 Baton Rouge. I live in Baton Rouge. So that's
22 the local branch. And I spoke -- and there are
23 plenty of branches around us because there's
24 plenty of parishes. But I've spoken with many of
25 the membership and many of the leadership.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

1 Q. Okay. So the State Conference doesn't
2 have any members; right?

3 A. No. We have members, but our members
4 are the members of our branches.

5 Q. Yeah, the branches.

6 But did you ask any of the branch
7 presidents whether they consent to being a part of
8 this lawsuit?

9 MS. ROHANI: Again, objection, to the
10 extent that this seeks attorney-client
11 privileged information.

12 But you can answer.

13 A. Well, all -- all members, when they
14 happily join the NAACP and they -- they join us
15 because we have a -- a bright, rich history. And
16 there are many methods that we employ -- we talk
17 about this all the time, that we employ to achieve
18 our mission. And that we -- we have marches, we
19 have phone calls, we have rallies. We raise
20 awareness through various social media campaigns.
21 And then we have litigation. All members, when
22 they join the NAACP, consent to the NAACP's
23 mission and the various means that we employ to
24 achieve that mission.

25 Q. And I appreciate that, Mr. McClanahan,

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

44

1 but my question was: Did you ask any vice
2 president or -- excuse me, president of the local
3 branches whether they agreed to join this lawsuit
4 before filing this litigation?

5 MS. ROHANI: Objection.

6 You can answer.

7 A. Well, I -- I have during meetings,
8 quarterly meetings or our state convention, talked
9 about our involvement. They wholeheartedly say,
10 let's go, and let's win for the state of
11 Louisiana. And so to that extent, they all agree,
12 let's go.

13 Q. Okay. But you didn't specifically --
14 specifically ask whether a president consented to
15 this litigation before filing it?

16 MS. ROHANI: Objection.

17 You can answer.

18 A. If you're saying whether I spoke to one
19 or I spoke to all of them in global, I think I
20 spoke to all of them in global at a meeting.

21 Q. What meeting was that?

22 A. Probably quarterly meeting because we
23 have quarterly meetings. And then we have a state
24 convention. This is every year. And so
25 throughout the whole process we would talk about

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

1 the process that we're going to -- the many issues
2 that we were fighting throughout the state.

3 And one of the issues that will always
4 come up would be the redistricting process because
5 we -- we have our members to participate. And so
6 one thing that we talked about was at the end --
7 the end result would be the state of Louisiana is
8 going to do the right thing and pass fair maps;
9 and if they were not, what our next choice would
10 be. Everyone always agreed to what is our next
11 choice, and if we have to, we'll bring some type
12 of litigation.

13 Q. Mr. McClanahan, what is the relief that
14 the State Conference is seeking in this
15 litigation?

16 A. I'm so glad you asked.

17 You know -- you know, we would hope that
18 the relief that we're seeking is that the people
19 of the state of -- the people -- the great people
20 of the great state of Louisiana would have an
21 opportunity to elect candidates of their choice.
22 And we believe that we can get more state senators
23 and state representatives out of this
24 redistricting cycle than we have. And so we are
25 praying that you would go back to your -- your

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

46

1 client and tell him, Mike is right, let's go ahead
2 and do the right thing, agree to additional
3 senatorial districts and agree to additional
4 majority-minority representatives so we can all go
5 about our daily lives again.

6 Q. Well, Mr. McClanahan, my client is the
7 Secretary of State. Does he have any authority to
8 do what you're asking?

9 A. I don't know if he does, but his friends
10 are on the Legislature and so he can make calls
11 and say, look, I -- I've seen the writing on the
12 wall, the Lord has spoken to me, and we should be
13 about the right thing.

14 Q. Now, I believe you said a lot of people
15 of Louisiana to elect candidates of their choice.
16 What did you mean by "candidates of their choice"?

17 MS. ROHANI: Objection, to the extent it
18 calls for a legal conclusion.

19 Mr. McClanahan, you can answer.

20 A. Well, I do know --

21 MS. HOLT: Sara, I'm asking him what he
22 meant by a specific phrase that he used.

23 MS. ROHANI: Correct, but it is a legal
24 term, and so I just wanted to establish that
25 on the record.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

47

1 MS. HOLT: Okay. It's a legal term that
2 he used.

3 BY MS. HOLT:

4 Q. But you can -- you can answer that,
5 Mr. McClanahan.

6 A. Okay.

7 So we -- we do know that Louisiana is
8 made up of black folks. African Americans make up
9 a third of Louisiana. And so a third of
10 anything -- we just want that third. Whatever the
11 law says we're entitled to according to that
12 third. And so the way things are now, I don't
13 think we can get that third. And so -- in
14 anything. So we just want to make sure, through
15 this litigation, that we'll get that third
16 throughout the entire senate, state senate and
17 state house of representatives.

18 Q. So you said "entire." So does that
19 apply to the maps as a whole?

20 A. That third, whatever that third applies
21 to.

22 MS. HOLT: If we can turn to page 58.
23 Great.

24 Q. Mr. McClanahan, do you see where it says
25 "prayer for relief" at the top of this page?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

48

1 A. Can you -- can you scroll so I can make
2 sure that it's page 58.

3 It doesn't say it.

4 Q. Yeah.

5 MS. HOLT: Please, if we can scroll up
6 or down, whichever.

7 A. Okay. All right.

8 Q. And I'll give you a minute to
9 familiarize yourself with this.

10 A. Okay.

11 Q. Okay. Do you see where it starts with,
12 "Wherefore, plaintiffs respectfully request that
13 the court..."

14 Did I read that correctly?

15 A. Right.

16 Q. Can you please read paragraph A out
17 loud, for the record.

18 A. "A, Declare SB1 and HB14 to be in
19 violation of Section 2 of the Voting Rights Act,
20 as amended, 52 USC, Section 10301."

21 Q. Is it your understanding that plaintiffs
22 want the court to declare the entire state senate
23 map illegal and in violation of Section 2?

24 MS. ROHANI: Objection. Again, calls
25 for a legal conclusion.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

49

1 But you can answer.

2 A. Yes. If SB1 is the senate map, yes.

3 Q. And if HB14 is the house map?

4 A. Yes.

5 Q. Okay.

6 MS. ROHANI: And then, Cassie, I
7 apologize, if there's a moment where we can
8 take a five-minute break whenever we're done
9 with this line of questioning.

10 MS. HOLT: Sure. I'm done with this
11 exhibit, and we can go ahead and take a
12 comfort break. We've been going for about an
13 hour.

14 (Recess in proceedings.)

15 MS. HOLT: So back on the record.

16 BY MS. HOLT:

17 Q. Mr. McClanahan, I wanted to clarify
18 something just so that I make sure we're on the
19 same page here as to the organizational structure.

20 Is the State Conference made up of the
21 branches?

22 A. Yes.

23 Q. Is the State Conference a corporate
24 entity?

25 A. No.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

50

1 Q. Okay. So it's not a 501(c)(3)?

2 A. We are a -- we are an association, a
3 member of the national association, and so our
4 status is 501(c)(4).

5 Q. Okay.

6 A. Based upon the association, the national
7 association.

8 Q. Great.

9 And are the branches separate entities
10 or separate 501(c)(4)s?

11 A. Yes.

12 Q. Okay. And we looked at the Amended
13 Complaint in this matter.

14 We don't need to pull it back up.

15 But do you remember when this litigation
16 was first brought?

17 A. In terms of the date and time and that
18 type of stuff you're asking?

19 Q. Does the spring of 2022 sound right?

20 A. Right. I think you -- I think it
21 said -- yeah, spring of 2022.

22 Q. Do you have a specific recollection of
23 any meetings with state branch presidents before
24 the spring of 2022?

25 A. I meet with -- I meet with the

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

51

1 leadership and the branches five times a year.

2 And so -- so we are talking about 2021? We met
3 five times that year.

4 And when you talk about spring, we
5 probably met at least once before the spring -- or
6 once during that part of the year.

7 Q. At any of those meetings, did branch
8 presidents give you permission to bring this
9 lawsuit?

10 MS. ROHANI: Objection.

11 You can answer.

12 A. Okay. So what happens is we talk about
13 a plethora of issues that we have. And one of
14 them was the redistricting process. And I -- I
15 asked them what was their pleasure. You know,
16 they said we employed the other methods, if they
17 don't work -- if the last method of litigation
18 works, let's go with litigation.

19 Q. Which branch presidents were present at
20 that meeting?

21 A. I don't know because I don't have
22 anything before me, but I'm quite sure it's a good
23 number of them, were present, their membership.
24 So we talked about it, and they agreed, just file
25 the lawsuit.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

52

1 Q. And when was -- was that one meeting
2 where they agreed?

3 A. No.

4 What happens is that I -- I probably
5 talk about the process along the way, as we were
6 talking about, you know, how -- how the
7 redistricting process was coming along. And so I
8 let them know every step of the way, via the
9 Monday night calls, what's going on.

10 And then we have our quarterly meetings,
11 I let them know also.

12 At our state convention, we were talking
13 about all of this.

14 And then -- and then I also, you know,
15 we would bring our lawyers, the greatest lawyers
16 this side of Heaven, they would give us updates.

17 And so, you know, when all else, you
18 know, looked like it was going to be a -- still a
19 lopsided, one-sided illegal victory, we brought --
20 we said -- the membership said, let's go ahead and
21 let's file a lawsuit.

22 Q. So when you say if the membership says,
23 what are you basing that off of?

24 A. When you say the memberships says, so I
25 talked to -- during our quarterly meetings, all

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

53

1 NAACP members get on -- are there via Zoom. I
2 think we were doing Zoom then. And so I would
3 have people from all over, as well as the
4 leadership.

5 At leadership meetings, the presidents,
6 the officers for the branches would be on those --
7 those Zoom calls. And we talk about issues that
8 we're dealing with throughout the whole state.
9 And one of -- I will always keep them informed of
10 what's going on with the redistricting here in
11 Louisiana as pertains to the Louisiana senate,
12 Louisiana house, as well as the congressional
13 lawsuit I forgot to talk about. I was involved in
14 that one also. We would talk about those.

15 And also the Supreme Court suit that
16 we're involved in. I would talk about all those
17 things to -- to the membership. And they
18 understand this is Louisiana and that -- and we
19 would have to ultimately file a lawsuit, and they
20 agreed.

21 Q. Did you take attendance at those
22 quarterly meetings?

23 A. I didn't. Maybe my staff -- I mean,
24 maybe, you know, the leadership -- maybe the
25 secretary or somebody would always get attendance,

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

1 but I didn't. I don't.

2 Q. Okay. And so you don't know if all of
3 the members or all of the presidents of the
4 branches were present at that meeting?

5 A. I don't, but it's done through a
6 democratic process.

7 Q. And those Monday Zoom calls, I believe
8 you said earlier there wasn't attendance at those;
9 is that correct?

10 A. I didn't hear the last part.

11 Q. There -- there was not attendance at
12 those monthly Zoom calls; is that correct?

13 A. When you say "attendance," you mean
14 attendance taken?

15 Q. Yes, sir.

16 A. No, not that I'm aware of.

17 Q. Okay. So you don't know if all of the
18 members were present on those Monday Zoom calls?

19 A. No. It would be hard to get all the
20 members present because, you know, you're talking
21 about thousands of people. But we have a good --
22 a good many persons on the calls.

23 Q. All right. Do you recall any specific
24 branch president on one of those month -- or one
25 of those Monday calls?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

55

1 A. Do I remember one -- one branch
2 president? You asking --

3 Q. Yes.

4 A. -- for a particular name?

5 Q. I'm asking if you recall -- well, let me
6 scratch that. That's a -- that's a poor question.

7 Now, before the break we were discussing
8 the relief that the State Conference seeks in this
9 litigation. I'd like to clarify. I didn't
10 understand your definition of "candidate of
11 choice."

12 Can you explain that for me?

13 MS. ROHANI: Objection again, to the
14 extent it calls for a legal conclusion.

15 But, Mr. McClanahan, you can answer.

16 Q. Sure.

17 And just to be clear, Mr. McClanahan,
18 I'm referring to the phrase that you used, the
19 people of Louisiana to elect candidates of their
20 choice.

21 A. Okay.

22 What I was referring to is abundant --
23 abundant -- the way Louisiana -- the state of
24 Louisiana and its house and senate are structured,
25 that our options are limited to the very few that

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

1 they -- that they say we have to choose from. But
2 if those -- but if those districts were expanded
3 to include more persons that make up Louisiana,
4 black and brown people, other nationality, races,
5 we would get a greater mix of representation
6 throughout this whole legislative process --
7 throughout the whole Legislature.

8 Q. So is the candidate of choice a
9 particular race?

10 MS. ROHANI: Objection.

11 You can answer.

12 A. Not in this particular instance as
13 we're -- as I just told you, a candidate of
14 choice, because if a particular area was -- was
15 needed -- better representation or more diverse
16 representation, should I say -- then we hope that
17 the state of Louisiana would draw maps so that
18 persons could actually choose one of their own
19 choice.

20 Q. Sir, when you're referring to the
21 persons in various parts of Louisiana, who are
22 you -- who do you mean by that?

23 MS. ROHANI: Objection, vague.

24 You can answer.

25 A. Okay. So repeat the question. Just

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

57

1 repeat the question.

2 Q. Yeah. Sure.

3 So you've been referring to people in
4 specific parts of Louisiana and expanding their --
5 I believe you said the options are limited in
6 wanting to expand the mix. Who are those people
7 that you are referring to in that context?

8 MS. ROHANI: Objection.

9 Cassie, can we determine whether or not
10 that was the exact testimony of Mr.
11 McClanahan?

12 MS. HOLT: Sure.

13 MS. ROHANI: Would the court reporter
14 please read that back to us. Thank you.

15 (Record read back by Stenographer.)

16 MS. ROHANI: Thank you.

17 BY MS. HOLT:

18 Q. Okay. So, Mr. McClanahan, my question
19 was: Who do you mean by more persons?

20 MS. ROHANI: Objection.

21 You can answer.

22 A. Okay. Louisiana is made -- like New
23 York -- I think New York is the melting pot.
24 Louisiana is the gumbo pot. And the gumbo here in
25 Louisiana is made up of a whole lot of stuff

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

58

1 that's in there, right, that makes it good.

2 That's what makes Louisiana great.

3 And so if you look at black and brown,
4 if you look at the Asian population and others,
5 Louisiana has a great, rich culture and a great
6 race history. And so to have those at the
7 Legislature would be great, but -- but as it
8 stands, we just don't have those options because
9 they're limited.

10 You have -- I don't know of any Asian
11 that's in the Legislature. And I don't know of
12 any Hispanics that are in the Legislature. I'm
13 not saying in all of them. But I do know that we
14 would have a great gumbo if all of them were in
15 the Legislature.

16 Over rice, I might add.

17 Q. Fair enough.

18 Would -- so I believe you previously
19 mentioned before the break one-third. Does that
20 one-third include all the members of the gumbo pot
21 or specific members of that pot?

22 MS. ROHANI: Apologies. Objection.

23 You can answer.

24 A. I think -- I think the one-third
25 pertains to African Americans. Black folks make

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

59

1 up a third of the population of the state of
2 Louisiana.

3 Q. So for the Louisiana State Conference to
4 get the relief it seeks, would the maps need
5 one-third to elect black candidates of choice?

6 MS. ROHANI: Objection.

7 You can answer.

8 A. The one-third throughout the leg- --
9 throughout the redistricting of the legislative
10 process, yes, it would give us a greater --
11 greater options to elect candidates of our choice.
12 In this -- in this particular instance, should be
13 majority minorites, majority minorities, black
14 folks.

15 Q. So that's in -- the one-third, that's in
16 proportion to the overall black population of
17 Louisiana; is that correct?

18 A. Correct.

19 MS. HOLT: I would like to pull up a
20 document called "Plaintiff NAACP Louisiana
21 State Conference's Supplemental Responses..."

22 If the tech can pull that up, please,
23 and mark it as Exhibit 3.

24 REMOTE TECHNICIAN: I believe we're on
25 Exhibit 4 now.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

60

1 MS. HOLT: Oh, Exhibit 4. Excuse me.
2 (Exhibit 4 was marked for identification
3 and is attached to the transcript.)

4 REMOTE TECHNICIAN: Yes. The Amended
5 Complaint was Exhibit 3.

6 MS. HOLT: Thank you. Thank you.
7 Counting is not a lawyer's strong suit.

8 Okay. And if we can please scroll
9 through this entire document for Mr.
10 McClanahan.

11 BY MS. HOLT:

12 Q. Okay. Mr. McClanahan, do you recognize
13 this document?

14 A. Yes.

15 MS. HOLT: And if we can go back to the
16 top.

17 Q. And what is this document?

18 A. It is the Plaintiff, NAACP Louisiana
19 State Conference's Supplemental Responses and
20 Objections to Defendant Ardoin's First Set of
21 Interrogatories and First Set of Requests for
22 Production of Documents to the Organizational
23 Plaintiffs.

24 Q. Thank you. I know that's a long title.

25 MS. HOLT: If we can turn to the very

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

61

1 last page of this Exhibit 4, please.

2 BY MS. HOLT:

3 Q. Mr. McClanahan, do you recall signing
4 that verification?

5 A. Yes.

6 Q. So you understand that these responses
7 you've sworn to answer in the best of your
8 knowledge and belief?

9 A. Yes.

10 MS. HOLT: Now, if we can turn back to
11 the bottom of page 1. And if we can include
12 the top of page 2 in this view we're
13 looking -- yeah. Great.

14 Q. Mr. McClanahan, can you please read that
15 Interrogatory No. 3 to yourself and let me know
16 when you're finished.

17 A. Okay. Read the --

18 Q. Perfect.

19 A. -- first and the -- okay.

20 Q. Okay. Do you see part (a) there?

21 A. Right.

22 Q. And can you read that out loud for the
23 record.

24 A. "Identify the members of your
25 organization living in each challenged district."

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

62

1 Q. Thank you.

2 MS. HOLT: And if we can look down on
3 page 2 to the response. Great.

4 Q. Can you please read that first paragraph
5 in the response to paragraph (a). I'm sorry.
6 It's the second paragraph down under Supplemental
7 Response, starting with -- it starts with the
8 subsection (a).

9 A. Do I read it silently or out loud?

10 Q. If you can read it out loud for the
11 record, please.

12 A. "Plaintiff has identified at least one
13 member who resides in, among others, each of the
14 following Louisiana senate districts: 2, 5, 7, 8,
15 10, 14, 15, 17, 19, 31, 36, 38 and 39."

16 Q. Great. Thank you.

17 Is every senate district listed in this
18 response?

19 MS. ROHANI: Objection, calls for a
20 legal conclusion.

21 You can answer.

22 A. Now repeat your question again.

23 Q. Sure.

24 How many senate districts does Louisiana
25 have?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

63

1 MS. ROHANI: Objection.

2 You can answer.

3 A. I don't know. Off the top of my head, I
4 don't know. I know --

5 Q. That's totally fine.

6 Do you see the number 1 in this
7 response?

8 A. I see 1 down by the house districts.

9 Q. Okay.

10 A. But I don't see nothing by the senate.

11 Q. So what I'm getting at is: Can we agree
12 that there are numbers missing between 1 and 39 in
13 this response?

14 A. Okay. All right. We can.

15 Q. So what does the Louisiana State
16 Conference mean when it says it has identified at
17 least one member?

18 MS. ROHANI: Objection.

19 You can answer.

20 A. Okay. It means that we have at least
21 one member living in these identified senatorial
22 districts, 2, 5, 7, 8, 10, 14, 15, 17, 19, 31, 36,
23 38, and 39.

24 Q. And how do you know that?

25 MS. ROHANI: Objection.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

64

1 A. Well, what we've done is looked at these
2 maps, the legal maps of the -- that were passed,
3 looked at the illustrative maps. And I'm from
4 Louisiana. I'm a -- I'm from north Louisiana, the
5 best part of Louisiana. It's Sabine Parish in
6 Zwolle, Louisiana. But I've been all over the
7 state of Louisiana as the NAACP State Conference
8 president. And as I -- as I cross-reference
9 these, I do know that we have members residing in
10 all of these -- these senatorial districts.

11 Q. Sir, I believe you testified earlier
12 that you don't receive any reports on membership
13 from the branches; is that correct?

14 A. I don't receive a report about member --
15 about membership, but I receive -- you know, they
16 tell me what they're doing. I receive -- I
17 receive activity reports.

18 Q. So how do you know the members or
19 what -- what members are in which house -- or
20 which senate district? Excuse me.

21 MS. ROHANI: Objection.

22 A. Okay. I'm a native. I'm a native
23 Louisianan. I've been all over the state.

24 I've gone to many of these parishes
25 where they have branches and they have Freedom

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

65

1 Fund banquets.

2 I've gone to many of these areas where
3 we've had to deal with police brutality.

4 I've gone to many of these areas where
5 we've had to deal with voter registration.

6 I've gone to many of these areas where
7 they've had an issue with school systems, the
8 desegregation suits.

9 I've gone to many of these areas where
10 we had to go talk to the senate -- the senator for
11 that particular area.

12 I've gone to many of these areas because
13 I've gone to the football games with members.

14 And we've had rallies at these various
15 places.

16 I've attended parades in these various
17 areas.

18 I'm familiar with leadership. I might
19 not be familiar with every member, but I'm
20 familiar with the leadership of those various
21 areas.

22 And so -- and sometime members come up
23 to me and say, Mr. McClanahan, how you doing, I'm
24 a member. I might remember that day. I might not
25 remember his face, but I remember I met them

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

66

1 there.

2 So I'm familiar with having members
3 in -- at least one member that reside in each one
4 of these questioned senatorial districts.

5 Q. Do you know those members' home
6 addresses?

7 MS. ROHANI: Objection, to the extent
8 that this is protected by attorney-client
9 privilege.

10 But you can answer.

11 A. I've gone to some of their homes. I
12 haven't -- probably haven't gone to all of them,
13 but I've gone to a lot of homes. And not only
14 eaten gumbo, but crackers. I'm telling you.

15 I was up in Cottonport last night.
16 That's right outside of Marksville, right.

17 And I've gone to those places and I've
18 sat down.

19 And I've also attended funerals.

20 But I might not have gone to each home,
21 but I've gone to enough of them to understand that
22 we have members that reside there.

23 Q. So let me -- let me try it this way. So
24 do you see how it lists Senate District 2?

25 A. Yes.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

67

1 Q. The member identified in that
2 district -- I'm not asking for their identity, but
3 do you know their home address?

4 MS. ROHANI: Objection.

5 A. I know they live there, yes.

6 Q. How do you know that?

7 A. Because I've already looked at that
8 particular area, and I know we have at least one.
9 I might not know every one at -- at that
10 particular senatorial dist- -- address, but I know
11 at least one of the membership that stays in that
12 area. And I know -- I've been to the homes. I've
13 been -- most of these homes I've been to.

14 And Louisiana is a welcoming state.
15 We -- we love to bring you in, watch some LSU,
16 southern football and eat some barbecue and some
17 dirty rice and some -- so I've been to many of
18 those homes. And so I -- I can get to most of
19 their homes from -- just on memory alone.

20 Q. Okay. Now, Mr. McClanahan, I'm -- I'm
21 not doubting that you go to certain members'
22 homes.

23 What I'm getting at is: This response
24 says that plaintiff has identified at least one
25 member who resides in Senate District 2. Now, I

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

68

1 want to know how you know that.

2 MS. ROHANI: Objection.

3 You can answer.

4 A. Okay. So as I alluded to earlier, the
5 senate districts are a whole lot larger than the
6 house representative districts, right. So I do
7 know, based upon looking -- and looking at the
8 maps that have the parishes -- Louisiana has
9 parishes, not counties. So looking at the
10 parishes, cross-referencing them with our
11 branches, where our branch is located, it's easy.
12 I know that easily, that we have branches in and
13 the members that make up the branches in these
14 particular senatorial districts.

15 Q. Does "member" mean member in good
16 standing?

17 MS. ROHANI: Objection.

18 A. Either you're a member or you're not.
19 Either you're a member -- paid dues member or
20 you're not. I don't know if there's a quasi -- a
21 place where members go until they get in good
22 standing. I'm not aware of anything like that.

23 So if your \$30 paid up, then I want
24 everybody on the call, on this Zoom, that paid
25 their \$30 to become a member of the oldest and the

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

69

1 boldest civilized organization in the country.

2 Q. So how did you verify that the
3 identified member was, in fact, a member?

4 MS. ROHANI: Objection.

5 I want to make sure that none of these
6 answers Mr. McClanahan gives invites
7 discussions or consultation with counsel, he
8 or the NAACP had with counsel.

9 A. Repeat your question.

10 Q. Sure.

11 So how did you verify that the
12 identified member in Senate District 2 was
13 actually a member of the NAACP?

14 A. Well, I do know that we have at least
15 one member -- several members. And so I looked at
16 the -- I know the leadership of the various
17 branches, and I know that somebody from the
18 leadership lives in that area. And if they're not
19 part of the leadership, then the branch would know
20 because national would tell them that, you know,
21 this -- this person or that person cannot be part
22 of the leadership because they're not a member.
23 But I haven't -- I haven't gotten anything saying
24 that the leadership as the branch has it is not in
25 good standing.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

70

1 So when I look around and go to these
2 places, I speak to the presidents, vice
3 presidents, or some -- somebody in leadership.
4 And they're situated, living in these questioned
5 senatorial districts.

6 Q. Mr. McClanahan, did you have a
7 conversation with a local branch president whose
8 jurisdiction covers Senate District 2 before this
9 litigation?

10 MS. ROHANI: Objection.

11 Apologies, Cassie.

12 A. Okay. So what I've done, you know, I
13 have these calls, the quarterly meetings, I have
14 the state convention, and we talk about issues
15 that affect them.

16 So we know -- we know that, once we
17 talked about how the state looks like, they were
18 going to -- going to vote. We decided as a group.
19 And it included members from all of these
20 questioned senatorial districts. And we -- we
21 decided as a group, as a -- to -- to agree to a
22 lawsuit.

23 Q. Mr. McClanahan, I'm a little confused
24 because I believe you testified that you don't get
25 membership lists and that you rely on the local

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

71

1 branches to tell you about their members. But how
2 do you -- how do you know, then, what members
3 actually reside in which senate districts?

4 How did you identify those particular
5 members?

6 MS. ROHANI: Objection.

7 Again, I want to make sure that, Mr.
8 McClanahan, the answers you give invite [sic]
9 conversations you've discussed with counsel,
10 including General Counsel.

11 A. As I alluded to you before, I looked --
12 I cross-referenced the legal maps, the
13 illustrative maps with the membership. The
14 state -- the state map had -- with the parishes in
15 it, right, with the parishes. And I
16 cross-referenced that. And I've been to many of
17 these places, and I know the membership and I know
18 the leadership. And they're there, at least one
19 or two.

20 And I know the leadership. That means
21 the president, vice president, secretary,
22 treasurer, the various vice presidents are in
23 those areas. I know that. I know that. I've
24 been to their homes and I know -- I know this area
25 well. I know the terrain of Louisiana, if I don't

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

72

1 know anything else.

2 Q. Okay. Now, you said you
3 cross-referenced the map. Did you cross-reference
4 the map of the membership list?

5 A. I --

6 MS. ROHANI: Objection.

7 THE WITNESS: Go ahead.

8 MS. ROHANI: Objection.

9 Please go ahead and answer.

10 A. I cross-referenced the maps with -- with
11 the -- with the vice president and those areas
12 that they represent, the vice president. So
13 the -- so the maps would have the parish. Because
14 that, based upon my knowledge -- I know for a fact
15 that I've been in those towns and I've sat down at
16 those tables. And I know for a fact that I was in
17 2, 5, and I got calls from members in 14 and 15.
18 And I've attended funerals in 38, 39. All over
19 the state of Louisiana I've been. And I've sat
20 down and I've talked to members. And we've
21 rallied together in all of those senatorial
22 districts in question.

23 MS. ROHANI: Counsel, I would like to
24 ask for a quick five-minute break, if
25 possible.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

73

1 MS. HOLT: Okay. We can certainly do
2 that.

3 Would you like to meet back -- I guess
4 we're about -- we can go ahead and do a
5 little bit longer than five because every
6 time I look at the clock, it keeps going up.
7 You want to do 11:55?

8 MS. ROHANI: That's fine.

9 MS. HOLT: 10:55 your time.

10 MS. ROHANI: That's fine.

11 We just need to clarify. We think
12 there's an issue with the attorney-client
13 privilege. That's fine.

14 MS. HOLT: Okay. Do you need to consult
15 with -- well, no. I'll -- that's totally
16 fine. All right.

17 MS. ROHANI: We'll be back at 11:55.

18 (Recess in proceedings.)

19 BY MS. HOLT:

20 Q. Mr. McClanahan, before the break --

21 MS. HOLT: And if we could bring back up
22 Exhibit 4, please.

23 Thank you.

24 Q. Mr. McClanahan, before the break we were
25 talking about the second paragraph there regarding

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

74

1 the identification of members in Louisiana senate
2 districts.

3 And do -- do you see the senate
4 districts identified in 3(a), Mr. McClanahan?

5 A. Yes, I do.

6 Q. Did you review any list or document with
7 addresses and names to verify that a branch member
8 lives in each of these districts?

9 A. I didn't -- I didn't look at a list. I
10 didn't have a list. But I do know, and -- and in
11 reviewing this, talked with my lawyers and we took
12 the legal maps and illustrative maps, put
13 together. And based upon our conversations -- and
14 I told them that I've been all over these places,
15 and I could identify where members live in these
16 particular senatorial districts.

17 Q. Did you speak with any branch leaders
18 for the purpose of identifying these districts?

19 MS. ROHANI: Objection.

20 You can answer.

21 A. Did I speak to any -- any leadership
22 about the districts?

23 Q. Any branch leaders.

24 A. What do you mean, "speak with" them?

25 Q. Did you ask any branch leaders whether

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

75

1 they had been a member and residing in each of
2 these senate districts?

3 MS. ROHANI: Objection.

4 You can answer.

5 A. Well, besides going to these branch --
6 branches, branches and branch meetings, I know for
7 a fact because I've been to all of them. There's
8 probably not too many branches I haven't visited.
9 And I visited all of these. I know the
10 leadership.

11 And in preparing for this, I speak with
12 my lawyers. I know these. I know this. We have
13 members there. We have branches there in these
14 districts and these areas. And -- and the
15 membership's excited about being a part of the
16 NAACP.

17 Q. So I don't believe you answered my
18 question there.

19 I -- I asked if you spoke with specific
20 branch leaders for the purpose of answering this
21 interrogatory.

22 MS. ROHANI: Objection.

23 You can answer.

24 A. I -- I may have spoke with some, but may
25 have spoke with all. But a good many of them, in

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

76

1 terms of our Monday call, in terms of our
2 quarterly meetings, in terms of our state
3 conventions about -- about this litigation. And,
4 you know, they all agreed that we have members in
5 these districts. I know for a fact they have
6 members in these districts. I've been there.

7 And so in terms of the leadership, we
8 know that there's -- somebody lives in each one of
9 those districts from the leadership team.

10 Q. Now, you just said we know individuals
11 live in each of those districts from the
12 leadership team.

13 What particular conversations did you
14 have or documents did you review to come up with
15 that conclusion?

16 MS. ROHANI: Objection, again, with
17 respect that it seeks information covered by
18 attorney-client privilege.

19 But, President McClanahan, anything
20 that's not, you can feel free to answer.

21 A. Well, I do know that I've been to and
22 having these -- all these quarterly meetings,
23 quarterly meetings and conventions, going to all
24 of these Freedom Fund banquets, going to these
25 galas in every -- these towns, in these -- I do

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

77

1 know that we have somebody there. And in talking
2 to -- on the calls about this litigation,
3 preparing them for as we go down toward the end of
4 this litigation, I'm aware of members that stay in
5 each one of these districts.

6 Q. Are those members black?

7 A. Our membership is diverse.

8 Q. Yes, but you said you're aware of
9 members in the specific district.

10 Is the member that you're aware of
11 black?

12 A. It all depends. It all depends on where
13 the senatorial district is located at.

14 Q. Okay.

15 A. But most of it's black.

16 Q. So the member that you say you
17 identified for Senate District 2, is that member
18 black?

19 A. I probably -- identify it in my head,
20 probably 2. And yes, that one's probably black.

21 Q. How do you -- you said "probably." What
22 do you -- what do you mean in your -- in your
23 head? What do you mean by "probably" and in your
24 head?

25 A. Because our membership is diverse. I

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

78

1 was at a meeting on -- last night where the
2 members were -- where two or three of the members
3 were white. And so it's -- you know. So -- and
4 Louisiana is diverse. And so our membership also
5 refers diversity. And so I can't assume that the
6 member's going to be black because he could have
7 very well been white.

8 Q. Okay. Do you know if that member is
9 registered to vote?

10 A. No, I don't.

11 Q. And would your answer -- I asked you
12 specifically about Senate District 2. Would your
13 answer be the same for the other senate districts
14 listed here?

15 A. Probably so.

16 Q. Okay. So this response to part (a)
17 regarding the senate districts, is that based on
18 your own personal knowledge?

19 A. If I would have to say an answer, yes.

20 Q. I'm sorry, I didn't hear that first
21 part.

22 A. Yes. Yes, it's based upon my personal
23 knowledge, and it's based upon me talking with the
24 lawyers and me looking at the maps, the
25 illustrative maps, me looking at the illegal maps

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

79

1 that we looking -- I know where I've been and
2 where the membership resides through the state --
3 the state of Louisiana, yes.

4 Q. Mr. McClanahan, who is that member who
5 live -- who's been identified who lives in Senate
6 District 2?

7 MS. ROHANI: Objection.

8 Direct not to answer.

9 Q. Mr. McClanahan, who is that member who
10 has been identified who resides in District 5?

11 MS. ROHANI: Objection.

12 Direct not to answer.

13 MS. HOLT: And, Sara, is your
14 instruction going to be the same for every
15 senate district on this list?

16 MS. ROHANI: Correct.

17 I just want to clarify that there was a
18 motion to compel filed in order to get this
19 information already, and it was denied. So
20 these are questions that shouldn't be asked
21 in this deposition. It's really improper to
22 even ask that.

23 MS. HOLT: Sara, we intend to challenge
24 that.

25 And in addition, the motion -- the

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

80

1 denial of the motion to compel didn't say
2 that we couldn't ask these questions at
3 30(b)(6).

4 MS. ROHANI: It is still -- at this
5 current point, it was denied.

6 You -- it's not appropriate to be asking
7 personally-identifiable information from the
8 president.

9 MS. HOLT: Sure. And I understand that
10 it's been denied. I need to ask these
11 questions to create a record, and it is a
12 topic in the 30(b)(6) notice.

13 MS. ROHANI: I just want to get on the
14 record that it is improper to even ask. This
15 is based on First Amendment privileges, and
16 my answers will be exactly the same for every
17 single district.

18 MS. HOLT: And is your objection going
19 to be the same for Senate District 15?

20 MS. ROHANI: Yes.

21 MS. HOLT: Even though Mr. McClanahan
22 lives in Senate District 15?

23 MS. ROHANI: Yes.

24 MS. HOLT: Okay.

25

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

81

1 BY MS. HOLT:

2 Q. All right. So let's now go to that
3 second paragraph of this response.

4 Mr. McClanahan, can you please read that
5 out loud, for the record?

6 A. "Plaintiff has identified at least one
7 member who lives in, among others, each of the
8 following Louisiana House Districts: 1, 2, 3, 4,
9 5, 6, 7, 8, 9, 13, 22, 25, 27, 34, 35, 36, 37, 47,
10 57, 58, 59, 60, 61, 62, 63, 65, 66, 67, 68, 69,
11 70, 80, 88, and 101.

12 Q. Thank you, Mr. McClanahan.

13 Is that -- do you know how many house
14 districts Louisiana has?

15 A. No, I don't. Not off the top of my
16 head.

17 Q. Let's see. Do you see number 10 in this
18 response?

19 A. No, I don't.

20 Q. So is it fair to say that not all the
21 Louisiana house districts are listed in this
22 response?

23 A. Right.

24 Q. Okay. Now, did you review any list or
25 documents with names and addresses to verify that

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

82

1 a member lives in each of these house districts?

2 A. I didn't have a list.

3 Q. Okay. What did you have?

4 MS. ROHANI: Objection.

5 Q. You can answer, I believe.

6 MS. ROHANI: No. Direct not to answer.

7 MS. HOLT: Direct not to answer? Okay.

8 MS. ROHANI: Yeah. It's confidential.

9 MS. HOLT: Okay.

10 BY MS. HOLT:

11 Q. On -- Mr. McClanahan, do you have
12 personal knowledge of at least one member
13 identified in each of these house districts?

14 A. Yes.

15 Q. And how do you know that?

16 MS. ROHANI: Objection.

17 Direct not to answer.

18 MS. HOLT: Sara, I'm a little confused.

19 MS. ROHANI: My apologies, Cassie. I
20 merely object to the extent that this may be
21 covered by attorney-client privileges;
22 however, Mr. McClanahan can answer how. My
23 apologies.

24 MS. HOLT: Okay.

25 A. Okay. Well, as I alluded to you in the

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

83

1 answer to (a), that I'm a native Louisianan. How
2 I travel this whole state, bad roads and all, and
3 I looked at the illustrative maps, I looked at the
4 illegal maps, and I know -- I know that we have
5 members in the house district because the house
6 district is smaller than the senatorial district.

7 So we eat, watch football games. We go
8 to festivals. We go to Freedom Fund banquets. I
9 go to protest police brutality. We go to stand in
10 the school district or -- or kicking our kids out
11 of school for literally nothing. I go there to
12 test medication or -- or healthcare, inadequate
13 healthcare. I've been to these areas and I've
14 stood with members. Stood with members in all of
15 these areas.

16 And so I know, based upon looking at the
17 illustrative maps, looking at the illegal maps,
18 and just knowledge of Louisiana, talked with our
19 lawyers, knowing that we have a plaintiff -- we've
20 identified at least one member in each one of
21 these house districts.

22 Q. Mr. McClanahan, how many house -- do you
23 know how many house districts Baton Rouge has?

24 A. I don't, not off the top of my head.

25 Q. Sure.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

84

1 Is it more than one?

2 A. Yes.

3 Q. How did you verify that at least one
4 member lives in at least two house districts in
5 Baton Rouge?

6 MS. ROHANI: Again, objection, to the
7 extent that there are maybe privileged
8 communications.

9 However, President McClanahan, you can
10 answer.

11 THE WITNESS: Okay.

12 A. You say Baton Rouge?

13 Q. Yes, sir.

14 A. I used to be Baton Rouge vice president,
15 so I know for a fact that we have at least one or
16 two members living in each of the house districts
17 in Baton Rouge area.

18 Q. How do you know that those members
19 didn't move?

20 A. I live in Baton Rouge. I know them
21 personally.

22 Q. Okay.

23 A. On more times than not I've been to
24 their house. And then I've probably helped fix
25 their house, repair their house.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

85

1 Q. Okay.

2 A. You know, we've been through floods and
3 all that, hurricane. So I've been there. I've
4 been the president -- when I was branch
5 president -- branch president, that they can call
6 on me to also pray for them and to welcome them,
7 you know, when they have bursts and to help grieve
8 with them when they've had losses.

9 So I've been to many of the houses.
10 Been on the Southern University branch. I've been
11 to these homes and cheered on the Jaguars. Been
12 to these homes to cheer on the Tigers. And so
13 we're familiar with those here in the Baton Rouge
14 area in the house districts.

15 Q. When you go to a home, do you know which
16 house district you're in when you visit?

17 A. Probably so.

18 Q. Probably so?

19 A. Probably so. In the State of Louisiana,
20 probably. And in Baton Rouge, probably so.

21 Q. Now, there's -- there's other house
22 districts listed outside of Baton Rouge in this
23 response; is that correct?

24 A. Yes.

25 Q. Did you speak with any branch leaders

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

86

1 for the purposes of verifying this interrogatory
2 as to the house districts?

3 MS. ROHANI: Objection.

4 You can answer.

5 A. Okay. You know, I've spoke with
6 leadership all over the state through the various
7 means I alluded to earlier. And the response
8 would be the same because, you know, I know, and
9 they would tell me in these various house
10 districts. And so I'm confident that I've spoken
11 with, or they made their voices known. And so
12 they agreed with what we're doing.

13 Q. Did you have a specific meeting with a
14 specific branch president --

15 MS. ROHANI: Objection --

16 Q. -- about these house districts?

17 MS. HOLT: Oh. I apologize, Sara.

18 MS. ROHANI: My apologies, Cassie. I
19 keep doing that.

20 Objection.

21 But you can answer.

22 A. I've had conversation with a number of
23 members about -- about the -- about the methods we
24 were about to employ and the various issues that
25 we deal with. And the leadership, which reflects

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

87

1 the membership, agrees that we should employ these
2 methods on these various house districts.

3 So I've spoken to them individually, but
4 they speak in global. When they speak through --
5 the membership speak through the leadership.

6 Q. But that -- there wasn't a specific
7 conversation with a branch leader. That was my
8 question.

9 A. If there was, I don't remember. Because
10 a lot of times when we -- when we have these
11 various meetings, these various calls, they'll
12 speak out; they want to be part of this. And so
13 sometimes they're speaking for themselves
14 individually, but -- but when they speak, they
15 speak as -- as a head, so they represent the whole
16 branch.

17 Q. So for the house districts that are in
18 other parts of the state, like New Orleans, how do
19 you -- how did you identify a member who lived in
20 that specific house district?

21 MS. ROHANI: Objection.

22 You can answer.

23 A. Well, I'm a Louisiana native. And I've
24 lived in New Orleans also. And I've known -- I've
25 known each president, branch president of Orleans

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

88

1 for the last -- probably the last ten -- ten
2 years. And I've sit with them all. I know New
3 Orleans pretty good now. So, you know, I've spoke
4 with the leadership and the membership when I
5 was -- then.

6 I used to be the administrator for the
7 entire branch. That means when they're -- when
8 the branch president was in between. And so I've
9 spoken with them. And I -- I know Orleans. And I
10 can say that I've spoken to -- not individually,
11 as the administrator. But also in speaking with
12 the membership about -- about this. And we have a
13 member, at least one member in each one of
14 these -- this house district in New Orleans in
15 question.

16 Q. Mr. McClanahan, when did you speak with
17 the New Orleans branch president about this case?

18 MS. ROHANI: Objection.

19 A. I don't know a -- if you're asking for a
20 specific date and time, I'm not that good. I'm
21 sorry. But I spoke with him because he gets on
22 our Monday calls, too. And he and I are friends.
23 I speak with him regularly.

24 Q. Okay. Now, Mr. McClanahan, sitting here
25 today, can you identify which house districts are

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

89

1 within New Orleans?

2 A. I'm not -- I'm not that good. I
3 don't -- I don't even know where my kids' rooms
4 are in my own house.

5 Q. Do you know if any of the members
6 identified in these house districts are registered
7 voters?

8 A. No, I don't.

9 Q. Do you know if they are black?

10 A. No, I don't. Because the membership is
11 diverse. And then when you talk about Orleans,
12 you're talking about really diversity, so I
13 wouldn't know.

14 Q. Okay. Now, let's see, house district
15 or -- yeah, House District 1, who is the member
16 who you identified that lives in House District 1?

17 MS. ROHANI: Again, objection.

18 Direct not to answer.

19 MS. HOLT: All right. And, Sara, is
20 your objection and instruction going to be
21 the same for every house district --

22 MS. ROHANI: Yes, ma'am.

23 MS. HOLT: -- listed here?

24 MS. ROHANI: Yes, Cassie.

25 MS. HOLT: All right.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

90

1 So if we can go to the very last
2 paragraph -- oh, we don't need to scroll. I
3 apologize. That's just -- my eyes need to go
4 down.

5 BY MS. HOLT:

6 Q. All right. Mr. McClanahan, can you
7 please read this last paragraph out loud for the
8 record.

9 A. "Plaintiff has identified at least one
10 member who would reside in each of the newly
11 created majority-Black districts or the newly
12 unpacked majority-Black districts in Bill Cooper's
13 June 2023 illustrative plans, including, among
14 others, illustrative House Districts 1, 3, 4, 29,
15 34, 38, 57, 58, 60, 61, 63, 65, 68, 69, and 101,
16 and illustrative Senate Districts 2, 7, 15, 17,
17 19, 38, and 39."

18 Q. Thank you, Mr. McClanahan.

19 And some of these questions are going to
20 be the same as the previous sections.

21 But how did you identify a member that
22 lives in these illustrative districts?

23 A. Well, being a native Louisianan, I
24 looked at the illustrative maps, looked at the
25 illegal -- illegal maps, and I know the areas,

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

91

1 spoke with my -- my lawyers, and I know these
2 areas and I know the membership that lives there.
3 And it was easy for me to identify where branches
4 are, where the leadership lives, and members live
5 in these particular districts.

6 Q. Did you review any other documents to
7 make that determination?

8 A. I didn't have a list or anything.

9 I spoke with my lawyers. We got
10 together, and -- and I know -- I looked at the
11 illegal maps, which was the -- I looked at the
12 illustrative maps and, you know, came to the
13 conclusion, based upon the -- the membership,
14 based upon our -- where our branches are located.
15 We came to the conclusion.

16 I've been in these areas. I've been in
17 these homes. I've been in these football
18 stadiums. I've been in these courtrooms. I've
19 been here and I've been there. I've eaten here
20 and I've bought from here.

21 And so we came to the conclusion that we
22 have persons -- because when I would go there, I
23 wouldn't go there by myself. I would go there at
24 the request of the membership. I would go there
25 at the request of the leadership.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

92

1 Q. So is it fair to say that this response
2 is based off your personal knowledge?

3 A. Based upon my personal knowledge, and
4 it's based upon the information that the lawyers
5 and I talked about.

6 Q. And did you speak with any branch
7 presidents to identify members that live in these
8 illustrative districts?

9 MS. ROHANI: Objection.

10 But you can answer.

11 THE WITNESS: Okay.

12 A. So when I would have these quarterly
13 meetings and these state conventions and we would
14 talk about what's -- so I would keep them updated,
15 right. And we would talk about these districts.
16 Literally talk about these districts. And based
17 upon me talking to them about this -- this
18 litigation, about where we're headed with
19 litigation, we all agree -- they agreed with me
20 that we have somebody who lives in each one of
21 these districts in question.

22 Q. Did you show them Mr. Cooper's
23 illustrative districts?

24 MS. ROHANI: Objection.

25 You can answer.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

93

1 A. I didn't show them, per se, but we
2 talked about the districts, the numbers
3 themselves. I probably didn't have the map to
4 show them. If I did, I didn't have -- you know, I
5 didn't pull it up on a particular screen or
6 anything like that. But we talked about the areas
7 in question, as you talk about Orleans, as you
8 talk about Baton Rouge. It's easy for me to say
9 that to them, East Baton Rouge, Orleans Parish, or
10 Caddo Parish or Sabine Parish.

11 Q. Do you know if any of those members
12 identified are registered to vote?

13 A. No, I don't.

14 Q. Do you know if any of those members
15 identified are black?

16 A. Yes.

17 Q. How do you know that?

18 MS. ROHANI: Objection.

19 You can answer.

20 THE WITNESS: Okay.

21 A. Because in talking with some of them, or
22 two or three of them, they identify as black
23 because I know them personally.

24 Q. And who are those members?

25 MS. ROHANI: Objection.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

94

1 Direct not to answer.

2 BY MS. HOLT:

3 Q. Mr. McClanahan, so your sworn testimony
4 today is that you have identified members in each
5 of the districts listed in this interrogatory
6 response; is that correct?

7 A. If the document you're talking about is
8 the one that I signed, yes.

9 Q. Are you aware if any court cases or
10 local branches of the NAACP have been compelled to
11 produce member names?

12 MS. ROHANI: Objection.

13 But you can answer.

14 A. I'm not, because the NAACP is a vast
15 organization, so I wouldn't be aware of that kind
16 of stuff.

17 Q. All right.

18 MS. HOLT: We are done with this exhibit
19 for now.

20 And I'd like to pull up a document
21 called "NAACP's Responses to Defendant's
22 First Set of Discovery," which we -- I would
23 like to have marked as Exhibit 5, please.

24 (Exhibit 5 was marked for identification
25 and is attached to the transcript.)

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

95

1 MS. HOLT: And if we can scroll down for
2 Mr. McClanahan so that he can review this.

3 BY MS. HOLT:

4 Q. Now, Mr. McClanahan, from what you've
5 seen so far, are you familiar with this document?

6 A. Yes.

7 MS. HOLT: And if we could scroll back
8 up to page 1, please. Great.

9 Q. And do you understand this document to
10 be NAACP Louisiana State Conference's Responses
11 and Objections to Defendant's First Set of
12 Discovery?

13 A. Yes.

14 Q. Okay. I shortened the title there a
15 little bit for you.

16 A. All right.

17 Q. All right.

18 MS. HOLT: And if we can turn to the
19 very last page of this document, please.

20 Q. Okay. Mr. McClanahan, do you recall
21 verifying these interrogatory responses?

22 A. Yes.

23 Q. All right.

24 MS. HOLT: And if we could please turn
25 to page 7. Okay. Let's see. And actually,

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

96

1 if we can -- sure. If we can scroll back up
2 so Mr. McClanahan can actually see the
3 question. I believe they're on page 6. Oh,
4 no, a little bit further. There we go.

5 BY MS. HOLT:

6 Q. Interrogatory No. 2. Mr. McClanahan,
7 I'll let you review this Interrogatory No. 2, and
8 please let me know when you're finished.

9 A. Okay.

10 Q. Great.

11 MS. HOLT: Now if we can please turn to
12 page -- back to page 7.

13 Q. And, Mr. McClanahan, do you see the very
14 last paragraph at the bottom of the page, it
15 starts with, "In addition..."?

16 A. Yes.

17 Q. Okay. Could you please read that out
18 loud, for the record?

19 A. "In addition, plaintiff intends to call
20 a number of fact witnesses. The specific fact
21 witnesses plaintiff will call have not yet been
22 determined but will likely include Louisiana NAACP
23 president, Michael McClanahan. Mr. McClanahan's
24 testimony will include information about the
25 Louisiana NAACP's activities and mission, the harm

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

97

1 to the organization, its members, and Black
2 communities in Louisiana caused by the enacted
3 maps, the lack of responsiveness of elected
4 officials in addressing issues faced by Black
5 Louisianans, and other topics relevant to
6 Plaintiffs' claims. The other plaintiffs in the
7 case will also likely testify, including
8 representatives from the Black Voters Matter Fund
9 and the individual plaintiffs. Other witnesses
10 Plaintiff may call will be identified as their
11 identities are determined and in accordance with
12 the pre-trial schedule and Plaintiffs' discovery
13 obligations."

14 Q. Thank you, Mr. McClanahan.

15 I didn't want to interrupt you, but
16 we -- we could have stopped it at "claims."

17 I'm going to ask you a few questions
18 about the first part of that paragraph.

19 What harm has the Louisiana State
20 Conference suffered as an organization as a result
21 of the enacted maps?

22 MS. ROHANI: Objection.

23 But you can answer.

24 A. Okay. What we've had to do since the
25 enactment of these illegal maps is that we have

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

98

1 had to shift our -- our -- our action plan, for
2 lack of a better term. You know, we had to get
3 geared up during the -- during the time from the
4 census through the Road Shows, the legislative
5 Road Shows to the legislative sessions. And so we
6 had members get up because the -- because when the
7 census came back, it identified that we had --
8 that we had gained population, black population,
9 in certain areas. We're excited about that
10 because we knew that we were going to get some
11 additional majority-minority representatives. And
12 so when the -- when the house passed the illegal
13 maps, the areas that we were shifting to do the
14 work in and keep going, because these areas were
15 going to get excited about having a representative
16 of their choice, possibly somebody who looks just
17 like them, and when that didn't happen, we had to
18 shift the resources and manpower to -- to take
19 into account that this area that we thought was
20 gonna have a -- probably a black representative or
21 an Asian, if that was the case -- excuse me, or
22 Hispanic, if that was the case, would no longer
23 have that.

24 And we were having radio spots already
25 getting ready to be cut. And we were doing

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

99

1 trainings to get people excited about going to
2 these particular areas and talking about, finally,
3 Louisiana got it right this time.

4 But, no, we had to say that Louisiana is
5 still Lousyana because it's going to keep us in
6 bandage. And so we suffered not only because the
7 people were emotionally distressed, but having to
8 redirect manpower and resources to these areas.

9 It makes our work a little bit harder
10 because it's easier to get you excited about
11 something that you know is coming your way. It's
12 easier. But it's a lot bit tougher to get you
13 excited about something that you know should have
14 happened but you will tell me, "I told you that
15 things were not going to change in Louisiana."

16 You have that mindset. It's really
17 tough for me to get you excited about just wanting
18 to participate in the process because you know the
19 process is not -- is not kin to you, is not liken
20 to you. The process -- we know that in Louisiana,
21 the good ol' boy still wins out.

22 "The good ol' boy still wins out; power
23 does not concede power," those are the things that
24 I would hear. And how would I combat that? And
25 how would I combat that? I would have to pray all

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

100

1 the time, just pray all the time that we -- that I
2 be given encouragement, that I could encourage my
3 members to go in these areas in Louisiana to talk
4 about we're trying to -- we're trying to -- the
5 process is still going to work, we just have to
6 keep the faith. And that's tough, trying to tell
7 somebody to keep the faith and you just slapped
8 them in the face. It's tough.

9 It's tough going into these areas and
10 saying, look -- I think Sam Cook says, "If changes
11 don't come, can't stay in that zone, can't sit on
12 the dock of the bay, can't do that." So it's a
13 little bit tougher.

14 When you talk about harm to the -- to
15 the State Conference, people would tell me, "Man,
16 y'all lying, y'all are not good." It damaged our
17 reputation because I'm getting geared up, I'm
18 pumping them up. We'd like to do right -- for
19 once in Louisiana's history, we're about to do
20 right. Once. We're about to get this right.

21 And I was saying it all along because I
22 have faith in Louisiana. I have faith in the
23 members in the House and members in the Senate. I
24 have faith in them. And I would tell people
25 throughout the state, just watch, you're going to

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

101

1 have somebody that you like, get ready. You ready
2 to run? Let's get you ready to run. Let's get
3 you excited about running for an office, and a --
4 for a office position, the House or the Senate,
5 get excited about that. And only to go back
6 behind myself and tell them, well, next time.

7 And then that's a slap in their face
8 because they say, you lied then, you're lying now,
9 things ain't going to change. This is Louisiana.

10 So trying to get the harm -- the harm is
11 to this whole state of Louisiana because our kids,
12 as they grow up -- they grew up under the Jim Crow
13 law. They grew up understanding what Jim Crow law
14 is. And now they're young adults. And they
15 saying, "It ain't gonna change. Let me move out
16 of the state of Louisiana. Let me go to another
17 state."

18 So let's try to keep families together.
19 Because that breaks up families. And so the harm
20 to the Louisiana NAACP, but it harms us all.

21 So now I'm still -- I'm still going from
22 town to town shouting that change is gonna come
23 some day, change is gonna come sooner than you
24 think.

25 Q. Thank you.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

102

1 So you said -- I believe one part of
2 your answer was sending members to go into these
3 areas. What areas are you referring to?

4 A. Well -- well, when we were -- we were
5 sending members into areas where the elections or
6 maps saying we were going to get a -- a
7 majority-minority representative there, right.
8 Sending them there to get people excited about
9 participating again in the process, the democratic
10 process. Getting them geared up to maybe my uncle
11 or maybe my brother's about to become a state
12 senator or state representative, and getting them
13 excited about what's about to happen, what's going
14 to come, what's down the road.

15 Q. Are you aware of any specific resources
16 that have been diverted as a result of the enacted
17 maps?

18 A. Well, we talk about resources. Do you
19 mean resources from the State Conference or
20 resources from any other -- any other areas
21 that...

22 Q. Sure, from the State Conference.

23 A. I'm aware because -- you know, because,
24 you know, I have to make sure that we have the
25 resources. And so we -- we've diverted resources.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

103

1 We've diverted finances. We've diverted manpower.
2 I'm aware of -- I'm aware of it personally because
3 I've had to say that we're not gonna spend in
4 here; if we are, we're not going to spend this
5 much; we're going to have to double up in this
6 particular area. And we need to talk about
7 renting cars and renting vans and those type of
8 things. And we need to talk about hotel rooms.
9 And we talk about staying all day and all night.
10 I'm aware of the resources that go into these
11 particular areas.

12 Q. Are you aware of any specific events
13 that have been canceled or postponed as a result
14 of the enacted maps?

15 A. Oh, yes.

16 MS. ROHANI: Objection.

17 Go ahead.

18 A. Oh, yes, yes, indeed.

19 I refer -- refer to you again, I'm a
20 native Louisianan. I know areas that we can go
21 easily into and do the -- and do the cheering
22 thing and take down. And I'm also aware of areas
23 that we have to tiptoe in now. And so I am -- I'm
24 aware of areas like that. I'm aware of stuff that
25 we had planned for those areas that we tiptoe in.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

104

1 I'm aware of things like that. I'm aware of -- we
2 didn't have -- we had planned to have maybe a -- a
3 town hall or -- or a rally, I'm familiar with
4 that. But we had to postpone that or we had to
5 downsize or we're going to be staying and talking
6 about the people that we were gonna make sure that
7 got there. I'm familiar with those type of
8 things.

9 Q. What -- I believe you mentioned town
10 halls. What specific town halls were canceled?

11 MS. ROHANI: Objection.

12 You can answer.

13 A. Well, we're looking to go into a town
14 called Bogalusa and engage the memberships there,
15 the town there. We've been looking to go to
16 Orleans because they're always excited about
17 getting geared up to get people excited about
18 transform to government. But we had to downsize
19 that, or not change that at all. And other areas
20 that we've had to do specifically, we just
21 couldn't do.

22 Q. Now, the State Conference is still
23 having their annual conference this year?

24 A. I like you, Cassie, because you're
25 excited about it, just like I am.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

105

1 Q. I am.

2 A. We are in a couple of weeks. So, you
3 know, I want you to be my guest. And we are. I'm
4 excited about it.

5 Q. Great.

6 And are you aware of any legislative
7 efforts that have been sidelined as a result of
8 the enacted maps?

9 MS. ROHANI: Objection.

10 But you can answer.

11 A. Probably so, because I talk to -- I talk
12 to the black caucus all the time. I talk to them
13 and their leadership. But specifically, it's
14 something that eludes me right now. But I speak
15 to them regularly. We speak with them regularly
16 about things that they're doing, the things that
17 we can do together. But it specifically eludes me
18 right now.

19 Q. Mr. McClanahan, are you familiar with
20 the Voting Systems Commission?

21 A. Yes, I am.

22 Q. And what is that commission?

23 A. It's a legislative-created commission
24 that talks about the -- the way that voting will
25 take place in the state of Louisiana in the

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

106

1 future.

2 Q. And are you a member of that commission?

3 A. Yes, I am.

4 Q. Is the Voting Systems Commission
5 important to the Louisiana State Conference?

6 MS. ROHANI: Objection.

7 You can answer.

8 A. Very much so.

9 Q. How so?

10 A. Because as we have voted now in
11 Louisiana, we have a machine, electronic machine
12 that records and tabulates the votes. And so now
13 we're not going to have that. It's going to be
14 done either through paper or a hybrid paper
15 system.

16 And for us, change for people, period,
17 it's just not good. And so for all of Louisiana,
18 not just black Louisiana, that would change. And
19 so persons may -- may not vote because the lines
20 may be longer.

21 And that's -- that may be a form of
22 voter suppression because telling me I have to
23 wait outside in long lines to vote or -- it may be
24 scary, changing my voting, so...

25 But it's -- you know, it's important to

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

107

1 the NAACP because we want -- we want to make
2 voting easier, not more cumbersome. We want
3 people to be able to vote happily and freely,
4 right.

5 And so through the commission, it's just
6 not happening because they already passed the law
7 saying how the voting machines gonna be done
8 through -- in the future.

9 Q. Mr. McClanahan, are you familiar with
10 Senate Bill 23?

11 A. If you tell me what it is, I can tell
12 you if I'm familiar with it or not.

13 Q. Sure.

14 I can say generally it expands
15 permissible locations and alternative locations
16 for early voting. Does that sound familiar?

17 A. Yes.

18 Q. Do you know if that bill passed?

19 MS. ROHANI: Objection.

20 This is not really relevant to the case
21 at hand. If Mr. McClanahan is being asked in
22 his personal capacity -- but he's here as a
23 representative of the Louisiana NAACP. So
24 with regards to questions about his position
25 on the Voting Systems Commission, those are

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

108

1 personal to President McClanahan. He's not a
2 member of that commission.

3 BY MS. HOLT:

4 Q. So, Mr. McClanahan, are you a member of
5 the commission in your personal capacity?

6 A. No. I say it as a member of the NAACP.

7 Q. Okay. Thank you.

8 And I was asking you about Senate
9 Bill 23. Is examining early voting locations --
10 or expanding, excuse me, early voting locations an
11 important policy objective of the Louisiana NAACP?

12 MS. ROHANI: Objection.

13 But you can answer.

14 A. Yes, it is.

15 Q. And do you know if Secretary Ardoin
16 worked to help get that legislation passed?

17 MS. ROHANI: Objection.

18 You can answer.

19 A. I have -- I really don't know personally
20 if he worked on it. But, you know, it's something
21 that he should have been worked on if he didn't.

22 Q. And what is the harm suffered by
23 Louisiana State Conference members as a result of
24 the enacted maps?

25 MS. ROHANI: Objection.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

109

1 You can answer.

2 A. What harm -- say that again. Repeat the
3 question.

4 Q. Sure.

5 So I previously asked you about the harm
6 suffered by the organization. Now I'm wondering
7 about the harm to any of the individual members.

8 A. As a result of the enacted maps?

9 Q. Yes, sir.

10 A. Okay.

11 Now I get calls. I get calls from the
12 members that talk about -- because I tell them to
13 get their areas excited. They're not excited
14 because this is Louisiana. They say, "President
15 McClanahan, we love you, you're always getting us
16 excited about the changes happening in Louisiana,
17 but we don't see change. And without proper
18 representation, the status quo is the same."

19 They understand. Some of these small
20 towns are so racist and so low down, you know, I
21 can't go in there and have a NAACP shirt on. If I
22 do, man -- if I do before -- before the sun goes
23 down, that's fine, but after the sun goes down, I
24 have to make my way -- I probably have to change
25 clothes because, you know -- because things are

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

110

1 real, real rough, the racism and low down.

2 So members understand that. So if they
3 had somebody who understands their plight, you
4 know, they could -- they could finally feel that
5 there is hope, there's a hope for them in
6 Louisiana when most -- most people would have no
7 hope because of things staying the same. So
8 members would be down in the dumps.

9 I get those calls. You know, the family
10 saying, "I told you, President McClanahan, you
11 doing good, but you -- you barreling upstream."
12 And they would talk about now look at what's going
13 to happen to the school system in which their kids
14 and grandkids live.

15 They would talk about the police
16 brutality that happens in these communities as a
17 result of it because they don't have proper
18 representation.

19 They would talk about how -- how they
20 will have access to -- to healthcare, you know,
21 adequate and affordable healthcare because they
22 would have adequate representation; how the
23 streets still have potholes filled up; President
24 McClanahan, we're not going to get trash picked up
25 today, not on our side of the town because we

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

111

1 don't have the representation that we need to look
2 after us and to advocate for us. They would talk
3 about that.

4 Q. Mr. McClanahan, do you know of a
5 specific member who hasn't been able to elect
6 their candidate of choice because of the enacted
7 maps?

8 MS. ROHANI: Objection.

9 But you can answer.

10 A. If I -- if I were to tell -- look at the
11 maps that were illegally drawn, everybody will
12 raise they hand. All of them, like in school.
13 They would all raise their hand like -- if you
14 asked them a question like that.

15 Q. So is it your position that all members
16 of the Louisiana State Conference are harmed as a
17 result of the enacted maps?

18 MS. ROHANI: Objection.

19 But you can answer.

20 A. Well, to this extent, if one suffer, we
21 all suffer. If one suffers, we all suffers.

22 Q. So that includes members that aren't
23 registered voters?

24 MS. ROHANI: Objection.

25 But you can answer.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

112

1 A. In a -- you know, if one suffer, we all
2 suffer. Suffering doesn't -- I don't think
3 suffering has anything to do with whether or not
4 you're a voter or not, right. If you suffer
5 internally, emotionally, spiritually, financially,
6 economically, you know, you suffer. Suffer is
7 suffering. I don't think because I'm a voter and
8 you may not, that your suffering is -- is any less
9 or a bit worse than mine. I think suffering is
10 suffering.

11 Q. Sure.

12 Mr. McClanahan, are you familiar -- I
13 believe we looked at before -- with the claims
14 brought in this case?

15 A. If you talk about something specific,
16 show me.

17 Q. Sure.

18 Do you understand this case to be under
19 the Section 2 of the Voting Rights Act?

20 A. Yes.

21 MS. ROHANI: Apologies.

22 Would it be possible to have that on the
23 screen so President McClanahan is able to
24 look at it while we go over this?

25 MS. HOLT: Sure.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

113

1 The Amended Complaint?

2 MS. ROHANI: Correct. Exhibit 3.

3 Thank you.

4 BY MS. HOLT:

5 Q. And, Mr. McClanahan, we're on Exhibit 3,
6 page 58, the Prayer for Relief that we discussed
7 earlier. Do you see paragraph A?

8 A. Yes.

9 Q. And do you see where it says "...in
10 violation of Section 2 of the Voting Rights
11 Act..."?

12 A. Right.

13 Q. So I'm wondering about the specific harm
14 to members --

15 A. Okay.

16 Q. -- under this specific claim, not the
17 general harm. So I'm wondering what members --
18 are you aware of a specific member who has not
19 been able to elect its -- his candidate of choice
20 because of the enacted maps?

21 MS. ROHANI: Objection. This calls for
22 a legal conclusion.

23 But, President McClanahan, to the best
24 of your knowledge, you can answer.

25 A. To the best of my knowledge, I am aware

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

114

1 of a member.

2 Q. And who is that member?

3 MS. ROHANI: Objection.

4 Personally-identifiable information is not
5 appropriate to be asked at this point.

6 BY MS. HOLT:

7 Q. Mr. McClanahan, what senate district do
8 you live in?

9 A. I should know, but it eludes me. I
10 can't tell off the top of my head today. Ask me a
11 little bit later on, I probably could tell you.

12 Q. Okay. If I said Senate District 15,
13 does that sound right?

14 A. If you can -- if you can -- who the
15 senator is? I could tell if it's mine or not.

16 Q. Well, who -- who is your senate
17 representative?

18 Is it Senator Regina Barrow?

19 A. Yes.

20 Q. And is Ms. Barrow a democrat?

21 A. I don't know her party affiliation.

22 Yes, she is. Yes, she is.

23 Q. Is she black?

24 A. Yes.

25 Q. Was Senator Barrow your candidate of

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

115

1 choice in the last state senate election?

2 MS. ROHANI: Objection, again calls for
3 a legal conclusion.

4 But you can answer.

5 A. I don't know who was running against
6 her. But she's a personal friend.

7 Q. But was she your candidate of choice out
8 of all the candidates running?

9 MS. ROHANI: Again, objection, vague.

10 A. Ask it another way. Let me see if I can
11 answer that.

12 Q. Sure.

13 So did you vote for Senator Barrow?

14 MS. ROHANI: Objection.

15 Direct not to answer.

16 MS. HOLT: On what grounds, Sara?

17 MS. ROHANI: Again, that's personal --
18 that's private information. It's not
19 appropriate to be asking about who President
20 McClanahan voted for.

21 BY MS. HOLT:

22 Q. Okay. Mr. McClanahan, you said
23 earlier -- you had talked about expanding the
24 options for, like, people to elect their -- a
25 candidate of their choosing. Was Senator Barrow

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

116

1 the candidate of your choosing?

2 A. When I talked about expanding options, I
3 was talking about everyone. And it just so
4 happens she just might have gotten into the race.
5 But, for me, it was broad. It was broader than
6 that. For everybody to have a candidate of their
7 choice. And I don't -- I don't think she was
8 running at the time. I don't think she was
9 running at the time, I don't think.

10 Q. Okay. So you -- hmm. Let me -- let me
11 ask you some -- something a little bit different.

12 So for other state legislative districts
13 that already elect black representatives, what is
14 the harm to members in those specific districts?

15 MS. ROHANI: Objection.

16 You can answer.

17 A. You're saying what harm is there to
18 members that have black represen- -- black
19 representation?

20 Q. Yes, sir.

21 A. They -- there might be harm in that once
22 bills come -- bills come through or legislation
23 comes through its process, if there are not enough
24 persons to pick up their representative vote as
25 they wish to get that legislation passed, then

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

117

1 they're harmed because there are not enough of
2 persons that look like them, black and brown
3 people, that would get that particular legislation
4 through. And so they're harmed if they only have
5 one black and you got -- just say senate, you've
6 got 39 senators, you have five blacks, but you
7 want to get something passed that affects you as a
8 black person in one of those senatorial areas.

9 Q. Can -- do -- I'm going to -- I'm going
10 to strike that.

11 I'm going to ask you about a specific
12 example.

13 So House District 63, do you know who
14 the representative is for that district?

15 A. You tell me where District 63 is --

16 Q. Sure.

17 A. -- I'll help you out.

18 Q. It is in Baton Rouge.

19 And does the name Barbara Carpenter
20 sound familiar?

21 A. Barbara Carpenter sounds familiar.

22 Q. Okay. Do you know if Ms. Carpenter is
23 black?

24 A. Yes, she is.

25 Q. Okay. How is a member that lives in

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

118

1 Representative Carpenter's district harmed by the
2 enacted maps?

3 A. Because, as I alluded before, Barbara
4 Carpenter might go there and talk -- she might
5 talk to her constituents about things that matter
6 to them. If she goes to the Legislature and
7 proposes legislation, it will not pass because
8 there's not enough Barbara Carpenters, a person
9 that looks like Barbara Carpenters, that would get
10 it through. And so if we had more -- more persons
11 that looked like Barbara Carpenter there, then
12 maybe the Legislature could get passed.

13 But because the map does not give enough
14 of minorities the opportunity to get elected to
15 these positions -- so the legislation that would
16 have helped Barbara's constituents doesn't get
17 past committee -- so they're harmed.

18 MS. HOLT: Sara, I've got a few more
19 questions, but now might be a good time for a
20 comfort break. I don't anticipate taking too
21 much longer. Does that sound good to you?

22 MS. ROHANI: Yeah, that sounds good.

23 MS. HOLT: Okay. Do we want to do --
24 let's see. Come back at 1- -- I'm having a
25 hard time seeing the time on all the TV

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

119

1 screens -- 1:05?

2 MS. ROHANI: Yeah. That sounds great.

3 MS. HOLT: Okay. Great. Thank you.

4 (Recess in proceedings.)

5 MS. HOLT: All right. Back on the
6 record.

7 BY MS. HOLT:

8 Q. Mr. McClanahan, you mentioned earlier
9 that you do political work; is that correct?

10 A. Correct.

11 Q. Did you do political work for Senator
12 Barrow?

13 A. No.

14 Q. Did you do political work for
15 Representative Carpenter?

16 A. No.

17 Q. Has Senator Barrow represented your
18 interests in the senate?

19 MS. ROHANI: Objection.

20 This is outside the scope. President
21 McClanahan, again, is here as a
22 representative of the State Conference and
23 not in his individual capacity.

24 But you can answer, President.

25 A. Has she represented -- she's represented

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

120

1 my interests to the best of her ability.

2 Q. Now, I believe before the break some of
3 the harm that was discussed involved school
4 boards. And does the Legislature appoint school
5 board members?

6 A. They -- they don't.

7 Q. School board members have different
8 maps; right?

9 A. Right.

10 Q. And they have their own elections?

11 A. Right.

12 Q. Does the Legislature award trash
13 contracts?

14 MS. ROHANI: Objection. This is outside
15 the scope of this litigation.

16 MS. HOLT: Sara, he's testified that
17 part of the harm was trash and trash pickups,
18 so I am just asking him about that.

19 MS. ROHANI: Okay.

20 Please go ahead and answer, President.

21 A. No.

22 Q. Okay. Do you know who awards trash
23 contracts?

24 MS. ROHANI: Objection.

25 You can answer.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

121

1 A. I'm quite sure that the local government
2 authority.

3 Q. Okay.

4 MS. HOLT: No further questions for me
5 at this time.

6 Do any of the other defendants have
7 questions?

8 MS. PROUTY: Yes, I do. This is Erica
9 Prouty on behalf of the Legislative
10 Intervenors.

11 EXAMINATION

12 BY MS. PROUTY:

13 Q. Mr. McClanahan, I apologize that we
14 haven't met, but I would like to ask a few
15 follow-up questions today.

16 A. Okay.

17 Q. So I understand your testimony earlier
18 today was that you did not review any documents or
19 lists when preparing the responses -- or the
20 supplemental responses to Interrogatory No. 3.

21 MS. PROUTY: I believe that's Exhibit 4,
22 if we want to pull that back up.

23 MS. ROHANI: Objection. That misstates
24 President McClanahan's testimony.

25 A. Correct.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

122

1 Q. So I know we're at the end here and the
2 lunch hour's approaching, so I want to keep it
3 short and just focus on what you did to prepare
4 the supplemental responses to this interrogatory.

5 So I understand, Mr. McClanahan, that
6 you said you met with counsel to prepare your
7 responses to Interrogatory No. 3; is that right?

8 A. Well, that -- that was one of the -- one
9 of the things that I did. That's one. I did some
10 other stuff, but one of the things I did was meet
11 with counsel, right.

12 Q. Okay. And who did you meet with?

13 MS. ROHANI: Objection, attorney-client
14 privilege.

15 Direct not to answer.

16 MS. PROUTY: Sara, I believe he can
17 identify who he met with.

18 MS. ROHANI: Oh, apologies. Apologies.
19 I misheard the question.

20 MS. PROUTY: Yeah.

21 MS. ROHANI: Okay. Thank you, Erica.

22 A. Okay. So I talked to LDF, the team of
23 lawyers with LDF.

24 Q. Okay. And do you recall the specific
25 names of the attorneys at LDF you met with?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

123

1 A. I do. I do. I think at some point in
2 time I met with -- I know Sara, Stuart, Victoria,
3 maybe others, but they elude me right now. But I
4 know those came from heaven.

5 Q. And when did you have those meetings to
6 repair -- to prepare the supplemental responses to
7 Interrogatory No. 3?

8 A. If you're looking for a date and time,
9 I'm not that smart. I write everything down.
10 Even my kids' names. So I don't know a date and
11 time that we did, but it was before I signed it
12 and sent it in, if that would help.

13 Q. Okay. Do you know for about how long
14 you met?

15 A. We met over time, just not one day, one
16 call. It was a series of calls and a series of
17 meetings.

18 Q. Okay. And did you review any documents
19 when you were preparing the supplemental response
20 to Interrogatory No. 3?

21 A. Well, I looked at the illegal maps, I
22 looked at the illustrative maps and then I looked
23 at the state of the federal -- the -- the map that
24 has the parishes on it and the list -- and just
25 the out- -- the outlines of the parishes. I

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

124

1 looked at the names of the parishes and the map
2 that has that.

3 Q. Okay. But no other documents; is that
4 right?

5 A. Not to -- not to my knowledge.

6 Q. Okay. And when you were preparing your
7 supplemental response to Interrogatory No. 3, did
8 you identify the specific name of the member who
9 lives in House District 4, for example?

10 MS. ROHANI: Objection, privileged
11 communications.

12 Q. To the extent that you can answer
13 without revealing any privileged communi- --
14 communications, did you -- you identify the
15 specific name of the member who you assert lives
16 in House District 4?

17 A. Identify, yes.

18 Q. You did identify that member?

19 A. Identified.

20 Q. Okay. And you -- you identified their
21 specific name?

22 A. Identified the member and the name --
23 identified the name. Might have got a first name,
24 might have got a second name, might have got them
25 both right, but I identified a person.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

125

1 Q. Okay. So do you -- at the time you were
2 preparing this response, you were able to identify
3 a specific name of that member who lives in House
4 District 4?

5 A. Yes.

6 Q. Okay. And I understand this is likely
7 to draw an objection, but would you be able to
8 state that name on the record today?

9 MS. ROHANI: Objection.

10 Q. I'm not asking you to actually identify
11 what that name is, but if you could, would you be
12 able to remember who that is today?

13 MS. ROHANI: Objection.

14 MS. PROUTY: Are you instructing him not
15 to answer?

16 MS. ROHANI: Yes.

17 MS. PROUTY: Okay.

18 BY MS. PROUTY:

19 Q. And when you were preparing your
20 response to Interrogatory No. 3, did you identify
21 the address of the specific member who lives in
22 House District 4?

23 A. In House District 4, I would say yes. I
24 have been to those houses. I would say, yes. I
25 identified the address. Now -- yes. I'm just --

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

126

1 yes.

2 Q. And how did you do that?

3 A. How did I identify the address?

4 Q. Yeah.

5 A. I know the -- I know -- when I -- when I
6 cross-referenced the illustrative maps and the
7 illegal maps and the parishes that they in, I
8 probably -- I've been to most, if not all of
9 the -- the areas that -- that are there, and I
10 could identify that persons. Might not can do a
11 navigation to his house, but I know the area.

12 Q. Okay. And do you know where House
13 District 4 is -- is located?

14 A. If you tell me -- if you tell me the
15 parish, I can tell you where it's at.

16 Q. It's not -- it's not a memory test.
17 Just curious.

18 And when you said that you were
19 preparing Interrogatory No. 3 and you were
20 identifi- -- you were able to identify the
21 specific name of the member who lives in House
22 District 4, how did you do that?

23 A. Repeat that now.

24 Q. When you were preparing your responses
25 to Interrogatory No. 3, and you said you were able

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

127

1 to identify the specific name of the member who
2 lives in House District 4, how did you do that?

3 A. As I alluded earlier, what I do is
4 cross-reference the area so I can identify the
5 parish, the town, and where the branch is located
6 at. Based upon that knowledge there alone, once I
7 know the branch, I know the leadership.

8 Q. Okay. And so you were able to just
9 recall a specific name?

10 A. Yes.

11 Q. Okay. Is there a record of that name
12 somewhere?

13 A. Now, the -- the branch is -- the
14 branches has membership roles. They do that.
15 Now, I know because I have to go -- I have to
16 go -- probably have to administer the oath,
17 probably have installation. So I go to these -- I
18 go to these branch areas all the time. And so I
19 can identify that, I know they're there, but I
20 don't know all the different areas.

21 Q. Okay. But you didn't review the
22 membership role when you were preparing your
23 supplemental response to Interrogatory No. 3;
24 right?

25 MS. ROHANI: Objection.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

128

1 But you can answer.

2 A. No, I didn't get a -- I didn't get a --
3 I didn't get a roster, per se, or role, per se.

4 Q. And when you identify the address of
5 this -- the same specific member in House
6 District 4, how did you know what their specific
7 address was?

8 A. Okay. So I've -- I've been to these
9 areas. I've almost lived in all of these areas
10 because I'm rarely at home. So -- this is
11 Louisiana -- when I go to these places, they bring
12 me to their house. If I could -- I could
13 identify. I can identify the particular area, the
14 particular member or members. But we know at
15 least one. I can identify at least one member
16 there. And might not could take you to the house,
17 but I could identify with certainty those that
18 live in that -- in that area.

19 Q. And when you were preparing your
20 response to Interrogatory No. 3, did you do
21 anything to confirm that that specific member in
22 House District 4 -- that their address actually
23 fell within the boundaries of House District 4 and
24 wasn't, for example, in House District 5 or House
25 District 2?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

129

1 A. Right, right. Yeah. I did. We did. I
2 did.

3 Q. Okay.

4 A. With the lawyers, we did. We did.
5 We -- we cross-referenced to make sure that -- and
6 some of these areas, right, some of these areas
7 were close, where the lines might have drawn, but
8 we identified to the -- to the street that they
9 were not in -- they were in this particular
10 district and not in the one that it was not.

11 Because sometimes when you look, zoom in -- you
12 have to zoom in. And we zoomed in and realized
13 the street and we identified the member that lives
14 in that particular district on that street.

15 Q. And when you were preparing your
16 responses to Interrogatory No. 3, did you
17 personally talk to this specific member who lives
18 in House District 4?

19 MS. ROHANI: Objection, to the extent
20 that it calls for attorney-client privileged
21 communications.

22 Direct not to answer.

23 MS. PROUTY: And I -- I believe the
24 question didn't call for information
25 protected by the attorney-client privilege.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

130

1 BY MS. PROUTY:

2 Q. But did -- did you personally talk to
3 this specific member?

4 A. I talked to -- I talked to -- as I
5 alluded to under Cassie's questioning, I talked to
6 all of them. Maybe not individually. Some
7 individually, some not. But all of them,
8 collectively, I spoke with.

9 Q. Okay. So you can't recall a specific
10 conversation with a specific member in House
11 District 4?

12 A. When you say "conversation," you know,
13 we have general conversation or we have specific
14 conversations.

15 Q. Yes.

16 A. I can say -- I can speak to general
17 conversations, yeah. But if you ask me something
18 else...

19 Q. Yeah.

20 I'm talking about when you were
21 preparing your supplemental response to
22 Interrogatory No. 3, did you speak to the member
23 who lives in House District 4?

24 A. Once I identified who that member was, I
25 didn't -- I didn't go and say, look, we preparing

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

131

1 a lawsuit because this is your area.

2 But I do know when I spoke with them
3 through the quarterly meetings, the State
4 Conference conventions, we identified these areas
5 of interest. And so we just did a general talk
6 about all of them because you have a -- a host of
7 house districts that we're looking at.

8 So I would tell them that we're coming
9 to them because we have a -- we have some
10 discrepancies based upon the illegal maps and the
11 maps that our people have drawn. And so --

12 Q. I apologize. I don't mean to interrupt,
13 but I -- I think we can keep this really specific.

14 So you did not have a conversation with
15 a specific member in House District 4 when you
16 were preparing your supplemental response to
17 Interrogatory No. 3?

18 A. Did you say did I have or did I not?

19 Q. Did you -- you did not have a
20 conversation with them?

21 A. Not specifically.

22 Q. Okay. Do you know if this specific
23 member who lives in House District 4 is registered
24 to vote?

25 A. No, I don't.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

132

1 Q. Okay. Do you know if this specific
2 member who lives in House District 4 intends to
3 vote in future elections?

4 A. I -- I don't.

5 Q. Okay. And do you know for whom this
6 specific member who lives in House District 4
7 voted for in the last election for the Louisiana
8 House of Representatives?

9 A. No, I don't.

10 Q. Okay. Now, are the answers the same for
11 all of the other house districts that are
12 identified in this supplemental response to
13 Interrogatory No. 3?

14 A. Yes, it would be the same.

15 Q. Okay. And the same for all the senate
16 districts that are identified in the supplemental
17 response to Interrogatory No. 3?

18 A. Right.

19 Q. Are you still there, Mr. McClanahan?

20 A. Yes.

21 Q. Okay. I apologize, I didn't hear your
22 answer.

23 Is your answer the same for all of the
24 districts, the senate districts that are
25 identified in supplemental interrogatory response

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

133

1 No. 3?

2 A. If you're -- if you're asking if my
3 answer would be the same as you questioned me
4 about No. 4?

5 Q. Yes.

6 A. Well, I can't say that because I have
7 spoken to some of them. Some of them are more
8 personal to me than others.

9 Q. Okay.

10 A. So I can't say all.

11 Like the Orleans president is a friend
12 of mine, so I speak with him. The Baton Rouge guy
13 is a friend of mine. So some of them are a little
14 bit closer than others so I would speak to them
15 more intimately as opposed to others.

16 Q. Okay. But the questions about whether
17 you know for a fact that they are registered to
18 vote or they intend to vote for -- in future
19 elections or who they voted for in the past, is
20 your answer no, you still don't know as to the
21 specific districts in the senate for those
22 members?

23 A. I don't know what they would do
24 personally. I would hope that they would vote,
25 but I don't know personal -- their personal

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

134

1 voting.

2 Q. Okay. Great.

3 MS. PROUTY: Well, thank you,
4 Mr. McClanahan. Those are all the questions
5 that I have for you today. I really
6 appreciate your time.

7 THE WITNESS: Thank you.

8 MS. HOLT: All right. And, Sara, at
9 this time we're going to leave the deposition
10 open pending motions practice regarding the
11 instructions not to answer.

12 MS. ROHANI: Understood.

13 I have a few questions for President
14 McClanahan.

15 MS. HOLT: Oh. Absolutely.

16 EXAMINATION

17 BY MS. ROHANI:

18 Q. So, President McClanahan, you were
19 earlier asked about the membership -- membership
20 structure of the State Conference. Do you
21 remember that?

22 A. Yes.

23 Q. And you explained your understanding of
24 the membership structure.

25 A. Okay. Yes.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

135

1 Q. And where does this understanding --
2 your understanding of the membership structure
3 come from?

4 A. It comes from the constitution and
5 by-laws and -- and my being in the NAACP for over
6 ten years.

7 Q. So is it fair to say that the membership
8 structure is accurately reflected in the NAACP
9 by-laws?

10 A. Correct.

11 MS. ROHANI: Thank you. No further
12 questions.

13 MS. HOLT: All right. So I'll just
14 restate again that we're -- at this time,
15 we're leaving the deposition open pending
16 further motions practice on the instructions
17 not to answer, but we would still like a copy
18 of the transcript.

19 Does the stenographer need any
20 information?

21 THE COURT REPORTER: I would just ask if
22 you want the exhibits attached as well?

23 MS. HOLT: Yes, please.

24 THE COURT REPORTER: Okay. Thank you.
25 And then other counsel present, if you

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

1 could let me know your orders at this time.

2 MS. ROHANI: We will read and sign, and
3 also would like a copy of the transcript,
4 please, with the exhibits.

5 THE COURT REPORTER: Thank you.

6 MS. PROUTY: And this is Erica Prouty on
7 behalf of the Legislative Intervenors. We
8 would like a copy as well.

9 THE COURT REPORTER: And exhibits?

10 MS. PROUTY: Yes, please.

11 THE COURT REPORTER: Thank you. I think
12 that takes care of it.

13

14 AND FURTHER THIS DEPONENT SAITH NOT.

15 SIGNATURE RIGHTS RESERVED.

16 (Videotaped Deposition concluded at 1:25 p.m.)

17

18

* * * * *

19

20

21

22

23

24

25

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

1 STATE OF NORTH CAROLINA:

2 COUNTY OF MECKLENBURG :

3 I, April Reid, Court Reporter and Notary
4 Public in and for the State of North Carolina,
5 and whose commission expires March 4, 2025,
6 do certify that the aforementioned appeared
7 before me, was sworn by me, and was thereupon
8 examined by counsel; and that the foregoing is a
9 true, correct, and full transcript of the
10 testimony adduced.

11 I further certify that I am neither
12 related to nor associated with any counsel or
13 party to this proceeding, nor otherwise interested
14 in the event thereof.

15 Given under my hand and notarial seal in
16 Charlotte, North Carolina, this 12th day of
17 September, 2023.

18 

19 _____
20 April Reid, RPR, CRR, Notary Public
21 State of North Carolina, County of Mecklenburg
22 Notary Registration No. 20012210079
23
24
25

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

138

A			
ability	125:10, 128:22	affirmed	al
120:1	adcock	7:7	1:5
able	4:16, 29:24	affordable	alluded
107:3, 111:5,	add	110:21	68:4, 71:11,
112:23, 113:19,	58:16	aftermentioned	82:25, 86:7,
125:2, 125:7,	added	137:6	118:3, 127:3,
125:12, 126:20,	35:1, 35:13,	afr	130:5
126:25, 127:8	36:7, 38:3	20:14	almost
above	addition	african	128:9
36:13, 36:18	79:25, 96:15,	47:8, 58:25	alone
absolutely	96:19	after	67:19, 127:6
134:15	additional	32:6, 32:7,	along
abundant	46:2, 46:3,	109:23, 111:2	52:5, 52:7,
55:22, 55:23	98:11	again	100:21
access	address	43:9, 46:5,	alora
110:20	8:13, 8:14,	48:24, 55:13,	4:13, 22:14
accordance	8:16, 8:17,	62:22, 71:7,	already
97:11	8:19, 8:23,	76:16, 84:6,	11:10, 67:7,
according	67:3, 67:10,	89:17, 102:9,	79:19, 98:24,
47:11	125:21, 125:25,	103:19, 109:2,	107:6, 116:13
account	126:3, 128:4,	115:2, 115:9,	also
98:19	128:7, 128:22	115:17, 119:21,	3:3, 4:3, 23:6,
accurately	addresses	135:14	38:13, 52:11,
135:8	26:23, 27:1,	against	52:14, 53:14,
achieve	66:6, 74:7,	115:5	53:15, 66:19,
43:17, 43:24	81:25	age	78:4, 85:6,
aclu	addressing	28:19	87:24, 88:11,
4:14	97:4	agree	97:7, 103:22,
act	adduced	18:25, 44:11,	136:3
48:19, 112:19,	137:10	46:2, 46:3,	alternative
113:11	adequate	63:11, 70:21,	107:15
action	110:21, 110:22	92:19	alton
1:4, 40:22,	administer	agreed	9:20
40:23, 98:1	127:16	44:3, 45:10,	always
actions	administrator	51:24, 52:2,	11:4, 45:3,
41:8	88:6, 88:11	53:20, 76:4,	45:10, 53:9,
activities	adult	86:12, 92:19	53:25, 104:16,
22:12, 96:25	14:25, 19:18,	agrees	109:15
activity	29:5	87:1	alyssa
64:17	adults	ahead	2:17
acts	101:14	17:2, 46:1,	amanda
23:3	advocate	49:11, 52:20,	4:5, 4:9, 8:1
actually	111:2	72:7, 72:9,	amended
10:2, 56:18,	affect	73:4, 103:17,	5:13, 5:18,
69:13, 71:3,	70:15	120:20	15:12, 16:3,
95:25, 96:2,	affects	ain't	39:2, 39:16,
	117:7	101:9, 101:15	39:20, 48:20,
	affiliation	airline	50:12, 60:4,
	114:21	8:19, 21:1	

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

139

<p>113:1 amendment 27:23, 28:4, 28:5, 80:15 americans 47:8, 58:25 among 62:13, 81:7, 90:13 annual 20:5, 20:17, 104:23 another 101:16, 115:10 answer 10:21, 27:10, 41:21, 42:12, 43:12, 44:6, 44:17, 46:19, 47:4, 49:1, 51:11, 55:15, 56:11, 56:24, 57:21, 58:23, 59:7, 61:7, 62:21, 63:2, 63:19, 66:10, 68:3, 72:9, 74:20, 75:4, 75:23, 76:20, 78:11, 78:13, 78:19, 79:8, 79:12, 82:5, 82:6, 82:7, 82:17, 82:22, 83:1, 84:10, 86:4, 86:21, 87:22, 89:18, 92:10, 92:25, 93:19, 94:1, 94:13, 97:23, 102:2, 104:12, 105:10, 106:7, 108:13, 108:18, 109:1, 111:9, 111:19, 111:25, 113:24, 115:4, 115:11, 115:15, 116:16, 119:24,</p>	<p>120:20, 120:25, 122:15, 124:12, 125:15, 128:1, 129:22, 132:22, 132:23, 133:3, 133:20, 134:11, 135:17 answered 75:17 answering 11:25, 75:20 answers 13:19, 16:10, 42:10, 69:6, 71:8, 80:16, 132:10 anticipate 118:20 any 8:7, 10:3, 10:6, 11:25, 12:18, 12:22, 12:25, 13:24, 14:17, 17:12, 18:3, 21:11, 21:16, 23:18, 25:15, 27:22, 30:10, 30:18, 34:22, 38:18, 41:6, 42:4, 42:15, 43:2, 43:6, 44:1, 46:7, 50:23, 51:7, 54:23, 58:10, 58:12, 64:12, 74:6, 74:17, 74:21, 74:23, 74:25, 81:24, 85:25, 89:5, 91:6, 92:6, 93:11, 93:14, 94:9, 102:15, 102:20, 103:12, 105:6, 109:7, 112:8, 121:6, 121:18, 123:18, 124:13, 135:19, 137:12</p>	<p>anybody 27:13 anymore 12:10 anyone 15:3, 15:5, 21:21 anything 11:13, 11:24, 12:17, 23:7, 23:8, 27:13, 27:15, 36:18, 36:24, 37:6, 37:7, 47:10, 47:14, 51:22, 68:22, 69:23, 72:1, 76:19, 91:8, 93:6, 112:3, 128:21 apologies 58:22, 70:11, 82:19, 82:23, 86:18, 112:21, 122:18 apologize 49:7, 86:17, 90:3, 121:13, 131:12, 132:21 appeared 2:2, 137:6 application 35:9 applies 47:20 apply 47:19 appoint 120:4 appreciate 7:23, 18:8, 43:25, 134:6 approaching 122:2 appropriate 80:6, 114:5, 115:19 april 1:25, 137:3,</p>	<p>137:20 ardoin 1:8, 7:18, 7:20, 108:15 ardoin's 5:25, 60:20 area 33:7, 56:14, 65:11, 67:8, 67:12, 69:18, 71:24, 84:17, 85:14, 98:19, 103:6, 126:11, 127:4, 128:13, 128:18, 131:1 areas 65:2, 65:4, 65:6, 65:9, 65:12, 65:17, 65:21, 71:23, 72:11, 75:14, 83:13, 83:15, 90:25, 91:2, 91:16, 93:6, 98:9, 98:13, 98:14, 99:2, 99:8, 100:3, 100:9, 102:3, 102:5, 102:20, 103:11, 103:20, 103:22, 103:24, 103:25, 104:19, 109:13, 117:8, 126:9, 127:18, 127:20, 128:9, 129:6, 131:4 aren't 111:22 arises 21:8 around 42:23, 70:1 asian 58:4, 58:10, 98:21 asked 16:5, 22:7, 45:16, 51:15,</p>
---	--	---	--

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

140

75:19, 78:11, 79:20, 107:21, 109:5, 111:14, 114:5, 134:19 asking 27:25, 30:20, 30:22, 37:22, 46:8, 46:21, 50:18, 55:2, 55:5, 67:2, 80:6, 88:19, 108:8, 115:19, 120:18, 125:10, 133:2 aspect 36:16 assert 124:15 assessment 20:6, 20:7, 20:15 assigns 20:11 associated 137:12 association 18:22, 50:2, 50:3, 50:6, 50:7 associational 28:4 assume 78:5 attached 15:16, 25:7, 39:6, 60:3, 94:25, 135:22 attend 21:20, 22:2, 34:20, 41:12, 41:13 attendance 41:16, 53:21, 53:25, 54:8, 54:11, 54:13, 54:14 attended 65:16, 66:19, 72:18	attorney 4:6 attorney-client 42:8, 43:10, 66:8, 73:12, 76:18, 82:21, 122:13, 129:20, 129:25 attorneys 122:25 audibly 31:16 authority 46:7, 121:2 automatically 29:22 available 7:24, 24:25 avoid 10:18 award 120:12 awards 120:22 aware 23:23, 54:16, 68:22, 77:4, 77:8, 77:10, 94:9, 94:15, 102:15, 102:23, 103:2, 103:10, 103:12, 103:22, 103:24, 104:1, 105:6, 113:18, 113:25 awareness 43:20 away 33:25, 34:10, 34:11	back 22:17, 26:2, 30:7, 45:25, 49:15, 50:14, 57:14, 57:15, 60:15, 61:10, 73:3, 73:17, 73:21, 95:7, 96:1, 96:12, 98:7, 101:5, 118:24, 119:5, 121:22 bad 83:2 baker 3:13 bandage 99:6 banquet 21:15 banquets 65:1, 76:24, 83:8 barbara 117:19, 117:21, 118:3, 118:8, 118:9, 118:11 barbara's 118:16 barbecue 67:16 barreling 110:11 barrow 114:18, 114:20, 114:25, 115:13, 115:25, 119:12, 119:17 based 50:6, 68:7, 72:14, 74:13, 78:17, 78:22, 78:23, 80:15, 83:16, 91:13, 91:14, 92:2, 92:3, 92:4, 92:16, 127:6, 131:10	basing 52:23 baton 3:8, 8:18, 8:19, 9:9, 9:14, 9:15, 9:18, 12:20, 12:22, 12:25, 14:4, 33:10, 42:21, 83:23, 84:5, 84:12, 84:14, 84:17, 84:20, 85:13, 85:20, 85:22, 93:8, 93:9, 117:18, 133:12 bay 100:12 became 16:23, 40:10, 41:4 because 19:10, 21:5, 24:12, 27:11, 30:12, 31:5, 31:24, 35:19, 36:12, 36:19, 37:14, 38:4, 38:5, 40:11, 40:22, 42:20, 42:23, 43:15, 44:22, 45:4, 51:21, 54:20, 56:14, 58:8, 65:12, 67:7, 69:20, 69:22, 70:24, 72:13, 73:5, 75:7, 77:25, 78:6, 83:5, 86:8, 87:9, 88:21, 89:10, 91:22, 93:21, 93:23, 94:14, 98:6, 98:10, 98:14, 99:5, 99:6, 99:10, 99:18, 100:17, 100:21,
	B		
	b) (6 1:15, 5:13, 15:13, 16:10, 80:3, 80:12 baby 28:21		

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

141

101:8, 101:11, 101:19, 102:23, 103:2, 104:16, 104:24, 105:11, 106:10, 106:19, 106:22, 107:1, 107:6, 109:12, 109:14, 109:25, 110:7, 110:17, 110:21, 110:25, 111:6, 112:7, 113:20, 117:1, 118:3, 118:7, 118:13, 127:15, 128:10, 129:11, 131:1, 131:6, 131:9, 133:6 become 28:16, 28:20, 29:11, 29:13, 29:15, 35:5, 35:6, 35:8, 35:9, 40:9, 68:25, 102:11 becomes 29:5, 29:20 been 9:2, 10:1, 12:7, 13:12, 16:5, 49:12, 57:3, 64:6, 64:23, 67:12, 67:13, 67:17, 71:16, 71:24, 72:15, 72:19, 74:14, 75:1, 75:7, 76:6, 76:21, 78:7, 79:1, 79:5, 79:10, 80:10, 83:13, 84:23, 85:2, 85:3, 85:4, 85:9, 85:10, 85:11, 91:16, 91:17, 91:18, 91:19, 94:10, 96:21, 102:16, 103:13,	104:15, 105:7, 108:21, 111:5, 113:19, 125:24, 126:8, 128:8 before 9:3, 9:11, 10:21, 10:23, 11:22, 14:18, 42:5, 42:16, 44:4, 44:15, 50:23, 51:5, 51:22, 55:7, 58:19, 70:8, 71:11, 73:20, 73:24, 109:22, 112:13, 118:3, 120:2, 123:11, 137:7 begin 7:12 behalf 2:6, 2:15, 3:3, 3:11, 16:6, 121:9, 136:7 behind 101:6 being 7:7, 14:18, 30:25, 35:12, 43:7, 75:15, 90:23, 107:21, 135:5 belief 61:8 believe 18:9, 23:20, 23:24, 24:22, 31:20, 45:22, 46:14, 54:7, 57:5, 58:18, 59:24, 64:11, 70:24, 75:17, 82:5, 96:3, 102:1, 104:9, 112:13, 120:2, 121:21, 122:16, 129:23 belong 12:18, 33:20	below 20:11, 20:12 besides 17:10, 75:5 best 11:6, 61:7, 64:5, 113:23, 113:25, 120:1 better 23:3, 28:15, 37:15, 56:15, 98:2 between 19:6, 38:14, 63:12, 88:8 bill 18:1, 90:12, 107:10, 107:18, 108:9 bills 116:22 binding 16:10 bit 26:6, 40:2, 40:13, 73:5, 95:15, 96:4, 99:9, 99:12, 100:13, 112:9, 114:11, 116:11, 133:14 black 47:8, 56:4, 58:3, 58:25, 59:5, 59:13, 59:16, 77:6, 77:11, 77:15, 77:18, 77:20, 78:6, 89:9, 93:15, 93:22, 97:1, 97:4, 97:8, 98:8, 98:20, 105:12, 106:18, 114:23, 116:13, 116:18, 117:2, 117:5, 117:8, 117:23 blacks 117:6	board 22:19, 23:4, 23:5, 120:5, 120:7 boards 120:4 bodies 38:14 bogalusa 104:14 boldest 69:1 both 8:15, 17:5, 124:25 bottom 25:18, 61:11, 96:14 bought 91:20 boundaries 40:17, 128:23 boy 99:21, 99:22 brain 23:2 branch 12:21, 12:23, 13:1, 29:15, 29:17, 29:21, 30:1, 30:3, 30:6, 31:1, 31:2, 31:4, 32:5, 32:20, 33:6, 33:8, 33:11, 33:13, 33:14, 33:15, 33:18, 33:20, 34:3, 36:11, 36:12, 36:25, 38:12, 42:1, 42:20, 42:22, 43:6, 50:23, 51:7, 51:19, 54:24, 55:1, 68:11, 69:19, 69:24, 70:7, 74:7, 74:17,
--	---	---	--

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

142

74:23, 74:25, 75:5, 75:6, 75:20, 85:4, 85:5, 85:10, 85:25, 86:14, 87:7, 87:16, 87:25, 88:7, 88:8, 88:17, 92:6, 127:5, 127:7, 127:13, 127:18 branches 12:19, 14:25, 15:10, 18:23, 19:5, 19:6, 19:12, 19:14, 19:18, 19:25, 20:8, 30:10, 30:18, 31:10, 32:6, 32:7, 32:23, 32:24, 32:25, 33:21, 35:20, 35:22, 37:18, 37:21, 37:22, 37:23, 38:5, 38:10, 38:20, 42:5, 42:16, 42:18, 42:23, 43:4, 43:5, 44:3, 49:21, 50:9, 51:1, 53:6, 54:4, 64:13, 64:25, 68:11, 68:12, 68:13, 69:17, 71:1, 75:6, 75:8, 75:13, 91:3, 91:14, 94:10, 127:14 break 11:13, 49:8, 49:12, 55:7, 58:19, 72:24, 73:20, 73:24, 118:20, 120:2 breakfast 21:17	breaks 101:19 bright 43:15 bring 45:11, 51:8, 52:15, 67:15, 73:21, 128:11 bringing 42:5 broad 116:5 broader 116:5 brother's 102:11 brought 41:15, 50:16, 52:19, 112:14 brown 56:4, 58:3, 117:2 brutality 65:3, 83:9, 110:16 bursts 85:7 business 8:14, 8:19, 23:7 by-laws 16:25, 17:12, 18:14, 18:19, 18:20, 19:2, 135:5, 135:9	76:1, 85:5, 96:19, 96:21, 97:10, 123:16, 129:24 called 14:4, 15:12, 25:3, 39:2, 59:20, 94:21, 104:14 calls 28:7, 41:11, 43:19, 46:10, 46:18, 48:24, 52:9, 53:7, 54:7, 54:12, 54:18, 54:22, 54:25, 55:14, 62:19, 70:13, 72:17, 77:2, 87:11, 88:22, 109:11, 110:9, 113:21, 115:2, 123:16, 129:20 came 91:12, 91:15, 91:21, 98:7, 123:4 campaigns 43:20 can't 78:5, 100:11, 100:12, 109:21, 114:10, 130:9, 133:6, 133:10 canceled 103:13, 104:10 candidate 55:10, 56:8, 56:13, 111:6, 113:19, 114:25, 115:7, 115:25, 116:1, 116:6 candidates 45:21, 46:15, 46:16, 55:19, 59:5, 59:11, 115:8 cannot 69:21	capacity 1:9, 7:19, 107:22, 108:5, 119:23 care 136:12 carolina 137:1, 137:4, 137:16, 137:21 carpenter 117:19, 117:21, 117:22, 118:4, 118:11, 119:15 carpenter's 118:1 carpenters 118:8, 118:9 cars 103:7 case 9:16, 17:23, 88:17, 97:7, 98:21, 98:22, 107:20, 112:14, 112:18 cases 94:9 casino 22:9 cassie 2:16, 7:15, 49:6, 57:9, 70:11, 82:19, 86:18, 89:24, 104:24 cassie's 130:5 caucus 105:12 caused 97:2 census 98:4, 98:7 center 3:14, 14:4, 14:16 certain 28:22, 67:21,
---	--	--	---

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

143

<p>98:9 certainly 73:1 certainty 128:17 certify 137:6, 137:11 chair 33:4 chairs 23:14 challenge 79:23 challenged 61:25 change 99:15, 101:9, 101:15, 101:22, 101:23, 104:19, 106:16, 106:18, 109:17, 109:24 changes 100:10, 109:16 changing 106:24 chapters 15:1 charge 33:1 charlotte 137:16 check 36:18, 36:19, 36:23 checked 30:12 cheer 85:12 cheered 85:11 cheering 103:21 chief 1:7 choice 45:9, 45:11, 45:21, 46:15, 46:16, 55:11,</p>	<p>55:20, 56:8, 56:14, 56:19, 59:5, 59:11, 98:16, 111:6, 113:19, 115:1, 115:7, 116:7 choose 56:1, 56:18 choosing 115:25, 116:1 city 9:9, 9:13, 9:18 civic 3:14 civil 1:4 civilized 69:1 claim 113:16 claims 97:6, 97:16, 112:13 clarify 49:17, 55:9, 73:11, 79:17 clark 4:8 clear 11:3, 37:5, 55:17 client 46:1, 46:6 clock 73:6 close 129:7 closer 30:15, 133:14 clothes 109:25 coleman 27:13, 27:17 collectively 130:8 college 15:1 columbus 3:16</p>	<p>combat 99:24, 99:25 come 22:2, 22:3, 42:2, 45:4, 65:22, 76:14, 100:11, 101:22, 101:23, 102:14, 116:22, 118:24, 135:3 comes 18:7, 24:10, 116:23, 135:4 comfort 11:13, 49:12, 118:20 coming 32:6, 52:7, 99:11, 131:8 commission 105:20, 105:22, 105:23, 106:2, 106:4, 107:5, 107:25, 108:2, 108:5, 137:5 committee 5:16, 22:22, 22:25, 23:1, 23:3, 23:6, 23:9, 23:14, 23:16, 25:14, 25:25, 118:17 communi 124:13 communications 84:8, 124:11, 124:14, 129:21 communities 97:2, 110:16 company 14:3, 14:7, 14:9, 14:11 compel 79:18, 80:1 compelled 94:10 compile 36:2</p>	<p>complaint 5:18, 39:2, 39:16, 39:20, 50:13, 60:5, 113:1 completely 12:1, 15:22, 39:17 compliance 20:13, 20:15, 30:9, 36:15 complying 36:19, 37:3 computer 15:21 concede 99:23 concerned 27:3 concise 11:3 concluded 136:16 conclusion 28:8, 46:18, 48:25, 55:14, 62:20, 76:15, 91:13, 91:15, 91:21, 113:22, 115:3 conducted 1:19 conference 1:16, 13:4, 13:8, 13:22, 14:18, 16:4, 16:7, 16:11, 19:15, 19:19, 20:2, 20:21, 21:10, 21:13, 22:18, 22:21, 23:2, 23:10, 23:18, 23:22, 24:1, 24:23, 29:12, 29:14, 29:18, 29:23, 30:5, 31:8, 31:22, 34:9,</p>
---	---	---	---

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

144

35:2, 35:17, 37:13, 38:18, 40:9, 41:4, 43:1, 45:14, 49:20, 49:23, 55:8, 59:3, 63:16, 64:7, 97:20, 100:15, 102:19, 102:22, 104:22, 104:23, 106:5, 108:23, 111:16, 119:22, 131:4, 134:20 conference's 5:22, 59:21, 60:19, 95:10 conferences 18:23, 26:9 confident 86:10 confidential 82:8 confirm 128:21 confused 70:23, 82:18 confusion 10:18 congressional 53:12 conine 3:5 consent 43:7, 43:22 consented 44:14 constituents 118:5, 118:16 constitution 16:25, 17:11, 18:10, 18:14, 18:19, 18:20, 19:2, 135:4 consult 41:6, 42:3, 42:13, 42:14, 73:14 consultant 14:5, 14:8	consultation 69:7 consulted 17:1, 41:2 cont'd 3:1, 4:1 contact 26:8 contain 25:23, 26:8 context 57:7 continue 14:22, 31:19 contracts 120:13, 120:23 control 41:22 controls 41:24 convention 21:15, 21:19, 21:20, 21:23, 30:15, 30:18, 36:4, 36:5, 36:17, 44:8, 44:24, 52:12, 70:14 conventions 76:3, 76:23, 92:13, 131:4 conversation 70:7, 86:22, 87:7, 130:10, 130:12, 130:13, 131:14, 131:20 conversations 42:11, 71:9, 74:13, 76:13, 130:14, 130:17 cook 100:10 cooper 17:25, 18:1 cooper's 90:12, 92:22 coordinate 14:24	copies 15:20 copy 39:15, 135:17, 136:3, 136:8 corporate 37:16, 49:23 correct 24:13, 46:23, 54:9, 54:12, 59:17, 59:18, 64:13, 79:16, 85:23, 94:6, 113:2, 119:9, 119:10, 121:25, 135:10, 137:9 correctly 38:17, 48:14 cottonport 66:15 could 10:20, 25:17, 26:17, 27:4, 28:23, 33:10, 56:18, 73:21, 74:15, 78:6, 95:7, 95:24, 96:17, 97:16, 100:2, 110:4, 114:11, 114:15, 118:12, 125:11, 126:10, 128:12, 128:16, 128:17, 136:1 couldn't 80:2, 104:21 council 9:19, 9:21 counsel 41:3, 42:11, 69:7, 69:8, 71:9, 71:10, 72:23, 122:6, 122:11, 135:25, 137:8, 137:12 counties 68:9 counting 60:7	country 69:1 county 137:2, 137:21 couple 15:23, 105:2 court 1:1, 7:2, 7:11, 7:21, 9:3, 10:14, 10:19, 48:13, 48:22, 53:15, 57:13, 94:9, 135:21, 135:24, 136:5, 136:9, 136:11, 137:3 courtroom 11:22 courtrooms 91:18 cover 24:15 covered 76:17, 82:21 covers 70:8 cozen 4:11 crackers 66:14 create 80:11 created 90:11 cross-reference 64:8, 72:3, 127:4 cross-referenced 71:12, 71:16, 72:3, 72:10, 126:6, 129:5 cross-referencing 68:10 crow 101:12, 101:13 crr 137:20 culture 58:5
--	--	--	---

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

<p>cumbersome 107:2</p> <p>curious 126:17</p> <p>current 8:13, 8:23, 13:3, 80:5</p> <p>currently 30:11, 37:10</p> <p>cut 26:18, 98:25</p> <p>cycle 40:16, 45:24</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>daily 21:4, 46:5</p> <p>dakota 4:10, 8:25</p> <p>damaged 100:16</p> <p>date 40:5, 50:17, 88:20, 123:8, 123:10</p> <p>day 35:8, 65:24, 101:23, 103:9, 123:15, 137:16</p> <p>deal 32:23, 65:3, 65:5, 86:25</p> <p>dealing 40:14, 53:8</p> <p>deceased 35:11</p> <p>decided 70:18, 70:21</p> <p>decision 40:24</p> <p>declaratory 5:19, 39:21</p> <p>declare 48:18, 48:22</p> <p>deemed 20:13</p> <p>defendant 1:12, 2:15,</p>	<p>3:3, 5:24, 7:18, 60:20</p> <p>defendant's 6:4, 94:21, 95:11</p> <p>defendants 121:6</p> <p>defense 2:6</p> <p>definition 55:10</p> <p>demand 40:22</p> <p>democrat 114:20</p> <p>democratic 54:6, 102:9</p> <p>demographer 17:21</p> <p>denial 80:1</p> <p>denied 79:19, 80:5, 80:10</p> <p>department 20:19</p> <p>depends 21:5, 36:3, 77:12</p> <p>deponent 136:14</p> <p>deposed 9:2, 10:1</p> <p>deposition 1:15, 2:1, 5:14, 7:16, 8:2, 9:1, 9:7, 16:3, 16:21, 22:15, 29:25, 39:24, 79:21, 134:9, 135:15, 136:16</p> <p>description 5:12, 6:2</p> <p>desegregation 65:8</p> <p>designee 16:10</p> <p>determination 91:7</p>	<p>determine 41:18, 57:9</p> <p>determined 96:22, 97:11</p> <p>determines 33:16, 33:17</p> <p>dick 1:8</p> <p>difference 19:6</p> <p>different 24:14, 116:11, 120:7, 127:20</p> <p>dinner 22:8</p> <p>direct 79:8, 79:12, 82:6, 82:7, 82:17, 89:18, 94:1, 115:15, 122:15, 129:22</p> <p>directors 22:19</p> <p>dirty 67:17</p> <p>discover 6:5</p> <p>discovery 94:22, 95:12, 97:12</p> <p>discrepancies 131:10</p> <p>discussed 71:9, 113:6, 120:3</p> <p>discussing 55:7</p> <p>discussions 42:10, 69:7</p> <p>dispute 25:16</p> <p>dist 67:10</p> <p>distressed 99:7</p> <p>district 1:1, 1:2, 7:21, 15:8, 23:24,</p>	<p>24:5, 24:9, 24:18, 26:10, 26:20, 61:25, 62:17, 64:20, 66:24, 67:2, 67:25, 69:12, 70:8, 77:9, 77:13, 77:17, 78:12, 79:6, 79:10, 79:15, 80:17, 80:19, 80:22, 83:5, 83:6, 83:10, 85:16, 87:20, 88:14, 89:14, 89:15, 89:16, 89:21, 114:7, 114:12, 117:13, 117:14, 117:15, 118:1, 124:9, 124:16, 125:4, 125:22, 125:23, 126:13, 126:22, 127:2, 128:6, 128:22, 128:23, 128:24, 128:25, 129:10, 129:14, 129:18, 130:11, 130:23, 131:15, 131:23, 132:2, 132:6</p> <p>districts 46:3, 56:2, 62:14, 62:24, 63:8, 63:22, 64:10, 66:4, 68:5, 68:6, 68:14, 70:5, 70:20, 71:3, 72:22, 74:2, 74:4, 74:8, 74:16, 74:18, 74:22, 75:2, 75:14, 76:5, 76:6, 76:9, 76:11, 77:5, 78:13, 78:17, 81:8, 81:14,</p>
--	---	--	---

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

146

81:21, 82:1, 82:13, 83:21, 83:23, 84:4, 84:16, 85:14, 85:22, 86:2, 86:10, 86:16, 87:2, 87:17, 88:25, 89:6, 90:11, 90:12, 90:14, 90:16, 90:22, 91:5, 92:8, 92:15, 92:16, 92:21, 92:23, 93:2, 94:5, 116:12, 116:14, 131:7, 132:11, 132:16, 132:24, 133:21 diverse 56:15, 77:7, 77:25, 78:4, 89:11 diversity 78:5, 89:12 diverted 102:16, 102:25, 103:1 dock 100:12 document 15:12, 15:25, 25:3, 25:11, 39:2, 39:9, 39:19, 39:23, 59:20, 60:9, 60:13, 60:17, 74:6, 94:7, 94:20, 95:5, 95:9, 95:19 documents 5:28, 17:12, 18:4, 60:22, 76:14, 81:25, 91:6, 121:18, 123:18, 124:3 doing 22:3, 53:2, 64:16, 65:23,	86:12, 86:19, 98:25, 105:16, 110:11 done 27:15, 49:8, 49:10, 54:5, 64:1, 70:12, 94:18, 106:14, 107:7 dorothy 1:4 double 103:5 doubting 67:21 down 13:7, 17:2, 18:11, 22:3, 26:3, 26:16, 28:17, 48:6, 62:2, 62:6, 63:8, 66:18, 72:15, 72:20, 77:3, 90:4, 95:1, 102:14, 103:22, 109:20, 109:23, 110:1, 110:8, 123:9 downsize 104:5, 104:18 dr 1:4 draw 56:17, 125:7 drawn 111:11, 129:7, 131:11 drive 3:14, 8:18 dues 12:9, 12:22, 28:15, 29:9, 29:10, 31:14, 31:19, 31:23, 31:25, 32:4, 32:18, 32:19, 33:2, 68:19 duly 7:7	.dumps 110:8 during 9:19, 30:17, 44:7, 51:6, 52:25, 98:3 duties 14:20, 14:22 <hr/> E <hr/> e-mail 26:22, 26:25 each 26:23, 36:25, 61:25, 62:13, 66:3, 66:20, 74:8, 75:1, 76:8, 76:11, 77:5, 81:7, 82:1, 82:13, 83:20, 84:16, 87:25, 88:13, 90:10, 92:20, 94:4 earlier 30:7, 54:8, 64:11, 68:4, 86:7, 113:7, 115:23, 119:8, 121:17, 127:3, 134:19 early 107:16, 108:9, 108:10 easier 10:19, 15:21, 99:10, 99:12, 107:2 easily 68:12, 103:21 east 93:9 easy 68:11, 91:3, 93:8 eat 67:16, 83:7 eaten 66:14, 91:19	economically 112:6 educational 2:7 effective 35:5, 35:6 efforts 105:7 eight 24:2, 24:3, 26:12 either 33:13, 68:18, 68:19, 106:14 elect 45:21, 46:15, 55:19, 59:5, 59:11, 111:5, 113:19, 115:24, 116:13 elected 13:15, 14:18, 97:3, 118:14 election 115:1, 132:7 elections 102:5, 120:10, 132:3, 133:19 electronic 106:11 else 18:7, 52:17, 72:1, 130:18 elude 123:3 eludes 105:14, 105:17, 114:9 emotionally 99:7, 112:5 employ 43:16, 43:17, 43:23, 86:24, 87:1 employed 51:16 employee 13:21
--	---	--	---

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

<p>employees 21:11 enacted 97:2, 97:21, 102:16, 103:14, 105:8, 108:24, 109:8, 111:6, 111:17, 113:20, 118:2 enactment 97:25 encourage 100:2 encouragement 100:2 end 26:6, 45:6, 45:7, 77:3, 122:1 endurance 11:12 engage 104:14 enough 10:9, 33:22, 58:17, 66:21, 116:23, 117:1, 118:8, 118:13 entered 8:1, 8:25, 22:14, 29:24 entire 39:10, 40:18, 42:19, 47:16, 47:18, 48:22, 60:9, 88:7 entities 50:9 entitled 47:11 entity 49:24 erica 121:8, 122:21, 136:6 erika 3:12 escort 9:22</p>	<p>esq 2:8, 2:9, 2:10, 2:16, 2:17, 3:4, 3:5, 3:12, 4:8, 4:9, 4:10, 4:13, 8:1, 8:25, 22:14 est 1:21 establish 46:24 et 1:5 even 79:22, 80:14, 80:21, 89:3, 123:10 event 22:10, 137:14 events 21:17, 103:12 ever 9:2 every 41:7, 44:24, 52:8, 62:17, 65:19, 67:9, 73:5, 76:25, 79:14, 80:16, 89:21 everybody 8:9, 68:24, 111:11, 116:6 everyone 35:3, 45:10, 116:3 everything 123:9 exact 57:10 exactly 80:16 examination 5:5, 5:7, 5:9, 7:13, 121:11, 134:16 examined 7:9, 137:8 examining 108:9</p>	<p>example 117:12, 124:9, 128:24 excellent 15:17, 16:15 excited 75:15, 98:9, 98:15, 99:1, 99:10, 99:13, 99:17, 101:3, 101:5, 102:8, 102:13, 104:16, 104:17, 104:25, 105:4, 109:13, 109:16 excuse 28:6, 37:13, 44:2, 60:1, 64:20, 98:21, 108:10 executive 5:15, 22:22, 22:24, 23:1, 23:3, 23:9, 23:14, 23:16, 25:14, 25:25 exhibit 5:13, 5:15, 5:18, 5:21, 6:3, 15:14, 15:15, 15:24, 16:15, 16:18, 16:22, 17:11, 18:12, 25:4, 25:6, 28:18, 39:3, 39:5, 49:11, 59:23, 59:25, 60:1, 60:2, 60:5, 61:1, 73:22, 94:18, 94:23, 94:24, 113:2, 113:5, 121:21 exhibits 135:22, 136:4, 136:9 expand 57:6</p>	<p>expanded 56:2 expanding 57:4, 108:10, 115:23, 116:2 expands 107:14 expected 19:1 expert 17:23 expires 137:5 explain 40:13, 55:12 explained 134:23 explanation 31:10 extent 42:6, 43:10, 44:11, 46:17, 55:14, 66:7, 82:20, 84:7, 111:20, 124:12, 129:19 eyes 90:3</p> <hr/> <p style="text-align: center;">F</p> <hr/> <p>face 65:25, 100:8, 101:7 faced 97:4 facilitate 14:24 fact 69:3, 72:14, 72:16, 75:7, 76:5, 84:15, 96:20, 133:17 failed 32:19 fair 10:9, 24:18, 29:21, 31:7, 33:23, 45:8,</p>
--	--	---	---

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

148

58:17, 81:20, 92:1, 135:7 faith 100:6, 100:7, 100:22, 100:24 fall 20:11 fallen 34:21 familiar 9:25, 16:23, 18:15, 28:14, 34:8, 41:25, 65:18, 65:19, 65:20, 66:2, 85:13, 95:5, 104:3, 104:7, 105:19, 107:9, 107:12, 107:16, 112:12, 117:20, 117:21 familiarize 48:9 families 101:18, 101:19 family 34:18, 110:9 far 95:5 federal 123:23 feel 76:20, 110:4 fees 31:25 fell 128:23 festivals 83:8 few 7:24, 10:11, 55:25, 97:17, 118:18, 121:14, 134:13 fifth 2:12 fighting 45:2	file 20:5, 20:12, 20:14, 51:24, 52:21, 53:19 filed 79:18 filing 40:5, 42:16, 44:4, 44:15 filled 110:23 finally 99:2, 110:4 finances 103:1 financial 20:5, 20:18, 20:19 financially 112:5 find 34:17 fine 15:22, 39:17, 63:5, 73:8, 73:10, 73:13, 73:16, 109:23 finish 10:21, 10:23, 11:15 finished 61:16, 96:8 firm 7:17 first 5:25, 5:26, 6:4, 7:7, 20:13, 27:23, 28:4, 28:5, 40:2, 50:16, 60:20, 60:21, 61:19, 62:4, 78:20, 80:15, 94:22, 95:11, 97:18, 124:23 five 13:14, 51:1, 51:3, 73:5,	117:6 five-minute 49:8, 72:24 fix 84:24 floods 85:2 floor 2:12 flower 34:19 focus 122:3 folks 47:8, 58:25, 59:14 follow 19:1 follow-up 121:15 following 62:14, 81:8 follows 7:10 font 40:3 football 65:13, 67:16, 83:7, 91:17 foregoing 137:8 forever 13:13 forgot 53:13 form 14:14, 106:21 four 26:11 framework 18:21 free 21:21, 76:20 freedom 21:15, 64:25, 76:24, 83:8 freely 107:3	friday 1:20, 22:10 friend 115:6, 133:11, 133:13 friends 46:9, 88:22 full 8:4, 137:9 fund 2:7, 21:15, 65:1, 76:24, 83:8, 97:8 funded 21:13, 21:14 funds 21:17 funerals 66:19, 72:18 further 96:4, 121:4, 135:11, 135:16, 136:14, 137:11 future 106:1, 107:8, 132:3, 133:18
G			
			gained 98:8 galas 76:25 games 65:13, 83:7 gave 14:14, 27:20 geared 98:3, 100:17, 102:10, 104:17 general 35:7, 41:3, 71:10, 113:17, 130:13, 130:16, 131:5 general's 4:6 generally 9:17, 107:14

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

149

<p>getting 22:17, 36:3, 63:11, 67:23, 98:25, 100:17, 102:10, 102:12, 104:17, 109:15</p> <p>giglio 4:9, 8:1</p> <p>give 10:15, 10:21, 27:17, 39:11, 48:8, 51:8, 52:16, 59:10, 71:8, 118:13</p> <p>given 100:2, 137:15</p> <p>gives 69:6</p> <p>glad 22:7, 45:16</p> <p>global 44:19, 44:20, 87:4</p> <p>go 11:12, 17:2, 21:4, 22:2, 26:5, 32:5, 32:23, 35:19, 36:4, 44:10, 44:12, 45:25, 46:1, 46:4, 49:11, 51:18, 52:20, 60:15, 65:10, 67:21, 68:21, 70:1, 72:7, 72:9, 73:4, 77:3, 81:2, 83:7, 83:8, 83:9, 83:11, 85:15, 90:1, 90:3, 91:22, 91:23, 91:24, 96:4, 100:3, 101:5, 101:16, 102:2, 103:10, 103:17, 103:20, 104:13, 104:15, 109:21,</p>	<p>112:24, 118:4, 120:20, 127:15, 127:16, 127:17, 127:18, 128:11, 130:25</p> <p>goes 30:7, 31:25, 109:22, 109:23, 118:6</p> <p>going 10:10, 11:2, 11:9, 15:11, 15:23, 22:8, 22:9, 24:11, 28:9, 40:17, 40:20, 45:1, 45:8, 49:12, 52:9, 52:18, 53:10, 70:18, 73:6, 75:5, 76:23, 76:24, 78:6, 79:14, 80:18, 89:20, 90:19, 97:17, 98:10, 98:14, 98:15, 99:1, 99:5, 99:15, 100:5, 100:9, 100:25, 101:9, 101:21, 102:6, 102:13, 103:4, 103:5, 104:5, 106:13, 110:12, 110:24, 117:9, 117:11, 134:9</p> <p>gone 8:7, 64:24, 65:2, 65:4, 65:6, 65:9, 65:12, 65:13, 66:11, 66:12, 66:13, 66:17, 66:20, 66:21</p> <p>gonna 98:20, 101:15, 101:22, 101:23, 103:3, 104:6, 107:7</p>	<p>good 7:2, 7:15, 10:24, 10:25, 11:4, 11:7, 20:1, 29:6, 29:10, 30:2, 30:4, 30:6, 30:11, 30:19, 31:1, 31:2, 31:6, 31:10, 31:20, 51:22, 54:21, 54:22, 58:1, 68:15, 68:21, 69:25, 75:25, 88:3, 88:20, 89:2, 99:21, 99:22, 100:16, 106:17, 110:11, 118:19, 118:21, 118:22</p> <p>gotten 69:23, 116:4</p> <p>government 104:18, 121:1</p> <p>grandkids 110:14</p> <p>great 8:21, 11:1, 12:3, 13:11, 17:3, 17:9, 18:2, 19:13, 19:24, 22:4, 22:9, 29:19, 31:17, 39:22, 40:7, 45:19, 45:20, 47:23, 50:8, 58:2, 58:5, 58:7, 58:14, 61:13, 62:3, 62:16, 95:8, 96:10, 105:5, 119:2, 119:3, 134:2</p> <p>greater 56:5, 59:10, 59:11</p> <p>greatest 52:15</p>	<p>grew 101:12, 101:13</p> <p>grieve 85:7</p> <p>ground 10:11</p> <p>grounds 115:16</p> <p>groundwork 18:21</p> <p>group 14:12, 70:18, 70:21</p> <p>grow 101:12</p> <p>guess 73:3</p> <p>guest 41:14, 41:15, 41:19, 105:3</p> <p>gumbo 57:24, 58:14, 58:20, 66:14</p> <p>guy 133:12</p> <hr/> <p style="text-align: center;">H</p> <hr/> <p>hall 104:3</p> <p>halls 104:10</p> <p>hand 7:4, 107:21, 111:12, 111:13, 137:15</p> <p>happen 98:17, 102:13, 110:13</p> <p>happened 99:14</p> <p>happening 107:6, 109:16</p> <p>happens 32:14, 33:24, 35:16, 51:12, 52:4, 110:16, 116:4</p> <p>happily 43:14, 107:3</p>
--	--	---	--

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

150

<p>happy 11:15 hard 15:19, 39:15, 54:19, 118:25 harder 99:9 harm 96:25, 97:19, 100:14, 101:10, 101:19, 108:22, 109:2, 109:5, 109:7, 113:13, 113:17, 116:14, 116:17, 116:21, 120:3, 120:17 harmed 111:16, 117:1, 117:4, 118:1, 118:17 harmony 14:4, 14:16 harms 101:20 hb 48:18, 49:3 head 63:3, 77:19, 77:23, 77:24, 81:16, 83:24, 87:15, 114:10 headed 92:18 headquartered 18:21 healthcare 83:12, 83:13, 110:20, 110:21 hear 54:10, 78:20, 99:24, 132:21 heaven 52:16, 123:4 held 2:1 help 10:12, 85:7, 108:16, 117:17,</p>	<p>123:12 helped 84:24, 118:16 here 8:9, 11:20, 14:4, 16:6, 16:17, 19:11, 42:20, 49:19, 53:10, 57:24, 78:14, 85:13, 88:24, 89:23, 91:19, 91:20, 103:4, 107:22, 119:21, 122:1 highway 8:19, 21:1 hillsborough 2:19 hispanic 98:22 hispanics 58:12 history 43:15, 58:6, 100:19 hmm 116:10 hold 14:17 holt 2:16, 5:5, 7:14, 7:15, 15:17, 15:18, 16:14, 18:11, 25:2, 25:8, 25:20, 26:2, 26:5, 26:15, 28:9, 28:17, 39:1, 39:7, 39:13, 40:1, 40:4, 46:21, 47:1, 47:3, 47:22, 48:5, 49:10, 49:15, 49:16, 57:12, 57:17, 59:19, 60:1, 60:6, 60:11, 60:15,</p>	<p>60:25, 61:2, 61:10, 62:2, 73:1, 73:9, 73:14, 73:19, 73:21, 79:13, 79:23, 80:9, 80:18, 80:21, 80:24, 81:1, 82:7, 82:9, 82:10, 82:18, 82:24, 86:17, 89:19, 89:23, 89:25, 90:5, 94:2, 94:18, 95:1, 95:3, 95:7, 95:18, 95:24, 96:5, 96:11, 108:3, 112:25, 113:4, 114:6, 115:16, 115:21, 118:18, 118:23, 119:3, 119:5, 119:7, 120:16, 121:4, 134:8, 134:15, 135:13, 135:23 home 14:3, 14:6, 66:5, 66:20, 67:3, 85:15, 128:10 homes 66:11, 66:13, 67:12, 67:13, 67:18, 67:19, 67:22, 71:24, 85:11, 85:12, 91:17 honestly 12:1 hope 29:8, 45:17, 56:16, 110:5, 110:7, 133:24 host 21:16, 131:6 hostetler 3:13</p>	<p>hotel 103:8 hour 49:13 hour's 122:2 house 47:17, 49:3, 53:12, 55:24, 63:8, 64:19, 68:6, 81:8, 81:13, 81:21, 82:1, 82:13, 83:5, 83:21, 83:22, 83:23, 84:4, 84:16, 84:24, 84:25, 85:14, 85:16, 85:21, 86:2, 86:9, 86:16, 87:2, 87:17, 87:20, 88:14, 88:25, 89:4, 89:6, 89:14, 89:15, 89:16, 89:21, 90:14, 98:12, 100:23, 101:4, 117:13, 124:9, 124:16, 125:3, 125:22, 125:23, 126:11, 126:12, 126:21, 127:2, 128:5, 128:12, 128:16, 128:22, 128:23, 128:24, 129:18, 130:10, 130:23, 131:7, 131:15, 131:23, 132:2, 132:6, 132:8, 132:11 houses 85:9, 125:24 however 82:22, 84:9 hurricane 85:3 hybrid 106:14</p>
---	--	---	--

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

151

I			
identifi	illegal	individual	interrogatories
126:20	17:15, 40:20,	37:25, 97:9,	5:26, 16:24,
identification	48:23, 52:19,	109:7, 119:23	60:21
15:15, 25:6,	78:25, 83:4,	individually	interrogatory
39:5, 60:2,	83:17, 90:25,	29:14, 87:3,	17:4, 17:6,
74:1, 94:24	91:11, 97:25,	87:14, 88:10,	17:7, 17:10,
identified	98:12, 123:21,	130:6, 130:7	61:15, 75:21,
32:15, 62:12,	126:7, 131:10	individuals	86:1, 94:5,
63:16, 63:21,	illegally	76:10	95:21, 96:6,
67:1, 67:24,	111:11	information	96:7, 121:20,
69:3, 69:12,	illustrative	26:9, 27:5,	122:4, 122:7,
74:4, 77:17,	17:17, 17:19,	27:18, 42:7,	123:7, 123:20,
79:5, 79:10,	64:3, 71:13,	43:11, 76:17,	124:7, 125:20,
81:6, 82:13,	74:12, 78:25,	79:19, 80:7,	126:19, 126:25,
83:20, 89:6,	83:3, 83:17,	92:4, 96:24,	127:23, 128:20,
89:16, 90:9,	90:13, 90:14,	114:4, 115:18,	129:16, 130:22,
93:12, 93:15,	90:16, 90:22,	129:24, 135:20	131:17, 132:13,
94:4, 97:10,	90:24, 91:12,	informed	132:17, 132:25
98:7, 124:19,	92:8, 92:23,	53:9	interrupt
124:20, 124:22,	123:22, 126:6	initial	97:15, 131:12
124:23, 124:25,	imagine	17:5	intervenors
125:25, 129:8,	12:8, 19:21,	injunctive	3:11, 121:10,
129:13, 130:24,	32:20	5:20, 39:21	136:7
131:4, 132:12,	important	installation	intimately
132:16, 132:25	106:5, 106:25,	127:17	133:15
identify	108:11	instance	introduced
27:4, 34:4,	improper	56:12, 59:12	17:18
61:24, 71:4,	79:21, 80:14	instructing	invite
74:15, 77:19,	inadequate	125:14	71:8
87:19, 88:25,	83:12	instruction	invited
90:21, 91:3,	inc	79:14, 89:20	35:7
92:7, 93:22,	2:7	instructions	invites
122:17, 124:8,	include	134:11, 135:16	69:6
124:14, 124:17,	56:3, 58:20,	intend	involved
124:18, 125:2,	61:11, 96:22,	79:23, 133:18	40:9, 40:10,
125:10, 125:20,	96:24	intends	53:13, 53:16,
126:3, 126:10,	included	96:19, 132:2	120:3
126:20, 127:1,	70:19	interchangeable	involvement
127:4, 127:19,	includes	19:11	44:9
128:4, 128:13,	28:25, 111:22	interest	issue
128:15, 128:17	including	131:5	65:7, 73:12
identifying	71:10, 90:13,	interested	issues
74:18	97:7	137:13	41:10, 45:1,
identities	inclusive	interests	45:3, 51:13,
28:3, 97:11	28:24, 29:1	119:18, 120:1	53:7, 70:14,
identity	income	internally	86:24, 97:4
67:2	13:25, 14:15	112:5	itself
	indeed	international	27:12
	103:18	20:20	

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

152

J			
jack 4:16, 29:24	123:10 kin 99:19	78:1, 88:1, 90:1, 90:7, 95:19, 96:14, 115:1, 132:7	87:5, 88:4, 91:4, 91:25, 105:13, 127:7
jackson 4:18	kind 30:14, 39:10, 39:11, 39:13, 94:15	lastly 11:19	least 20:4, 30:25, 31:2, 36:15, 36:19, 51:5, 62:12, 63:17, 63:20, 66:3, 67:8, 67:11, 67:24, 69:14, 71:18, 81:6, 82:12, 83:20, 84:3, 84:4, 84:15, 88:13, 90:9, 128:15
jaguars 85:11	kinds 22:12	later 114:11	leave 134:9
jim 101:12, 101:13	knehans 4:10, 8:25	law 7:17, 47:11, 101:13, 107:6	leaving 135:15
job 1:23, 11:4	knew 40:16, 40:21, 98:10	lawsuit 40:9, 40:10, 42:5, 43:8, 44:3, 51:9, 51:25, 52:21, 53:13, 53:19, 70:22, 131:1	leg 59:8
john 3:4, 3:5	knowing 83:19	lawyer's 60:7	legal 2:6, 28:8, 46:18, 46:23, 47:1, 48:25, 55:14, 62:20, 64:2, 71:12, 74:12, 113:22, 115:3
johnson 1:10	knowledge 29:3, 61:8, 72:14, 78:18, 78:23, 82:12, 83:18, 92:2, 92:3, 113:24, 113:25, 124:5, 127:6	lawyers 17:1, 52:15, 74:11, 75:12, 78:24, 83:19, 91:1, 91:9, 92:4, 122:23, 129:4	legislation 108:16, 116:22, 116:25, 117:3, 118:7, 118:15
join 40:24, 43:14, 43:22, 44:3	known 86:11, 87:24, 87:25	ldf 122:22, 122:23, 122:25	legislative 3:11, 56:6, 59:9, 98:4, 98:5, 105:6, 116:12, 121:9, 136:7
jr 3:5	kyle 1:8, 7:18	leader 87:7	legislative-crea- ted 105:23
judge 1:7, 1:9, 11:22	L	leaders 74:17, 74:23, 74:25, 75:20, 85:25	legislature 46:10, 56:7, 58:7, 58:11, 58:12, 58:15, 118:6, 118:12,
judgment 5:19, 39:21	la 3:8	leadership 42:25, 51:1, 53:4, 53:5, 53:24, 65:18, 65:20, 69:16, 69:18, 69:19, 69:22, 69:24, 70:3, 71:18, 71:20, 74:21, 75:10, 76:7, 76:9, 76:12, 86:6, 86:25,	
june 90:13	lack 23:3, 28:15, 37:15, 97:3, 98:2		
jurisdiction 24:12, 24:15, 24:20, 70:8	lagroue 4:5		
jury 11:22	large 38:5		
K	larger 68:5		
keep 29:8, 30:14, 53:9, 86:19, 92:14, 98:14, 99:5, 100:6, 100:7, 101:18, 122:2, 131:13	last 9:11, 10:8, 16:15, 30:17, 51:17, 54:10, 61:1, 66:15,		
keeps 30:8, 73:6			
kicking 83:10			
kids 83:10, 89:3, 101:11, 110:13,			

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

153

<p>120:4, 120:12 less 34:5, 112:8 let's 8:15, 11:19, 25:20, 26:17, 44:10, 44:12, 46:1, 51:18, 52:20, 52:21, 81:2, 81:17, 89:14, 95:25, 101:2, 101:18, 118:24 lied 101:8 life 12:10, 12:11, 12:12, 12:13 lifetime 10:5 likely 96:22, 97:7, 125:6 liken 99:19 limited 55:25, 57:5, 58:9 line 49:9 lines 106:19, 106:23, 129:7 list 34:23, 35:12, 35:13, 36:23, 36:24, 41:16, 72:4, 74:6, 74:9, 74:10, 79:15, 81:24, 82:2, 91:8, 123:24 listed 16:18, 26:13, 27:22, 62:17, 78:14, 81:21, 85:22, 89:23, 94:5</p>	<p>lists 35:21, 66:24, 70:25, 121:19 literally 83:11, 92:16 litigation 27:24, 40:25, 41:5, 42:16, 43:21, 44:4, 44:15, 45:12, 45:15, 47:15, 50:15, 51:17, 51:18, 55:9, 70:9, 76:3, 77:2, 77:4, 92:18, 92:19, 120:15 little 9:25, 10:19, 14:6, 26:5, 40:2, 40:13, 70:23, 73:5, 82:18, 95:15, 96:4, 99:9, 100:13, 114:11, 116:11, 133:13 live 24:7, 24:9, 24:19, 33:10, 33:14, 42:21, 67:5, 74:15, 76:11, 79:5, 84:20, 91:4, 92:7, 110:14, 114:8, 128:18 lived 87:19, 87:24, 128:9 lives 33:17, 46:5, 69:18, 74:8, 76:8, 79:5, 80:22, 81:7, 82:1, 84:4, 89:16, 90:22, 91:2, 91:4, 92:20, 117:25, 124:9, 124:15,</p>	<p>125:3, 125:21, 126:21, 127:2, 129:13, 129:17, 130:23, 131:23, 132:2, 132:6 living 61:25, 63:21, 70:4, 84:16 llp 2:18 local 12:18, 42:4, 42:16, 42:18, 42:20, 42:22, 44:2, 70:7, 70:25, 94:10, 121:1 located 33:8, 33:14, 33:15, 68:11, 77:13, 91:14, 126:13, 127:5 locations 107:15, 108:9, 108:10 long 12:7, 13:12, 29:9, 60:24, 106:23, 123:13 longer 73:5, 98:22, 106:20, 118:21 look 15:20, 22:3, 27:14, 32:6, 32:7, 32:22, 35:25, 36:1, 36:12, 39:16, 46:11, 58:3, 58:4, 62:2, 70:1, 73:6, 74:9, 100:10, 110:12, 111:1, 111:10, 112:24, 117:2, 129:11, 130:25 looked 16:22, 17:15,</p>	<p>17:17, 18:4, 50:12, 52:18, 64:1, 64:3, 67:7, 69:15, 71:11, 83:3, 90:24, 91:10, 91:11, 112:13, 118:11, 123:21, 123:22, 124:1 looking 15:21, 61:13, 68:7, 68:9, 78:24, 78:25, 79:1, 83:16, 83:17, 104:13, 104:15, 123:8, 131:7 looks 13:14, 70:17, 98:16, 118:9 lopsided 52:19 lord 34:6, 46:12 losses 85:8 lot 46:14, 57:25, 66:13, 68:5, 87:10, 99:12 loud 48:17, 61:22, 62:9, 62:10, 81:5, 90:7, 96:18 louis 3:7 louisiana's 100:19 louisianan 64:23, 83:1, 90:23, 103:20 louisianans 97:5 lousyana 53:18, 99:5 love 22:13, 67:15,</p>
---	--	--	--

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

<p>109:15 low 109:20, 110:1 lsu 67:15 lunch 122:2 lying 100:16, 101:8</p> <hr/> <p style="text-align: center;">M</p> <hr/> <p>ma'am 8:11, 89:22 machine 106:11 machines 107:7 made 37:18, 40:24, 47:8, 49:20, 57:22, 57:25, 86:11 magistrate 1:9 maintain 20:3 majority 59:13 majority-black 90:11, 90:12 majority-minority 46:4, 98:11, 102:7 make 10:13, 10:15, 10:19, 23:13, 23:14, 31:9, 42:9, 46:10, 47:8, 47:14, 48:1, 49:18, 56:3, 58:25, 68:13, 69:5, 71:7, 91:7, 102:24, 104:6, 107:1, 109:24, 129:5 makes 58:1, 58:2,</p>	<p>99:9 making 7:23 man 100:15, 109:22 manager 14:3 manpower 98:18, 99:8, 103:1 many 19:18, 23:25, 37:1, 37:9, 37:20, 37:22, 42:24, 42:25, 43:16, 45:1, 54:22, 62:24, 64:24, 65:2, 65:4, 65:6, 65:9, 65:12, 67:17, 71:16, 75:8, 75:25, 81:13, 83:22, 83:23, 85:9 map 48:23, 49:2, 49:3, 71:14, 72:3, 72:4, 93:3, 118:13, 123:23, 124:1 maps 17:15, 17:17, 17:19, 17:21, 45:8, 47:19, 56:17, 59:4, 64:2, 64:3, 68:8, 71:12, 71:13, 72:10, 72:13, 74:12, 78:24, 78:25, 83:3, 83:4, 83:17, 90:24, 90:25, 91:11, 91:12, 97:3, 97:21, 97:25, 98:13, 102:6, 102:17, 103:14, 105:8, 108:24,</p>	<p>109:8, 111:7, 111:11, 111:17, 113:20, 118:2, 120:8, 123:21, 123:22, 126:6, 126:7, 131:10, 131:11 march 137:5 marches 43:18 mark 36:19, 59:23 marked 15:14, 15:15, 25:4, 25:6, 39:3, 39:5, 60:2, 94:23, 94:24 marksville 66:16 matter 50:13, 97:8, 118:5 matters 9:5, 10:3 maybe 53:23, 53:24, 84:7, 102:10, 102:11, 104:2, 118:12, 123:3, 130:6 mcclanahan 1:18, 2:1, 5:3, 7:3, 7:6, 7:23, 8:6, 12:4, 15:19, 16:16, 18:13, 24:22, 25:9, 39:8, 43:25, 45:13, 46:6, 46:19, 47:5, 47:24, 49:17, 55:15, 55:17, 57:11, 57:18, 60:10, 60:12, 61:3, 61:14, 65:23, 67:20, 69:6,</p>	<p>70:6, 70:23, 71:8, 73:20, 73:24, 74:4, 76:19, 79:4, 79:9, 80:21, 81:4, 81:12, 82:11, 82:22, 83:22, 84:9, 88:16, 88:24, 90:6, 90:18, 94:3, 95:2, 95:4, 95:20, 96:2, 96:6, 96:13, 96:23, 97:14, 105:19, 107:9, 107:21, 108:1, 108:4, 109:15, 110:10, 110:24, 111:4, 112:12, 112:23, 113:5, 113:23, 114:7, 115:20, 115:22, 119:8, 119:21, 121:13, 122:5, 132:19, 134:4, 134:14, 134:18 mcclanahan's 96:23, 121:24 mean 30:13, 32:17, 42:13, 42:19, 46:16, 53:23, 54:13, 56:22, 57:19, 63:16, 68:15, 74:24, 77:22, 77:23, 102:19, 131:12 means 23:12, 37:2, 37:4, 43:23, 63:20, 71:20, 86:7, 88:7 meant 46:22 mecklenburg 137:2, 137:21 media 43:20</p>
---	--	--	--

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

155

medication 83:12 meet 20:8, 50:25, 73:3, 122:10, 122:12 meeting 9:19, 35:7, 44:20, 44:21, 44:22, 51:20, 52:1, 54:4, 78:1, 86:13 meetings 44:7, 44:8, 44:23, 50:23, 51:7, 52:10, 52:25, 53:5, 53:22, 70:13, 75:6, 76:2, 76:22, 76:23, 87:11, 92:13, 123:5, 123:17, 131:3 melting 57:23 member's 78:6 members 18:22, 18:24, 20:4, 20:12, 25:24, 27:4, 28:3, 29:13, 31:9, 31:14, 32:3, 32:7, 35:12, 35:13, 37:9, 37:14, 37:18, 37:20, 38:1, 38:8, 38:19, 38:20, 38:23, 41:6, 41:8, 41:13, 41:24, 43:2, 43:3, 43:4, 43:13, 43:21, 45:5, 53:1, 54:3, 54:18, 54:20, 58:20, 58:21, 61:24,	64:9, 64:18, 64:19, 65:13, 65:22, 66:2, 66:5, 66:22, 67:21, 68:13, 68:21, 69:15, 70:19, 71:1, 71:2, 71:5, 72:17, 72:20, 74:1, 74:15, 75:13, 76:4, 76:6, 77:4, 77:6, 77:9, 78:2, 83:5, 83:14, 84:16, 84:18, 86:23, 89:5, 91:4, 92:7, 93:11, 93:14, 93:24, 94:4, 97:1, 98:6, 100:3, 100:23, 102:2, 102:5, 108:23, 109:7, 109:12, 110:2, 110:8, 111:15, 111:22, 113:14, 113:17, 116:14, 116:18, 120:5, 120:7, 128:14, 133:22 membership 12:17, 20:3, 20:4, 28:12, 28:13, 28:14, 29:9, 29:10, 31:25, 33:4, 34:23, 35:4, 35:18, 35:23, 36:20, 37:3, 42:25, 51:23, 52:20, 52:22, 53:17, 64:12, 64:15, 67:11, 70:25, 71:13, 71:17, 72:4, 77:7, 77:25, 78:4, 79:2, 87:1, 87:5,	88:4, 88:12, 89:10, 91:2, 91:13, 91:24, 127:14, 127:22, 134:19, 134:24, 135:2, 135:7 membership's 75:15 memberships 32:22, 52:24, 104:14 memorial 34:3 memory 67:19, 126:16 mentioned 18:9, 20:17, 21:19, 23:20, 23:24, 24:23, 35:11, 58:19, 104:9, 119:8 merely 82:20 met 51:2, 51:5, 65:25, 121:14, 122:6, 122:17, 122:25, 123:2, 123:14, 123:15 method 51:17 methods 43:16, 51:16, 86:23, 87:2 michael 1:18, 2:1, 5:3, 7:6, 8:6, 96:23 middle 1:2, 7:21 might 26:18, 35:24, 58:16, 65:18, 65:24, 66:20, 67:9, 116:4, 116:21, 118:4, 118:19, 124:23, 124:24, 126:10, 128:16, 129:7	mike 46:1 mind 18:7, 19:7, 19:9 mindset 99:16 mine 112:9, 114:15, 133:12, 133:13 minimum 28:19 minorities 59:13 minorities 59:13, 118:14 minute 48:8 misheard 122:19 missing 63:12 mission 14:23, 43:18, 43:23, 43:24, 96:25 misstates 121:23 mix 56:5, 57:6 moment 49:7 monday 41:7, 41:11, 52:9, 54:7, 54:18, 54:25, 76:1, 88:22 monitor 30:5 monitors 20:8 month 54:24 monthly 32:11, 54:12 more 26:11, 34:5, 40:3, 40:13,
--	--	---	--

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

156

<p>45:22, 56:3, 56:15, 57:19, 84:1, 84:23, 107:2, 118:10, 118:18, 133:7, 133:15 morning 7:2, 7:15 most 67:13, 67:18, 77:15, 110:6, 126:8 motion 79:18, 79:25, 80:1 motions 134:10, 135:16 move 10:12, 28:9, 28:10, 84:19, 101:15 moved 20:25 much 18:6, 22:16, 34:13, 103:5, 106:8, 118:21 mullins 2:18, 7:17 multiple 24:16, 33:21 murder 9:21 myself 91:23, 101:6</p> <hr/> <p style="text-align: center;">N</p> <hr/> <p>naacp 1:16, 2:6, 5:17, 5:21, 12:5, 12:14, 12:16, 13:5, 13:8, 14:23, 18:14, 18:16, 23:5, 23:16, 24:5, 25:3, 25:15, 28:12, 28:16, 37:10,</p>	<p>37:11, 37:25, 38:18, 40:19, 41:4, 43:14, 43:22, 53:1, 59:20, 60:18, 64:7, 69:8, 69:13, 75:16, 94:10, 94:14, 95:10, 96:22, 101:20, 107:1, 107:23, 108:6, 108:11, 109:21, 135:5, 135:8 naacp's 6:3, 28:3, 43:22, 94:21, 96:25 naifeh 2:10 nairne 1:4, 7:20 name 7:15, 8:4, 8:6, 8:7, 14:11, 34:22, 55:4, 117:19, 124:8, 124:15, 124:21, 124:22, 124:23, 124:24, 125:3, 125:8, 125:11, 126:21, 127:1, 127:9, 127:11 names 25:24, 26:8, 26:23, 35:24, 36:1, 74:7, 81:25, 94:11, 122:25, 123:10, 124:1 national 12:17, 20:6, 20:10, 23:5, 30:8, 31:24, 31:25, 32:2, 32:8, 35:9, 35:18, 36:4, 36:17, 38:13, 50:3, 50:6,</p>	<p>69:20 nationality 28:25, 56:4 native 64:22, 83:1, 87:23, 90:23, 103:20 navigation 126:11 nc 2:21 need 10:13, 11:13, 21:8, 30:24, 31:19, 50:14, 59:4, 73:11, 73:14, 80:10, 90:2, 90:3, 103:6, 103:8, 111:1, 135:19 needed 56:15 needs 24:19 neither 137:11 nelson 2:18, 7:17 never 36:24 new 2:13, 23:7, 33:11, 35:1, 35:4, 35:5, 35:12, 57:22, 57:23, 87:18, 87:24, 88:2, 88:14, 88:17, 89:1 newly 90:10, 90:11 next 10:23, 45:9, 45:10, 101:6 nicknames 8:8 night 41:7, 41:11,</p>	<p>52:9, 66:15, 78:1, 103:9 none 42:9, 69:5 nonpaying 32:14, 32:16, 32:17 north 64:4, 137:1, 137:4, 137:16, 137:21 notarial 137:15 notary 137:3, 137:20, 137:22 nothing 7:9, 34:7, 63:10, 83:11 notice 5:14, 15:13, 16:3, 34:12, 80:12 notices 34:13, 34:14, 34:15 notification 32:21 notify 34:4 number 5:12, 6:2, 19:22, 30:22, 30:23, 30:24, 36:14, 37:1, 37:4, 37:6, 37:8, 37:25, 38:2, 38:3, 38:6, 51:23, 63:6, 81:17, 86:22, 96:20 number's 37:24 numbers 35:25, 36:2, 36:6, 36:7, 36:8, 36:9, 36:10, 36:12,</p>
---	--	---	---

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

157

<p>36:13, 36:18, 38:6, 38:11, 63:12, 93:2 ny 2:13</p> <hr/> <p style="text-align: center;">O</p> <hr/> <p>o'connor 4:11 oath 11:21, 127:16 object 82:20 objection 19:4, 27:9, 28:7, 41:20, 42:6, 43:9, 44:5, 44:16, 46:17, 48:24, 51:10, 55:13, 56:10, 56:23, 57:8, 57:20, 58:22, 59:6, 62:19, 63:1, 63:18, 63:25, 64:21, 66:7, 67:4, 68:2, 68:17, 69:4, 70:10, 71:6, 72:6, 72:8, 74:19, 75:3, 75:22, 76:16, 79:7, 79:11, 80:18, 82:4, 82:16, 84:6, 86:3, 86:15, 86:20, 87:21, 88:18, 89:17, 89:20, 92:9, 92:24, 93:18, 93:25, 94:12, 97:22, 103:16, 104:11, 105:9, 106:6, 107:19, 108:12, 108:17, 108:25, 111:8, 111:18, 111:24, 113:21, 114:3,</p>	<p>115:2, 115:9, 115:14, 116:15, 119:19, 120:14, 120:24, 121:23, 122:13, 124:10, 125:7, 125:9, 125:13, 127:25, 129:19 objections 5:24, 60:20, 95:11 objective 108:11 obligations 97:13 oblige 11:16 observing 4:11 office 4:6, 12:17, 20:10, 20:11, 20:20, 20:22, 20:24, 21:2, 30:8, 31:24, 32:1, 32:2, 32:8, 35:9, 37:16, 38:14, 41:3, 101:3, 101:4 officers 23:11, 23:12, 23:19, 23:21, 23:23, 53:6 official 1:9, 7:18, 8:12 officially 8:10, 34:7 officials 97:4 often 32:8 oh 3:16, 41:7, 60:1, 86:17, 90:2, 96:3, 103:15, 103:18, 122:18, 134:15</p>	<p>ol 99:21, 99:22 old 23:7 oldest 68:25 once 29:5, 51:5, 51:6, 70:16, 100:19, 100:20, 116:21, 127:6, 130:24 one 9:11, 10:8, 11:5, 23:4, 24:19, 30:25, 31:2, 33:20, 33:22, 35:6, 41:10, 44:18, 45:3, 45:6, 51:13, 52:1, 53:9, 53:14, 54:24, 55:1, 56:18, 62:12, 63:17, 63:21, 66:3, 67:8, 67:9, 67:11, 67:24, 69:15, 71:18, 76:8, 77:5, 81:6, 82:12, 83:20, 84:1, 84:3, 84:15, 88:13, 90:9, 92:20, 94:8, 102:1, 111:20, 111:21, 112:1, 117:5, 117:8, 122:8, 122:9, 122:10, 123:15, 128:15, 129:10 one's 77:20 one-sided 52:19 one-third 58:19, 58:20, 58:24, 59:5,</p>	<p>59:8, 59:15 only 4:11, 23:4, 34:2, 34:3, 37:4, 66:13, 99:6, 101:5, 117:4 open 21:21, 134:10, 135:15 opportunity 45:21, 118:14 opposed 32:6, 133:15 options 55:25, 57:5, 58:8, 59:11, 115:24, 116:2 order 79:18 orders 136:1 organization 22:18, 61:25, 69:1, 94:15, 97:1, 97:20, 109:6 organizational 5:29, 18:15, 49:19, 60:22 orleans 33:11, 87:18, 87:24, 87:25, 88:3, 88:9, 88:14, 88:17, 89:1, 89:11, 93:7, 93:9, 104:16, 133:11 other 8:7, 10:3, 13:24, 17:12, 18:3, 23:18, 23:21, 23:23, 27:15, 27:16, 36:25, 41:6, 51:16, 56:4, 78:13, 85:21, 87:18, 91:6,</p>
--	---	--	--

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

158

<p>97:5, 97:6, 97:9, 102:20, 104:19, 116:12, 121:6, 122:10, 124:3, 132:11, 135:25 others 9:19, 58:4, 62:13, 81:7, 90:14, 123:3, 133:8, 133:14, 133:15 otherwise 137:13 out 9:23, 14:13, 20:13, 20:15, 34:17, 45:23, 48:16, 61:22, 62:9, 62:10, 81:5, 83:10, 87:12, 90:7, 96:17, 99:21, 99:22, 101:15, 115:7, 117:17, 123:25 outlines 123:25 outside 34:6, 66:16, 85:22, 106:23, 119:20, 120:14 over 10:4, 12:8, 16:22, 16:24, 53:3, 58:16, 64:6, 64:23, 72:18, 74:14, 86:6, 112:24, 123:15, 135:5 overall 59:16 overseeing 33:1 own 56:18, 78:18, 89:4, 120:10</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>page 5:3, 5:12,</p>	<p>5:16, 6:2, 16:15, 25:14, 25:23, 26:3, 39:11, 40:2, 47:22, 47:25, 48:2, 49:19, 61:1, 61:11, 61:12, 62:3, 95:8, 95:19, 95:25, 96:3, 96:12, 96:14, 113:6 pages 1:24 paid 13:17, 21:6, 21:11, 29:9, 29:10, 31:23, 32:3, 68:19, 68:23, 68:24 paper 106:14 parades 65:16 paragon 22:8 paragraph 48:16, 62:4, 62:5, 62:6, 73:25, 81:3, 90:2, 90:7, 96:14, 97:18, 113:7 parish 64:5, 72:13, 93:9, 93:10, 126:15, 127:5 parishes 24:16, 24:19, 42:24, 64:24, 68:8, 68:9, 68:10, 71:14, 71:15, 123:24, 123:25, 124:1, 126:7 part 34:25, 43:7, 51:6, 54:10,</p>	<p>61:20, 64:5, 69:19, 69:21, 75:15, 78:16, 78:21, 87:12, 97:18, 102:1, 120:17 participate 45:5, 99:18 participating 102:9 particular 24:8, 24:9, 29:21, 33:6, 33:13, 42:1, 55:4, 56:9, 56:12, 56:14, 59:12, 65:11, 67:8, 67:10, 68:14, 71:4, 74:16, 76:13, 91:5, 93:5, 99:2, 103:6, 103:11, 117:3, 128:13, 128:14, 129:9, 129:14 parties 41:22 parts 56:21, 57:4, 87:18 party 41:4, 41:23, 114:21, 137:13 pass 34:11, 45:8, 118:7 passed 17:16, 34:10, 64:2, 98:12, 107:6, 107:18, 108:16, 116:25, 117:7, 118:12 passes 33:24 past 118:17, 133:19 pay 12:9, 12:16,</p>	<p>12:22, 20:5, 20:6, 20:14, 28:14, 31:14, 31:19, 32:18, 32:19, 33:2 pays 33:1 pending 7:20, 134:10, 135:15 people 26:19, 27:22, 40:11, 40:22, 45:18, 45:19, 46:14, 53:3, 54:21, 55:19, 56:4, 57:3, 57:6, 99:1, 99:7, 100:15, 100:24, 102:8, 104:6, 104:17, 106:16, 107:3, 110:6, 115:24, 117:3, 131:11 perfect 26:7, 61:18 period 12:16, 106:16 periodic 35:17, 35:22 periodically 32:12 permanent 33:7 permissible 107:15 permission 27:18, 51:8 person 24:7, 33:4, 69:21, 117:8, 118:8, 124:25 personal 8:14, 8:16, 8:17, 8:23, 26:25, 78:18, 78:22, 82:12, 92:2, 92:3,</p>
---	--	--	--

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

159

<p>107:22, 108:1, 108:5, 115:6, 115:17, 133:8, 133:25 personally 36:22, 84:21, 93:23, 103:2, 108:19, 129:17, 130:2, 133:24 personally-ident- ifiable 80:7, 114:4 persons 27:4, 30:14, 34:11, 37:1, 38:21, 54:22, 56:3, 56:18, 56:21, 57:19, 91:22, 106:19, 116:24, 117:2, 118:10, 126:10 pertains 53:11, 58:25 phone 43:19 phrase 46:22, 55:18 physical 20:22 pick 116:24 picked 110:24 pickups 120:17 pictures 25:24 place 24:8, 68:21, 105:25 places 65:15, 66:17, 70:2, 71:17, 74:14, 128:11 plaintiff 5:21, 59:20, 60:18, 62:12, 67:24, 81:6,</p>	<p>83:19, 90:9, 96:19, 96:21, 97:10 plaintiffs 1:6, 5:29, 9:8, 48:12, 48:21, 60:23, 97:6, 97:9, 97:12 plan 98:1 planned 103:25, 104:2 plans 90:13 plant 34:19 please 7:3, 8:4, 10:15, 10:20, 11:5, 11:14, 15:14, 24:13, 25:5, 39:4, 48:5, 48:16, 57:14, 59:22, 60:8, 61:1, 61:14, 62:4, 62:11, 72:9, 73:22, 81:4, 90:7, 94:23, 95:8, 95:19, 95:24, 96:8, 96:11, 96:17, 120:20, 135:23, 136:4, 136:10 pleasure 51:15 plenty 42:23, 42:24 plethora 51:13 plight 110:3 point 35:15, 80:5, 114:5, 123:1 police 9:22, 65:3, 83:9, 110:15</p>	<p>policy 108:11 political 14:5, 14:8, 119:9, 119:11, 119:14 poor 55:6 population 58:4, 59:1, 59:16, 98:8 position 13:15, 13:17, 21:6, 24:10, 28:3, 101:4, 107:24, 111:15 positions 12:25, 14:17, 118:15 possible 72:25, 112:22 possibly 98:16 post 27:18 posting 27:4 postpone 104:4 postponed 103:13 pot 57:23, 57:24, 58:20, 58:21 potholes 110:23 power 99:22, 99:23 practice 134:10, 135:16 pray 85:6, 99:25, 100:1 prayer 21:17, 47:25, 113:6 praying 45:25</p>	<p>pre-trial 97:12 prefer 39:16 preparation 39:24 prepare 16:20, 122:3, 122:6, 123:6 prepared 17:2 preparing 36:16, 75:11, 77:3, 121:19, 123:19, 124:6, 125:2, 125:19, 126:19, 126:24, 127:22, 128:19, 129:15, 130:21, 130:25, 131:16 present 4:3, 51:19, 51:23, 54:4, 54:18, 54:20, 135:25 president 13:6, 13:12, 14:18, 14:21, 19:1, 23:20, 24:5, 42:3, 44:2, 44:14, 54:24, 55:2, 64:8, 70:7, 71:21, 72:11, 72:12, 76:19, 80:8, 84:9, 84:14, 85:4, 85:5, 86:14, 87:25, 88:8, 88:17, 96:23, 108:1, 109:14, 110:10, 110:23, 112:23, 113:23, 115:19, 119:20, 119:24, 120:20, 121:24, 133:11, 134:13, 134:18 presidents 15:9, 15:10,</p>
---	---	--	---

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

160

23:12, 23:25, 26:10, 26:20, 42:4, 42:15, 43:7, 50:23, 51:8, 51:19, 53:5, 54:3, 70:2, 70:3, 71:22, 92:7 pretty 18:6, 34:12, 88:3 prevent 11:25 previous 90:20 previously 35:11, 58:18, 109:5 primary 14:14 printing 26:18 printout 5:15, 25:14 private 115:18 privilege 27:24, 28:6, 42:8, 66:9, 73:13, 76:18, 122:14, 129:25 privileged 43:11, 84:7, 124:10, 124:13, 129:20 privileges 80:15, 82:21 probably 10:4, 10:5, 13:13, 14:16, 26:12, 32:5, 33:3, 34:18, 37:23, 38:7, 42:19, 44:22, 51:5, 52:4, 66:12, 75:8, 77:19, 77:20, 77:21, 77:23,	78:15, 84:24, 85:17, 85:18, 85:19, 85:20, 88:1, 93:3, 98:20, 105:11, 109:24, 114:11, 126:8, 127:16, 127:17 problem 11:18 proceeding 137:13 proceedings 49:14, 73:18, 119:4 process 10:12, 40:15, 44:25, 45:1, 45:4, 51:14, 52:5, 52:7, 54:6, 56:6, 59:10, 99:18, 99:19, 99:20, 100:5, 102:9, 102:10, 116:23 produce 94:11 produced 17:20, 17:22 production 5:27, 60:22 professional 10:5 promote 14:22 proper 109:17, 110:17 proportion 59:16 proposes 118:7 protected 28:4, 42:7, 66:8, 129:25 protest 83:9 prouty 3:12, 5:7,	121:8, 121:9, 121:12, 121:21, 122:16, 122:20, 125:14, 125:17, 125:18, 129:23, 130:1, 134:3, 136:6, 136:10 provide 36:22 public 21:22, 27:12, 137:4, 137:20 publicly 24:25 publicly-availab- le 27:5 pull 15:12, 25:2, 39:1, 50:14, 59:19, 59:22, 93:5, 94:20, 121:22 pumping 100:18 purpose 18:18, 74:18, 75:20 purposes 86:1 put 74:12 <hr/> Q <hr/> qualifications 28:11 quarterly 32:11, 44:8, 44:22, 44:23, 52:10, 52:25, 53:22, 70:13, 76:2, 76:22, 76:23, 92:12, 131:3 quasi 68:20 question 10:21, 10:23,	11:15, 13:20, 37:12, 44:1, 55:6, 56:25, 57:1, 57:18, 62:22, 69:9, 72:22, 75:18, 87:8, 88:15, 92:21, 93:7, 96:3, 109:3, 111:14, 122:19, 129:24 questioned 66:4, 70:4, 70:20, 133:3 questioning 49:9, 130:5 questions 7:25, 10:16, 11:3, 11:5, 11:25, 15:24, 30:21, 79:20, 80:2, 80:11, 90:19, 97:17, 107:24, 118:19, 121:4, 121:7, 121:15, 133:16, 134:4, 134:13, 135:12 quick 72:24 quite 18:6, 35:14, 51:22, 121:1 <hr/> Q <hr/> quo 109:18 <hr/> R <hr/> race 28:22, 56:9, 58:6, 116:4 racess 56:4 racism 110:1 racist 109:20 radio 98:24
---	--	---	---

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

161

<p>raise 7:3, 25:17, 43:19, 111:12, 111:13 raleigh 2:21 rallied 72:21 rallies 43:19, 65:14 rally 104:3 rarely 128:10 read 16:25, 48:14, 48:16, 57:14, 57:15, 61:14, 61:17, 61:22, 62:4, 62:9, 62:10, 81:4, 90:7, 96:17, 136:2 ready 11:10, 36:3, 98:25, 101:1, 101:2 real 11:21, 110:1 realized 40:19, 129:12 really 23:1, 30:3, 32:22, 79:21, 89:12, 99:16, 107:20, 108:19, 131:13, 134:5 reason 25:15 recall 9:10, 10:6, 10:8, 17:14, 30:17, 30:25, 54:23, 55:5, 61:3, 95:20, 122:24, 127:9, 130:9 receive 21:17, 36:24,</p>	<p>64:12, 64:14, 64:15, 64:16, 64:17 recently 9:7, 20:25, 30:12 recess 49:14, 73:18, 119:4 recognize 15:25, 25:11, 26:19, 39:8, 60:12 recollection 50:22 record 8:5, 10:14, 10:19, 31:17, 46:25, 48:17, 49:15, 57:15, 61:23, 62:11, 80:11, 80:14, 81:5, 90:8, 96:18, 119:6, 125:8, 127:11 recorded 34:1, 34:2, 34:7 records 106:12 rector 2:11 red 40:3 redirect 99:8 redistricting 40:15, 40:16, 45:4, 45:24, 51:14, 52:7, 53:10, 59:9 redondo 8:18 refer 103:19 referring 13:9, 17:5, 17:20, 55:18,</p>	<p>55:22, 56:20, 57:3, 57:7, 102:3 refers 78:5 reflected 135:8 reflects 86:25 regarding 16:17, 73:25, 78:17, 134:10 regards 107:24 regina 114:18 register 22:2 registered 8:22, 20:4, 29:2, 38:23, 78:9, 89:6, 93:12, 111:23, 131:23, 133:17 registration 65:5, 137:22 regular 35:7 regularly 34:13, 88:23, 105:15 reid 1:25, 137:3, 137:20 related 137:12 relevant 97:5, 107:20 relief 5:20, 39:21, 45:13, 45:18, 47:25, 55:8, 59:4, 113:6 rely 70:25 relying 38:10 remain 29:6</p>	<p>remember 31:4, 50:15, 55:1, 65:24, 65:25, 87:9, 125:12, 134:21 remind 10:11 remote 4:19, 59:24, 60:4 remotely 2:2 removed 34:22, 35:12, 36:7 removing 34:25 renting 103:7 repair 14:6, 84:25, 123:6 repeat 31:11, 37:11, 56:25, 57:1, 62:22, 69:9, 109:2, 126:23 rephrase 11:6, 31:13 report 15:3, 15:5, 15:9, 19:14, 20:5, 21:2, 64:14 reported 1:25 reporter 7:2, 7:11, 10:14, 10:20, 57:13, 135:21, 135:24, 136:5, 136:9, 136:11, 137:3 reports 15:7, 20:18, 32:3, 32:9, 64:12, 64:17 represen 116:18</p>
--	---	--	--

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

162

<p>represent 7:17, 25:13, 40:11, 40:18, 72:12, 87:15</p> <p>representation 56:5, 56:15, 56:16, 109:18, 110:18, 110:22, 111:1, 116:19</p> <p>representations 38:10</p> <p>representative 1:17, 68:6, 98:15, 98:20, 102:7, 102:12, 107:23, 114:17, 116:24, 117:14, 118:1, 119:15, 119:22</p> <p>representatives 45:23, 46:4, 47:17, 97:8, 98:11, 116:13, 132:8</p> <p>represented 119:17, 119:25</p> <p>reputation 100:17</p> <p>request 48:12, 91:24, 91:25</p> <p>requests 5:27, 60:21</p> <p>requirement 29:4</p> <p>requirements 20:9</p> <p>reserved 136:15</p> <p>reside 66:3, 66:22, 71:3, 90:10</p> <p>resident 33:7</p> <p>resides 62:13, 67:25, 79:2, 79:10</p> <p>residing 64:9, 75:1</p>	<p>resources 98:18, 99:8, 102:15, 102:18, 102:19, 102:20, 102:25, 103:10</p> <p>respect 76:17</p> <p>respectfully 48:12</p> <p>response 10:16, 62:3, 62:5, 62:7, 62:18, 63:7, 63:13, 67:23, 78:16, 81:3, 81:18, 81:22, 85:23, 86:7, 92:1, 94:6, 123:19, 124:7, 125:2, 125:20, 127:23, 128:20, 130:21, 131:16, 132:12, 132:17, 132:25</p> <p>responses 5:23, 6:3, 10:14, 16:24, 17:5, 17:6, 17:7, 17:11, 59:21, 60:19, 61:6, 94:21, 95:10, 95:21, 121:19, 121:20, 122:4, 122:7, 123:6, 126:24, 129:16</p> <p>responsible 35:16</p> <p>responsiveness 97:3</p> <p>restate 135:14</p> <p>result 45:7, 97:20, 102:16, 103:13, 105:7, 108:23, 109:8, 110:17, 111:17</p>	<p>revealing 124:13</p> <p>review 17:12, 39:23, 74:6, 76:14, 81:24, 91:6, 95:2, 96:7, 121:18, 123:18, 127:21</p> <p>reviewed 18:13</p> <p>reviewing 74:11</p> <p>rice 58:16, 67:17</p> <p>rich 43:15, 58:5</p> <p>riggins 2:17</p> <p>right 7:4, 8:10, 9:15, 11:9, 11:11, 13:19, 18:1, 18:8, 21:7, 22:17, 24:21, 25:22, 25:23, 26:6, 26:22, 31:14, 31:15, 31:18, 31:21, 33:23, 43:2, 45:8, 46:1, 46:2, 46:13, 48:7, 48:15, 50:19, 50:20, 54:23, 58:1, 61:21, 63:14, 66:16, 68:6, 71:15, 73:16, 81:2, 81:23, 89:19, 89:25, 90:6, 92:15, 94:17, 95:16, 95:17, 95:23, 99:3, 100:18, 100:20, 102:7, 105:14, 105:18, 107:4, 112:4, 113:12,</p>	<p>114:13, 119:5, 120:8, 120:9, 120:11, 122:7, 122:11, 123:3, 124:4, 124:25, 127:24, 129:1, 129:6, 132:18, 134:8, 135:13</p> <p>rights 48:19, 112:19, 113:10, 136:15</p> <p>riley 2:18</p> <p>road 98:4, 98:5, 102:14</p> <p>roads 83:2</p> <p>rob 4:8</p> <p>role 14:8, 22:24, 127:22, 128:3</p> <p>roles 127:14</p> <p>roll 37:2</p> <p>room 8:2, 9:1, 22:15, 29:25</p> <p>rooms 89:3, 103:8</p> <p>roster 128:3</p> <p>rouge 3:8, 8:18, 8:20, 9:9, 9:14, 9:15, 9:18, 12:20, 12:22, 13:1, 14:4, 33:10, 42:21, 83:23, 84:5, 84:12, 84:14, 84:17, 84:20, 85:13, 85:20, 85:22, 93:8, 93:9, 117:18, 133:12</p>
--	---	---	--

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

163

<p>rough 110:1 rpr 137:20 rules 10:11 run 101:2 running 101:3, 115:5, 115:8, 116:8, 116:9</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>sabine 64:5, 93:10 safe 38:15 said 9:13, 19:5, 30:7, 31:14, 40:15, 46:14, 47:18, 50:21, 51:16, 52:20, 54:8, 57:5, 72:2, 76:10, 77:8, 77:21, 102:1, 114:12, 115:22, 122:6, 126:18, 126:25 saith 136:14 sam 100:10 same 10:22, 19:22, 49:19, 78:13, 79:14, 80:16, 80:19, 86:8, 89:21, 90:20, 109:18, 110:7, 128:5, 132:10, 132:14, 132:15, 132:23, 133:3 sara 2:9, 46:21, 79:13, 79:23, 82:18, 86:17,</p>	<p>89:19, 115:16, 118:18, 120:16, 122:16, 123:2, 134:8 sat 17:1, 66:18, 72:15, 72:19 saturday 22:11 say 12:12, 14:14, 17:4, 17:19, 19:8, 24:2, 24:18, 29:21, 31:16, 37:11, 38:9, 38:15, 42:2, 42:13, 42:18, 44:9, 46:11, 48:3, 52:22, 52:24, 54:13, 56:1, 56:16, 65:23, 77:16, 78:19, 80:1, 81:20, 84:12, 88:10, 92:1, 93:8, 99:4, 101:8, 103:3, 107:14, 108:6, 109:2, 109:14, 117:5, 125:23, 125:24, 130:12, 130:16, 130:25, 131:18, 133:6, 133:10, 135:7 saying 44:18, 58:13, 69:23, 100:10, 100:21, 101:15, 102:6, 107:7, 110:10, 116:17 says 47:11, 47:24, 52:22, 52:24, 63:16, 67:24, 100:10, 113:9 sb1 48:18, 49:2</p>	<p>scarborough 2:18 scary 106:24 schedule 97:12 school 65:7, 83:10, 83:11, 110:13, 111:12, 120:3, 120:4, 120:7 schueler 4:18 scope 119:20, 120:15 scott 1:10 scratch 55:6 screen 15:22, 93:5, 112:23 screens 119:1 scroll 26:2, 26:15, 26:16, 39:13, 40:1, 48:1, 48:5, 60:8, 90:2, 95:1, 95:7, 96:1 se 29:14, 30:1, 30:24, 34:2, 37:14, 93:1, 128:3 seal 137:15 second 5:13, 15:12, 26:3, 62:6, 73:25, 81:3, 124:24 secretaries 30:13 secretary 1:10, 7:19, 23:13, 27:21,</p>	<p>33:5, 46:7, 53:25, 71:21, 108:15 section 48:19, 48:20, 48:23, 112:19, 113:10 sections 90:20 see 11:19, 25:9, 25:21, 26:11, 26:17, 26:22, 37:19, 39:10, 40:3, 47:24, 48:11, 61:20, 63:6, 63:8, 63:10, 66:24, 74:3, 81:17, 89:14, 95:25, 96:2, 96:13, 109:17, 113:7, 113:9, 115:10, 118:24 seeing 118:25 seek 42:7 seeking 45:14, 45:18 seeks 43:10, 55:8, 59:4, 76:17 seems 13:13 seen 46:11, 95:5 senate 47:16, 48:22, 49:2, 53:11, 55:24, 62:14, 62:17, 62:24, 63:10, 64:20, 65:10, 66:24, 67:25, 68:5, 69:12, 70:8, 71:3, 74:1, 74:3, 75:2,</p>
--	--	---	--

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

164

77:17, 78:12, 78:13, 78:17, 79:5, 79:15, 80:19, 80:22, 90:16, 100:23, 101:4, 107:10, 108:8, 114:7, 114:12, 114:16, 115:1, 117:5, 119:18, 132:15, 132:24, 133:21 senator 65:10, 102:12, 114:15, 114:18, 114:25, 115:13, 115:25, 119:11, 119:17 senatorial 46:3, 63:21, 64:10, 66:4, 67:10, 68:14, 70:5, 70:20, 72:21, 74:16, 77:13, 83:6, 117:8 senators 45:22, 117:6 send 32:2, 32:9, 32:10, 32:12, 34:18, 35:8, 35:22, 35:24, 35:25, 36:6, 36:25 sending 102:2, 102:5, 102:8 sent 20:18, 20:19, 123:12 separate 50:9, 50:10 september 1:20, 137:17 series 123:16 serve 23:6	service 34:20 services 34:3, 34:20 sessions 98:5 set 5:25, 5:26, 6:4, 18:20, 60:20, 60:21, 94:22, 95:11 sets 23:6 several 69:15 sharp 14:12 shelly 1:8 shift 40:17, 98:1, 98:18 shifting 98:13 shirt 109:21 short 122:3 shorten 13:7 shortened 95:14 should 26:12, 33:4, 35:21, 46:12, 56:16, 59:12, 87:1, 99:13, 108:21, 114:9 shouldn't 79:20 shouting 101:22 show 92:22, 93:1, 93:4, 112:16 shows 3:6, 98:4, 98:5 sic 17:20, 71:8	side 52:16, 110:25 sidelined 105:7 sign 136:2 signature 136:15 signature-plkal 137:18 signed 94:8, 123:11 signing 61:3 silently 62:9 since 10:13, 97:24 single 80:17 sir 7:11, 33:24, 54:15, 56:20, 64:11, 84:13, 109:9, 116:20 sit 88:2, 100:11 sitting 88:24 situated 70:4 six 13:14, 26:19, 26:23 slap 101:7 slapped 100:7 small 14:6, 38:6, 109:19 smaller 83:6 smart 123:9 social 43:20 soldier 34:21	some 9:8, 9:19, 26:20, 30:20, 32:21, 34:18, 34:19, 35:14, 40:17, 40:20, 42:17, 45:11, 66:11, 67:15, 67:16, 67:17, 70:3, 75:24, 90:19, 93:21, 98:10, 101:23, 109:19, 116:11, 120:2, 122:9, 123:1, 129:6, 130:6, 130:7, 131:9, 133:7, 133:13 somebody 33:17, 53:25, 69:17, 70:3, 76:8, 77:1, 92:20, 98:16, 100:7, 101:1, 110:3 someone 23:15, 24:4, 27:3, 28:19, 29:11, 29:20, 41:18 something 18:7, 24:14, 27:16, 49:18, 99:11, 99:13, 105:14, 108:20, 112:15, 116:11, 117:7, 130:17 sometime 65:22 sometimes 87:13, 129:11 somewhere 127:12 sooner 101:23 sorry 62:5, 78:20, 88:21
---	--	--	--

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

165

<p>sound 10:24, 11:7, 50:19, 107:16, 114:13, 117:20, 118:21</p> <p>sounds 10:25, 117:21, 118:22, 119:2</p> <p>south 8:17</p> <p>southern 67:16, 85:10</p> <p>speak 9:22, 70:2, 74:17, 74:21, 74:24, 75:11, 85:25, 87:4, 87:5, 87:12, 87:14, 87:15, 88:16, 88:23, 92:6, 105:14, 105:15, 130:16, 130:22, 133:12, 133:14</p> <p>speaking 10:23, 87:13, 88:11</p> <p>specific 46:22, 50:22, 54:23, 57:4, 58:21, 75:19, 77:9, 86:13, 86:14, 87:6, 87:20, 88:20, 96:20, 102:15, 103:12, 104:10, 111:5, 112:15, 113:13, 113:16, 113:18, 116:14, 117:11, 122:24, 124:8, 124:15, 124:21, 125:3, 125:21, 126:21, 127:1, 127:9, 128:5, 128:6, 128:21, 129:17, 130:3, 130:9, 130:10, 130:13,</p>	<p>131:13, 131:15, 131:22, 132:1, 132:6, 133:21</p> <p>specifically 44:13, 44:14, 78:12, 104:20, 105:13, 105:17, 131:21</p> <p>spend 103:3, 103:4</p> <p>spiritually 112:5</p> <p>spoke 42:22, 44:18, 44:19, 44:20, 75:19, 75:24, 75:25, 86:5, 88:3, 88:21, 91:1, 91:9, 130:8, 131:2</p> <p>spoken 42:24, 46:12, 86:10, 87:3, 88:9, 88:10, 133:7</p> <p>spots 98:24</p> <p>spring 50:19, 50:21, 50:24, 51:4, 51:5</p> <p>st 3:7</p> <p>stadiums 91:18</p> <p>staff 30:13, 53:23</p> <p>stand 83:9</p> <p>standing 20:1, 27:23, 28:5, 29:7, 30:2, 30:4, 30:6, 30:11, 30:19, 31:1, 31:3, 31:6, 31:10, 31:20, 68:16, 68:22,</p>	<p>69:25</p> <p>stands 58:8</p> <p>started 9:24, 10:10</p> <p>starting 62:7</p> <p>starts 34:25, 48:11, 62:7, 96:15</p> <p>states 1:1, 7:21</p> <p>statewide 37:23</p> <p>status 50:4, 109:18</p> <p>stay 20:1, 77:4, 100:11</p> <p>staying 103:9, 104:5, 110:7</p> <p>stays 30:4, 67:11</p> <p>stenographer 57:15, 135:19</p> <p>step 52:8</p> <p>sterling 9:20</p> <p>still 52:18, 80:4, 99:5, 99:21, 99:22, 100:5, 101:21, 104:22, 110:23, 132:19, 133:20, 135:17</p> <p>stood 83:14</p> <p>stop 21:9</p> <p>stopped 97:16</p> <p>street 2:11, 2:19, 3:7, 129:8, 129:13, 129:14</p> <p>streets 110:23</p>	<p>strike 117:10</p> <p>strong 60:7</p> <p>structure 18:16, 49:19, 134:20, 134:24, 135:2, 135:8</p> <p>structured 55:24</p> <p>stuart 2:10, 123:2</p> <p>stuff 30:14, 40:20, 50:18, 57:25, 94:16, 103:24, 122:10</p> <p>styled 7:20</p> <p>subsection 62:8</p> <p>sued 9:9, 9:13</p> <p>suffer 111:20, 111:21, 112:1, 112:2, 112:4, 112:6</p> <p>suffered 97:20, 99:6, 108:22, 109:6</p> <p>suffering 112:2, 112:3, 112:7, 112:8, 112:9, 112:10</p> <p>suffers 111:21</p> <p>suit 9:8, 53:15, 60:7</p> <p>suite 2:20, 3:15</p> <p>suits 65:8</p> <p>sun 109:22, 109:23</p> <p>supplemental 5:23, 17:6, 59:21, 60:19,</p>
---	--	---	--

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

<p>62:6, 121:20, 122:4, 123:6, 123:19, 124:7, 127:23, 130:21, 131:16, 132:12, 132:16, 132:25 suppression 106:22 supreme 53:15 sure 10:13, 10:15, 11:8, 18:6, 25:19, 28:1, 31:9, 31:12, 35:14, 39:12, 42:9, 42:19, 47:14, 48:2, 49:10, 49:18, 51:22, 55:16, 57:2, 57:12, 62:23, 69:5, 69:10, 71:7, 80:9, 83:25, 96:1, 102:22, 102:24, 104:6, 107:13, 109:4, 112:11, 112:17, 112:25, 115:12, 117:16, 121:1, 129:5 sworn 7:7, 61:7, 94:3, 137:7 system 106:15, 110:13 systems 65:7, 105:20, 106:4, 107:25</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>tables 72:16 tabulates 106:12 take 18:11, 28:17, 40:22, 40:23,</p>	<p>41:8, 49:8, 49:11, 53:21, 98:18, 103:22, 105:25, 128:16 taken 54:14 takes 136:12 taking 7:16, 118:20 talk 9:20, 34:18, 41:8, 42:15, 43:16, 44:25, 51:4, 51:12, 52:5, 53:7, 53:13, 53:14, 53:16, 65:10, 70:14, 89:11, 92:14, 92:15, 92:16, 93:7, 93:8, 100:3, 100:14, 102:18, 103:6, 103:8, 103:9, 105:11, 105:12, 109:12, 110:12, 110:15, 110:19, 111:2, 112:15, 118:4, 118:5, 129:17, 130:2, 131:5 talked 16:23, 42:17, 44:8, 45:6, 51:24, 52:25, 70:17, 72:20, 74:11, 83:18, 92:5, 93:2, 93:6, 115:23, 116:2, 122:22, 130:4, 130:5 talking 51:2, 52:6, 52:12, 54:20, 73:25, 77:1, 78:23, 89:12, 92:17, 93:21, 94:7, 99:2,</p>	<p>104:5, 116:3, 130:20 talks 105:24 team 76:9, 76:12, 122:22 tech 15:11, 59:22 technically 30:3 technician 4:19, 59:24, 60:4 tell 36:21, 46:1, 64:16, 69:20, 71:1, 86:9, 99:14, 100:6, 100:15, 100:24, 101:6, 107:11, 109:12, 111:10, 114:10, 114:11, 114:15, 117:15, 126:14, 126:15, 131:8 telling 66:14, 106:22 tells 38:12, 38:14 ten 12:8, 88:1, 135:6 term 23:4, 28:15, 37:16, 46:24, 47:1, 98:2 terms 19:11, 36:20, 37:3, 50:17, 76:1, 76:2, 76:7 terrain 71:25 test 11:13, 83:12, 126:16 testified 7:10, 9:2, 9:6,</p>	<p>9:8, 10:1, 10:3, 64:11, 70:24, 120:16 testify 7:8, 16:6, 16:17, 97:7 testifying 11:20, 11:22 testimony 38:17, 57:10, 94:3, 96:24, 121:17, 121:24, 137:10 th 137:16 thank 7:11, 11:17, 15:17, 18:12, 22:16, 28:18, 57:14, 57:16, 60:6, 60:24, 62:1, 62:16, 73:23, 81:12, 90:18, 97:14, 101:25, 108:7, 113:3, 119:3, 122:21, 134:3, 134:7, 135:11, 135:24, 136:5, 136:11 thanks 18:8 that'd 40:6 themselves 87:13, 93:3 thereof 137:14 thereupon 7:5, 137:7 thing 37:4, 45:6, 45:8, 46:2, 46:13, 103:22 things 11:12, 32:23, 35:19, 47:12, 53:17, 99:15,</p>
---	--	--	---

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

167

<p>99:23, 101:9, 103:8, 104:1, 104:8, 105:16, 109:25, 110:7, 118:5, 122:9, 122:10 think 18:5, 24:13, 34:6, 44:19, 47:13, 50:20, 53:2, 57:23, 58:24, 73:11, 100:10, 101:24, 112:2, 112:7, 112:9, 116:7, 116:8, 116:9, 123:1, 131:13, 136:11 third 47:9, 47:10, 47:12, 47:13, 47:15, 47:20, 59:1 thomas-lundborg 4:13, 22:14 thought 98:19 thousands 37:24, 38:4, 38:7, 38:9, 38:15, 38:22, 54:21 three 14:13, 78:2, 93:22 three-day 22:10 through 1:17, 10:12, 14:23, 35:20, 39:14, 43:20, 47:14, 54:5, 60:9, 79:2, 85:2, 86:6, 87:4, 87:5, 98:4, 106:14, 107:5, 107:8, 116:22, 116:23,</p>	<p>117:4, 118:10, 131:3 throughout 15:2, 41:9, 44:25, 45:2, 47:16, 53:8, 56:6, 56:7, 59:8, 59:9, 100:25 thursday 22:10 tigers 85:12 time 22:4, 22:9, 33:21, 43:17, 50:17, 73:6, 73:9, 88:20, 98:3, 99:3, 100:1, 101:6, 105:12, 116:8, 116:9, 118:19, 118:25, 121:5, 123:2, 123:8, 123:11, 123:15, 125:1, 127:18, 134:6, 134:9, 135:14, 136:1 times 51:1, 51:3, 84:23, 87:10 tiptoe 103:23, 103:25 title 13:3, 26:17, 60:24, 95:14 today 7:16, 7:24, 9:24, 10:7, 10:10, 10:16, 11:20, 12:1, 16:6, 16:17, 17:2, 39:24, 88:25, 94:4, 110:25, 114:10, 121:15, 121:18, 125:8, 125:12, 134:5</p>	<p>together 72:21, 74:13, 91:10, 101:18, 105:17 told 56:13, 74:14, 99:14, 110:10 tone 23:6 took 74:11 top 25:17, 47:25, 60:16, 61:12, 63:3, 81:15, 83:24, 114:10 topic 80:12 topics 16:18, 97:5 tori 2:8 totally 63:5, 73:15 tough 99:17, 100:6, 100:8, 100:9 tougher 99:12, 100:13 toward 77:3 town 101:22, 104:3, 104:9, 104:10, 104:13, 104:15, 110:25, 127:5 towns 72:15, 76:25, 109:20 track 30:8, 31:22 trainings 22:12, 99:1 transcript 15:16, 25:7, 39:6, 60:3, 94:25, 135:18, 136:3, 137:9</p>	<p>transform 104:18 transitioned 34:5, 34:21 trash 110:24, 120:12, 120:17, 120:22 travel 83:2 treasurer 23:13, 71:22 trigger 36:14 true 137:9 trust 23:2 truth 7:8, 7:9 try 10:15, 10:22, 11:2, 34:17, 66:23, 101:18 trying 31:5, 100:4, 100:6, 101:10 turn 16:14, 47:22, 60:25, 61:10, 95:18, 95:24, 96:11 tv 118:25 two 9:12, 33:3, 33:4, 35:6, 38:14, 71:19, 78:2, 84:4, 84:16, 93:22 type 21:16, 32:21, 34:19, 45:11, 50:18, 103:7, 104:7</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>uh-huh 18:1</p>
--	--	--	--

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

168

<p>ultimately 53:19</p> <p>uncle 102:10</p> <p>under 11:21, 26:23, 62:6, 101:12, 112:18, 113:16, 130:5, 137:15</p> <p>understand 11:5, 11:20, 16:5, 16:9, 27:25, 53:18, 55:10, 61:6, 66:21, 80:9, 95:9, 109:19, 110:2, 112:18, 121:17, 122:5, 125:6</p> <p>understanding 16:16, 28:2, 38:16, 48:21, 101:13, 134:23, 135:1, 135:2</p> <p>understands 110:3</p> <p>understood 134:12</p> <p>unit 19:12</p> <p>united 1:1, 7:20</p> <p>units 12:19, 19:6, 19:14, 19:22, 20:1</p> <p>university 85:10</p> <p>unless 30:4</p> <p>unpacked 90:12</p> <p>until 10:20, 68:21</p> <p>updated 92:14</p> <p>updates 35:18, 35:23,</p>	<p>52:16</p> <p>upstream 110:11</p> <p>usc 48:20</p> <p>use 19:10</p> <hr/> <p style="text-align: center;">V</p> <hr/> <p>vague 56:23, 115:9</p> <p>vans 103:7</p> <p>various 15:10, 41:9, 43:20, 43:23, 56:21, 65:14, 65:16, 65:20, 69:16, 71:22, 86:6, 86:9, 86:24, 87:2, 87:11</p> <p>vast 94:14</p> <p>verbal 10:16</p> <p>verification 61:4</p> <p>verify 37:6, 37:7, 69:2, 69:11, 74:7, 81:25, 84:3</p> <p>verifying 86:1, 95:21</p> <p>via 41:23, 52:8, 53:1</p> <p>vice 15:8, 23:12, 23:25, 24:5, 26:10, 26:20, 44:1, 70:2, 71:21, 71:22, 72:11, 72:12, 84:14</p> <p>victoria 2:8, 123:2</p>	<p>victory 52:19</p> <p>videotaped 136:16</p> <p>view 61:12</p> <p>violation 48:19, 48:23, 113:10</p> <p>virtual 8:1, 9:1, 22:15, 29:24</p> <p>virtually 1:19, 2:2</p> <p>visit 85:16</p> <p>visited 75:8, 75:9</p> <p>voices 86:11</p> <p>vote 8:22, 38:23, 70:18, 78:9, 93:12, 106:19, 106:23, 107:3, 115:13, 116:24, 131:24, 132:3, 133:18, 133:24</p> <p>voted 106:10, 115:20, 132:7, 133:19</p> <p>voter 29:2, 65:5, 106:22, 112:4, 112:7</p> <p>voters 89:7, 97:8, 111:23</p> <p>votes 106:12</p> <p>voting 48:19, 105:20, 105:24, 106:4, 106:24, 107:2, 107:7, 107:16, 107:25, 108:9, 108:10, 112:19, 113:10, 134:1</p>	<p>vp 23:20, 24:18</p> <p>vps 24:12, 24:15</p> <hr/> <p style="text-align: center;">W</p> <hr/> <p>wait 10:20, 106:23</p> <p>waived 27:23</p> <p>wall 46:12</p> <p>walsh 3:4, 3:6</p> <p>want 9:21, 24:2, 27:13, 42:9, 47:10, 47:14, 48:22, 68:1, 68:23, 69:5, 71:7, 73:7, 79:17, 80:13, 87:12, 97:15, 105:3, 107:1, 107:2, 117:7, 118:23, 121:22, 122:2, 135:22</p> <p>wanted 26:16, 27:14, 46:24, 49:17</p> <p>wanting 57:6, 99:17</p> <p>watch 67:15, 83:7, 100:25</p> <p>way 20:16, 21:16, 21:18, 24:13, 47:12, 52:5, 52:8, 55:23, 66:23, 99:11, 105:24, 109:24, 115:10</p> <p>wayne 8:6</p> <p>ways 35:6</p> <p>we'll 45:11, 47:15,</p>
--	---	---	---

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

169

73:17 we're 22:3, 22:9, 28:23, 36:3, 37:16, 38:15, 45:1, 45:18, 47:11, 49:8, 49:18, 53:8, 53:16, 56:13, 59:24, 61:12, 73:4, 85:13, 86:12, 92:18, 98:9, 100:4, 100:19, 100:20, 103:3, 103:4, 103:5, 104:5, 104:13, 106:13, 110:24, 113:5, 122:1, 131:7, 131:8, 134:9, 135:14, 135:15 we've 49:12, 64:1, 65:3, 65:5, 65:14, 72:20, 83:19, 85:2, 97:24, 102:25, 103:1, 104:15, 104:20 website 5:17, 22:2, 24:23, 24:25, 25:3, 25:15, 27:6, 27:12, 27:14, 27:19, 27:23 weeks 105:2 welcome 22:11, 85:6 welcoming 67:14 wenger 2:8 went 9:20, 16:24 weren't 30:18	whatever 40:21, 47:10, 47:20 whenever 49:8 wherefore 48:12 whether 20:8, 30:6, 31:23, 43:7, 44:3, 44:14, 44:18, 57:9, 74:25, 112:3, 133:16 whichever 48:6 white 78:3, 78:7 whole 7:8, 44:25, 47:19, 53:8, 56:6, 56:7, 57:25, 68:5, 83:2, 87:15, 101:11 wholeheartedly 44:9 william 17:25 win 44:10 wins 99:21, 99:22 wish 116:25 within 33:17, 89:1, 128:23 without 109:17, 124:13 witness 72:7, 84:11, 92:11, 93:20, 134:7 witnesses 96:20, 96:21, 97:9 wondering 109:6, 113:13,	113:17 work 13:24, 14:24, 33:14, 51:17, 98:14, 99:9, 100:5, 119:9, 119:11, 119:14 worked 108:16, 108:20, 108:21 works 33:17, 51:18 worse 112:9 wouldn't 30:22, 32:22, 36:1, 89:13, 91:23, 94:15 write 123:9 writing 46:11 <hr/> Y <hr/> y'all 100:16 yeah 11:18, 17:15, 18:1, 18:5, 43:5, 48:4, 50:21, 57:2, 61:13, 82:8, 89:15, 118:22, 119:2, 122:20, 126:4, 129:1, 130:17, 130:19 year 9:11, 20:25, 21:24, 44:24, 51:1, 51:3, 51:6, 104:23 year's 30:17 year-old 30:20 years 12:8, 13:14, 88:2, 135:6	york 2:13, 57:23 young 101:14 yourself 7:24, 48:9, 61:15 youth 15:1 <hr/> Z <hr/> zone 100:11 zoom 41:23, 41:24, 53:1, 53:2, 53:7, 54:7, 54:12, 54:18, 68:24, 129:11, 129:12 zoomed 129:12 zwole 64:6 <hr/> \$ <hr/> \$30 68:23, 68:25 <hr/> 0 <hr/> 00178 1:5 04 1:21 05 119:1 <hr/> 1 <hr/> 1 118:24, 119:1, 136:16 10 1:21, 62:15, 63:22, 73:9, 81:17 10006 2:13 101 81:11, 90:15
--	--	---	--

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

170

10301 48:20 11 73:7, 73:17 12 137:16 1200 3:15 121 5:7 13 81:9 134 5:9 137 1:24 14 48:18, 49:3, 62:15, 63:22, 72:17 1400 2:20 1461 3:9 1473 8:17 15 5:13, 62:15, 63:22, 72:17, 80:19, 80:22, 90:16, 114:12 17 62:15, 63:22, 90:16 19 62:15, 63:22, 90:17 <hr/> 2 <hr/> 200 3:14 20012210079 137:22 2021 40:15, 51:2 2022 50:19, 50:21, 50:24	2023 1:20, 90:13, 137:17 2025 137:5 22 1:5, 81:9 225 3:9 23 107:10, 108:9 25 5:15, 81:9, 136:16 27 81:9 27603 2:21 29 90:14 <hr/> 3 <hr/> 3 122:7, 127:23 3(a) 74:4 30 1:15, 5:13, 15:13, 16:10, 80:3, 80:12 301 2:19 31 62:15, 63:22 34 81:9, 90:15 346 3:9 35 81:9 36 62:15, 63:22, 81:9 37 81:9 38 62:15, 63:23, 72:18, 90:15,	90:17 3800 2:22 39 5:18, 62:15, 63:12, 63:23, 72:18, 90:17, 117:6 3:-cv--sdd-sdj 1:5 <hr/> 4 <hr/> 4/4/22 40:6 40 2:11, 19:20 43215 3:16 462 3:17 47 81:9 4710 3:17 <hr/> 5 <hr/> 50 20:4, 20:12, 36:13, 36:18, 36:22, 36:23, 38:13 501 50:1, 50:4, 50:10 506194 1:23 52 48:20 55 73:7, 73:9, 73:17 57 81:10, 90:15 58 30:20, 47:22, 48:2, 81:10, 90:15, 113:6 59 81:10	<hr/> 6 <hr/> 60 5:21, 81:10, 90:15 61 81:10, 90:15 614 3:17 62 81:10 628 3:7 63 81:10, 90:15, 117:13, 117:15 65 81:10, 90:15 66 81:10 67 81:10 68 81:10, 90:15 69 81:10, 90:15 <hr/> 7 <hr/> 70 81:11 70802 3:8 70814 8:20 70815 8:18 7600 8:19, 21:1 <hr/> 8 <hr/> 80 81:11 877 2:22 88 81:11 <hr/> 9 <hr/> 919 2:22
--	--	--	---

EXHIBIT 9

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA**

DR. DOROTHY NAIRNE, et al.

Plaintiffs,

v.

R. KYLE ARDOIN, in his official capacity as
Secretary of State of Louisiana,

Defendant.

CIVIL ACTION NO. 3:22-cv-00178
SDD-SDJ

Chief Judge Shelly D. Dick

Magistrate Judge Scott D. Johnson

**DECLARATION OF PRESIDENT MICHAEL W. MCCLANAHAN IN OPPOSITION
TO DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

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

1. I am over 18 years of age and competent to make this declaration.
2. I serve as President of the Louisiana State Conference of the National Association for the Advancement of Colored People (“Louisiana NAACP”) and have served in that capacity since 2017. In my role, I am responsible for overseeing and supporting over 40 local branches and 16 youth and college chapters across the state.
3. The Louisiana NAACP is a nonprofit, nonpartisan organization whose work is devoted to pursuing the social, political, economic, and educational equity of Black people in this state and nation. The Louisiana NAACP works to eliminate racial discrimination, protect voting rights, and uphold fair political participation.
4. As a membership organization, the Louisiana NAACP collects dues from paying members. Any active member may run for leadership positions within the NAACP. I was elected

by the membership of the Louisiana NAACP to serve as President. From my experience running for this position and serving since, I am familiar with our membership across the state. The Louisiana NAACP membership is from every corner of the state and is predominantly Black. Our members join the NAACP because they agree with its mission to advance equality and increase political power for Black people and Black communities. The Louisiana NAACP aims to serve all Black Louisianians regardless of their membership status.

5. In my capacity as President, I work with membership from across the state, including the challenged districts, on a regular basis. I have personal relationships with members in challenged districts, have been to their homes, and listened to their concerns about the dilutive maps in our meetings.

6. I have also reviewed our membership information in conjunction with the enacted House and Senate maps and the illustrative House and Senate maps created by our expert witness Mr. Bill Cooper to confirm that we have at least one member in each part of the state in which districts dilute Black voting strength (that is, “pack” or “crack” Black voters) who could be drawn into a new majority-Black district that could be created in that area. Specifically:

- a. I have identified a Louisiana NAACP member in a dilutive district in the Shreveport area, encompassing parts of Caddo and Bossier Parishes, who could be drawn into a new opportunity district as demonstrated by Illustrative Senate District 38.
- b. I have identified a Louisiana NAACP member in a dilutive district in the Baton Rouge area, encompassing parts of East Baton Rouge, Iberville, Pointe Coupee, and West Baton East Baton Rouge, Iberville, Pointe Coupee, and West Baton Rouge Parishes, who could be drawn into a new opportunity district as demonstrated by Illustrative Senate District 17.

- c. I have identified a Louisiana NAACP member in a dilutive district in the New Orleans area, encompassing parts of Jefferson and St. Charles Parishes, who could be drawn into a new opportunity district as demonstrated by Illustrative Senate District 19.
 - d. I have identified a Louisiana NAACP member in a dilutive district in the Shreveport area, encompassing parts of Caddo and Bossier Parishes, who could be drawn into a new opportunity district as demonstrated by Illustrative House District 1.
 - e. I have identified a Louisiana NAACP member in a dilutive district in the Natchitoches area, encompassing parts of Desoto, Natchitoches, Red River Parishes, who could be drawn into a new opportunity district as demonstrated by Illustrative House District 23.
 - f. I have identified a Louisiana NAACP member in a dilutive district in the Lake Charles area, encompassing parts of Calcasieu Parish, who could be drawn into a new opportunity district as demonstrated by Illustrative House District 38.
 - g. I have identified a Louisiana NAACP member in a dilutive district in the Baton Rouge area encompassing parts of Ascension and Iberville Parishes who could be drawn into a new opportunity district, as demonstrated by Illustrative House District 60, and I have identified two members in dilutive districts in East Baton Rouge Parish, who could be drawn into two new opportunity districts, as demonstrated by Illustrative House Districts 65 and 68 respectively.
7. These are just some of the Louisiana NAACP's members who are harmed by the enacted House and Senate maps because they reside in dilutive districts and who would benefit from

new, fairer redistricting plans that created additional districts that provide equal electoral opportunity to Black voters.

8. The redistricting process was a top priority for the Louisiana NAACP because of our commitment to the fair representation of Black voters and our understanding of the implications of the district lines for the efficacy of our programmatic work and policy priorities. For example, the Louisiana NAACP mobilized members and branch leaders to speak out at the redistricting roadshow hearings about the need for fair representation for Black Louisianians. Along with other organizations, we delivered letters to the Legislature throughout the redistricting process calling for compliance with the Voting Rights Act and submitted House and Senate maps that would have better represented Black voters and Black communities.

9. As a result of the discriminatory House and Senate maps enacted by the Legislature, the Louisiana NAACP has been forced to shift our efforts to fight against the effects of voter dilution in the affected areas of the state by increasing education and outreach to voters. The Louisiana NAACP has had to work even harder to engage our members, who have become disillusioned and hopeless after this past redistricting cycle.

10. For instance, the Louisiana NAACP typically engages in “Get Out the Vote” (or “GOTV”) campaigns across the entire state, including organizing voter education events, preparing voter education resources, fielding volunteers to knock on doors in Black communities, and distributing thousands of voter information materials. These efforts have become more difficult and resource-intensive due to the enactment of discriminatory state legislative maps.

11. Volunteers engaged in canvassing spend time speaking to voters at their doorsteps, talking to them about issues, about the importance of voting and making their voices heard, about where and how to vote, and asking them to commit to voting in the next election. When voters feel

their votes don't matter, these conversations take longer, sometimes significantly longer, and volunteers are not able to connect with as many voters in a day of canvassing.

12. Because of the discriminatory way districts were drawn for the Louisiana House and Senate, there were not competitive elections in many of the communities Louisiana NAACP members live, serve, canvass, and vote. Over 40% of legislative seats were filled without an election this year because no competitor entered the race. Even where elections occurred during the recent primary elections on the Enacted Maps, many did not advance to a runoff election.

13. The lack of competitive legislative races makes it harder for the Louisiana NAACP to recruit volunteers to help door knock, text, call, and further engage voters to participate in the other important elections on the ballot because they do not have the same opportunities to mobilize around the higher-visibility races in their communities. When the results feel decided before the votes are cast, our volunteers feel deflated, and voters are less responsive to our outreach efforts leading to more work and less reward.

14. Moreover, we have observed how noncompetitive elections in packed and cracked districts lead to less investment from political campaigns and other organizations due to fewer races being on the ballot. For example, when there is only one Senate candidate who enters a race in a district, there is little incentive for that candidate's campaign to expend resources on voter outreach and mobilization since the candidate wins outright without even needing to appeal to voters. This is true regardless of the political party of the candidate in a non-competitive district or whether or not the candidate has the support of Black voters: It is true in districts in which Black voters are packed, virtually guaranteeing a win for Black voters' preferred candidate and in districts in which Black voters are cracked, making it virtually impossible for Black voters' preferred candidate to prevail.

15. I have directly observed the lack of investment from candidates, campaigns, and political parties in the areas impacted by the Enacted Maps. When I travel among the communities in these packed and cracked districts where our members live, I see fewer campaign signs and billboards than in prior election years. I hear fewer campaign advertisements on the radio for state legislative races. At one point I had to call into the radio station myself to encourage people to get out and vote since there was so little discussion of the important election dates this year. Under the Enacted Maps, there is less information exchange, less engagement in Black communities from candidates and elected officials, less enthusiasm, and less opportunity for voters to realize the full weight of their vote.

16. In these situations, the Louisiana NAACP has had to step in and fill the gap, compensating for the lack of information and voter engagement in the communities we serve to ensure voters know that elections are happening and believe in the value of their vote on other key races and constitutional amendments. This is expensive and time-consuming; it drains the financial resources and people power the Louisiana NAACP can invest in our broader programmatic work and voter outreach in other areas of the state.

17. Because races under the Enacted Map have been dismissed as noncompetitive, we have received less funding from national sources and other donors to conduct our GOTV work this year. These organizations do not want to invest in GOTV work in states and districts where the outcome of elections is a foregone conclusion when there are other, more competitive elections where they can have a greater impact. As a result, we have had to stretch the resources we have and make choices between what districts, communities, events, and initiatives we can invest in at the expense of others.

18. The Louisiana NAACP has had to cancel or postpone specific events—namely, rallies and town hall sessions that we planned to hold in Bogalusa and Orleans—in order to redirect our limited resources to engaging Black voters disenfranchised by the redistricting plans. The impact of the discriminatory districts has not only burdened outreach efforts in those areas, but has drained and deferred resources meant to reach other regions of the state.

19. The Louisiana NAACP must also now devote more of its resources to engage with the House and Senate candidates that represent Black voters in the affected districts to ensure that Black voters have an opportunity to be heard by their elected officials. In the districts where our members and other Black voters are underrepresented due to their communities being cracked across district lines, it is harder to get responses from elected officials on important issues or to have our meeting requests granted. Our members feel that their voices are not heard and that their interests are not reflected in the policy platforms of the candidates running and elected to serve them.

20. For example, each year the Louisiana NAACP invites candidates to a town hall during our annual state convention. This is an important opportunity for candidates to be able to speak with attending members, share their platforms, and to hear feedback and field questions. Many candidates will also buy ad space in our convention booklet or tables at our Annual Freedom Fund Dinner held during the convention. This year, we saw a dramatic drop off in responses, participation, and contributions from candidates and incumbent elected officials who faced uncompetitive elections. This meant we lost funding revenue that used to be reliable in election years. Worse, it meant that Louisiana NAACP members lost out on a critical opportunity to engage with these candidates, learn their positions, share their opinions, and feel that their voices were heard.

21. Political participation is the cornerstone of the Louisiana NAACP's mission. Now, under the discriminatory maps, the NAACP has had to redouble its efforts to engage Black voters in parts of the state where candidates supported by Black voters have little chance of winning and convince them that, despite the lack of competitive elections, their vote matters and their opinions can influence change in the political process. This labor requires more effort, more volunteers, and more money, and has made it more difficult to accomplish other organizational goals. Every time Black voters lose an opportunity to vote due to uncompetitive elections cuts against our organizational objective to encourage Black Louisianians to become chronic voters.

22. Despite the significant efforts and resources that we devoted to advocating for a representative state legislative map, the Louisiana legislature insisted on enacting maps that violate federal law and deprive Black voters of an equal opportunity to participate in the political process and elect candidates of choice in parts of the state with large Black populations who should be better represented. For Louisiana to have fair and representative State Legislative Maps, there must be a meaningful expansion of the number of majority-minority opportunity districts for Black voters.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 27, 2023

A handwritten signature in black ink, appearing to read "Michael W. McClanahan". The signature is somewhat stylized and scribbled.

Michael W. McClanahan

EXHIBIT 10

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA**

DR. DOROTHY NAIRNE, et al.

Plaintiffs,

v.

R. KYLE ARDOIN, in his official capacity as
Secretary of State of Louisiana,

Defendant.

and

CLAY SHEXNAYDER, et al.,

Defendant-Intervenors.

CIVIL ACTION NO. 3:22-cv-00178
SDD-SDJ

Chief Judge Shelly D. Dick

Magistrate Judge Scott D. Johnson

**DECLARATION OF DOROTHY NAIRNE IN OPPOSITION TO DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT**

Pursuant to 28 U.S.C. § 1746, I, Dr. Dorothy Nairne, declare as follows:

1. My name is Dorothy Nairne. I am over 18 years of age and am competent to make this declaration. I have personal knowledge of the statements made in this affidavit and each is true and correct.

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

3. I am a resident of the State of Louisiana, and I currently reside in Napoleonville, Louisiana in Assumption Parish.

4. I am lawfully registered to vote in Louisiana House District 60 and Senate District 2.

5. Under the illustrative map prepared by Mr. Bill Cooper in June 2023, I would reside in House District 58 and Senate District 2.

6. I am a dues-paying member of the Assumption Parish NAACP and attend their meetings and events.

7. I am a regular voter who votes in federal, state, and local elections. I have voted in recent election cycles and intend to vote in future elections.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 27, 2023.

A handwritten signature in cursive script, appearing to read "Dorothy Nairne".

Dorothy Nairne

EXHIBIT 11

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA**

DR. DOROTHY NAIRNE, et al.

Plaintiffs,

v.

R. KYLE ARDOIN, in his official capacity as
Secretary of State of Louisiana,

Defendant.

and

CLAY SHEXNAYDER, et al.,

Defendant-Intervenors.

CIVIL ACTION NO. 3:22-cv-00178
SDD-SDJ

Chief Judge Shelly D. Dick

Magistrate Judge Scott D. Johnson

**DECLARATION OF CLEE LOWE IN OPPOSITION TO DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT**

Pursuant to 28 U.S.C. § 1746, I, Clee Lowe, declare as follows:

1. My name is Clee Lowe. I am over 18 years of age and am competent to make this declaration. I have personal knowledge of the statements made in this affidavit and each is true and correct.

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

3. I am a resident of the State of Louisiana, and I currently reside in East Baton Rouge Parish.

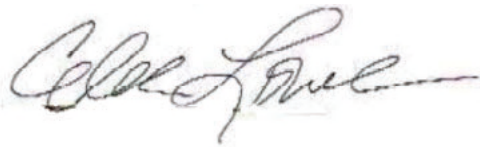
4. I am lawfully registered to vote in Louisiana House District 66 and Senate District 16.

5. Under the illustrative maps, I would reside in Louisiana House District 101 and Senate District 16.

6. I am a regular voter who votes in federal, state, and local elections. I have voted in recent election cycles and intend to vote in future elections.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 27, 2023.

A handwritten signature in cursive script, appearing to read "Cleo Lowe", written in black ink. The signature is positioned above a horizontal line.

Cleo Lowe

EXHIBIT 12

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA**

DR. DOROTHY NAIRNE, et al.

Plaintiffs,

v.

R. KYLE ARDOIN, in his official capacity as
Secretary of State of Louisiana,

Defendant.

and

CLAY SHEXNAYDER, et al.,

Defendant-Intervenors.

CIVIL ACTION NO. 3:22-cv-00178
SDD-SDJ

Chief Judge Shelly D. Dick

Magistrate Judge Scott D. Johnson

**DECLARATION OF ALICE WASHINGTON IN OPPOSITION TO DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT**

Pursuant to 28 U.S.C. § 1746, I, Dr. Alice Washington, declare as follows:

1. My name is Alice Washington. I am over 18 years of age and am competent to make this declaration. I have personal knowledge of the statements made in this affidavit and each is true and correct.

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

3. I am a resident of the State of Louisiana, and I currently reside in East Baton Rouge Parish.

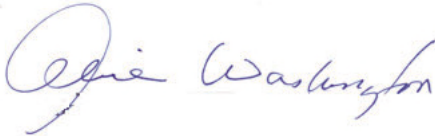
4. I am lawfully registered to vote in Louisiana House District 66 and Senate District 16.

5. Under the illustrative map prepared by Mr. Bill Cooper in June 2023, I would reside in House District 101 and Senate District 16.

6. I am a regular voter who votes in federal, state, and local elections. I have voted in recent election cycles and intend to vote in future elections.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 27, 2023.

A handwritten signature in blue ink that reads "Alice Washington". The signature is written in a cursive style with a large initial "A".

Alice Washington

EXHIBIT 13

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA**

DR. DOROTHY NAIRNE, et al.

Plaintiffs,

v.

R. KYLE ARDOIN, in his official capacity as
Secretary of State of Louisiana,

Defendant.

and

CLAY SHEXNAYDER, et al.,

Defendant-Intervenors.

CIVIL ACTION NO. 3:22-cv-00178
SDD-SDJ

Chief Judge Shelly D. Dick

Magistrate Judge Scott D. Johnson

**DECLARATION OF STEVEN HARRIS IN OPPOSITION TO DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT**

Pursuant to 28 U.S.C. § 1746, I, Steven Harris, declare as follows:

1. My name is Steven Harris. I am over 18 years of age and am competent to make this declaration. I have personal knowledge of the statements made in this affidavit and each is true and correct.

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

3. I am a resident of the State of Louisiana, and I currently reside in Natchitoches Parish.

4. I am lawfully registered to vote in Louisiana House District 25 and Senate District 29.

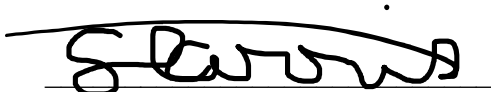
5. Under the illustrative map prepared by Mr. Bill Cooper in June 2023, I would reside in House District 23 and Senate District 29.

6. I am a dues-paying member of the Louisiana NAACP and attend their meetings and events.

7. I am a regular voter who votes in federal, state, and local elections. I have voted in recent election cycles and intend to vote in future elections.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 27, 2023.


Steven Harris