

Nos. 24-109, 24-110

IN THE
Supreme Court of the United States

LOUISIANA,

Appellant,

v.

PHILLIP CALLAIS, *et al.*,

Appellees.

PRESS ROBINSON, *et al.*,

Appellants,

v.

PHILLIP CALLAIS, *et al.*,

Appellees.

ON APPEAL FROM THE UNITED STATES DISTRICT
COURT FOR THE WESTERN DISTRICT OF LOUISIANA

**BRIEF OF FAITH LEADERS IN
CONGRESSIONAL DISTRICT 6 AS AMICI
CURIAE IN SUPPORT OF APPELLANTS**

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INTEREST OF AMICI CURIAE¹

Along the banks of the Red River and the I-49 corridor lies Congressional District 6 (“CD6”). Geographic commonalities aside, CD6 embraces a stretch of communities that are bound together by their deeply-held faith, collective religious and social concerns, and shared values.

Amici are faith leaders who live and practice in CD6. Amici file this brief to inform the Court of the powerful faith-based ties that bind their communities together. Amici include Pastor Carlos Donaway of Shreveport, Pastor Ronnie Evans of Natchitoches, Pastor Altorio Holden of Natchitoches, Pastor Theron Jackson of Shreveport, Reverend Floyd Kirts of Alexandria, Reverend J.J. Mitchell of Baton Rouge, and Reverend Fred Jeff Smith of Baton Rouge. Each Amicus currently leads or used to lead at least one church in CD6 and has a long-standing presence in the community.

Amici report that for the first time in a long time, their congregations feel that they have a political voice. They were an afterthought before with their votes diluted across many districts. They rarely (if ever) saw a congressional candidate seek their support. In the past, a candidate might have put a sign on the side of the road or sent out mailings, but there were hardly any *real* attempts to get to know them, listen to their distinct concerns, or earn their votes.

1. Amici certify that no counsel for any party authored this brief in whole or in part and that no person other than Amici and their counsel financed the brief’s preparation or submission.

The creation of the new CD6 changed everything. This past fall, congressional candidates finally stepped into these communities to break bread with them, attend their church gatherings, and meet them face-to-face. This stark contrast shows that CD6 united a group that used to be systemically ignored in favor of voting blocs that always outweighed them. By bringing together this faith-based community of interest, CD6 has enabled a previously (politically) powerless group to have the opportunity to elect a Representative who knows them and shares their values.

Amici urge the Court to uphold the challenged map that created CD6 because it has unified their congregations and allowed them, finally, to participate meaningfully in the election of their Congressional Representatives.

INTRODUCTION AND SUMMARY OF THE ARGUMENT

Communities of interest play a critical role in racial-gerrymander analysis. A plaintiff trying to prove racial gerrymandering must show that race predominated in the legislature's sorting of citizens into voting districts. This inquiry hinges on whether the legislature subordinated traditional redistricting principles, such as preserving communities of interest, to racial considerations. If the plaintiff can make this showing, the burden then shifts to the State to prove that its race-based choice serves a compelling interest and is narrowly tailored to that end.

In a long line of cases, this Court has assumed (correctly) that complying with the Voting Rights Act of 1965 (the "VRA") is a compelling interest. A State's race-

based sorting of voters is narrowly tailored to comply with the VRA when the State had good reason to believe that the so-called *Gingles* preconditions for liability under the VRA were satisfied. The first of those three preconditions hinges on whether the challenged district adheres to traditional redistricting principles, which (again) include (among others) keeping together communities of interest. So racial-gerrymandering claims may rise and fall with whether the challenged district preserves communities of interest.

Many states define “community of interest” in their districting guidelines. Louisiana, however, does not. Under this Court’s precedent, communities of interest may be defined by many different shared characteristics, such as socio-economics, education, healthcare, geography, needs, and interests. *See Miller v. Johnson*, 515 U.S. 900, 919 (1995); *League of United Latin Am. Citizens v. Perry*, 548 U.S. 399, 432 (2006); *Allen v. Milligan*, 599 U.S. 1, 21 (2023). Amici report based on their long-standing presence in the community that the people united by CD6 are anchored by powerful faith-based ties and shared values, such as the desire to reduce poverty, increase access to healthcare, improve education and educational funding, and maintain or improve essential infrastructure.

Pastor Steven Harris testified below about the faith-based community of interest joined together in CD6. Pastor Harris is a pastor in Natchitoches, Louisiana. Trial Tr. vol. 2, 462, 470. His church activities take him all over CD6—including Shreveport, Alexandria, Opelousas, Lafayette, and Baton Rouge. *Id.* at 465–66, 471. Most of the churches he visits are in CD6, and when guest pastors visit his church, they, too, typically come from CD6. *Id.*

at 465–66, 469–70. The reason is straightforward: These are “common communities of interest” where different churches come together to fellowship. *Id.* 466–67, 471. Beyond faith, Pastor Harris highlighted shared needs and interests relating to education, healthcare, and infrastructure. *Id.* 468–69, 472. Allowing CD6 to elect its own representative means that this community will be able to elect someone with “shared values,” hopefully someone who is “concerned about some of the same things that [these communities] are concerned about.” *Id.* at 472.

Yet the majority of the three-judge district court below disregarded the evidence showing that CD6 unites communities of interest and held instead that race predominated in the creation of the District. Worse, in applying strict scrutiny, the majority jettisoned testimony from CD6 residents in favor of a three-decade-old analysis of Louisiana demographics that had been previously (and correctly) rejected by a different federal court. *See infra* pp. 7-10. That stale analysis included an alleged “north-south religious divide,” which the majority illustrated with a fake anecdote that Huey Long used to tell about his Catholic grandparents and Baptist parents while campaigning for governor—in the 1920s. *Callais v. Landry*, No. 3:24-CV-00122 DCJ-CES-RRS, 2024 WL 1903930, at *22 n.13 (W.D. La. Apr. 30, 2024); *Huey Long*, BRITANNICA, <https://www.britannica.com/biography/Huey-Long-American-politician> (last visited Dec. 20, 2024). The district court’s decisions to (1) disregard evidence that CD6 joins together communities of interest and (2) credit a century-old, fake anecdote in favor of live trial testimony from people living in CD6 today are grave errors that should be corrected by this Court.

Amici reaffirm that the trial testimony, which was incorrectly disregarded by the district court, demonstrates that CD6 unifies a community of interest bound together by common faith, values, concerns, interests, needs, experiences, events, institutions—and even a common dialect.

ARGUMENT

Amici will briefly set out the critical role that communities of interest play in evaluating racial-gerrymander claims. They then build on the trial testimony below to paint a more complete picture of the valuable faith-based community of interest united by CD6.

I. COMMUNITIES OF INTEREST PLAY A CRITICAL ROLE IN A RACIAL-GERRYMANDER ANALYSIS.

The Equal Protection Clause bars a State from unjustifiably sorting its citizens into voting districts on the basis of race. *Bethune-Hill v. Va. State Bd. of Elections*, 580 U.S. 178, 187 (2017). When a voter claims that the State has engaged in racial gerrymandering, the Court uses a two-step analysis to evaluate the challenged district. *Cooper v. Harris*, 581 U.S. 285, 291 (2017). In step one, the plaintiff “must prove that ‘race was the predominant factor motivating the legislature’s decision to place a significant number of voters within or without a particular district.’” *Id.* (quoting *Miller v. Johnson*, 515 U.S. 900, 916 (1995)). This is no easy feat, as the legislature enjoys a presumption of good faith. *See Abbott v. Perez*, 585 U.S. 579, 603 (2018). To prove that race predominated, the plaintiff must show that the “legislature subordinated

traditional race-neutral districting principles,” such as retaining or uniting communities of interest, “to racial considerations.” *Miller*, 515 U.S. at 916.

If the plaintiff makes this showing, the burden shifts to the State, which must “prove that its race-based sorting of voters serves a ‘compelling interest’ and is ‘narrowly tailored’ to that end.” *Cooper*, 581 U.S. at 292 (quoting *Bethune-Hill*, 580 U.S. at 193). One “compelling interest” is complying with the VRA. *See id.* (noting that the Court has “long assumed” that complying with the VRA is a compelling interest).

Section 2 of the VRA bars the State from imposing or applying any “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.” 52 U.S.C. § 10301(a). That bar extends to vote dilution—when a group’s members are scattered across different districts, rendering them politically powerless. *Cooper*, 581 U.S. at 292 (citing *Thornburg v. Gingles*, 478 U.S. 30, 46 n.11 (1986)). To prove a § 2 violation, a plaintiff must first satisfy the *Gingles* preconditions. *Allen v. Milligan*, 599 U.S. 1, 18 (2023). The preconditions are: (1) the minority group is “sufficiently large and [geographically] compact to constitute a majority in a reasonably configured district,” (2) the minority group is “politically cohesive,” and (3) the “white majority votes sufficiently as a bloc to enable it . . . to defeat the minority’s preferred candidate.” *Id.* (first quoting *Wis. Legis. v. Wis. Elections Comm’n*, 595 U.S. 398, 402 (2022) (per curiam); and then quoting *Gingles*, 478 U.S. at 51). The first precondition hinges on whether the district “comports with traditional districting criteria,” including whether it brings together a community of

interest. *Id.* at 18, 20–21. A plaintiff who satisfies the *Gingles* preconditions must then show, “under the ‘totality of circumstances,’ that the political process is not ‘equally open’ to minority voters.” *Id.* at 18 (quoting *Gingles*, 478 U.S. at 45–46).

To demonstrate that a race-based district was drawn to satisfy the VRA, the State must show that it had “a strong basis in evidence” to support its choice. *Ala. Legis. Black Caucus v. Alabama*, 575 U.S. 254, 278 (2015). Put differently, the “State must establish that it had ‘good reasons’ to think that it would transgress the Act if it did *not* draw race-based district lines.” *Cooper*, 581 U.S. at 293 (quoting *Alabama*, 575 U.S. at 278).

In practical terms, this means that the State must have “good reason to think that all the ‘*Gingles* preconditions’ [for § 2 liability under the VRA] are met.” *Id.* at 302 (quoting *Bush v. Vera*, 517 U.S. 952, 978 (1996)). For if it has good reason to think that it could be liable under § 2 of the VRA, “then so too it has good reason to believe that § 2 requires drawing a majority-minority district.” *Id.*

This “strong evidence” or “good reason” standard gives States “‘breathing room’ to adopt reasonable compliance measures.” *Id.* (quoting *Bethune-Hill*, 580 U.S. at 195–96); *see also id.* at 306 (explaining that “States enjoy leeway to take race-based actions reasonably judged necessary”). Otherwise, they would be trapped between the “‘competing hazards of liability’ under the Voting Rights Act and the Equal Protection Clause.” *Bethune-Hill*, 580 U.S. at 196 (quoting *Bush v. Vera*, 517 U.S. 952, 977 (1996)).

II. THE DISTRICT COURT DISREGARDED POWERFUL TESTIMONY THAT CD6 UNITES A COMMUNITY OF INTEREST.

This case presents just that scenario. The Constitution requires States to redraw the boundaries of congressional districts after each decennial census. *Robinson v. Ardoin*, 86 F.4th 574, 584 (5th Cir. 2023). After the Census Bureau delivered the 2020 census data, the Louisiana Legislature began the task of redrawing the State’s six electoral districts. The census data showed that Louisiana’s population had increased, “especially the minority populations.” *Id.* Yet the Legislature passed a congressional district map that strongly resembled the old map—including only one majority-minority district. *Id.* at 585. Then-Governor John Bel Edwards vetoed the map, “applaud[ing] proposed maps that would have created two majority-black districts.” *Id.* The Legislature overrode the Governor’s veto, “and the map became law.” *Id.*

Two groups of plaintiffs immediately challenged the map, claiming that Louisiana had violated § 2 of the VRA by “packing” a majority of Black voters into a single district and “cracking” the remaining Black voters between the other five districts. *Id.* After a five-day evidentiary hearing, a district court preliminarily enjoined the map. It concluded that the plaintiffs had shown that “(1) Louisiana’s black population is sufficiently large and compact to form a majority in a second district, (2) the black population votes cohesively, and (3) whites tend to vote as a bloc usually to defeat black voters’ preferred candidates.” *Id.* at 586 (citation omitted). The Fifth Circuit denied a motion to stay the preliminary injunction pending appeal, *Robinson v. Ardoin*, 37 F.4th

208 (5th Cir. 2022), and later affirmed the district court’s ruling, *Robinson*, 86 F.4th at 589–99.

With multiple rulings in hand that it had likely violated the VRA, and staring down the barrel of a trial on the merits, the Legislature decided to redraw the map to ensure VRA compliance. On January 19, 2024, the Legislature passed SB8, La. Rev. Stat. § 18:1276.1 (2024), which included CD6, the additional majority-minority district contemplated by the district court’s twice-affirmed preliminary injunction. CD6 covers cities from Shreveport in northwest Louisiana to Baton Rouge in southeast Louisiana, tracing the Red River and I-49 corridor diagonally across the State.

The instant lawsuit quickly followed. Now, the plaintiffs claim that the Legislature somehow violated the Equal Protection Clause by creating CD6 predominantly based on race. Despite the lengthy procedural history detailed above, the three-judge district court concluded that race predominated in the drawing of CD6 and further concluded that CD6 could not withstand strict scrutiny because it did not satisfy the first *Gingles* precondition. *Callais v. Landry*, No. 3:24-CV-00122 DCJ-CES-RRS, 2024 WL 1903930, at *17, 24 (W.D. La. Apr. 30, 2024). In doing so, the court disregarded—among other things—powerful testimony from Pastor Harris detailing how CD6 joins together a longstanding, faith-based community of interest. Such evidence that CD6 maps onto communities of interest is powerful proof that the legislature did not subordinate race to traditional redistricting principles. *See Miller*, 515 U.S. at 916 (explaining that a State may defeat a racial-gerrymander claim by showing that race-neutral principles, such as respect for “communities

defined by actual shared interests,” are the “basis for redistricting legislation”). But the district court erroneously ignored Pastor Harris’s testimony in assessing racial predominance and, in assessing strict scrutiny, jettisoned Pastor Harris’s live, contemporaneous accounts in favor of a 30-year-old analysis of Louisiana demographics. *See id.* at *22–23 (relying on the “local appraisal” analysis set forth in *Hays v. Louisiana*, 839 F. Supp. 1188 (W.D. La. 1993)).

But “*Hays* is a red herring,” *Robinson v. Ardoin*, 605 F. Supp. 3d 759, 834 (M.D. La. 2022), in light of the *critical* differences in Louisiana’s Black population between 1990 (*Hays*’ demographics data) and 2020. The Black population in Louisiana has increased by nearly 250,000 people since the *Hays* litigation. *Id.* And, tellingly, the court provided no evidentiary hook for its decision to paper over the testimony it heard from the people living in CD6 today with *Hays*’ stale history.

Building on that critical trial testimony, Amici prove below that the legislature’s drawing of CD6 was driven by race-neutral principles because CD6 maps onto long-standing and distinct communities of interest. This same proof also shows that CD6 easily satisfies the first *Gingles* precondition.

III. CD6 BRINGS TOGETHER A VALUABLE FAITH-BASED COMMUNITY OF INTEREST.

Amici are faith leaders who live in and lead churches throughout CD6. They are from all corners of the District, yet they share the same story about their communities.

Amici describe first the powerful ties that bind together the communities in CD6 and the role that churches play there. Anchored in faith and family, they also tell the Court about the common values they hold dear and the collective concerns they share—from reducing poverty, to increasing access to healthcare and education funding, to maintaining the ports along the Red River. Last, they explain that they used to be systemically ignored and that now, united in CD6, they can participate meaningfully in the election of their Congressional Representatives.

A. Amici reflect on the powerful faith-based ties in communities throughout CD6 and the role that churches play there.

Amici begin with some historical context. The United States has historically been a “highly religious nation.” *Independents Take Center Stage in Obama Era, Section 4: Religion and Social Values*, PEW RES. CTR. (May 21, 2009), <https://www.pewresearch.org/politics/2009/05/21/section-4-religion-and-social-values/>. This is even more true in Black communities. “Black Americans are more religious than the American public as a whole on a range of measures of religious commitment,” including belief in God and regular church attendance. Besheer Mohamed et al., Pew Res. Ctr., *Faith Among Black Americans* 16 (Feb. 16, 2021).

In Black communities in Louisiana, 87% of people say that religion is “[v]ery important” to them. *Racial and Ethnic Composition Among Adults in Louisiana*, RELIGIOUS LANDSCAPE STUDY, PEW. RES. CTR., <https://www.pewresearch.org/religious-landscape-study/database/state/louisiana/racial-and-ethnic-composition/>

(last visited Dec. 20, 2024). Only 64% say the same in the surrounding white communities. *Id.*

The churches in Black communities play an outsized role in their congregants' lives, providing far more than Sunday services and Wednesday Bible study. "Black churches have historically taken on numerous civic roles . . . , stretching back as far as the antebellum period," such as "running community programs" and "hosting civil rights meetings." Mohamed et al., *supra*, at 80, 85; cf. *Religion and Black Power*, NAT'L MUSEUM OF AFR. AM. HIST. & CULTURE, SMITHSONIAN INST., <https://nmaahc.si.edu/explore/stories/religion-and-black-power> (last visited Dec. 20, 2024) ("African American churches provided spiritual and practical support for civil rights advocates.").

From the northwest corner of CD6 in Shreveport to the southeast corner of CD6 in Baton Rouge, Black churches were the heart of the civil rights movement and remain the backbone of these communities.

Start in Shreveport. The Old Galilee Baptist Church was the "main hub for the African American Civil Rights movement." *Old Galilee Baptist Church (Shreveport, Louisiana)*, NAT'L PARK SERV., <https://www.nps.gov/articles/000/old-galilee-baptist-church-shreveport-louisiana.htm> (updated Jan. 31, 2024). Its hallowed halls hosted the Reverend Doctor Martin Luther King Jr., where, in 1958, "he gave his famous 'Speech at Galilee.'" *Id.* A mile to the west, Little Union Baptist Church is likewise remembered as an "epicenter of the Civil Rights struggle." Jaclyn Tripp & Gary Joiner, *Little Union Baptist Church: the Epicenter of Shreveport's Civil Rights Movement*,

KTALNEWS.COM, <https://www.ktalnews.com/louisianas-lost-history/little-union-baptist-church-the-epicenter-of-shreveports-civil-rights-movement/> (updated Jan. 18, 2024). It was “one of the last places” the Rev. Dr. King “preached before his assassination in 1968.” John Walton, *Little Union Baptist Church Honored with Marker on Louisiana’s Civil Rights Trail*, KTALNEWS.COM, <https://www.ktalnews.com/news/local-news/little-union-baptist-church-honored-with-marker-on-louisianas-civil-rights-trail/> (updated May 7, 2021).

On the other end of CD6 in Baton Rouge, the “nation’s first civil rights bus boycott was planned at the Mount Zion First Baptist Church.” *Meeting Places*, <https://www.louisianacivilrightstrail.com/themes/meeting-places> (select “Baton Rouge”). The 1953 Baton Rouge bus boycott was the “nation’s first protest of its kind and inspired the Montgomery bus boycott two years later.” Tiana Kennell, “*Best-kept Secrets*”: *Louisiana Civil Rights Trail Marker Unveiled at Shreveport Church*, SHREVEPORT TIMES (May 7, 2021, 8:00 PM), <https://www.shreveporttimes.com/story/life/2021/05/08/shreveport-little-union-baptist-church-louisiana-civil-rights-trail/4977633001/>.

Beyond civil rights, Black churches across CD6 have played a pivotal part in their communities’ social and economic development—regardless of denomination. West of Baton Rouge and north of Lafayette, in Opelousas, Father Albert McKnight, a Catholic practitioner, served both Catholic and Protestant Louisianans throughout CD6 when he “organized and led [in 1969] a peaceful economic revolution among low-income families in the rural South by teaching them how to help themselves by working together in cooperatives and establishing a widespread system of

credit unions.” *Fr. Albert J. McKnight: 1927–2016*, 34 IN A WORD: A PUBL’N OF THE SOC’Y OF THE DIVINE WORD, S. PROVINCE, no. 4, Apr. 2016. Fr. McKnight created “sources of financial and technical assistance for cooperatives such as the Southern Cooperative Development Program and the Southern Cooperative Development Fund.” *Id.* Among the many positions he held, Fr. McKnight was “pastor of Holy Ghost Catholic Church in Opelousas, Louisiana”—“the largest African American church in the country.” *Id.*

Today, churches remain the “institutional backbone of the African American community.” LaPrincess C. Brewer & David R. Williams, *We’ve Come This Far by Faith: The Role of the Black Church in Public Health*, 109 AM. J. PUB. HEALTH 385, 385 (2019). As Amici explain below, the churches in CD6 go the extra mile² by providing an extensive range of community services. *See infra* pp. 16-18. They “look at the total concerns of people”—the “whole person, not just the spiritual part.” And not just for their members. They support anyone in the community seeking “solace,” “direction,” or “uplifting.” *See infra* pp. 17-18. The community that CD6 brings together is both cohesive and distinct, anchored in powerful faith-based ties and shared interests.

Most of Amici’s congregants live in CD6. When Amici travel to preach to other churches, and when guest pastors visit their churches, they generally travel within CD6. The reason is simple, Reverend Mitchell explained: The

2. This common idiom finds its roots in the Bible. In Jesus’s Sermon on the Mount, he preached about the value of service and instructed his followers: “If anyone forces you to go one mile, go with them two miles.” *Matthew* 5:41.

faith leaders within CD6 are “on the same page” and “hold some of the same views when it comes to the people [they] serve.” Amici said that the faith-based ties binding CD6 together go back generations. Pastor Donaway, who lives in Shreveport (the northwest corner of CD6) and leads Shiloh Baptist Church in Natchitoches (between Shreveport and Alexandria) explained:

District 6 is made up of pastors that have known each other for some time. And it goes back to some of the pastors’ fathers and grandfathers, [who] were pastors and preachers in District 6. It goes back further than the pastors today. It goes back to our grandfathers and great grandfathers who were pillars of the community years and years ago. That’s why I feel that District 6 is different than any other district. We have a culture that has stretched back many years. Not only do the pastors work in the churches, they were community leaders and civil rights leaders in the area as well.

Pastor Jackson similarly shared:

I could name a couple of churches from each one of th[e] [major] cities [in District 6] that we all have worked together for. I don’t know, I would say, of course, it hasn’t been that long for me, but I know this goes back 60, 80 years probably, that we have been institutions, organizations working together like that.

Amici’s stories about the faith-based ties across congregations in CD6—which echo the trial testimony—

completely belie the alleged “north-south religious divide” that the majority viewed as proving that CD6 divides, rather than unites, communities of interest. *See Callais*, 2024 WL 1903930, at *22 & n.13. To the contrary, Amici prove that congregations and denominations throughout CD6 are cohesive in values, practices, and a shared commitment to advancing their local communities.

These ties transcend religion. As Pastor Evans put it, “We do more than just have church services on Sunday.” Churches are the epicenter of community well-being in CD6, attending to every aspect of their congregants’ lives. Pastor Jackson joked:

I had an interview earlier today with somebody from New York University doing some research on our community—our church and our community—the work that we’re doing. And we talked for about 45 minutes and then closing, she said, “anything else that we need to add?” I said, “Oh, we do have church on Sundays.” And so we spent most of the time talking about what we do in our community and how we’re working to make our communities more resilient, and then how what we’re doing, as relates to—we built a resilience hub in our community, community gardens, we’re working to create ecosystems for better health outcomes—and as we do those kinds of things we’re gathering, or gaining I should say, evidence all the time of what works and then we seek to scale those with our friends and colleagues who are looking to improve their communities across the State as well. So . . . one of the things that we do have, as

a valued principle, is that while we are guided by faith principles, we don't gather for religion.

Reverend Mitchell emphasized the constant presence of the church in communities in CD6—even in the lives of people who do not belong to a church family:

[The church is] holistic in the sense that we concern ourselves with the whole person, not just the spiritual part. It's not just for our members. It's for anyone who would be looking for solace, looking for direction, looking for uplifting, looking for encouragement, whatever the case may be. Certainly, it is more than religion, more than just spiritual. It's the total life a person experiences.

Pastor Donaway said the same:

District 6 has always been a[n] [area] where people who try and work together and come together and try and do things together in and around the community. We always try and incorporate the community as well as the church community—not just separating the church community and not including the [broader] community. Because of the way we try and work together and come together and move forward with the community as well.

The churches throughout CD6 join hands to serve their communities. Pastor Jackson explained:

We have found that, as [it] relates to what we do—to not only fellowship and worship as

religious institutions—but the way we work together even in our public policy, we do it better together. So we’ve found, particularly over the last 20 years, we’ve grown stronger in developing a regional and statewide effort. So we have worked more together. Again we have groups—we have one group, Together Louisiana, for example, is a wonderful example of interfaith as well as intra-faith groups who work together. We’ve created friendships with folks who have the exact same kind of institutions, same types of institutional issues, same types of problems, same types of possibilities, whether they be from Lafayette, Alexandria, Shreveport, Opelousas, and all of those parishes in between. We have relationships through our groups.

B. Amici describe the common values, collective concerns, and shared events and institutions in CD6.

Because the communities in CD6 share the same needs and values, the churches there are able to seamlessly serve everyone from Shreveport to Baton Rouge. In one conversation, Reverend Kirts shared:

[The people in District 6 want] the same thing for our community, our people, our children, our elderly, and homeless people, trying to make sure that we have what we need to cover these areas within our District. Outside of God being the bigger head of our life, we’re all the same base in Jesus Christ our Savior.

Later in that conversation, he said that the churches in CD6 are “always” providing community aid within the District. *Id.*

Pastor Evans added that “because of [their shared] geographical location,” the people in CD6 have the “same needs.” “There’s a lot of poverty, low-income people within that District 6.” “[E]ach city within District 6 reaches out to other communities within the District to help them, it’s not just one church. The need is the whole District 6.” “So we try to reach out, to communicate with the pastors, the faith leaders, to try to help where we can.”

Beyond having the same needs, the people in CD6 share the same values. Pastor Evans said, “We are mostly bound by our faith, in what we believe in, and that’s basically what binds us together, our similar beliefs in our faith community.” But the ties that bind go much further. Pastor Holden explained:

[We have] [c]ommon values, one is family. We have a lot of family in common in this area. We support each other on whatever we need to be supported on. I have relatives in Lafayette, Baton Rouge, Alexandria area, Shreveport area. We support each other for whatever reasons—if it’s just a graduation we go. We go to graduations together, we go to church together, we have fellowship, if there’s a fundraiser we go together, if there’s a death we go to support.

Pastor Evans echoed:

[The people in District 6] care about their families and they care about their church and they care about their neighbors. . . . [F]amilies are close, church members are close, and they're willing to roll up their sleeves and help each other in any way they can.

What is more, the communities in CD6 share the same events, schools, and institutions. “Just to start off,” Pastor Holden said, “there’s a radio station there called KAYT—it covers the area.” Broadcast from Alexandria and Shreveport, among other places, listeners tune in from all over CD6 for its Christian programming. *Program Guide*, KAYT-FM, <http://www.kaytfm.com/kayt/page.php?pid=programguide> (last visited Dec. 20, 2024). Pastor Jackson and Reverend Kirts also mentioned the “Central Louisiana Interfaith” organization. Pastor Donaway added:

You have the Ben D. Johnson memorial scholarship that we participate in every year. You have the MLK triangle that is a ceremony that we’re getting ready to try to put together for 2025. We also have what you call the 12 districts, which I’m one of the presidents of. It’s 12 churches that make it up. Every 5th Sunday, it’s at a different church, and the pastors in those 12 churches gather and plan out things they’d like to do in the community and the church.

Amici also highlighted educational ties in CD6. Reverend Smith said that most of the people he

associates with attended or graduated from Louisiana State University, Grambling State University, Southern University, or Baton Rouge Community College. Pastor Holden added:

The seminary college I teach at, we are a satellite of the seminary in Shreveport—that connects us. The main campus is Shreveport, but we have a campus here in Natchitoches, so that shows our connectivity and our fellowship.

The list goes on. Pastor Jackson shared:

I have friends and associates, colleagues, who are a part of what we call our Louisiana Baptist State Convention as well—we're from all of those cities [in District 6]. We hold our annual meetings in July, and we hold November, May, and February meetings. Typically, every year, of those four meetings, at least two of those meetings will be in two of the [major] cities [in District 6].

Spread along the Red River and I-49 corridor, these communities share the same concerns and problems—concerns and problems that other parts of the State do not have. Pastor Jackson described:

[W]e found that we have the same kind of issues because we look at major cities, like Baton Rouge, Lafayette, Alexandria, Shreveport, we've got a lot of crime issues that's the same in our communities, so some of the things we work on, again, while they're unique to our areas,

they're common in the sense that because we are from larger cities that we have issues that sometimes our friends, in Ville Platt, and other smaller places do not have.

...

We have more in common—Shreveport does, for example, with Baton Rouge and Lafayette than we do with some of those smaller parishes and towns that are closer to us. And we're the only large city in our area, so sometimes we seem to be unfortunate outliers with a lot of the bad things that happen. But when we are connected with Baton Rouge, Alexandria, Lafayette, we got some common problems that some smaller communities don't have.

Reverend Kirts added:

[Our shared concerns include] the ports. We have to look at the voting problems. We have to look at the ending of poverty. Education, recreation—the lack of.

A tale of common deprivation—lack of education funding, healthcare, safety, resources—was ubiquitous among the Amici. So, too, were the stories of their fight to overcome it. Reverend Smith said:

[The people in District 6] want to see equity within the community, or coming from our governmental institutions. That equity includes access to quality education, access to quality

healthcare, access to good jobs where they can earn a decent income for their families. So we want equity within our community. And one of the things that we petition for is a government that recognizes our value and is willing to yield itself, bend itself toward us in order to make sure we have the same access to things that a majority of culture has—that white folks have.

Reverend Mitchell listed the many concerns shared across CD6, including the struggles to earn a living wage, get access to affordable healthcare and education funding, and keep the communities safe. “Those disparities bind us because we all deal with those disparities in our individual cities.” “Some of the same resources that’s needed here in Baton Rouge, it’s needed in Shreveport, Alexandria, and all of the other communities. . . . We need the same things, the same things are not being done.”

Even the dialect is cohesive in CD6. “If you go from Shreveport to Baton Rouge, our accents are not that in New Orleans. When it comes to dialect, a word might mean something different in a place like New Orleans,” Pastor Holden explained.

C. Amici explain that they used to be systemically ignored and that now, united in CD6, they can participate meaningfully in the election of their Congressional Representatives.

Amici—from all corners of CD6—stand united in their plea that this Court uphold the challenged map. It is telling that faith leaders from all corners of CD6 join hands in support of the District. It is telling that they

all agree that this map has given their communities a voice and a Representative who shares their values and priorities. It means that Louisiana did exactly what it was supposed to do when drawing this new district: It joined together a community of interest that was previously politically powerless because its members were scattered across multiple districts. Start in Shreveport with Pastor Jackson:

I don't know [my previous representative], and he doesn't know me, and yet he [wa]s our Congressman. So one of the major things for me is that, when District 6 was drawn, I said to our folks, "Hey, listen up, we may have the opportunity to have representatives."

...

[Without District 6,] we would be disenfranchised considerably, and unfortunately there's a lot of people in our community who are accustomed to being disenfranchised and sometimes get comfortable with it.

Pastor Donaway echoed:

[N]ot just me, but to all of the people of District 6—we take District 6 as a district of loving, caring people that want to make a difference within the community. And we take District 6—we take this serious—and we would like for the Supreme Court to look at this District and really focus on this District, and know that this District is made up of some strong

pastors, some strong leaders, and some strong members of the community that want to make a difference and do some things to better the community of District 6.

They say the same thing in Natchitoches. Pastor Holden relayed:

[T]his new District 6, being able to vote in it, gives it a new life—it's like a breath of fresh air to be able to say, "Okay, I think I'm represented in this Congressional District." Because this is kind of the first time, when they had the campaign going, that we were bombarded in advertising from the congressional standpoint. People actually came and said, "I want your vote," to us and that felt good, to feel like they heard us, to feel like we were important. [Previously,] it would be a sign on the side of the road from someone saying they want to be our Congressperson, and you would not see them in our town or city. But [now] these people who campaigned, they came to our restaurants, to our events, and even came to some of our churches to say hello and that made people think that they were important enough that their vote counted, so I think it means a lot to us and our community to be able to vote in District 6.

Pastor Evans added:

[W]e feel comfortable that our voice will be more available heard or readily heard. . . . [I]

t means a lot to us to feel like our voices are being heard and knowing that our [newly-elected] representative, most of [us], know him personally. He's been visible from Caddo [Parish, whose Parish seat is Shreveport,] all the way down to Baton Rouge, so most of us know him. . . . And he makes himself readily available. So it means a lot to be able to know him and to be able to sit down and talk to him and to be able to let him know what our needs and concerns are.

...

I only knew [my previous representative's] name. . . . [W]e never heard of any occasions that he would be speaking to the minorities.

...

Everybody is excited about [our new representative], looking forward to it.

And in Alexandria. According to Reverend Kirts:

[District 6] means a lot because we can reach a lot more of, what they say, the minority. And we'd be able to educate them—the importance of being able to have this District 6—to be able to register more people in this district and have them have a voice in this District.

And also down in Baton Rouge. Reverend Smith stated:

[District 6] means that I can vote for someone who . . . shares my experiential background,

shares my educational background, and shares my values. Someone who goes to a church like the one I pastor. Someone who is committed to the community that deals with the same people I deal with on a daily basis. That was not true of the previous representative. No offense to [my previous representative], but [he] was out of touch with my communities.

...

[Before District 6,] [t]here was no face to face contact with the previous representatives. [Now candidates are] coming to worship experiences, sitting with my congregation, having the opportunity to talk with them before and after worship. But having the opportunity to talk with people and shake hands with people and hear from them face to face.

Now these communities are heard and have achieved meaningful participation in the democratic process. Reverend Mitchell said:

Now we believe we're going to be heard. The worst thing in the world is to be in the room and speak but nobody listens. You have serious concerns and speak and nobody listens. Then they want to give you what they think you need, what they think you ought to have. I don't want you to give me what you think I need, I want you to listen. That's the difference between then and now.

...

The only reason I knew who was running previously is because I saw it on the news somewhere, not because the candidate actually campaigned in the area. But now, you know, this past election we had candidates available in the district. . . . [Before] it was just an atrocious thing.

This community of interest united in CD6 hopes and prays that it remains able to elect a Representative who shares the people's values and priorities. As Pastor Holden shared,

[W]hen I kind of mentioned to [my congregation] to be in prayer for what's going on. They were distraught like "Oh no, we're gonna lose this? Because this is something we really wanted. We really want to see where this takes us in how we're represented." So they were a bit bothered by the fact that this could be snatched away from them after they came out and campaigned and talked to their friends and loved ones about voting and made sure they voted in this last election to get this person elected for Congressional District 6. So they don't like the idea of losing that opportunity.

CONCLUSION

"The worst thing in the world is to be in the room and speak but nobody listens," Reverend Mitchell poignantly observed. People are listening now.

This fall marked the first election under CD6. Cleo Fields, a "long time member of the Mt. Pilgrim Baptist

Church,” ran against four other candidates and won over 50% of the vote, avoiding a run-off. *Meet Cleo*, CLEO FIELDS FOR CONGRESS, <https://www.cleofields.com/meet-cleo>; *Democrat Cleo Fields Wins Re-drawn Louisiana Congressional District, Flipping Red Seat Blue*, AP NEWS (Nov. 11, 2024), <https://apnews.com/article/democrat-cleo-fields-louisiana-congressional-district-01cbab22601bef1cd8f4463a1ad395ef>. Unlike the candidates who came before him, he campaigned in and made himself available to Amici’s congregations from Shreveport all the way down to Baton Rouge. Joined together in the same District, the faith-based community of interest that Amici represent has finally been given meaningful participation in the democratic process. They are now able to elect someone who represents *them*.

For the reasons above, the three-judge district court’s decision should be reversed.

Respectfully submitted,

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