EXHIBIT A

COURT OF APPEAL, FIRST CIRCUIT STATE OF LOUISIANA DOCKET NO. 2017-CA-1141

VOICE OF THE EX-OFFENDER, ET AL.,

Plaintiffs-Appellants

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STATE OF LOUISIANA, ET AL.,

Defendants-Appellees

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AMICI CURIAE BRIEF BY NAACP LEGAL DEFENSE & EDUCATIONAL FUND, INC., THE SENTENCING PROJECT, & SOUTHERN POVERTY LAW CENTER IN SUPPORT OF PLAINTIFFS-APPELLANTS

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*Motion to enroll pro hac vice pending

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ARGUMENT

- I. FELONY DISENFRANCHISEMENT LAWS, INCLUDING LOUISIANA'S, ARE INCONSISTEN T WITH THE FUNDAMENTAL PRINCIPLE OF AN INCLUSIVE SOCIETY.
 - A. Louisiana's Felony Disenfranchisement Law Is Rooted in Racial

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¹⁹ Kyr supratal 8 at 11142.

²³ Hby suprate 2 at 92-93.

²⁰ A**þi**ĐiBrat5-6, nl; see alsoAþiRiBrat15 nl 1 (ig La. Cto at VI, §4 (1812)).

²¹ A**pisOiB**r at 5-6, nl (**pis**a **pl**(**ig**La. C**t** at VI, §4 (1812)).

²² Id. at6 (**i**La. Chat VIII, § (1921)).

1. Explicit Racial Discrimination Motivated the Adoption of Louisiana's and Other States' Criminal Disenfranchisement Laws.

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²⁵ Hunter, 471 U.S. at226.

²⁶ Id. at230.

²⁷ Add. Ship Ne Challenging Criminal Disenfrantisement Under the Voting Rights Act: A New Strategyl 03 YalL.J. 537, 538 (1993).

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²⁸ Louisiana,225 F. Spat367-70.

²⁹ Id. at369.

³⁰ Id. at371.

³¹ ld.

³² ld.

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³³ Louisiana 225 F. Spat373.

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2. The Fear of Purported Criminality of Black People Has Also Led to the Adoption in Louisiana and Elsewhere of Felony Disenfranchisement Statutes.

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- II. RESTORATION OF VOTING RIGHTS FOR PEOPLE WITH FELONY CONVICTIONS ON PR OBATION AND PAROLE WOULD STRENGTHEN COMMUNITIES IN LOUISIANA AND HAS WIDE PUBLIC SUPPORT.
 - A. Expanding Voter Eligibility in Lo uisiana and Elsewhere Leads to More Inclusive Communities by Increasing Civic Engagement and Public Safety.

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⁷⁷ B**s** supra**6**76 at 74041.

⁷⁸ See, e.g A Br at6; ABr at4.

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B. The Nationwide Momentum Against Disenfranchisement Laws Supports Expansion of Voting Rightsfor Individuals with Felony Convictions in Louisiana

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⁸⁹ Mark. Dhim Prisoner Disenfranchisement Policy: A Threat To Democrate A Threat Threat Threat Threat A Threat Threat Threat A Threat Threa

⁹⁰ Id. (in Handble Outsiders: Studies in the sociology of devia (not) UK: Fe PatGtCtMatan 1963)).

⁹¹ Felony Disenfranchisement: A Primeupratel 4 at5.

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⁹³ **N&**D. **Pb** Expanding the Vote: State FeloDysenfranchisement Reforma Ph(2010) at1-2, h/bil/2k.81y
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JaniS. Nk(N.Y. BarNo 2851301)

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^{*}Motion to enroll pro hac vice pending