

EXHIBIT A

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

VOICE OF THE EX-OFFENDER, ET AL.,

Plaintiffs-Appellants

■

STATE OF LOUISIANA, ET AL.,

Defendants-Appellees

On Appeal
19th Cir.
Harrisburg, Pa.
12, State
Docket No. 649587
Hoboken, N.J.

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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⁸ *Wesberry v. Sanders*, 376 U.S. 1, 17 (1964).

⁹ *Adkins v. Huckabay*, 99-3605, p7 (La. 2/25/00); 755 So2d 206, 211 (Tebri
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Prop. Owners 04-1674 p14 (La. 2/4/05); 894 So2d 225, 335 (Tebri
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thronilo pr'ApRiBr at 14.

¹⁰ *Shr* supra at 25-62.

¹¹ *Id.*; see also *Shaw v. Reno*, 509 U.S. 630, 640 (1993) (aly
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¹³ *Ag B h C U g & J Maa*, Ballot Manipulation and the "Menace of
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ARGUMENT

- I. FELONY DISENFRANCHISEMENT LAWS, INCLUDING LOUISIANA'S, ARE INCONSISTENT WITH THE FUNDAMENTAL PRINCIPLE OF AN INCLUSIVE SOCIETY.

- A. Louisiana's Felony Disenfranchisement Law Is Rooted in Racial

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¹⁹ K e r s u p r a d 18 a t 111-12.

²⁰ A p t O j B r a t 5-6, n l ;
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28 Louisiana,225 F. Spat367-70.

29 Id. at369.

30 Id. at371.

31 Id.

32 Id.

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³⁴ Id. at 374 (4 La. SaeJ. 1898, 33-35) (e

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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 PROBATION AND PAROLE WOULD STRENGTHEN COMMUNITIES IN LOUISIANA AND HAS WIDE PUBLIC SUPPORT.

A. Expanding Voter Eligibility in Louisiana and Elsewhere Leads to More Inclusive Communities by Increasing Civic Engagement and Public Safety.

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⁷⁷ See, e.g., *supra* note 76 at 74041.

⁷⁸ See, e.g., *supra* note 6; *supra* note 4.

⁷⁹ *supra* note 1, & *supra* note 2.

Transition and the Civic Reintegration of Convicted Felons in Louisiana: A Case Study

of the Louisiana State Penitentiary

in the White Paper (2004).

Less than the Average Citizen: Stigma, Role

Transition and the Civic Reintegration of Convicted Felons in Louisiana: A Case Study
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B. The Nationwide Momentum Against Disenfranchisement Laws Supports Expansion of Voting Rights for Individuals with Felony Convictions in Louisiana

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⁸⁹ Mark D. ... Prisoner Disenfranchisement Policy: A Threat To Democracy, 23 ... 235, 243 (2005).

⁹⁰ Id. (H. ... Outsiders: Studies in the sociology of deviance (1963)).

⁹¹ Felony Disenfranchisement: A Primer, supra note 4 at 5.

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93 N.D. P Expanding the Vote: State Felony Disenfranchisement Reforms

P(2010) at 1-2, p. 281

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The Court has held that the Equal Protection Clause of the U.S. Constitution requires that the State's disenfranchisement laws be applied equally to all persons. See *Shelby County v. Holder*, 133 S. Ct. 382 (2013). The Court has also held that the Equal Protection Clause requires that the State's disenfranchisement laws be applied equally to all persons. See *Shelby County v. Holder*, 133 S. Ct. 382 (2013).

CONCLUSION

The Court has held that the Equal Protection Clause of the U.S. Constitution requires that the State's disenfranchisement laws be applied equally to all persons. See *Shelby County v. Holder*, 133 S. Ct. 382 (2013). The Court has also held that the Equal Protection Clause requires that the State's disenfranchisement laws be applied equally to all persons. See *Shelby County v. Holder*, 133 S. Ct. 382 (2013).

Date: 11/16/2017

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¹⁰³ See *Expanding the Vote*, supra note 3 at 3; see also *Barber v. Matthews*, 133 S. Ct. 1193 (2013) (holding that the Equal Protection Clause of the U.S. Constitution requires that the State's disenfranchisement laws be applied equally to all persons); *Shelby County v. Holder*, 133 S. Ct. 382 (2013) (holding that the Equal Protection Clause of the U.S. Constitution requires that the State's disenfranchisement laws be applied equally to all persons).

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