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WESTERN DISTRICT OF LOUISIANA

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION

REV. CHRIS AUGUSTINE, REV.
VERNON SIMON and REV.
CHARLES GUILLORY

CIVIL ACTION NO. 1:06CV1662

VERSUS

JUDGE DRELL

AVOYELLES PARISH POLICE JURY,
ET AL

MAG. JUDGE KIRK

**PLAINTIFFS' PETITION TO ENJOIN THE SEPTEMBER 2007
QUALIFYING AND OCTOBER 2007 GENERAL ELECTIONS**

1.

Plaintiffs seek to enjoin the September 2007 qualifying and the October, 2007 general elections for the Avoyelles Parish Police Jury and enforce the provisions of the Fourteenth and Fifteenth Amendments to the United States Constitution and §2 of the Voting Rights Act of 1965, 42 U.S.C. §1973.

2.

The parties have agreed in conference with this Honorable Court that African-Americans are mal-apportioned and under-represented on the Avoyelles Parish Police Jury and that elections in Avoyelles Parish are polarized along racial lines.

3.

The parties have agreed that the current nine member Avoyelles Parish Police Jury should consist of three majority-minority districts.

4.

Each party has developed differing redistricting plans incorporating three minority districts.

5.

Qualifying for the October 20, 2007 general election for Avoyelles Parish Police Jury members is currently scheduled for September 4 - 6, 2007.

6.

To allow the election of the current mal-apportioned Avoyelles Parish Police Jury would be in violation of provisions of the United States Constitution.

7.

Petitioners show that the likelihood of success on the merits of their claim is great, as evident by the agreement between the parties to increase the number of minority districts from two to three.

8.

Petitioners show that there is a substantial threat of irreparable injury to minorities in Avoyelles Parish if the injunction is not granted, in that a mal-apportioned Avoyelles Parish Police Jury will continue in existence, further diluting the voting rights and representation of minorities in Avoyelles Parish.

9.

The aforementioned threatened injury to plaintiffs and other minorities in Avoyelles Parish greatly outweighs any perceived injury to the Avoyelles Parish Police Jury which will

not suffer at all if allowed to perpetuate a mal-apportioned system of representation.

10.

Petitioner show further that the granting of an injunction to stop the upcoming qualifying of current police jury members will not disserve the public interest, when in fact it will enhance the public interest by affording equal protection under the law and equal and fair representation as afforded by §2 of the 1965 Voting Rights Act.

11.

There is a real, actual and urgent controversy existing between the parties. Plaintiffs have no adequate remedy at law other than this action for injunctive relief. Plaintiffs are suffering and will continue to suffer irreparable injury as a result of a mal-apportioned Avoyelles Parish Police Jury should the September 4, 2007 qualifying period and general election schedule remain as is.

12.

Plaintiffs have attempted to resolve the differences which exist between the parties to no avail.

WHEREFORE, petitioners respectfully pray that this court:

1. Set a hearing date prior to September 4, 2007, whereby the opposing redistricting plans for election of Avoyelles Parish Police Jury members can be submitted to this Honorable Court for selection of a plan to remedy the violations of petitioners' rights described hereinabove;

2. Enjoin the qualifying period for election of Avoyelles Parish Police Jury members

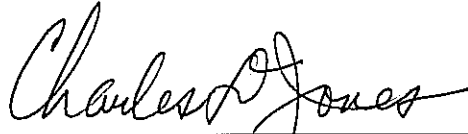
which begins September 4, 2007 and the general election set for October 20, 2007;

3. Set a new election schedule to accommodate a new redistricting plan adopted by the Court;

4. Award plaintiffs attorney fees and costs of this litigation as prevailing parties; and

5. Retain jurisdiction of this action and grant to plaintiffs any further relief which may be necessary and proper to insure that racially fair election procedures are employed in the election of a three minority member Avoyelles Parish Police Jury.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Charles D. Jones", is written over a horizontal line.

CHARLES D. JONES

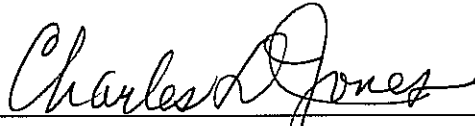
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Bar Roll No. 07476

CERTIFICATE

I certify that a copy of the foregoing has been forwarded to counsel for the Avoyelles Parish Police Jury by placing same in the U. S. Mail properly addressed and postage prepaid to:

Charles A. Riddle, Esq.
Avoyelles Parish District Attorney
P. O. Box 1200
Marksville, Louisiana 71351

Monroe, Louisiana, this 22nd day of August, 2007.

A handwritten signature in cursive script, reading "Charles D. Jones", written over a horizontal line.

CHARLES D. JONES