UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF LOUISIANA

INCLUSIVE LOUISIANA; MOUNT TRIUMPH BAPTIST CHURCH; RISE ST. JAMES, by and through their members *Plaintiffs*, vs. ST. JAMES PARISH; ST. JAMES PARISH COUNCIL; ST. JAMES PARISH PLANNING COMMISSION, *Defendants.*	Civil Action No. 2:23-cv-00987 Section J Judge Carl Barbier Magistrate Judge Janis van Meerveld

DECLARATION OF SHARON LAVIGNE

I, Sharon Lavigne, declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am a life-long resident of St. James Parish. I currently reside in the Fifth District of St. James at 8581 Highway 18, St. James, Louisiana.
2. In 2018, I founded the organization RISE St. James. RISE St. James is a faith-based grassroots organization that is fighting for environmental justice as it works to defeat the proliferation of petrochemical industries in St. James Parish and throughout Louisiana. Through my work with RISE, I am trying to make St. James Parish and all of Louisiana a better place to live and thrive because I believe that we deserve to live in a clean environment, free from worry about pollution. I want to leave something here for our grandchildren and great grandchildren.
3. In 2023, along with Inclusive Louisiana and Mount Triumph Baptist Church, RISE filed the instant litigation in the Eastern District of Louisiana seeking a moratorium on

industrial development in St. James Parish. We brought this case because we are tired of St. James Parish filling our communities with industrial pollution. We want a clean and safe environment for our families and neighbors.

4. In recent months, I have noticed an increase in negative comments directed against RISE St. James, including comments against me directly. These comments, made online and in person, suggest that RISE and its members are paid protestors whose advocacy is being directed and controlled by out-of-state funders.

5. There is a Facebook page called "The St. James Parish 411" where some residents have posted a significant number of negative comments against RISE. For instance, the attached image, Exhibit A, is a true and accurate screenshot of a Facebook post suggesting that RISE "busse[s] in . . . loud mouths" to attend Parish Council meetings.

6. Some of the comments that I have seen disparaged me personally, suggesting that I am more interested in traveling around the world than in making my community safe. *See* Exhibit 11, Sharma Pokharel Declaration.

7. I am concerned that these online comments have subjected RISE's members to harassment and intimidation. I worry that if individual RISE members' names appear in these posts, as mine have, it will discourage them from engaging in RISE's important advocacy for clean air and water in St. James Parish.

8. In addition to online comments, there has been a campaign of intimidating yard signs. These yard signs say "Stop the Noise" and have a copy of RISE's logo in a red circle with a line through it. These signs have been placed in yards all over the Parish. As Exhibit A references, I believe there are over 200 yard signs across the Parish.

9. When I drive through the Parish on my way to church, to see my family, or to go to the grocery store, I see these signs everywhere. The signs feel like a constant reminder that RISE's work is under attack.

10. A significant number of these signs, including one very large billboard-sized sign, were placed across the street from my daughter Shameka Lavigne's house in Paulina, St. James Parish. Attached is a true and accurate copy of a photo of that sign. *See* Exhibit B.

11. I was very upset by that big sign in particular because Shameka is not a member of RISE, but I felt that she had been targeted because of her perceived affiliation with RISE. I was also very worried about Shameka's safety and well-being, as well as that of her son, my grandson, after seeing how upset they were about the signs and hostility from neighbors.

12. Another billboard-sized sign targeting RISE appeared directly across from the St. James Parish Courthouse Annex in Convent, Louisiana. This is the primary municipal building in St. James Parish and is home to the courthouse, Parish Council and Planning Commission chambers, and many public officials' offices. A true and accurate copy of a photo of that sign is attached here as Exhibit C. That sign also accused RISE of being paid protestors.

13. After reading an article in The Advocate, I learned that at least one of these signs was paid for by the group Industry Makes. That article is attached as Exhibit 8 to the Sharma Pokharel Declaration.

14. Industry Makes has been targeting RISE St. James and me personally online. They have suggested that we are paid protestors and that our advocacy is directed by out-of-state

interests. Examples of those posts are attached as Exhibits 9-12 to the Sharma Pokharel Declaration.

15. I am aware that Industry Makes has been trying to publicly advance the narrative that Cancer Alley is a myth. I have seen public posts from Industry Makes on social media saying "there is no Cancer Alley," and I am aware that Industry Makes has sent "talking points" to Parish elected officials arguing that pollution in St. James does not cause increased cancer and other illness. *See* Exhibit 15, Sharma Pokharel Declaration.

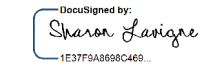
16. I know that Industry Makes coordinates with and regularly meets with St. James Parish elected officials. I know that they have discussed RISE's advocacy and this litigation. *See* Exhibits 14, 16 attached to Sharma Pokharel declaration.

17. The Parish Council does not regularly take meetings with RISE to see how Parish elected officials can support RISE's work.

18. Because of the affiliations with public officials, I worry that this campaign of online and in-person harassment is going to make Parish residents, including members of RISE St. James, afraid to speak out against pollution in the Parish for fear of being targeted by elected officials at public meetings and in other forums. I worry that if other members get named, they will not want to come to RISE meetings anymore or otherwise associate with the organization.

19. I am also very concerned about giving the personal health information of members of RISE St. James to the Parish. I do not wish to subject RISE members and their families to invasive review by their government officials of the most painful details of their illnesses. Additionally, I have concerns about non-government actors like Industry Makes, that Parish officials are apparently in regular communication with, receiving this personal

health information because of their documented campaign against RISE St. James and its associates because of our advocacy against industrial expansion.



Sharon C. Lavigne

Executed this 12th day of October, 2026

EXHIBIT A



Robbie Poche Jr. is with **Industry Makes.** and **4 others**.
AI content · June 2 ·

SHARE!!! SHARE!!! SHARE!!

Courthouse at 6pm

Tomorrow is the day to show your support. Yall want to fight and stop the bleeding of tax dollars, well here is your chance.

The parish council has a public hearing at 6pm tomorrow concerning rezoning a portion of property in Romeville from agricultural to industrial.

Every tax paying citizen of this parish should be at this meeting and tell our elected officials what your thoughts on it either way.

RISE ST. JAMES will have their bussed in loud mouths. I'm asking the 200 plus people who put the stop the noise signs in their yards to come and pack the chambers. If we continue to let these folks run off everything that wants to come here and cost us tax dollars doing it., eventually we will all end up paying higher taxes.

If you can't go you can Send an email to tammie.bodin@stjamesla.com and ask that it be recorded as a public comment and read at the meeting. Just need to tell them you support the zoning change. **See less**

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EXHIBIT B


WE WANT JOBS &
TAX REVENUE
NOT PAID
PROTESTERS
INDUSTRY
MAKES.

EXHIBIT C


WE WANT JOBS &
TAX REVENUE
NOT PAID
PROTESTERS
STOP THE NOISE
RISE
30
MINUTE
PARKING
30
MINUTE
PARKING