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 ASTHA SHARMA POKHAREL

I, Astha Sharma Pokharel, declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am an attorney representing Plaintiffs Inclusive Louisiana and Mount Triumph Baptist Church and submit this declaration in support of their opposition to the Defendant's Motion to Compel Responses to Second Set of Discovery.

2. Attached as **Exhibit 1** is a true and correct copy of the Parish's second deficiency letter, sent to Plaintiffs on August 25, 2026.

3. Attached as **Exhibit 2** is a true and correct copy of an email that I sent on September 1, 2026 to counsel for Defendant, after a meet and confer that same day.

4. Attached as **Exhibit 3** is a true and correct copy of a page on Industry Makes's website titled "Leadership Team." Based on my personal knowledge, Janile Parks, who is listed on that page, is the Director of Government and Community Relations for FG LA LLC, a subsidiary of the Formosa Plastics Group.

5. Attached as **Exhibit 4** is a true and correct copy of Josie Abugov, *Louisiana environmental justice activists navigate pushback under Trump. 'No one on our side.'*,

Nola.com, June 21, 2026, available at https://www.nola.com/news/environment/cancer-alley-louisiana-epa-trump-environmental-justice/article_e3972f63-bab9-430e-afda-bd3ac257b843.html

6. Attached as **Exhibit 5** is a true and correct copy of a post on Industry Makes's Facebook page from June 15, 2026, available at: https://www.facebook.com/IndustryMakesLa/posts/pfbid0juz3J4is3QukSLhbfbwbo76VWNdFKbwJ7Xrvpzy4dUWqBmBFj7Dswc98ADG6UUUrl#?hab

7. Attached as **Exhibit 6** is a true and correct copy of a post on Industry Makes's Facebook page from September 28, 2025, available at: https://www.facebook.com/IndustryMakesLa/posts/pfbid02k44gic2vUEPv5Kf2ogsAQEgGJM2Ggg9xWuchZeabursecNkQw4tJLCtUWB4sxsRMl#?fdj

8. Attached as **Exhibit 7** is a true and correct copy of a post on Industry Makes's Facebook page from September 1, 2025, available at: https://www.facebook.com/IndustryMakesLa/posts/pfbid02WwrR1qKk6E65bHcJsqLx6q1dAttUb9K7x9VXgeLVT5QYNiwFbTyzjuVGqhALyRihl#?jhk

9. Attached as **Exhibit 8** is a true and correct copy of a post on Industry Makes's Facebook page from January 12, 2026, available at https://www.facebook.com/IndustryMakesLa/posts/pfbid0pwTyzz7LrmXxhGXCbxP7GyatNLt93ji2EN7a2FqgegLwouRunKaoSHDfY7U1rJ7Al#?cbh

10. Attached as **Exhibit 9 is** a true and correct copy of an email and its attachment produced by the Defendant in discovery. The email is from Desiree Lemoine, Campaign Manager at Industry Makes, to a number of people including Parish President Pete Dufresne. The document is Bates stamped SJP-00003222 – SJP-00003223.

11. Attached as **Exhibit 10** is a true and correct copy of minutes from a March 28, 2023 meeting produced by the Defendant in discovery. The meeting participants include the St. James Parish President as well as an individual representing St. James Parish Economic Development, as well as representatives of Industry Makes, Nucor, OxyChem, and Formosa. The document is Bates stamped SJP-00003227 – SJP-00003231.

12. Attached as **Exhibit 11** is a true and correct copy of emails produced by the Defendant in discovery. The emails are from St. James Parish Executive Assistant to Parish President Pete Dufresne and an another individual, forwarding a set of talking points regarding "interesting cancer facts" shared by Desiree Lemoine, the Campaign Manager at Industry Makes, for Parish President Dufresne to use at the River Ready Economic Development Initiative ("RREDI") breakfast. The emails are Bates stamped SJP-00004242 – SJP-00004243.

13. Attached as **Exhibit 12** is a true and correct copy of emails produced by the Defendant in discovery. The emails are between various individuals, including Parish President Pete Dufresne and Industry Makes Campaign Manager Desiree Lemoine, and Louisiana Economic Development. The emails are Bates stamped SJP-00004981 – SJP-00004983.

14. Attached as **Exhibit 13** is a true and correct copy of emails produced by the Defendant in discovery. The emails are between St. James Parish Councilmember Ryan Louque and Father Vincent Dufresne. The emails are Bates stamped SJP-00005006 – SJP-00005009.

15. Attached as **Exhibit 14** is a true and correct copy of the cover page and an excerpt of the amicus brief submitted by Louisiana Attorney General Liz Murrill in *Alexander v. St. James Par.*, 2025-00866 (La. 3/6/26), 429 So. 3d 255.

16. Attached as **Exhibit 15** is a true and correct copy of a subpoena issued by St. James Parish to Earth Island Institute in connection with this litigation.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.



Astha Sharma Pokharel

EXECUTED this 13th day of October 2026

EXHIBIT 1

BREAZEALESACHSE

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August 25, 2026

Clara J. Potter
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Via Email:
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asharmapokharel@ccrjustice.org

Astha Sharma Pokharel
CENTER FOR CONSTITUTIONAL RIGHTS
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New York, NY 10012

RE: ***Inclusive Louisiana, et al. v. St. James Parish***
Civil Action No. 2:23-cv-00987
USDC – Eastern District of Louisiana

Dear Clara and Astha:

I am writing to address the continued deficiencies in discovery responses by RISE St. James ("RISE"), Inclusive Louisiana, and Mount Triumph Baptist Church to the St. James Parish's (the "Parish") *First of Interrogatories, Requests for Production, and Requests for Admission* (the "Responses") and the responses by RISE, Inclusive Louisiana, and Mount Triumph Baptist Church to the Parish's *Second Set of Requests for Production* (the "Second Responses").

The Responses and Second Responses are insufficient and incomplete as outlined below. We ask that Responses and Second Responses be supplemented no later than **August 31, 2026**.

Plaintiffs' Responses

1. RISE: Int. Nos. 12, 13, 14, 15, 16, 21, 24, 25, 27, 28, 31, 32, and 35
Inclusive Louisiana: Int. Nos. 11, 16, 24, 25, 26, 27, 28, 29, 30, and 31
Mount Triumph Baptist Church: Int. Nos. 10, 13, 14, 15, 17, 18, 21, 22, 23, 24, and 31

The Plaintiffs objected to these interrogatories "because [they] seek[] information in the possession of, known to, or otherwise equally available to the Defendant" and because the interrogatories request information "that will not be fully known until after additional discovery is completed." These answers are insufficient.

First, the interrogatory poses a specific question and requests a response. The Parish is entitled to a full response, even if the information is "known to" the Parish. Based on these

responses, the Parish is left to guess and/or speculate as to any number of possible factual scenarios that could possibly be responsive or that could possibly be meant by what is "known to" the Parish. The Plaintiffs' answer sets up a "trial by ambush" in which the Parish is required to prepare defenses to any number of these possible scenarios.

Second, to make the claim that information is "equally available," the Plaintiffs had to first identify information that is responsive (such that it is known to the Plaintiffs) in order to then assert that the Parish has that same information or that same information is "equally available." Thus, the Plaintiffs admit that they have been able to internally identify information that is responsive to the request. As a result, that information must be identified and produced.

Finally, the Parish is not required to wait for an indeterminate period until the Plaintiffs consider that the information is "fully known." The Parish is entitled to all responsive information currently in the Plaintiffs' possession that is responsive to the request. The Plaintiffs may supplement their responses at a later date if and when the information is "fully known."

In many of the responses to the interrogatories, the Plaintiffs referenced various paragraphs from the Second Amended Complaint as providing facts responsive to the request. If the Plaintiffs have no additional facts, other than those within the cited paragraphs, they should so state. Otherwise, the Plaintiffs must fully respond to the interrogatory by providing responsive information that is presently "known" and "available" to them.

By way of example, in Interrogatory No. 12 to RISE, the Parish sought the identification of "each and every 'official action' of St. James Parish prior to April 2, 2014 which authorized or approved the construction and operation of any industrial facility within the Parish." The Plaintiffs responded that RISE "objects to this interrogatory because it seeks information in the possession of, known to, or otherwise equally available to the Defendant, and because it requests information that will not be fully known until after additional discovery is completed." The Plaintiffs then "points Defendant to" various paragraphs of the Second Amended Complaint as "official actions."

By citing paragraphs from the Second Amended Complaint in response, the Plaintiffs claim that "official actions" occurred in a variety of manners, fact patterns, and/or situations well prior to April 2, 2014 (the date the Land Use Plan was passed): "allow[ing] the construction of the Kaiser Alumina Plant" in the 1950s (Par. 616); a simple meeting between the Police Jury President and the Sheriff with Freeport Sulphur in 1966 (Par. 187); writing a letter offering support for Shintech in the 1990s (Par. 231); receiving communications from a public relations firm (Par. 234); the construction of Nucor in 2012 (Par. 249); or even the simple presence of an industrial facility (Pars. 199, 203, 261, and 262).

Based on the variety of allegations of these different types of "official actions," it is impossible for the Parish to guess or speculate as to what other types of actions prior to April 2, 2014, the Plaintiffs will assert are "official actions" at trial. Discovery is designed to avoid a "trial by ambush," yet the Plaintiffs seek to withhold information in their possession in order to do just that.

If the Plaintiffs have no additional actions prior to April 2, 2014, that they consider to be "official actions" other than those within the cited paragraphs from the Second Amended Complaint, they should so state. Otherwise, the Plaintiffs must fully respond to the interrogatory and "identify each and every 'official action' of St. James Parish prior to April 2, 2014."

2. RISE: Int. No. 12
Inclusive Louisiana: Int. No. 11

In the Second Amended Complaint, the Plaintiffs repeatedly refer to a "policy, practice, and/or custom of land use" or "policies, practices, and/or customs." The Relief Requested mentions "policies, practices, and/or customs pertaining to the discriminatory land use system."

The Plaintiffs clearly regard the "policies, practices, and/or customs" within the parish as "official actions" by the Parish. Therefore, Interrogatory No. 12 is intended to include each and every "official action," each and every "policy, practice, and/or custom of land use," and all of the "policies, practices, and/or customs pertaining to the discriminatory land use system."

3. RISE: Int. No. 10 and Request for Production Nos. 10 and 11
Inclusive Louisiana: Int. No. 9 and Request for Production Nos. 16 and 17
Mount Triumph Baptist Church: Int. No. 8

In Interrogatory No. 10 to RISE (and similar interrogatories to the other Plaintiffs), the Parish requested: "Please identify the members of RISE you allege were exposed to 'heightened levels of carcinogens,' identifying all health diagnoses of those members you allege is the result of the pollutants and all deceased family members, as alleged in Paragraph 25 of the Complaint." The Plaintiffs' responded that "leaders and members have been exposed to heightened levels of carcinogens, and a dramatically increased risk of cancer and other diseases attendant to the heavy industrial sitings in those Districts as a result of Defendants' discriminatory land use decisions" and that "Plaintiffs' claims are based on publicly available data equally available to Defendant and not based on an individual illness or medical records and such information is therefore not relevant."

If the Plaintiffs are not identifying "all health diagnoses of those members you allege is the result of the pollutants" because they rely on "publicly available data" showing a "dramatically increased risk of cancer," then any and all "publicly available data" and/or information in Plaintiffs' possession showing that an increased risk of cancer exists should be produced.

In Request for Production No. 10 (and similar request to Inclusive Louisiana), the Parish requested "any other studies or analyses purporting to establish any link, relationship, or causal effect between an "elevated risk of cancer from pollution" and a "higher cancer incidence among Black communities across Louisiana." The Plaintiffs responded with a series of studies that are not at all related to cancer or provided self-made Chemical of the Month flyers that are not "studies or analyses." This is not responsive to the request. If the Plaintiffs have no such studies, they should so state.

In Request for Production No. 11 (and similar request to Inclusive Louisiana), the Parish made a similar request "specific to St. James Parish." The Plaintiffs merely referred to the response to Interrogatory No. 10. This is not responsive to the request. If the Plaintiffs have no such studies "specific to St. James Parish," they should so state.

4. RISE: Request for Production No. 2
Inclusive Louisiana: Request for Production No. 2
Mount Triumph Baptist Church: Request for Production No. 2

Each Plaintiff received a request for production for all documents listed in the Initial Disclosures. Among other documents, the Initial Disclosures include "academic and scholarly texts as well as media reports referenced in the Complaint" and "reports and news articles describing racially discriminatory impacts of industrial siting in St. James Parish cited to in the complaint." See e.g., RISE First Supplement, Nos. B.1.e and B.11. To date, all documents listed in the Initial Disclosures have not been produced. Please produce all such documents, including, without limitation, the documents listed in Exhibit A.

Also, the links provided by Plaintiffs as to certain documents mentioned in the Initial Disclosures do not work and/or are behind a "pay wall." See Exhibit B. Please produce a copy of each such document as requested.

Plaintiffs' Second Responses

5. RISE: Request for Production Nos. 15 and 16
Inclusive Louisiana: Request for Production Nos. 21 and 22
Mount Triumph Baptist Church: Request for Production Nos. 21 and 22

On June 19, 2026, the Parish sent two additional requests for production to the Plaintiffs. The first requests financial statements from 2014 to the present and the second requests federal and state tax returns and filings from 2014 to the present. In response, the Plaintiffs flatly refused, stating that such information is not relevant, not proportionate to the needs of the case, and may subject Plaintiffs to harassment. Courts in the Fifth Circuit recognize that bias — including a financial motive or interest in the outcome of litigation — is directly relevant to witness credibility, and that a party has a clear right to inquire into such bias through discovery.

The Parish is entitled to any and all information, not privileged, that is relevant to the Parish's defenses, even if it may not ultimately be admissible in evidence. The purpose of discovery is to allow a broad search for facts or any other matters which may aid a party in the preparation or presentation of his case. The requested documents are relevant to the Parish's defenses and obtaining possible impeachment evidence.

The financial and economic information requested is also relevant because the Second Amended Complaint has made it so. The Plaintiffs make repeated references and claims regarding economic matters, such as:

- The Parish is attempting to "suppress [the Plaintiffs'] political and economic empowerment that persist to this day" (Par. 2);
- More "economic exploitation … will follow in these historically Black communities struggling for the liberation and safety of their communities much like their ancestors did," (Par. 11); and
- Allegations of "economic exploitation," (Par 19).

Specifically, the Plaintiffs have made claims regarding an alleged decrease in property values in the parish. Inclusive Louisiana has admitted that it owns property located at 8111 Romeville Street in Convent, Louisiana. Because Plaintiffs have made claims regarding property valuation (which includes directly owned property), financial statements that may shed light or provide information regarding historic property valuation related to property owned by Inclusive Louisiana are relevant.

Further, RISE admits that Sharon Lavigne owns four properties in St. James Parish. RISE Response, Int. No. 8. Inclusive Louisiana members (Barbara Washington and Gail LeBoeuf) own at least three properties in St. James Parish. Inclusive Louisiana Response, No. 7. Mount Triumph Baptist Church owned property until its recent transfer to Pastor Harry Joseph. Mount Triumph Baptist Church Response, No. 6. The requested economic and financial documents will shed light on how the Plaintiffs funded, subsidized, valued, and/or otherwise paid costs and expenses on these properties which affects their value.

RISE states: "Effective Friday, May 1, 2026, RISE St. James Louisiana is no longer fiscally sponsored by Earth Island Institute." See https://risestjames.org/resources/. RISE "has operated since 2018 as a fiscally sponsored project of the Earth Island Institute, a Berkeley, California-based environmentalist group." See https://www.influencewatch.org/organization/rise-st-james/. Additionally, "Rise St. James has received funding from Bloomberg Philanthropies and the Tides Foundation, among other left-of-center donors, and has been represented in litigation by Earthjustice, a left-of-center environmental law organization." *Id.* Thus, RISE has shielded its past financial information through its relationship with Earth Island Institute.

Now, however, RISE secured its own Section 501(c)(3) from the IRS and is required to file publicly available IRS Form 990. Even under the simplest versions of Form 990, financial information such as that requested must be provided. Thus, this information is or will be publicly available and RISE should not be able to shield its prior and/or current financial situation when it will have to publicly report the same information.

Finally, representation by the Tulane Environmental Law Clinic is based on RISE's inability to afford private counsel. See Louisiana Supreme Court, Rule XX, Section 3: "an eligible law student may appear in any court … on behalf of … any indigent person or indigent community organization." See Louisiana Supreme Court, Rule XX, Section 5: "Law school clinical program … may represent any indigent community organization provided at least 51% of the organization's members are eligible for legal assistance pursuant to Section 4 of this rule. The indigent community organization shall also provide information to clinic staff which shows that the organization lacks, and has no practical means of obtaining, funds to retain private counsel." Publicly available data

suggests that RISE may not meet this standard. See Figure 1. Thus, the income statement, tax returns, and other such financial documents are indeed relevant to determine if RISE meets this standard.

Figure 1

Breakdown of LAFS members and out-of-state donations since 2020, per Foundation Directory and ProPublica Nonprofit Explorer databases:

Organization	Out-of-state donations since 2020	Total since 2020	Percent out-of-state
Rise St. James*	$616,463.00	$671,463.00	91.8%
Inclusive Louisiana	$290,000.00	$335,640.00	86.4%

*Denotes that data is incomplete for these groups due to how they are organized with the IRS (eg, at the time of this analysis, Rise St. James was a fiscally-sponsored project of the Earth Island Institute, meaning it did not file its own IRS Form 990 tax return).

Pelican Institute for Public Policy, *Barriers to Louisiana Energy Dominance, 2026*

The claim that the request is not proportionate to the needs of the case is not credible. The requested documents are a discrete and finite set of documents, likely electronically available, that can easily be produced.

The Parish is willing to enter into appropriate protective orders. Therefore, no harassment will result from counsel for the Parish obtaining this information.

Please supplement your responses accordingly to address these deficiencies.

Rule 37 Conference

Pursuant to Federal Rule of Civil Procedure 37(a)(1), to avoid having to file a motion to compel, we request that you provide supplemental discovery responses as soon as possible. If I have not received the supplemental discovery responses by **August 31, 2026**, I will call you on **September 1, 2026** at **10:00 a.m. CST**, to have the conference required by Federal Rule of Civil Procedure 37(a)(1) before filing a motion to compel. If you have a conflict with that time, please suggest another time as soon as possible.

With kindest regards, I remain.

Sincerely,

BREAZEALE, SACHSE & WILSON, L.L.P.

Danielle L. Borel

DLB/ams

CC: Devin Lowell (dlowell@tulane.edu)
Lisa W. Jordan (lwjordan@tulane.edu)
Pamela C. Spees (pspees@ccrjustice.org)
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Kayla Vinson (kvinson@ccrjustice.org)
Celine Zhu (czhu@ccrjustice.org)
William P. Quigley (quigley77@gmail.com)

Exhibit A

RISE St. James First Supplement to Initial Disclosures

Section B.1.c
Section B.1.e
Section B.1.f
Section B.1.g
Section B.1.h
Section B.1.j
Section B.1.l
Section B.1.o
Section B.1.q
Section B.1.r
Section B.1.s
Section B.1.v
Section B.1.w
Section B.1.ee
Section B.1.hh
Section B.1.jj
Section B.1.kk
Section B.1.mm
Section B.1.nn

Section B.2.f

Section B.11.a
Section B.11.b
Section B.11.c
Section B.11.d
Section B.11.e
Section B.11.f
Section B.11.g
Section B.11.h
Section B.11.i
Section B.11.k
Section B.11.l
Section B.11.a

Exhibit B

Document included in Second Amended Complaint, Footnote 179

Document included in Second Amended Complaint, Footnote 211

May 22, 2026, RISE St. James' First Response to St. James Parish's First Set of Discovery:

- Robert Travis Scott, State's incentive package for Nucor iron plant detailed, The Times-Picayune (September 17, 2010)

May 22, 2026, Mount Triumph Baptist Church's Responses to Defendant's First Set of Discovery:

- Anya Groner, Louisiana Chemical Plants Are Thriving Off of Slavery, The Atlantic, May 7, 2021,

July 17, 2026, RISE St. James Responses to St. James Parish's Second Set of Requests for Production:

- Josie Abugov, "Louisiana environmental justice activists navigate pushback under Trump. 'No one on our side.'", Nola.com (Jun. 21, 2026)

EXHIBIT 2

Outlook

Re: [EXTERNAL] Re: Inclusive Louisiana, et al. v. St. James Parish

From Astha Sharma Pokharel <asharmapokharel@ccrjustice.org>
Date Tue 9/1/2026 2:01 PM
To Dani Borel <danielle.borel@bswllp.com>; John B. King <john.king@bswllp.com>
Cc Potter, Clara J <cpotter2@tulane.edu>; Carroll Devillier, Jr. <Carroll.Devillier@bswllp.com>; Sandra E. Carlton <Sandra.Carlton@bswllp.com>; Lowell, Devin A <dlowell@tulane.edu>; Jordan, Lisa W <lwjordan@tulane.edu>; pspees <pspees@ccrjustice.org>; bazmy <bazmy@ccrjustice.org>; kvinson <kvinson@ccrjustice.org>; quigley77 <quigley77@gmail.com>; Ann Marie Salemi <annmarie.salemi@bswllp.com>

External Sender. Be aware of links, attachments and requests.

Hi Dani and John,

I am writing to memorialize our discussion from today regarding the Parish's August 25th deficiency letter.

- **Deficiency 1**: Plaintiffs' counsel will review each of the interrogatories and RFPs and determine whether supplementation is necessary, and clarify where the Plaintiffs are not withholding any information or documents. Plaintiff's counsel noted that many of these interrogatories amount to premature contention interrogatories, and the Parish's suggestion that Plaintiffs are preparing a "trial by ambush," over a year prior to trial, is unwarranted, especially considering the level of detail contained in the Second Amended Complaint.
- **Deficiency 2**: Same as above.
- **Deficiency 3**: Plaintiffs will supplement their responses.
- **Deficiency 4**: Almost all of these documents were produced or are publicly available online. Plaintiffs' counsel will review the list provided by the Parish, identify by Bates numbers the documents already produced, produce anything else that is now in Plaintiffs' custody, and identify where the documents are available online and/or, if they intend to use them at trial, produce those documents as PDFs.
- **Deficiency 5**: Plaintiffs continue to object to the request from the Parish—their government—for disclosure of their sensitive financial and tax documents. Plaintiffs' counsel noted their concern with this request, which seems to continue a pattern of harassment that Plaintiffs and Plaintiffs' members have been facing by industry groups in the Parish. Plaintiffs' counsel also noted its concern with the Parish's description in its August 25th letter of some of Plaintiffs' donors and counsel as "left-of-center," as though there is something objectionable to the Parish about "left-of-center" viewpoints

  Plaintiffs inquired about the relevance of these financial and tax documents to the parties' claims or defenses. In its August 25th letter, the Parish identified as one of its reasons for seeking this sensitive information as "Courts in the Fifth Circuit recognize that bias — including a financial

motive or interest in the outcome of litigation – is directly relevant to witness credibility[.]" When Counsel for Plaintiffs further inquired about what "financial motive in the outcome of the litigation" these documents may reveal, particularly in a case where Plaintiffs are seeking no monetary relief, the Parish responded that certain unidentified Parish residents believe that Plaintiff organizations are paying "lavish salaries" to employees, and that employees are motivated by "money and trips" rather than the issues relevant to this case. The Parish provided no basis for saying this other than the belief of unidentified "Parish residents," nor did it provide any explanation for how this may be related to a "financial motive in the outcome of the litigation."

Plaintiffs' counsel further noted that if the Parish has specific requests regarding Inclusive Louisiana's property at 8111 Romeville Street, it has already sent the Plaintiff's interrogatories and RFPs related to that property, that any assessment of the property is in the custody of the Parish's tax assessor, and that the Parish can feel free to send any other requests that may be relevant to the litigation. Absent a more specific request, these requests are not relevant and amount to a fishing expedition.

Finally, Counsel for Plaintiff RISE St. James noted two misstatements that the Parish has already made regarding this issue. First, that Louisiana Supreme Court Rule XX applies in federal court, which it does not. The applicable student practice rule is LR 82.2.13 which does not have the same income requirements as Louisiana Supreme Court Rule XX. And second, that in "2023, the Louisiana Bucket Brigade reported give [sic] $353,213 to RISE St. James," (dkt. no. 135 at 4), which is not what the exhibit attached to that filing says.

Thanks,
Astha

On Thu, Aug 27, 2026 at 5:08 PM Ann Marie Salemi <AnnMarie.Salemi@bswllp.com> wrote:

> Sure thing. I will circulate the Teams link.
>
> Thank you,
>
> BREAZEALE SACHSE | **Ann Marie Salemi**
> Paralegal
>
> Direct: (225) 376-3615 | Fax: (225) 381-8029
> AnnMarie.Salemi@bswllp.com | www.bswllp.com
> 301 Main Street, Suite 2300, Baton Rouge, LA 70801
> PO Box 3197, Baton Rouge, LA 70821-3197
>
> ---
>
> **From:** Astha Sharma Pokharel <asharmapokharel@ccrjustice.org>
> **Sent:** Thursday, August 27, 2026 4:05 PM

To: Ann Marie Salemi <AnnMarie.Salemi@bswllp.com>
Cc: Potter, Clara J <cpotter2@tulane.edu>; Dani Borel <Danielle.Borel@bswllp.com>; John B. King <John.King@bswllp.com>; Carroll Devillier, Jr. <Carroll.Devillier@bswllp.com>; Sandra E. Carlton <Sandra.Carlton@bswllp.com>; dlowell <dlowell@tulane.edu>; lwjordan <lwjordan@tulane.edu>; pspees <pspees@ccrjustice.org>; bazmy <bazmy@ccrjustice.org>; kvinson <kvinson@ccrjustice.org>; quigley77 <quigley77@gmail.com>
Subject: [EXTERNAL] Re: Inclusive Louisiana, et al. v. St. James Parish

Thank you Ann Marie.

I'm writing to confirm that the September 1st 10am CT proposed time works for plaintiffs' counsel. Could you please share dial-in info or a link for the call?

Thanks,

Astha

On Tue, 25 Aug 2026 at 16:10, Ann Marie Salemi <AnnMarie.Salemi@bswllp.com> wrote:

> Counsel,
>
> Please see the attached correspondence from Dani Borel regarding the above-referenced matter.
>
> Thank you,

BREAZEALE SACHSE | **Ann Marie Salemi**
Paralegal

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EXHIBIT 3

LEADERSHIP TEAM



Executive Director
Desiree Lemoine



Secretary
Janile Parks



Treasurer
Connie Fabre



Board Member
Meg Mahoney

INDUSTRY MAKES.

PHONE 225.931.2896

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ADDRESS P.O. Box 255, Ventress, LA, 70783

Donate →

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Send us an email, and we will follow-up with you.

Email Us →

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EXHIBIT 4

https://www.nola.com/news/environment/cancer-alley-louisiana-epa-trump-environmental-justice/article_e3972f63-bab9-430e-afda-bd3ac257b843.html

Louisiana environmental justice activists navigate pushback under Trump. 'No one on our side.'

BY JOSIE ABUGOV | Staff writer
Jun 21, 2026

1 of 10



A group of students ride their bikes past a refinery in Norco as part of Louisiana Bucket Brigade's "Down by the River" bike tour in Norco on Thursday, June 4, 2026. The ride makes stops along the chemical corridor to help students learn the history of the environmental justice movement.

STAFF PHOTO BY CHRIS GRANGER

A dozen teenagers ride their bikes down a quiet street in Norco on a warm June morning, stopping at an empty playground beside a Shell petrochemical plant.

Helmets off and bikes parked, they listen to their tour guides for the day, local advocates telling a story that weaves together Black history in the River Parishes and the current environmental justice movement.

"The ordinary people stood up and fought Shell and won," said Cathy Laurino, a tour guide with the advocacy group Louisiana Bucket Brigade, referencing a community battle over a relocation effort two decades ago.

Richlyn Gibson, a seventh grader from Donaldsonville, said later: "It was very inspirational because you see how you can stand up for something."

The bike ride and related summer camp are examples of the kind of outreach a constellation of local community and environmental groups have long been engaged in. That work gained unprecedented prominence and funding under former President Joe Biden's administration.



Cathy Laurino with the Louisiana Bucket Brigade leads a "Down by the River" bike tour in Norco on Thursday, June 4, 2026. The bike ride makes stops along the chemical corridor to help students learn the history of the environmental justice movement.

STAFF PHOTO BY CHRIS GRANGER

But since 2025, such groups have watched a stunning reversal both nationally and in Louisiana under the administrations of President Donald Trump and Gov. Jeff Landry. Landmark pollution rules long sought by local groups have been rolled back, and sharp cuts in grant funding have left environmental justice advocates navigating how to remain effective.

For some industry groups and politicians, the changes have been welcome – a necessary pushback against what they view as regulatory overreach that harms business and the broader economy.

But local organizations say that without the work they carry out, pollution will only worsen and poorer residents without an effective voice will suffer the most.

“The state of (environmental justice) is we’re in a bad place. We’re hanging on by a thread,” said Beverly Wright, founder of The Deep South Center for Environmental Justice, a New Orleans-based organization hit hard by cuts in federal grants.

“But I take heart in the fact that we have been here before and during worse times and under worse conditions, with fewer allies than what we have now.”

‘Lot of obstacles’

The Trump administration’s approach to environmental justice is in many ways the inverse of what occurred under Biden.

Biden’s Environmental Protection Agency chief, Michael Regan, was the first Black man to hold the position and put a high priority on environmental justice, or concerns that poor and Black neighborhoods have been forced to disproportionately suffer the effects of industrial pollution.

Louisiana and its heavily industrialized region along the river between Baton Rouge and New Orleans, which activists refer to as “Cancer Alley,” was among Regan’s areas of focus.



Activist Sharon Lavigne, of Rise St. James, poses at her home in St. James, La., Tuesday, June 9, 2026.

STAFF PHOTO BY SOPHIA GERMER

He visited Louisiana twice to tour industrialized areas and speak with residents. When he signed off on what is known as the HON rule aimed at reducing cancer risk in communities near industrial plants, Louisiana activists attended the event in Washington, D.C.

Sharon Lavigne, who founded Rise St. James, one of the most prominent local environmental groups, was there and still has a pen Regan used for the signing. But for her, the promise of that day has since eroded.

The 2024 rule had required over 200 industrial facilities nationwide to use stricter pollution controls and conduct routine air monitoring. The plants had until July 2026 to meet the bulk of these requirements.

But last summer, Trump exempted 49 chemical plants nationwide from complying with the standard by the 2026 deadline, including a dozen in Louisiana.

Industry groups in the state argued that the rule was impossible to comply with and would harm important sectors. Advocates see the exemptions as an interim move while the EPA seeks to permanently undo the requirements.

"Our member companies spend millions of dollars each year on emissions controls, operational reliability and safety systems because environmental, health and safety performance remains a core priority across the industry," said David Cresson, president of the Louisiana Chemistry Association, which represents the state's largest chemical companies.

Lavigne said “now that the new administration is in, we still have hope, but it’s a lot of obstacles that’s in our way,”

“We have to fight a little bit harder -- a whole lot harder -- and we have no one on our side,” she said.

‘Not going anywhere’

The changes have not only involved regulation. Some local groups have also been hit by the EPA’s cut of $70 million in funding for Louisiana agencies and nonprofits.

Wright's Deep South Center, a 34-year-old organization that partners with smaller groups, lost a $13 million grant and laid off roughly 10 employees as a result, she said.

The grant had supported a project that spanned 250 communities across 14 states, connecting local groups with researchers with expertise in pollution, flooding and energy consumption.

Wright said the loss was a "big blow," but it hasn't "taken the wind out of us."

Tish Taylor of The Concerned Citizens of St. John, another local group, said the organization received federal EPA support through a $500,000 grant managed by the Deep South center. The funding focused on air monitoring data in the parish, including exposure to a likely carcinogen – chloroprene – emitted from the now-suspended Denka Performance Elastomer Plant in Reserve.



Cathy Laurino with the Louisiana Bucket Brigade leads a "Down by the River" bike tour in Norco on Thursday, June 4, 2026. The bike ride makes stops along the chemical corridor to help students learn the history of the environmental justice movement.

STAFF PHOTO BY CHRIS GRANGER

Before Denka announced last May it would suspend operations, the Trump administration granted it an exemption from the HON rule and dropped a landmark federal government lawsuit alleging the facility threatened the area with unacceptable cancer risks.

When it comes to funding, however, Taylor said that philanthropy is the ultimate source.

“I’m just grateful because the philanthropy was there before. They’re not going anywhere,” she said. “They know that we need it even more now.”

Significant funding for Louisiana-based groups has come from organizations including Bloomberg Philanthropies, the Earth Island Institute and the Andrew Mellon Foundation.

Local groups have long faced criticism from Louisiana politicians and industry over allegations they are slowing economic development. Pointing to the groups’ funding, they also accuse them of doing the bidding of outside activists.

The groups counter that their work requires funding and that they are transparent about where it comes from. They also say the need for their advocacy is self-evident in a state with high levels of pollution.

Rise St. James recently welcomed middle schoolers from Colorado for an environmental class. Some schools in New York also teach students about the environmental justice group, Lavigne said.

But within the state, she said that U.S. Rep. Troy Carter, D-New Orleans, is the only elected official who has met with them.

Shamell Lavigne, Sharon Lavigne's daughter who helps lead Rise St. James, said opposition to their work has appeared to become more organized recently.

She pointed to an organization called Industry Makes, which shares posts and videos on social media about Rise St. James. It has criticized the environmental group for traveling by car and plane, and for using items such as computers and clothing derived from industry.

She believes the group is also involved with a "Stop Rise St. James" yard sign campaign cropping up around the community and questioned whether it was paying residents to post about the advocacy group online.

Desiree Lemoine, executive director for Industry Makes, said that the organization does not pay anyone for the posts, yard signs or its ambassador program. However, she said that Industry Makes did "partially pay" for a poster seen in parts of the community.

Lemoine said Industry Makes' focus on Rise St. James "is a small piece of our overall pillar to provide a positive perception of industry and the benefits it brings to the communities where it operates."

"Industry Makes does not believe that Rise St. James or any of the other activist groups in and around the area work towards environmental advocacy," Lemoine said. "It is our experience that they work to enrich their own pockets through spreading misinformation and fear amongst the communities they claim to want to protect."

Lemoine said her organization's funding comes from yearly dues from individuals, businesses and associations in Louisiana that "serve as partners that give us platforms and other media support."

Like Rise St. James, Taylor's organization has continued to fight on a wide range of issues.

Other smaller environmental groups are also pushing ahead – and even expanding – despite federal cuts and changing policies. Cynthia Robertson, who runs the Sulphur-based group Micah 6:8 Mission, said that her organization has persisted even after losing federal funding last year.

Robertson's organization began in the aftermath of 2020's Hurricane Laura and in the midst of the Covid pandemic, providing food, health information and clothing to residents in need.

"I just lean into God and know that whatever is supposed to happen will happen, and it does, so I'm very pleased with where we are now, despite the federal government," Robertson said.

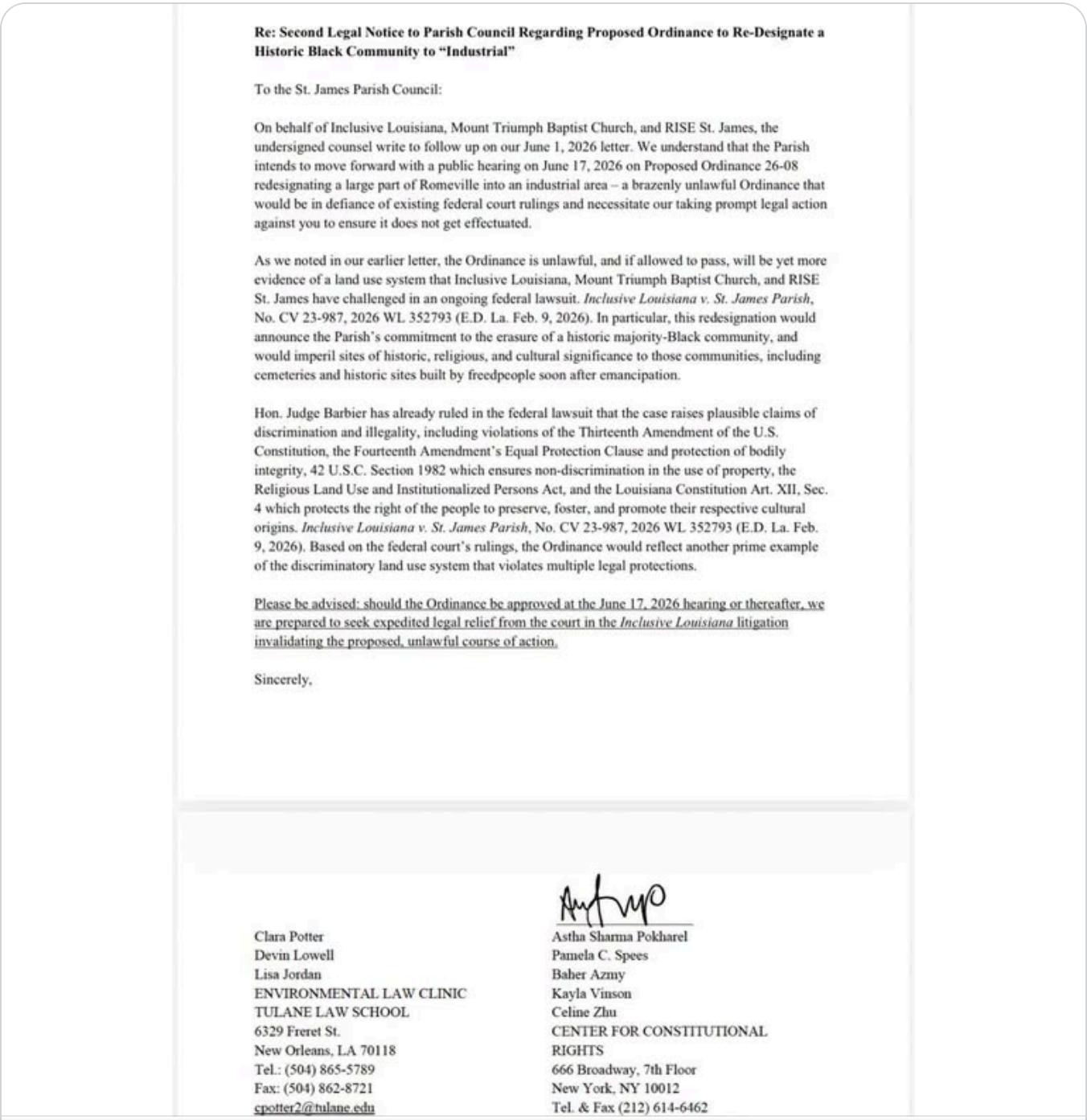
Email Josie Abugov at josie.abugov@theadvocate.com.

EXHIBIT 5

Industry Makes.'s Post

Industry Makes.
June 15 ·

More evidence of outside $$ and influence trying to tell St. James what to do.
They sure do have nerve.
Let the council hear the voices of its own citizens!



Re: Second Legal Notice to Parish Council Regarding Proposed Ordinance to Re-Designate a Historic Black Community to "Industrial"

To the St. James Parish Council:

On behalf of Inclusive Louisiana, Mount Triumph Baptist Church, and RISE St. James, the undersigned counsel write to follow up on our June 1, 2026 letter. We understand that the Parish intends to move forward with a public hearing on June 17, 2026 on Proposed Ordinance 26-08 redesignating a large part of Romeville into an industrial area – a brazenly unlawful Ordinance that would be in defiance of existing federal court rulings and necessitate our taking prompt legal action against you to ensure it does not get effectuated.

As we noted in our earlier letter, the Ordinance is unlawful, and if allowed to pass, will be yet more evidence of a land use system that Inclusive Louisiana, Mount Triumph Baptist Church, and RISE St. James have challenged in an ongoing federal lawsuit. *Inclusive Louisiana v. St. James Parish*, No. CV 23-987, 2026 WL 352793 (E.D. La. Feb. 9, 2026). In particular, this redesignation would announce the Parish's commitment to the erasure of a historic majority-Black community, and would imperil sites of historic, religious, and cultural significance to those communities, including cemeteries and historic sites built by freedpeople soon after emancipation.

Hon. Judge Barbier has already ruled in the federal lawsuit that the case raises plausible claims of discrimination and illegality, including violations of the Thirteenth Amendment of the U.S. Constitution, the Fourteenth Amendment's Equal Protection Clause and protection of bodily integrity, 42 U.S.C. Section 1982 which ensures non-discrimination in the use of property, the Religious Land Use and Institutionalized Persons Act, and the Louisiana Constitution Art. XII, Sec. 4 which protects the right of the people to preserve, foster, and promote their respective cultural origins. *Inclusive Louisiana v. St. James Parish*, No. CV 23-987, 2026 WL 352793 (E.D. La. Feb. 9, 2026). Based on the federal court's rulings, the Ordinance would reflect another prime example of the discriminatory land use system that violates multiple legal protections.

Please be advised: should the Ordinance be approved at the June 17, 2026 hearing or thereafter, we are prepared to seek expedited legal relief from the court in the *Inclusive Louisiana* litigation invalidating the proposed, unlawful course of action.

Sincerely,

Clara Potter
Devin Lowell
Lisa Jordan
ENVIRONMENTAL LAW CLINIC
TULANE LAW SCHOOL
6329 Freret St.
New Orleans, LA 70118
Tel.: (504) 865-5789
Fax: (504) 862-8721
cpotter2@tulane.edu

Astha Sharma Pokharel
Pamela C. Spees
Baher Azmy
Kayla Vinson
Celine Zhu
CENTER FOR CONSTITUTIONAL RIGHTS
666 Broadway, 7th Floor
New York, NY 10012
Tel. & Fax (212) 614-6462

Write a comment...

EXHIBIT 6

Industry Makes.'s Post

Industry Makes.
September 28, 2025 ·

RISE ST. JAMES doing what they do best.....raising outside money and promoting themselves on the backs of the hardworking industrial labor force up and down Louisiana's industrial corridor.
#shameless



RISE ST. JAMES
September 27, 2025 ·

Ms. Sharon C. Lavigne joined the Petrochemicals, Climate & Health Nexus event in New York City, bringing together advocates, funders, academics, and frontline community members working toward a healthier future.

Much appreciation to @BeyondPetrochemicals for always sharing the microphone with frontline

Write a comment...

EXHIBIT 7

Industry Makes.'s Post

Industry Makes.
September 1, 2025 ·

Industry Makes travel possible for RISE ST. JAMES founder and her daughter. But who pays for these elaborate trips?

#letothersmakenoise
#DirtyMoney



RISE ST. JAMES
September 1, 2025 ·

🇮🇹Wheels up to Italy
🙏 Traveling grace to RISE St. James Founder & Director Sharon C. Lavigne as she departs for Italy, joined by Shamyra Lavigne-Davey, Executive Assistant. ✈️🌎
Ms. Lavigne has been invited to serve as a visiting professor, lifting voices from Cancer Alley onto the world stage and linking grassroots struggles with global movements for climate and environmental solutions.
💐Her most recent visit to Italy was marked by mourning, as Pope Francis was in declining health and passed away shortly thereafter. On this journey, she is expected to meet with Pope Leo XIV before her visit concludes.
#risestjames

22 1

Write a comment...

EXHIBIT 8

Industry Makes.'s Post

Industry Makes.
January 12 ·

We see that the Rise St. James founder is now using her own grandchild to peddle her misinformation. This is how outside money and influence looks at Louisiana. Rise does not care who they hurt, as long as they stay relevant and funded. This is lazy journalism.

#letothersmakenoise



THELENSNOLA.ORG

Buyouts for a petrochemical complex threaten to erase Modeste | The Lens

6 21 1

Most relevant

Most relevant is selected, so some comments may have been filtered out.

Write a comment...

EXHIBIT 9

From: Desiree Lemoine
Sent: Mon, 27 Mar 2023 16:09:08 -05:00
To: Pete Dufresne; Steven Nosacka; Janile Parks; Calvin Hart; george nassar; Marc Hoss; Jordan Tremblay; Guidry, Chris A
Cc: Meagan Loupe; Laine Peterson; patty.prats@kochps.com
Subject: Industry Makes/St. James Parish Sub-Committee
Attachments: St.JamesSubAgenda.docx

EXTERNAL EMAIL: Do not click links or open attachments unless you recognize the sender and know the content is safe.

All, please find attached the Agenda for our meeting tomorrow morning.

Looking forward to our engagement.

Desiree

Desiree Lemoine
Campaign Manager, Industry Makes
4701 Bluebonnet Boulevard, Suite A
Baton Rouge, La 70809
225.931.2896- cell
225.757.5527- office
www.industrymakes.org



Industry Makes
St. James Parish/Cancer Alley Sub-Committee
Tuesday, March 28, 2023
9:00 a.m.
St. James Parish Courthouse, Convent, Louisiana
Mayor's Conference Room
Agenda

1. **Welcome and Introductions**
2. **Meeting Cadence**
3. **What is Industry Makes?**
4. **Updated Economic Data**
5. **Updated Investment per Council District**
6. **Rise St. James v. Parish of St. James lawsuit (Imagine St. James)**
7. **Discussion of Industry Makes social sites and how to make the most out of them**
8. **Potential sub-committee members**
9. **Path Forward**
10. **Adjourn**

EXHIBIT 10

INDUSTRY MAKES.

Let Others Make Noise. We'll Make Everything Else.

St. James Parish Subcommittee Minutes
March 28, 2023

Participants:
Pete Dufresne, St. James Parish President
Steve Nosacka, St. James Parish Economic Development
Mike Hall, Nucor
Kainen Leblanc, DDG
Laine Peterson, GBRIA
Chris Guidry, OxyChem
Desiree Lemoine, Industry Makes
Janile Parks, Industry Makes

A St. James Parish subcommittee for Industry Makes (IM) was called to order at approximately 9:00 a.m. on Tuesday, March 28.

The first order of business was to welcome and introduce the various ambassadors assembled at the first IM meeting held at the St. James Parish Courthouse in Convent, LA.

- Meeting Cadence
  - It was established that the St. James Parish subcommittee will meet on a regular basis for the time being and eventually transition to a quarterly meeting.
    - The next meeting is scheduled on May 11 from 11:00 a.m. – 1:00 p.m.
    - Due to limited space at the courthouse, Steve will research venue options (i.e., Associated or Creole House).
    - Based on availability, the viable option will accommodate the group.
- Industry Makes Initiative
  - Desiree provided an overview of initiative.
  - IM serves as a united voice for industry.
  - She touted the benefits of cobranding for advertisements and connecting your respective organizations with industry's cause.
- Pete and Steve referenced adding representation to the Industry Makes initiative from other manufacturers and sectors in the parish such as the suppliers, pilot associations, etc.
  - Steve will compile a list from every company with an occupational license and weed through the list to determine relevant companies.

        - Examples were cited.
            - M Rodrigue & Son
            - Guzman
            - Quality Machine Works
            - Louisiana Sugar Refining
            - Americas Styrenics
            - Excel
            - DG Fuels
            - Mosaic
            - Shell
            - Port of South Louisiana
            - St. James Parish School Board
    - Desiree will pull members of the St. James Parish CAP to determine additional members who should join the cause.
    - Michael referenced that our IM ambassadors should encourage participation from the contractors and suppliers at our respective sites.
- Billboards
    - Desiree reported that Lamar does not have available billboards in the parish.
        - St. John may be a viable option.
    - Bayou Signs in Houma, LA may have available billboards.
        - Kainen or Steve will follow-up.
- Representative Troy Carter
    - Elected officials should be balanced in their approach.
        - When Troy makes comments, industry is never represented in a positive light.
        - IM should schedule a meeting with the referenced elected official.
    - Chris brought to the group's attention that Representative Troy Carter sent a letter to the U.S. Environmental Protection Agency (EPA) Administrator and the U.S. Secretary of The Interior calling on industrial corporations or entities to certify that there are no burial grounds of the formerly enslaved on sites being considered for development when seeking a permit.
    - An article was published by L'Observateur on March 18, 2023.
    - Quotes from Troy Carter:
        - "This effort is not only significant to the formerly enslaved, it is important to all Americans. To truly embrace the American experience, we must acknowledge our tragic past as part of our shared cultural identity."
        - "History should be regarded as a means for understanding the past and solving the challenges of the future. Our community deserves better, and our ancestors deserve peace," he concluded.
    - Read more at: https://www.lobservateur.com/2023/03/18/rep-carter-calls-on-epa-and-department-of-the-interior-to-protect-formerly-enslaved-burial-grounds-ancestral-burial-grounds-are-critical-to-families-tracing-their-roots/.
- St. James Economic Data

- A suggestion was made to arm the IM team with knowledge that could be used to educate the residents.
  - There are designated growth areas (i.e., residential growth) in District 5.
  - There are 4 meals on wheels trucks that provide nourishment to homes.
    - 3 out of the 4 trucks are paid for by industry.
  - There are more industrial companies located in District 1 (i.e., per capita and per linear feet) on the East Bank.
  - Industry is highly regulated more than ever before.
  - There has been a large % of reduction in emissions.
  - Follow the science.
  - There are more industrial companies located on the East Bank in St. James Parish.
    - East Bank (13)
      - Continental Cement
      - Shell Convent (presently closed)
      - Air Products
      - Yara North America (terminal)
      - Zen-Noh Grain (terminal)
      - Nucor Steel
      - Oxy
      - Convent Marine Terminal (terminal)
      - Mosaic Uncle Sam
      - ADM Paulina (presently closed)
      - LSR
      - Atalco
      - Rain CII
    - West Bank (9)
      - Koch Methanol
      - Plains (terminal)
      - LOCAP (terminal)
      - Shell Pipeline (terminal)
      - NuStar (terminal)
      - Ergon (terminal)
      - Americas Styrenics
      - Mosaic Faustina
      - Valero Asphalt

- Michael Bloomberg's Beyond Plastics Campaign
  - Outsiders are trying to control industry as well as the narrative for our state.
  - Beyond Petrochemicals will scale the work being done by frontline groups and aligned organizations who are leading the fight to end petrochemical pollution in these communities, including Beyond Plastics, the Bullard Center at Texas Southern University, Defend Our Health, Earthjustice, Earthworks, Hip Hop Caucus, Louisiana Bucket Brigade, and Rise St. James among others, and will

continue to work with additional organizations and leaders to accelerate efforts to halt petrochemical expansion in Louisiana, Texas, and the Ohio River Valley.
    - Read more at: https://www.bloomberg.org/press/michael-r-bloomberg-launches-new-85-million-campaign-to-stop-rapid-rise-of-pollution-from-the-petrochemical-industry-in-the-united-states/.
- Situational Awareness Video
    - The group is considering if releasing a video speaking about the facts would benefit our cause.
        - Like the Facebook live video when Shell closed
- Proposed Industry Makes Ideas
    - Develop IM Community Meetings
        - Place an emphasis on the numbers
            - Example: There are 215 employees that work for St. James Parish.
            - Pull the effects of Shell's closure (November 2020)
            - Pull sales tax collections from industry
            - 75% of tax base is paid by industry
    - Recruit community advocates
        - Local residents
        - Business owners
        - Existing industry workers
        - Retired industry workers
    - Expand IM outreach to youth
        - Coloring books
        - Interactive hands on demonstrations
            - "Touch a Bus" event and explain how industry played a role in creating the bus
            - Like Solutions through Science Group
            - Familiarity with industry
    - Research the history of General Honoré
    - Develop high school awareness
        - Next 25 initiative
        - IM presentation (Fall 2023)
            - Industry familiarization campaign already occurs in the parish.
            - Steve will coordinate this effort.
    - Develop a "Did You Know" or "By the Numbers" campaign
    - Replace "Cancer Alley" myth map with Louisiana Jobs Corridor map on IM website
    - Build IM army from a different angle
        - Direct and indirect jobs (silence the noise)
    - Engage with key decision makers; make a coordinated effort and tout economic benefits of industry
        - Elected Officials
        - Hotel Association
        - Restaurant Association

- Industry Makes Social Media Platforms
    - Desiree encouraged all our ambassadors to follow us on all social media platforms.
        - Facebook
        - Instagram
        - Twitter
        - Linked In

Meeting was adjourned at 10:42 a.m.

EXHIBIT 11

From: Courtney Tomlinson
Sent: Thu, 25 Jan 2024 14:37:06 -06:00
To: Victoria Rocquin-Henry
Subject: Fwd: RREDI Breakfast Points for Pete
Attachments: Stjamesrredibreakfast.docx
Categories: Red Category

Hey Vic!

Sorry for the short notice... Please see attached and email below. Can you put together a short speech for Pete for the RREDI breakfast please? I would need it by tonight to though 😩 so sorry!

Courtney Tomlinson
Executive Assistant
St. James Parish Government- Parish President's Office
P.O. Box 106
Convent, LA 70723
courtney.tomlinson@stjamesla.com
Office: (225) 562-2396
Cell: (225) 483-1959
Get Outlook for iOS

From: Courtney Tomlinson <courtney.tomlinson@stjamesla.com>
Sent: Monday, January 22, 2024 4:19 PM
To: Pete Dufresne <pete.dufresne@stjamesla.com>
Subject: FW: RREDI Breakfast Points for Pete

Pete,

Please see attached.

Thanks,



Courtney Tomlinson
Executive Assistant ◈ (225) 562-2396
St. James Parish Government- Parish President's Office
P.O. Box 106 Convent, LA 70723
courtney.tomlinson@stjamesla.com

From: Desiree Lemoine <desiree@industrymakes.org>
Sent: Monday, January 22, 2024 2:09 PM
To: Courtney Tomlinson <courtney.tomlinson@stjamesla.com>

Cc: Blanche Gallagher <blanche.gallagher@thetjcgroup.com>; Janile Parks <jparks@fguniversal.com>; Steven Nosacka <steve_trinity@cox.net>
Subject: RREDI Breakfast Points for Pete
Importance: High

EXTERNAL EMAIL: Do not click links or open attachments unless you recognize the sender and know the content is safe.

Courney, attached are some interesting cancer facts that I have summarized from last week's retreat. I advised Pete that I would get them to you today.
Can you please see that he gets these points for his RREDI breakfast?
Many thanks,
Desiree

Desiree Lemoine
Campaign Manager, Industry Makes
4701 Bluebonnet Boulevard, Suite A
Baton Rouge, La 70809
225.931.2896- cell
225.757.5527- office
www.industrymakes.org



EXHIBIT 12

From: Desiree Lemoine
Sent: Mon, 21 Oct 2024 15:28:41 -05:00
To: Rachel Shields; Steven Nosacka; Susan Bourgeois
Cc: Ileana Ledet (LED); Janile Parks; Pete Dufresne; Steve Welch; Connie Fabre; Mary Ellen Pratt; jvicknair@sjph.org; Emma Wagner (LED); Pete Dufresne; Sandra Granata
Subject: RE: Industry Makes Meeting Re: River Parishes Brief
Importance: High

EXTERNAL EMAIL: Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thank you, Rachel, for your reply. Industry Makes is looking forward to partnering with LED to help dispel the misinformation that is rampant regarding Louisiana industry. The support of the State of Louisiana cannot be understated in this endeavor.

Please feel free to reach out anytime.

Desiree Lemoine

Desiree Lemoine
Campaign Manager, Industry Makes
4701 Bluebonnet Boulevard, Suite A
Baton Rouge, La 70809
225.931.2896- cell
225.757.5527- office
www.industrymakes.org



From: Rachel Shields <Rachel.Shields@LA.GOV>
Sent: Thursday, October 17, 2024 3:14 PM
To: Steven Nosacka <steve_trinity@cox.net>; Susan Bourgeois <Susan.Bourgeois@LA.GOV>
Cc: Ileana Ledet (LED) <Ileana.Ledet@la.gov>; Janile Parks <jparks@fguniversal.com>; Desiree Lemoine <desiree@industrymakes.org>; pete.dufresne@stjamesparishla.gov; Steve Welch <steve_welch@oxy.com>; Connie Fabre <connie@gbria.org>; Mary Ellen Pratt <mpratt@sjph.org>; jvicknair@sjph.org; Emma Wagner (LED) <Emma.Wagner@LA.GOV>; Pete Dufresne <pete.dufresne@stjamesla.com>; Sandra Granata <Sandra.Granata@LA.GOV>
Subject: RE: Industry Makes Meeting Re: River Parishes Brief

Thank you Steve and all for your time yesterday. The importance of these efforts to dispel myths and misconceptions around Louisiana's industry cannot be understated, and we are grateful to Industry Makes for its leadership in this space.

We are hopeful the next few months bring us opportunities to ease some of these challenges. But no matter the case, LED will continue to support Louisiana's private sector commitment to responsible growth *and* investments in innovation, job growth, and community wealth building.

Looking forward to continuing this dialogue with you.

Rachel Shields

From: Steven Nosacka <steve_trinity@cox.net>
Sent: Wednesday, October 16, 2024 3:35 PM
To: Susan Bourgeois <Susan.Bourgeois@LA.GOV>
Cc: Ileana Ledet (LED) <Ileana.Ledet@la.gov>; Rachel Shields <Rachel.Shields@LA.GOV>; Janile Parks <jparks@fguniversal.com>; Desiree Lemoine <desiree@industrymakes.org>; pete.dufresne@stjamesparishla.gov; Steve Welch <steve_welch@oxy.com>; Connie Fabre <connie@gbria.org>; Mary Ellen Pratt <mpratt@sjph.org>; jvicknair@sjph.org; Emma Wagner (LED) <Emma.Wagner@LA.GOV>; Pete Dufresne <pete.dufresne@stjamesla.com>
Subject: Re: Industry Makes Meeting Re: River Parishes Brief

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ms Susan, we are grateful for your time, attention, interest and input during today's briefing.
And thank you for your constructive comments to which we will attend.
We look forward to LED's continued support for manufacturing, and the career opportunities which we all want our young people to experience.

On Oct 15, 2024, at 11:32 AM, Susan Bourgeois <Susan.Bourgeois@la.gov>

wrote:

Adding a zoom link for those who need to join virtually.
https://zoom.us/j/91882097220?pwd=WXb8NbbbWVbND2qbuRbLOihayzvizu.1

Join Zoom Meeting

One tap mobile:	US: +16462551997,,91882097220# or +14042012656,,91882097220#
Meeting URL:	https://zoom.us/j/91882097220?pwd=WXb8NbbbWVbND2qbuRbLOihayzvizu.1
Meeting ID:	918 8209 7220
Passcode:	160406

<Mail Attachment.ics><LCA Presentation - Addressing Cancer Alley .pdf><Industry Makes Update 8-24.pdf>

Steven Nosacka
St James Parish Economic Development
steve_trinity@cox.net
Cell 2259780556

EXHIBIT 13

From: frvincent@rivrdcat.org
Sent: Thu, 27 Feb 2025 11:50:01 -06:00
To: Ryan Louque
Subject: RE: St. Peter Chanel Conference: Petrochemical Pollution, the Unborn, and Maternal Health
Attachments: MaternalHealthConference2025.docx, MaternalHealthConference2025.pdf

EXTERNAL EMAIL: Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Ryan,

Attached are docx and pdf files which I have prepared as a response to your email and those of other concerned citizens. As you can see from the first page summary of the material being put out for the Maternal Health Conference, St. Peter Chanel School is not sponsoring nor participating in this conference. As pastor of St. Joseph Church Parish, I have accepted the invitation to host this conference. It is a national conference and is sponsored, in part, by both the Diocese of Baton Rouge and the Archdiocese of New Orleans because the Catholic Church's moral teaching calls for people to be good stewards of God's creation and all life.

As I state in my personal comments, this is not an "anti-industry" conference, but one focused on prayer, reflection, and education. I do not see a "slap in the face," any more than Jesus speaking to the Jewish leaders of his day or my homilies which challenge my parishioners. It is disconcerting that you bring up financial support for the school and the church in what I judge (hopefully in error) to be an attempt to stop this conference from taking place. As I say in my comments, please accept an invitation to attend and be part of the dialogue.

God bless,
Fr. Vincent

-----Original Message-----
From: Ryan Louque <ryan.louque@stjamesparishla.gov>
Sent: Thursday, February 27, 2025 9:54 AM
To: frvincent@rivrdcat.org; matthew.arceneaux1@gmail.com; Paula Poche <ppoche@stpchanel.org>
Cc: Pete Dufresne <pete.dufresne@stjamesla.com>
Subject: St. Peter Chanel Conference: Petrochemical Pollution, the Unborn, and Maternal Health

Fr. Vincent, Ms. Paula, Matt,

Its quite concerning to hear that the church / school will be sponsoring this conference, or at the least even entertaining allowing outside NGO's to present at your facility.
Many many parishioners of this parish are employed by industry directly supporting the school through tuition as well as the church parish through donations and contributions. The school / church parish receives great support, donations and contributions to numerous programs that ensure continued education as well as extracurricular activities and great events such as the spring festival can occur. This will be a direct slap in the face to these individuals and industries. Please reconsider your decision regarding allowing one-sided biased presentation from these NGO's without also allowing presentation and meaningful data from industry and their reputable organizations and research groups.
Please consider scheduling an event where industry and reputable research groups as well as Louisiana DEQ can present to the Catholic Climate Covenant the substantial strides industry has made in past decades to reduce pollution and emissions substantially as well as well documented proof refuting the misnomer of our area being "Cancer Alley" as a direct result of industry's effects.

Sincerely,

Ryan Louque
Council Chairman
District 3 Councilman
St. James Parish
(225)206-2285

Sent from my iPhone

Petrochemical Pollution, the Unborn, and Maternal Health:
A Louisiana Catholic Health Conference

Quotes from the official flyer:

"This timely event will explore the **unintended** consequences of petrochemical waste on maternal health and unborn child health, with a particular focus on the communities in Louisiana's river parishes." *[Emphasis added]*

"Attendees will explore the social, medical, and scientific dimensions of pollution and maternal and unborn child health through presentations, a guided tour, and group dialogue."

This conference is sponsored by:
Catholic Climate Covenant
The Diocese of Baton Rouge
The Archdiocese of New Orleans
The Jesuit Central and Southern Province
Loyola Institute for Ministry
Rise St. James
The Center for the Human Spirit and Radical Reimaging

Conference Summary:
- PRAYER and faith reflection
- ENCOUNTER: a "geography of challenges and opportunities tour" of St. James Parish with RISE St. James
- SCIENTIFIC, MEDICAL, and SOCIAL ANALYSIS: A panel of two leading scientific experts from local universities focused on getting to the truth of current scientific evidence and health care experiences.
- THEOLOGICAL REFLECTION: Presentation and discussion of what our Catholic Tradition has to say about these issues.
- ACTION: What are the most promising ways we can act together as Church to impact this issue.
- DIALOGUE: We will build on the tradition of dialogue in the Church in Louisiana by infusing a balance between presentations, dialogue, and moments of silence.

Dates and Times: April 4, 2025 (6:30pm - 9:00pm) and April 5, 2025 (8:30am - 3:30pm)
Location: St. Joseph Church (Paulina, LA)
Cost: $20 (suggested donation)

Objectives:
- Create a space to build relationships between local Catholics, health workers, and residents of Louisiana's river parishes.
- Engage and discuss the scientific data.
- Continue the process of transforming culture toward care of God's Creation and the promotion of the common good.
- Build unity in the Church at a time of political polarization.

Website for registration:
https://catholicclimatecovenant.salsalabs.org/2025louisianahealthconference/index.html

As you can see, St. Peter Chanel School is **not** a sponsor **nor** a participant in this conference. This is a *misunderstanding* because of an article printed in the *News Examiner* on February 20, 2025. St. Joseph Church, a parish of the Diocese of Baton Rouge, has been chosen as the location for the event so that it will be prayerful and faith-based. St. Joseph Church Parish uses the school cafeteria for a parish hall, so presentations will be held in the "hall," a distinction lost on most people.

As a priest and pastor for many of the people in the river parish corridor, Fr. Vincent Dufresne (a native of St. John the Baptist Parish) has a great concern for everyone's health and well-being. This is Fr. Vincent's statement, (which you are free to quote):

> I am happy to host this Conference because it is in keeping with the Catholic Church's moral teaching on human responsibility for God's creation and for all life. This is a chance to gather in prayer and to reflect on the reality that we live in a fragile environment which requires us to improve our stewardship. I have no doubt that the petrochemical industry has made strides because of its concern for the environment and the local population. And, there is no way we can live without the petrochemical industry in our area, both for jobs offered and for the products produced. However, I hope everyone inside and outside of industry realize that there is more to be done to improve our stewardship of our environment. The more awareness people have of the issues, the more we can grow in cooperation and offer positive responses to the issues. Please be sure, this is not an "anti-industry" conference any more than Jesus was "anti-Jew" for challenging the religious leaders of his time. Every homily I give challenges good people to become better people. This is the purpose of the conference. I invite people to participate rather than pre-judge. This is a time to be educated and become morally responsive.

EXHIBIT 14

SUPREME COURT OF LOUISIANA

No. 2025-C-00868

BEVERLY ALEXANDER, ET AL.,

Respondents

v.

ST. JAMES PARISH,

Applicant

On Application for Writ of Certiorari From
Court of Appeal Fifth Circuit, Docket No. 24-CA-557,
Honorable Chehardy, Wicker, Johnson, Windhorst, Molaison

AMICUS CURIAE BRIEF OF ATTORNEY GENERAL LIZ MURRILL IN SUPPORT OF APPLICANTS

ELIZABETH B. MURRILL
Attorney General

CAITLIN HUETTEMANN (LSBA #40402)
Assistant Solicitor General

OFFICE OF THE ATTORNEY GENERAL
1885 N. 3rd Street
Baton Rouge, Louisiana 70802
Telephone: (225) 326-6000
Facsimile: (225) 326-6098
HuettemannC@ag.louisiana.gov

Counsel for Amicus Curiae
Attorney General Murrill

development throughout the United States.[2] This powerful anti-industry lobby is funded by a set of like-minded national donors that care nothing about the policies, priorities, and preferences of Louisiana and its citizens. Instead, sock-puppet local NGOs promote an agenda that opposes industrial development and is radically out-of-step with the views and interests of the State. Through this case (and others like it), these out-of-state moneyed interests hope to create an avenue to endlessly delay or halt most industrial activity in the State.

Consider each Respondent named here. Respondent Inclusive Louisiana was formed in 2020 as a non-profit—or so they claim. Though the organization is registered in Louisiana, the EIN their website provides is not registered with the Federal IRS.[3] Inclusive Louisiana is almost entirely funded by Louisiana Bucket Brigade, *see infra* p.4, but also received a sizable donation of $10,000 from the David Rockefeller Fund, an anti-industry funding vehicle, in 2021.[4] Similarly, Respondent Mount Triumph Baptist Church received $10,000 from anti-industry NGO Earthworks that same year.[5]

Respondent RISE St. James, formed in October 2018 by longtime activist Sharon Lavigne, is a fiscally sponsored project of a California anti-industry NGO, Earth Island Institute.[6] There are no records of donations from other anti-industry NGOs to RISE St. James until 2021, as with the other two Respondents. In that year, Louisiana Bucket Brigade became involved in RISE St. James's "organizational development, including program planning, budgeting, fundraising, administrative and financial management."[7]

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[2] *See* Robert Bryce, *The Anti-Industry Industry* (Feb. 18, 2023), https://robertbryce.substack.com/p/the-anti-industry-industry (gathering data demonstrating anti-hydrocarbon/anti-nuclear NGOs are outspending traditional energy NGOs by more than 4 to 1).

[3] *See* Donate, INCLUSIVE LA. (last visited Aug. 13, 2025), https://inclusivelouisiana.org/donate.

[4] *See* Form 990-PF, The David Rockefeller Fund Inc. (Dec. 2021), https://projects.propublica.org/nonprofits/organizations/133533359/202243149349102074/IRS990PF.

[5] *See* Form 990 Schedule I, Earthworks (Dec. 2021), https://projects.propublica.org/nonprofits/organizations/521557765/202231159349302018/full.

[6] *See* Earth Island Institute, Support RISE St. James (last visited Aug. 13, 2025), https://secure.acceptiva.com/?cst=aYnMTV.

[7] *See* Form 990 Part III, Louisiana Bucket Brigade (June 2021), https://projects.propublica.org/nonprofits/organizations/721488935/202201369349312815/IRS990.

EXHIBIT 15

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

Eastern District of Louisiana

INCLUSIVE LOUISIANA; MOUNT TRIUMPH BAPTIST CHURCH; RISE ST. JAMES, by and through their members

Plaintiff

v.

ST. JAMES PARISH; ST. JAMES PARISH COUNCIL; ST. JAMES PARISH PLANNING COMMISSION

Defendant

Civil Action No. 2:23-CV-00987

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Earth Island Institute Inc.
c/o Michael Sowle
2150 Allston Way, Suite 460, Berkeley, CA 94704

(Name of person to whom this subpoena is directed)

☑ *Production:* **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

See **Exhibit A**, attached.

Place:	Date and Time:
Breazeale, Sachse & Wilson, L.L.P. Attn: Danielle Borel 301 Main Street, Suite 2300, Baton Rouge, LA 70801 danielle.borel@bswllp.com	October 16, 2026, 10:00 a.m. CST

☐ *Inspection of Premises:* **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 9/25/2026

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

s/ Danielle L. Borel
Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* St. James Parish, who issues or requests this subpoena, are:

Danielle L. Borel, Breazeale, Sachse & Wilson, L.L.P., 301 Main Street, Ste 2300, Baton Rouge, LA 70801, danielle.borel@bswllp.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:23-CV-00987

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____

on *(date)* _____ .

❒ I served the subpoena by delivering a copy to the named person as follows: _____

_____

_____ on *(date)* _____ ; or

❒ I returned the subpoena unexecuted because: _____

_____ .

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of $ _____ .

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc.:

Print Save As... Add Attachment Reset

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) ***For a Trial, Hearing, or Deposition.*** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(2) ***For Other Discovery.*** A subpoena may command:

(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) ***Avoiding Undue Burden or Expense; Sanctions.*** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) ***Command to Produce Materials or Permit Inspection.***

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) ***Quashing or Modifying a Subpoena.***

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) ***Producing Documents or Electronically Stored Information.*** These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) ***Claiming Privilege or Protection.***

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013).

EXHIBIT A

Pursuant to Rule 45 of the Federal Rules of Civil Procedure, you are commanded to produce the documents and electronically stored information described below. These requests are continuing in nature and require supplementation in accordance with the Federal Rules.

A. Definitions

The following definitions apply to the below requests:

1. "You" and "Your," means Earth Island Institute Inc., and every individual who, acting on its behalf, can furnish information, including any person acting as a representative in the investigation, preparation, or prosecution of this action, and its agents, employees, owners, attorneys, investigators, representatives, and affiliates having knowledge of any matter which is the subject of this discovery pleading who can furnish information.

2. "Document(s)" means any printed, typewritten, or handwritten instrument of whatever character or the physical expression of any means of storage of information and includes, without limitation, any correspondence, communication, e-mail and other electronic mail and communication, memorandum, agreement, letter, hand or typewritten note, computer printout, computer tape, microfilm, microfiche, tape recording, photograph, motion picture, plate, diagram, survey, voice tapes, recordings, other items of a similar nature, originals and non-identical copies

3. "Communication(s)" means any transmission of information, including emails, text messages, messaging applications, letters, voicemail, and in-person or telephone communications reflected in notes or recordings.

4. "Earth Island Institute Inc." means Earth Island Institute Inc., its members, officers, directors, agents, attorneys, affiliates, subsidiaries, divisions, partners, parents, predecessors, successors, joint venturers, employees, representatives, and any and all other persons acting for, purporting to act for, or subject to the control of Earth Island Institute Inc., or its subsidiaries, parents, predecessors, or successors.

5. "RISE St. James" means RISE St. James, its members, officers, directors, agents, attorneys, affiliates, subsidiaries, divisions, partners, parents, predecessors, successors, joint venturers, employees, representatives, and any and all other persons acting for, purporting to act for, or subject to the control of RISE St. James, or its subsidiaries, parents, predecessors, or successors.

B. Requested Documents

1. Produce any and all documents and communications from 2017 to the present between Earth Island Institute Inc. and RISE St. James.

2. Produce any and all documents and communications from 2017 to the present related to, mentioning, and/or pertaining to any grants, monies, stipends, or other funds paid or transmitted to RISE St. James directly or indirectly.

3. Produce any and all documents and communications from 2017 to the present related to, mentioning, and/or pertaining to any grants, monies, stipends, or other funds received by Earth Island Institute Inc. on behalf of or for the benefit of RISE St. James and/or to be paid or transmitted to RISE St. James.

4. Produce any and all documents and communications from 2017 to the present related to, mentioning, and/or pertaining to the source of any grants, monies, stipends, or other funds received by Earth Island Institute Inc. on behalf of or for the benefit of RISE St. James and/or to be paid or transmitted to RISE St. James.