

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

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

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

1. I have been asked to opine on the history of the Pleasant Hill Baptist Church and Cemetery, and the individuals who formed it. If called as a witness, I would testify competently and truthfully to these matters.

2. I am the Principal of Southeast Preservation, an architectural conservation and preservation firm established in 2007. I hold a Master of Preservation Studies from the Tulane University School of Architecture in New Orleans, Louisiana and a B.A. in Creative Writing with an individually designed minor in Architecture from Trinity College in Hartford, Connecticut. I have been working in the field of preservation since 1998. My professional experience includes employment in both the for-profit and the non-profit sectors in the positions of Architectural Staff, Conservation Assistant, and Preservation Manager. From 2015 to 2022, I was a Preservation faculty member of the Tulane School of Architecture and served as Assistant Director and Interim Director of the Master of Preservation Studies Program. Through each of these positions, I have gained experience in the documentation, assessment and treatment of

historic structures, monuments and sites. I meet the Secretary of the Interior's Professional Qualifications Standards for Architectural History and History.

3. I make this declaration based on my expert professional knowledge in the field of historic preservation.

4. As background, I have been provided the Second Amended Complaint filed in this case, and the June 1, 2026 letter submitted by counsel for Plaintiffs regarding the proposed redesignation of Romeville.

5. I am providing this expert opinion on a *pro bono* basis.

#### **I. The Pleasant Hill Baptist Church and Cemetery Today**

6. Pleasant Green Baptist Church, now known as Pleasant Hill Baptist Church, is located in rural St. James Parish in the community of Romeville.

7. Pleasant Hill Baptist Church is a gable-front, concrete-block building with a brick veneer façade facing the River Road, constructed in 1973. Its modern materials and design are an example of how the gains of the Civil Rights movement manifested in architecture at this time. Modernist stylistic choices and durable materials were embraced as reflections of a new era in the African American experience.

8. Pleasant Green Cemetery, now known as Pleasant Hill Cemetery, is located half a mile northeast of the Church, and approximately one-fifth of a mile northeast of the Union Pacific railroad tracks on a dirt lane surrounded by cane fields. The cemetery is easily distinguishable in the landscape by its mature trees. There are approximately 125 concrete grave covers and burial vaults oriented southeast and interspersed with granite, marble, and concrete markers. Traditional cemetery plantings such as palmettos and jonquils complement the assemblage of markers.

9. The cemetery is easily recognizable as a historically sacred funerary space through the traditional planting and trees, which were used to define the place when permanent markers were not used.

10. There is a notable absence of historic grave markers, particularly from the significant first years of settlement, which in and of itself is a defining feature related to the significant history of the cemetery, as it reflects the limited economic resources available to the Pleasant Green community to erect permanent markers in its early years. There are, however, significant grave markers from its later years. An abundance of military markers demonstrates the community's rich history of service to the United States. In addition to professionally engraved stone markers and metal markers, there are also vernacular markers composed of concrete and painted plaques.

## **II. Background on Resettlement in Reconstruction-Era St. James Parish**

11. In the aftermath of the Civil War, emancipated people in St. James Parish looked to establish new lives in which freedom was not just a technicality, but a truly defining characteristic.

12. For some people, the path forward was out of the Parish. Census data indicates that between 1860 and 1870, the White population of St. James Parish decreased about 2% and the Black population declined by almost 16%.<sup>1</sup> This significant loss of population is just one indicator of shifting social patterns in Reconstruction St. James Parish.

13. Others were able to remain. In *Reconstruction in the Cane Fields: From Slavery to Free Labor in Louisiana's Sugar Parishes*, historian John C Rodrigue asserts that, "It is axiomatic that

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<sup>1</sup> It is likely that many of the African Americans who left St. James Parish in this period went to New Orleans or other more urban areas. Some may have gone to find family members they had been separated from. It was not until the next century that many African American would move north in the Great Migration.

most former slaves saw land as the linchpin to freedom.”<sup>2</sup> Rodrigue argues that while formerly enslaved people definitely felt that they were justly entitled to the land they had worked without compensation, their desire for land was “less a matter of settling old scores than of looking to the future.” This was true broadly across the South and specifically in Louisiana’s sugar region where Rodrigue says freed people “yearned for a freedom rooted in land.”<sup>3</sup>

14. For the most part, however, planters were just as determined to hold onto their property as freedpeople were to obtain it. Planters mostly succeeded in this within the first year after the war and only over the coming decades did ownership and settlement patterns increasingly shift.<sup>4</sup> As the cost of labor and other challenges of sugar production deepened, some owners of large land holdings began to divest of their properties, which opened more land for purchase.<sup>5</sup>

15. For newly freed people, education, religion, and social organizations became foundational to their new lives. Historian Eric Foner, author of *Reconstruction: America’s Unfinished Revolution*, identified churches, cemeteries, and schools as the three institutions freed African Americans first worked to create. At the center of these pillars was the church. Both cemeteries and schools were often linked to a church. As can be observed throughout the South, “When slavery ended, the number of Black churches increased exponentially as freed persons created their own church communities.”<sup>6</sup>

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<sup>2</sup> John C. Rodrigue, *Reconstruction in the Cane Fields: From Slavery to Free Labor in Louisiana’s Sugar Parishes, 1862-1880* (Baton Rouge: Louisiana State University Press, 2001), 60.

<sup>3</sup> Ibid.

<sup>4</sup> Ibid. at 62.

<sup>5</sup> For detailed analysis of wage labor and plantations in the postwar era, see Rodrigue and HHM Associates, *Historic Context and Survey Report of Great River Road, St. John the Baptist Parish, Louisiana* (National Park Service, U.S. Department of the Interior, 2024).

<sup>6</sup> Alison Foster, *“The Lord Is the Maker of Them All”: Black Membership in White Baptist Churches in Antebellum Louisiana* (Baton Rouge: LSU, 2022), 3.

16. According to William Hicks' *History of Louisiana Negro Baptists from 1804 to 1914*, "When New Orleans surrendered and freedom removed the persecutions and oppressions, new zeal for the faith sprang up, and the once-smothered flame burst forth and its influence spread all through the city and parish. Churches were organized in different parts of the city, and in every parish in the southern part of the state. In 1865 a large number of churches had been organized."<sup>7</sup> In *The Negro Church in America*, E. Franklin Frazier explained this "rapid growth" was the "most obvious result" of the merging of the "invisible church" that had existed on plantations with the institutional churches of African Americans who were free before the Civil War.<sup>8</sup> The Baptist church in particular gained great traction among freed African Americans.

17. In alignment with this trend, African American Baptist churches sprang up across St. James Parish in this period.

18. In St. James Parish, the establishment of new churches and cemeteries and the relocation of existing churches was intimately tied to land acquisition and settlement. While some new churches were erected on plantation land, many anchored newly acquired tracts of land. In *Delta Sugar: Louisiana's Vanishing Plantation Landscape*, cultural geographer John B. Rehder explains that African American churches began to appear in Louisiana's plantation landscape in the late 1800s and early 1900s, not within the core of the plantation properties, but set away on land obtained from the plantation management or off of plantation property in what he termed "free villages." "These small but functional structures," he stated, "were a special symbol of

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<sup>7</sup> William Hicks, *History of the Louisiana Negro Baptists from 1804 to 1914* (Nashville: National Baptist Publishing Board, 1914), 27.

<sup>8</sup> Frazier, 36.

freedom in the period of Reconstruction, and their traditional strength lay in a resident plantation population.”<sup>9</sup>

19. Before emancipation, enslaved people had been buried on the plantations where they lived and worked. During Reconstruction, establishing new cemeteries was an important act of establishing free communities. The National Historic Landmarks Theme Study, *The Era of Reconstruction, 1861-1900* states that, “Cemeteries were often sites of African American community and institution building. As Jim Crow laws solidified during the period under consideration, separate white and black cemeteries developed. Black cemeteries were often associated with black churches and civic associations.”<sup>10</sup> Benevolent and mutual aid societies played an important role in providing for funeral and burial expenses.

20. In St. James Parish a pattern emerged in the spatial arrangement of African American churches and cemeteries. The tracts of land freed people were able to obtain typically had a narrow frontage along the river roads, but extended far back into the swamps following the lines of the French arpent system. Churches were usually established close to the river road, which could be considered the front of the property. Cemeteries were typically established toward the back swamp. Between the two, lots were sold to individuals for places of residence. In comparison, the Catholic churches, which also face the river roads on both the east and west banks, have their cemeteries placed in close proximity to the church because their properties were intended for church use only, as opposed to establishment of a larger community.

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<sup>9</sup> John B. Rehder, *Delta Sugar: Louisiana's Vanishing Plantation Landscape* (Baltimore: The Johns Hopkins University Press, 1999), 156.

<sup>10</sup> Gregory P. Downs and Kate Masur, *The Era of Reconstruction, 1861-1900*, National Historic Landmarks Theme Study (Washington, DC: The National Historic Landmarks Program, Cultural Resources, National Park Service, U.S. Department of the Interior, 2017).

21. It must be emphasized that although there was a pattern of emancipated people establishing communities with churches and cemeteries—of which the Pleasant Hill community is a prime example—this was by no means common. There were many hurdles to property acquisition that only a minority of African American people were able to overcome. Although “. . . certain freedmen accumulated enough money to acquire small amounts of property,” overall “Black property holding was small scale.”<sup>11</sup> This was the conclusion of historian John Rodrigue after extensive study of Louisiana’s sugar parishes during Reconstruction. Analysis of property holding among African Americans in the 1870s is challenged by the absence and uneven nature of period documents, but an intact collection of tax records from Ascension Parish allowed Rodrigue to quantify property holding among a sample of 238 Black laborers. The finding was that just 19% owned any taxable property in 1880, less than half of which was land or improvements on land they did not own.<sup>12</sup>

### **III. The Eleven People Who Established Pleasant Green Settlement**

22. On February 20, 1874, eleven people were able to purchase a tract of land measuring one arpent, or approximately 192 feet, fronting the river with a depth of 8 arpents.

23. The tract of land was bounded by the property of Mrs. Harriet Jones and Vasseur Webre.

24. The purchase agreement stipulated that a portion of land on the public road would be specially devoted to the erection of a church called Pleasant Green for public worship, and another portion, forty-eight arpents from the river, would be dedicated for a burial ground.

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<sup>11</sup> Rodrigue, 140 and 154.

<sup>12</sup> Rodrigue, 154.

25. The eleven purchasers of the property were General Jones, Peter Riley, Robert Walker, Milton Scullock, Orange Jones, William Pleasant, Richard Johnson, Jack Carter, George Lewis, Anderson Pride, and Pleasant Jones. General Jones was identified as the agent for the group.

26. The land was sold to the group by J. Bruce Morson and Alfred Colomb, who were separately the owners of the nearby Wilton and Colomb Plantations.

27. The stories of the people who established Pleasant Green Church and Cemetery begin in 1810s-1840s Virginia and North Carolina, where they were born as documented in census records. However, no details of their early lives are known at this time.

28. By 1849, some of them were living in enslavement on the Wilton plantation just upriver from the later Pleasant Green settlement.

29. The plantation was then owned by Virginians, Dr. William Webb Wilkins, James Cole Bruce, and James Alexander Seddon (the future Secretary of War of the Confederacy).

30. The 1849 inventory of the enslaved people of the Wilton included General, age 30, Orange, age 28, and Pleasant, a carpenter age 26 who must almost certainly be the same individuals who founded the settlement.<sup>13</sup>

31. In 1859, William Webb Wilkins died and his succession inventory includes General, Orange, and Pleasant among 157 names of enslaved people on the plantation.<sup>14</sup>

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<sup>13</sup> Bruce Family Papers, Accession # 2692, Special Collections Dept., University of Virginia Library, Charlottesville, Va.

<sup>14</sup> Succession of W. W. Wilkins, March 18, 1859, Parish of St. James, Louisiana. Probate Records and Loose Papers, Folder No 1012-1032, Louisiana District Court. By the time of Wilkins death, Bruce had sold his share to his son-in-law, James Marion Morson and the plantation would later become the property of Bruce's grandson, James Bruce Morson.

32. At the end of Civil War, the then-owner of Wilton, James Marion Morson, reported 152 persons employed on the plantation, which again included General, Orange, and Pleasant along with Bob Walker and Milton (Scullock).

33. It also noted that, “All have resided on this plantation for many years or since their birth.”

34. In 1866, Morson executed a contract with the laborers of Wilton Plantation, which then numbered only seventy.

35. Nine of the eleven purchasers of the Pleasant Green property match the seventy names on this contract.

36. From all of this documentation, it can be concluded that most, if not all, of the people who established the Pleasant Green church, cemetery, and settlement knew each other from the nearby Wilton plantation and that in all likelihood, most had been living and enslaved there for decades. In other words, they were already a community with strong ties to each other and the land.

37. Indeed, according to the history of Pleasant Hill Baptist Church (the present name of Pleasant Green), it was established on the plantation prior to the acquisition of land. This is supported by the fact that General Jones represented Pleasant Green Baptist Church at the statewide Baptist convention in June of 1873, some eight months before the land purchase.<sup>15</sup>

#### **IV. The Pastors of the Church, and Those Buried in the Cemetery: General Jones, Isaac Mitchell, Mallory Green, Joseph Dumas, and Moses Russ**

38. Historical records reveal that General Jones was a recognized leader of the community.

39. In June of 1870, General Jones was identified as a member of the executive committee of the parish established by “radical” Republicans according to *Le Louisianais* newspaper.<sup>16</sup>

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<sup>15</sup> *New Orleans Republican*, June 4, 1873.

<sup>16</sup> *Le Louisianais*, June 4, 1870.

40. In 1873, General Jones represented Pleasant Green Baptist Church at the Louisiana “Colored Baptist Convention.”<sup>17</sup>

41. In 1876, “General Jones’ Church” was listed as the polling place for the 3<sup>rd</sup> Ward of St. James Parish.<sup>18</sup>

42. In 1877, General Jones was appointed to be a trustee for the 3<sup>rd</sup> school district of St. James Parish.<sup>19</sup>

43. General Jones does not appear in the historic record after 1877. It is unknown if he died between 1877 and the census of 1880 because there are no death records for the Parish from these years, but since he would have been in his sixties, it is a strong possibility.

44. If so, he may have been one of the first people laid to rest in the new Pleasant Green Cemetery. There was no other cemetery in the area except those on plantations.

45. According to the church history, the pastorship of Pleasant Green passed on to Isaac Mitchell and then Mallory Green.

46. Little is known about Isaac Mitchell, but Mallory Green was a community leader like General Jones. He was likely also a part of the community enslaved on the Plantation.<sup>20</sup>

47. He was born in approximately 1843-7 in Virginia.

48. In 1872, he was a Justice of the Peace for the 3<sup>rd</sup> Ward of St. James Parish.

49. In 1884, he was commissioned as Constable of the 3<sup>rd</sup> Ward and resigned from the position in 1886. Given the political and racial climate of this period, his commission as Constable is remarkable.

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<sup>17</sup> *New Orleans Republican*, June 4, 1873.

<sup>18</sup> *Le Louisianais*, Nov. 4, 1876.

<sup>19</sup> *Le Louisianais*, May 26, 1877.

<sup>20</sup> The 1866 work contract from the plantation includes an individual named Malry Green of approximately the correct age.

50. In 1900, the census recorded Green's occupation as Elder and he owned his own home. On the 1920 census, he was identified as a Clergyman, and when he died in 1926, his profession was listed as Preacher.

51. His death certificate identified his place of burial only as Central, Louisiana. Central Louisiana is the area between Romeville and Whitehall, but has been used historically to refer to the broader area. Given that the Pleasant Green Cemetery was the only non-plantation burial place in this area and the fact that he was the pastor of Pleasant Green, it is almost certain that Green would have been buried there.

52. Following the passing of Mallory Green, the Rev. Joseph Dumas became the pastor of Pleasant Hill Baptist Church (Pleasant Green was renamed Pleasant Hill by 1926). Dumas was the first pastor in the community to have been born after the Civil War.

53. Newspaper items from this period reveal the different ways the church was used as a community meeting place. Several Central School Board meetings were held there. This highlights the settlement's significance as a place of organizing and planning for the larger community. At this time, obituaries for members of the community began to appear in the paper.

54. Rev. Joseph Dumas passed on in 1936 and his marker is one of the oldest in the cemetery.

55. Rev. Moses Russ led the Pleasant Hill Baptist Church after Rev. Dumas. He was the first pastor to come from outside of the community. He was born in Florida, but was living in the settlement with his mother, Hester, by 1910. He served in World War I as a Private in the 805<sup>th</sup> Pioneer Infantry, which was part of the Meuse Argonne Offensive. After the war, he returned to Florida and became a preacher. By 1927, he was back in the Pleasant Hill settlement. In his leadership role as pastor, he contributed to the continued vitality of the community.

56. In 1954, Russ passed on and his military marker is one of many in the Pleasant Hill Cemetery that reflects the service given by this small community in all U.S. wars

**V. The Community's Remarkable Ability to Retain These Properties Over the Generations**

57. The establishment of the settlement, church, and cemetery did not guarantee that ownership of these properties would be retained. For emancipated people, no less a feat than buying property in the first place was holding on to it. As summarized by Rodrigue, "Freedmen could gain property, but they could also lose it."<sup>21</sup>

58. Global economic conditions were contributing factors for land loss, aside from the insidious methods by which some White people sought to repossess land from African Americans. The economic depression that followed the Panic of 1873 and lasted from September 1873 to 1877 caused a wage downturn and subsequent wage fluctuation for African American agricultural laborers.<sup>22</sup> The Panic also caused the investments of the Freedman's Saving and Trust Company to lose value or become worthless. The Bank was already being mismanaged prior to this by the all-White board of trustees, making it unable to withstand this downturn. When it failed in June 1874, 61,000 African Americans lost a combined \$3 million and that has had a lasting impact on intergenerational wealth.<sup>23</sup>

59. Yet, between 1874 and 1877, the purchasers of the Pleasant Green property paid off their note of \$1,372 with interest of 8% per annum.

60. With the end of Reconstruction in Louisiana following the Compromise of 1877, the political participation and civil rights of African Americans changed abruptly.

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<sup>21</sup> Rodrigue, 154.

<sup>22</sup> Ibid., 140.

<sup>23</sup> Justene Hill Edwards, *Savings and Trust: The Rise and Betrayal of the Freedman's Bank* (New York: W. W. Norton, 2024).

61. Suppression of voting and violent repression of African Americans became common. The impact of this is evidenced by an 1879 convention of “colored clergymen, teachers, and social leaders” from around the state on “the emigration question.”<sup>24</sup> These conditions causing the assembled people to consider leaving Louisiana were summarized as:

We, the representatives of the people of African descent in Louisiana, in convention assembled, solemnly and truly declare before God and the country that we are denied the freedom of the ballot and equality before the law, and that in the unholy persecutions visited upon us for our political opinions the utmost limit of endurance has been reached.<sup>25</sup>

62. The migration of African Americans to the Great Plains – especially Kansas – in the late 1870s to early 1880s was known as the Great Exodus and the participants as Exodusters. Most of the Exodusters came from Louisiana, Mississippi, Texas, and Tennessee. It is not known how many people, if any, chose to leave St. James Parish for Kansas or elsewhere.

63. Despite the changing circumstances for African Americans in Louisiana, it is clear that the African American churches established during Reconstruction continued to serve their communities both as religious institutions and as educational, social, and civic spaces.

64. For example, despite the suppression of the Black vote, in 1880 the Pleasant Green Baptist Church continued to serve as the polling place for its ward.<sup>26</sup>

65. Given that there are incredibly few surviving historic resources associated with the African American experience of Reconstruction, the Pleasant Hill Baptist Cemetery is very significant at the local level. The survival and perpetuation of the community throughout the

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<sup>24</sup> *The New Orleans Weekly Democrat*, April 26, 1879.

<sup>25</sup> *Ibid.*

<sup>26</sup> *Le Louisianais*, October 2, 1880.

twentieth century is also significant and embodied by the Pleasant Hill Baptist Church and Cemetery.

I hereby declare under the penalty of perjury pursuant to the laws of the United States that the above is true and correct to the best of our knowledge

  
Laura Ewen Blokker

EXECUTED this 18 day of June 2026