

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 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 motion for a temporary restraining order.

2. Attached as **Exhibit 1** is a true and correct copy of Proposed Ordinance 26-08, which was attached to the St. James Parish Council’s [May 20, 2026 agenda](#).

3. Attached as **Exhibit 2** is a true and correct copy of a letter that I sent to counsel for St. James Parish—Vic Franckiewicz, special counsel for the Parish, as well as John King, Carroll Devillier, and Danielle Borel, who are counsel of record on this case—on June 1, 2026.

4. Attached as **Exhibit 3** is a true and correct copy of the June 2, 2026 email from Mr. Franckiewicz that I received in response to my June 1, 2026 letter.

5. Attached as **Exhibit 4** is a true and correct copy of a map, obtained from Forensic Architecture’s [website](#). It is part of Forensic Architecture’s *Environmental Racism in Death Alley* project, and it visualizes the Romeville area, with a red polygon that depicts the Colomb Plantation Cemetery.

6. Attached as **Exhibit 5** is a true and correct copy of a map, obtained from the St. James Parish Tax Assessor's [property viewer website](#), which shows the same area as Exhibit 4, and shows the ownership information.

7. Attached as **Exhibit 6** is a true and correct copy of the [Port of South Louisiana's website](#), which lists "Shady Grove" as an available site for industrial development, listing Steve Nosacka as the agent, with a map of the area that is nearly identical to the Parish's Proposed Ordinance.

8. Attached as **Exhibit 7** is a true and correct copy of the [Entergy's Louisiana Site Selection webpage](#), about "Shady Grove" which, as of this filing, was last updated on April 13, 2026. It lists the "Property Type" as "Industrial."

9. Attached as **Exhibit 8** is a true and correct copy of St. James Parish Ordinance No. 14-03, the 2014 Land Use Plan, which includes the "Plantation Schools and Churches 2 Mi Buffer."

10. Attached as **Exhibit 9** is a true and correct copy of the U.S. Census Bureau's census data for Romeville, obtained from the [U.S. Census Bureau's website](#).

11. Attached as **Exhibit 10** is a true and correct copy of the minutes from the Parish Council's May 29, 2019 meeting, where the appeal of the Planning Commission's approval of Syngas Energy Holding, LLC's industrial land use application was denied, thereby allowing Syngas's proposed industrial use.

12. Attached as **Exhibit 11** is a true and correct copy of the St. James Parish Council's approval of Ergon's industrial land use application.

13. Attached as **Exhibit 12** is a true and correct copy of the Parish Council's January 23, 2019 decision to approve Formosa Plastics aka FG LA LLC.

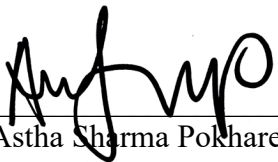
14. Attached as **Exhibit 13** is a true and correct copy of the Parish Council’s April 2, 2025 meeting minutes, which includes Resolution 25-60 to “reaffirm support for FG LA LLC Sunshine Project.”

15. Attached as **Exhibit 14** is a true and correct copy of a letter that I sent to counsel for St. James Parish—Vic Franckiewicz, special counsel for the Parish, as well as John King, Carroll Devillier, and Danielle Borel, who are counsel of record on this case—on June 11, 2026.

16. Attached as **Exhibit 15** is a true and correct copy of the June 16, 2026 email from Mr. Franckiewicz that I received in response to my June 11, 2026 letter.

17. Attached as **Exhibit 16** is a true and correct copy of Ordinance 26-08, which was attached to the St. James Parish Council’s [June 17, 2026 agenda](#).

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 18th day of June 2026