CASE No.: 2012-CA-000412/2012-CA-000490

## **EXHIBIT E**

## TO PLAINTIFFS' JOINT OBJECTION TO REVISED PLAN AND PROPOSED ELECTION SCHEDULES

## IN THE CIRCUIT COURT FOR THE SECOND JUDICIAL CIRCUIT IN AND FOR LEON COUNTY, FLORIDA

RENE ROMO, an individual; BENJAMIN
WEAVER, an individual; et. al,

Plaintiffs,

vs.

CASE NO. 2012-CA-00412

KEN DETZNER, in his official capacity as Florida Secretary of States, PAMELA JO BONDI, in her official capacity as Attorney General,

Defendants.

THE LEAGUE OF WOMEN VOTERS OF FLORIDA; THE NATIONAL COUNCIL OF LA RAZA; et al..

Plaintiffs,

vs.

CASE NO. 2012-CA-00490

KEN DETZNER, in his official capacity as Florida Secretary of State; THE FLORIDA SENATE; et al.,

Defendants.

## AFFIDAVIT OF PERRY E. THURSTON, JR

STATE OF FLORIDA County of Broward

Perry E. Thurston, Jr., being duly sworn, says:

- This affidavit is made upon my personal knowledge.
- 2. I am of legal age and competent to testify to the matters stated herein.

- 3. I currently serve as a member of the Florida House of Representatives, District 94, having been first elected in 2006 and re-elected subsequently every two years. During the 2012-2014 legislative biennium, I served as the Minority Leader of the House Democratic Caucus.
- 4. During the recent special legislative session to revise Florida's congressional districts in light of the orders of the Circuit Court of the Second Judicial Circuit of July 10, 2014 finding the Congressional redistricting plan enacted by the Legislature to be unconstitutional and of August 15, 2014 directing the Legislature to submit a remedial or revised plain on or before August 15, 2014, I participated in the special legislative called by the Speaker of the House of Representatives and President of the Senate.
- 5. In advance of the special session, a remedial plan was developed over the course of three days by the chairs of the House and Senate redistricting committees and their respective staffs and legal counsel, without participation of any member of the Democratic minority in the House of Representatives or their staff or counsel on their behalf.
- 6. During the 2012 redistricting process, the members of the House of Representatives were assured that the maps brought forward for a vote were a result of the most open and transparent process redistricting process known in Florida history. Yet the evidence presented in the litigation revealed that members of the House and Senate, legislative staff and legal counsel to the House and Senate participated in secret meetings with political operatives who, the Court found, engaged in a conspiracy, to influence and manipulate the Legislature into violating its duty and responsibility under the Fair District Amendments.
- 7. In order to address the concerns that there might be efforts to again manipulate or influence the process, Democratic members of the House Redistricting Committee sought to place witnesses who addressed under oath. This request was rejected on a strict party line vote.
- 8. In my view, the process under which this remedial may was enacted was tainted from its inception. The base map utilized to engraft the remedial changes was based on the map and changes resulting from the conspiratorial manipulations of the political operatives.

I HEREBY SWEAR OR AFFIRM THAT THE FOREGOING INFORMATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

Signature of Affiant

Sworm o (or affirmed) and subscribed before me this of day of August, 2014

Day O ( Total

Signature of Notary Public - State of Florida

Print, Type, or Stamp Commissioned Name of Notary Public

DARCEL CARTER
Notary Public - State of Florida
My Comm. Expires Sep 11, 2015
Commission # EE 127905
Bonded Through National Notary Assn.

Personally Known or Produced Identification
Type of Identification Produced: