

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

-----X Civil Action
JOE GARCIA, FERNANDO QUILES, DALIA No. 12-0556 RBS
RIVERA MATIAS,

PLAINTIFFS,

v.

2011 LEGISLATIVE REAPPORTIONMENT
COMMISSION and CAROLE AICHELE, in her
Capacity as Secretary of the Commonwealth of
Pennsylvania, and as Chief Election Officer of
the Commonwealth of Pennsylvania,

DEFENDANTS.

-----X

DECLARATION OF JOSE PEREZ

I, JOSE PEREZ, an attorney admitted *pro hac vice* to practice before this Court, declare the following to be true under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am the Associate General Counsel of LatinoJustice PRLDEF, which represents Plaintiffs Joe Garcia, Fernando Quiles, and Dalia Rivera Matias in this action. I am familiar with the proceedings in this case, and I submit this Declaration in support of Plaintiffs' Motion for a Preliminary Injunction.

2. Attached hereto as Exhibit A is a true and correct copy of the Declaration of Asher Ross, together with attached exhibits, submitted in further support of Plaintiffs' Motion for a Preliminary Injunction.

3. Attached hereto as Exhibit B is a true and correct copy of the Declaration of Plaintiff Joe Garcia, together with attached exhibit, submitted in further support of Plaintiffs' Motion for a Preliminary Injunction.

1. I declare the foregoing to be true under penalty of perjury, pursuant to 28 U.S.C. § 1746.

Dated: New York, New York

June 29, 2012

s / Jose Perez

Jose Perez

Exhibit A

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COMMISSION and CAROLE AICHELE, in her
Capacity as Secretary of the Commonwealth of
Pennsylvania, and as Chief Election Officer of
the Commonwealth of Pennsylvania,
DEFENDANTS.

-----X

DECLARATION OF ASHER ROSS

I, ASHER ROSS, declare the following to be true under penalty of perjury, pursuant to
28 U.S.C. § 1746:

A. BACKGROUND AND EXPERTISE

1. Given both my current studies and employment experiences to date, I have
obtained an extensive background in quantitative sociological research and analysis. A copy of
my resume is attached as Exhibit 1.

2. I am currently a Sociology Masters Candidate at CUNY Queens College, where I
have performed demographic research and analysis using public health as well as demographic
data sets, such as the Public Use Microdata Sample ("PUMS"), the American Community
Survey ("ACS"), and the 2000 and 2010 Decennial Censuses.

3. While employed at Working Families Party of New York, I worked with census,
voter, electoral returns, and geographic data to produce demographic analyses of voting patterns

for many state, federal, and local election campaigns. In turn, while working at Latino Justice PRLDEF, I have served as a Demography, Database, and G.I.S. Consultant, preparing and analyzing demographic and geographic data from the 2000 and 2010 censuses as well as the American Community Survey. I was also responsible for drawing alternate redistricting proposals for state, federal, and local electoral districts in New York, New Jersey, Connecticut, Maryland, Massachusetts, Florida and Pennsylvania.

B. SCOPE OF DECLARATION

4. This sworn declaration is being submitted in further support of Plaintiffs' Motion for a Preliminary Injunction. Accordingly, Plaintiffs requested that I perform three tasks. First, that I determine whether using Pennsylvania's 2001 Redistricting Plan in its upcoming 2012 elections for the Pennsylvania State Senate and State House Assembly would result in malportionment given equal population by district standards. Second, that I assess Latino population growth within the state of Pennsylvania between the 2000 and 2010 censuses and pinpoint specific areas of Latino population growth within the state to date. Third, based on my conclusions regarding specific areas of Latino growth, Plaintiffs asked that I determine whether using Pennsylvania's 2001 Redistricting Plan in its upcoming 2012 State Senate and House Assembly elections would result in malportionment directly affecting those areas of Latino growth within Lehigh, Berks, and Philadelphia counties.

5. In undertaking this work, I reviewed and compiled the following documents based on 2000¹ and 2010² United States Census data and publicly available 2001 Legislative Reapportionment Commission materials³:

¹ U.S. Census Bureau. Census 2000 Public Law 94-171 Redistricting Data, http://www.census.gov/rdo/data/redistricting_data.html.

- a. the 2001 State Senate Reapportionment Map, attached as Exhibit 2;
- b. the 2001 State House Reapportionment Map, attached as Exhibit 3;
- c. a table of population totals for all 2001 senate districts based on the 2010 census, sorted by degree of deviation, attached as Exhibit 4,
- d. a table of population totals for all 2001 house districts based on the 2010 census, sorted by degree of deviation, attached as Exhibit 5,
- e. demographic tables comparing the combined average population sizes of State Senate and House districts that overlap Berks and Lehigh counties (specifically, Senate districts 11, 16, 18, 24, 29, 44, and 48, and House districts 124 through 135, 183, and 187) with the combined average population sizes of the rest of the Senate and House districts in the state, attached as Exhibit 6;
- f. maps of southeast Pennsylvania demonstrating the overlap of Senate Districts across various state county borders, attached as Exhibit 7; and,
- g. maps of southeast Pennsylvania demonstrating the overlap of House Assembly Districts across various state county borders, attached as Exhibit 8.

² U.S. Census Bureau. 2010 Census Redistricting Data [P.L. 94-171] Summary Files http://www.census.gov/rdo/data/2010_census_redistricting_data_pl_94-171_summary_files.html; U.S. Census Bureau. 2010 Census Block Assignment Files, http://www.census.gov/geo/www/2010census/baf/baf_main.html.

³ See generally Pennsylvania Redistricting, The Legislative Guide to Redistricting in Pennsylvania, Pennsylvania House District 2001 Map, http://aws.redistricting.state.pa.us/Redistricting/Resources/GISData/Districts/Legislative/House/2001/PDF/HouseDistricts_2001.pdf; Pennsylvania Redistricting, The Legislative Guide to Redistricting in Pennsylvania, Pennsylvania Senate District 2001 Map, http://aws.redistricting.state.pa.us/Redistricting/Resources/GISData/Districts/Legislative/Senate/2001/PDF/SenateDistricts_2001.pdf.

C. FINDINGS

i. Using Pennsylvania's 2001 Redistricting Plan in its upcoming 2012 elections for the Pennsylvania State Senate and State House Assembly results in malaportionment.

6. Regarding Plaintiffs' first request, in which I determined that using Pennsylvania's 2001 Redistricting Plan in its upcoming 2012 elections for the Pennsylvania State Senate and State House Assembly would result in malaportionment, I first determined 2010 census population totals for the current 2001 district lines. I then determined the 2010 ideal equal population figures for state House and Senate seats. Finally, I compared the two sets of figures (2010 population figures for the 2001 State House and Senate districts and 2010 ideal population figures). Doing so revealed extremely high deviations from the ideal equal population numbers by district, and thus indicated malapportionment, statewide as well as by region. *See* Exhibits 4 and 5.

7. Specifically, according to the 2010 Census redistricting data release (P.L. 94-171),⁴ Pennsylvania has a total population of 12,702,379, meaning that for redistricting purposes in order to achieve equal population standards by district, the ideal population sizes of Pennsylvania's 203 State House and 50 State Senate districts are 62,573 and 254,048, respectively.

8. The House currently contains districts with deviations as high as 24.3% and as low as -18.5%. Specifically, House District 13 in Chester County is over-populated by 15,204 persons, for a deviation of 24.3%. House District 24 in Allegheny County is under-populated by 11,569 persons, for a deviation of -18.5%. *See* Exhibit 5.

⁴ U.S. Census Bureau. 2010 Census Redistricting Data [P.L. 94-171] Summary Files http://www.census.gov/rdo/data/2010_census_redistricting_data_pl_94-171_summary_files.html

9. The Senate, in turn, contains districts with deviations as high as 13.6% and as low as -15.8%. Senate District 44, encompassing Berks, Chester, and Montgomery Counties, is over-populated by 34,625 persons, yielding a deviation of 13.6%. Senate District 38, covering Allegheny, Armstrong, and Westmoreland Counties, is under-populated by 40,059 persons, for a deviation of -15.8%. *See* Exhibit 4.

10. Total deviations, calculated as the difference between the highest and lowest district deviation %'s for each part of the State Legislature are 42.8% and 29.4% for the House and Senate, respectively.

PA State House
max deviation: 24.3%
min deviation: -18.5%
total deviation: **42.8%**

PA Senate
max deviation: 13.6%
min deviation: -15.8%
total deviation: **29.4%**

See Exhibits 4 and 5.

ii. The Latino population has grown extensively in Pennsylvania.

11. In connection with Plaintiffs' second task, I determined that Latino population growth within Pennsylvania has been extensive since the 2000 census. Specifically, using data collected from the 2000 and 2010 census,⁵ I determined that the Latino population grew statewide by 325,572 since 2000, an increase of over 82%. During this time, however, Pennsylvania's total population grew by just over 3%. Whereas in 2000 Pennsylvania's 394,088 Latinos comprised 3.2% of the total population, in 2010 the state contained 719,660

⁵ Compare U.S. Census Bureau. Census 2000 Public Law 94-171 Redistricting Data, http://www.census.gov/rdo/data/redistricting_data.html, with U.S. Census Bureau. 2010 Census Redistricting Data [P.L. 94-171] Summary Files http://www.census.gov/rdo/data/2010_census_redistricting_data_pl_94-171_summary_files.html, and U.S. Census Bureau. 2010 Census Block Assignment Files, http://www.census.gov/geo/www/2010census/baf/baf_main.html.

Latinos, or 5.7% of the total population. Further, at the county level, increase in the total number of Latinos was highest in Lehigh, Berks, and Philadelphia counties. Within these counties, this increase was driven by large Latino growth within the cities of Allentown, Reading, and Philadelphia.

12. In Philadelphia (located within Philadelphia County and containing all or part of 26 House districts⁶ and 7 Senate districts⁷ (*See Exhibits 2 and 3*)), the Latino population has increased by more than 45%, a rate much higher than the overall growth rate of the city. Consequently, in Philadelphia in 2010 Latinos numbered 187,611, or over 12% of the city's total population.

13. Similarly, in Allentown, Pennsylvania (located within Lehigh County, containing part of Senate district 16 and all or part of House districts 131, 132, 133, and 135 (*See Exhibits 2, 3, 7 and 8*)), the total population in 2010 was 118,032, with Latinos numbering 50,461, or 42.8% of the total population.

14. Further, in Reading, Pennsylvania (situated within Berks County, containing part of Senate district 11 and part of House districts 126 and 127 (*See Exhibits 2, 3, 7, and 8*)), the total population in 2010 was 88,082 and Latinos numbered 51,230, or 58.2% of the total population.

iii. Using Pennsylvania's 2001 Redistricting Plan in its upcoming 2012 elections for the Pennsylvania State Senate and State House Assembly results in regional malapportionment in Lehigh and Berks counties.

15. Addressing Plaintiffs' third request, I determined that using 2001 reapportionment districts in 2012 elections would also result in a high degree of regional malapportionment. Regional malapportionment refers to when the average deviations from the

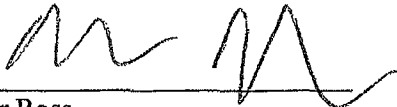
⁶ Philadelphia contains all or part of House districts 154, 169, 170, 172-175, 177, 179-182, 184-186, 188, 190, 192, 194, 195, 197, 198, and 200-203

⁷ Philadelphia contains all or part of Senate districts 1-5, 7, and 8.

ideal district size for districts in a specific area within the state are significantly above or below the average deviations of districts in other areas of the state. In particular, districts in a high Latino-population area, namely Berks (Senate Districts 11, 29, 44, and 48 and House Districts 124-130, 134, and 187) and Lehigh (Senate Districts 16, 18, 24, and 29 and House Districts 131- 135, 183, and 187) counties, are highly overpopulated compared to districts in other areas of the state. The average Berks/Lehigh House and Senate deviation percentages of 7.831% and 8.631%, respectively, contrast sharply with the low, negative average deviations of districts in the rest of the state, which are -0.580% for the State House and -1.405% for the State Senate. See Exhibit 6. Finally, it should be noted that there are two current House districts, districts 132 and 133, which overlap Berks and Lehigh counties, and which are entirely contained by those counties, whose average deviation of 10,560, or 16.9%, is exceptionally high. See Exhibits 6 and 8.

16. I declare the foregoing to be true under penalty of perjury, pursuant to 28 U.S.C. § 1746.

Dated: New York, New York
June 29, 2012



Asher Ross

Exhibit 1

ASHER GAYLORD-ROSS

EXPERIENCE

Latino Justice PRLDEF , New York, NY

Demography, Database, and G.I.S. Consultant, February 2011 to present

- Prepared demographic and geographic data from the 2010 U.S. Census for use in political redistricting analyses and mapping exercises.
- Designed redistricting plans for local, state, and federal political districts in seven states.
- Performed demographic analyses of existing and proposed political district plans.

Working Families Party (WFP), Brooklyn, NY

Database Administrator, April 2003 to March 2011

Demography, Database, and G.I.S. Consultant, April 2011 to present

- Developed and managed a relational membership and involvement database with 750,000 records, requiring constant modification to meet the needs of a rapidly expanding and evolving organization.
- Managed the WFP endorsement and petitioning process for more than 1,500 political candidates through three election cycles. Interfaced with election officials, candidates, volunteers, and staff; managed voter data; and prepared legal documents and candidate nominating certificates.
- Created a separate personnel database to increase the efficiency and accuracy of payroll systems, financial reporting, and employee earnings and information management for year-round canvass staff.
- Worked with all departments to develop new operational systems and refine existing systems.
- Directly supervised seven employees whose responsibilities included database development and management, technology, operations, data entry, clerical, and administrative duties.
- Worked with the accounting department to reconcile the financial databases with banking records and to file campaign finance disclosures.
- Assisted with development of a database that compiled geographic, demographic, and electoral returns data for use in electoral and issue campaign targeting.
- Worked closely with the development director to devise and implement a multiple-contact, annual fundraising strategy of high, medium and low level donors and members.

Queens College Sociology Department

Research Assistant, January to August 2006

- Assisted Professor Andrew Beveridge with grant project for the National Historical GIS. Allocated NYC property data (the PLUTO tax lot dataset) to census geography, using SAS and ArcGIS.

Avalon Publishing Company, New York, NY

Mail Coordinator, January 2002 to April 2003

- Coordination of mailing operations

Time Inc., New York, NY

Data Analyst, November 1999 to June 2000

- Data entry and general administrative duties

EDUCATION

Queens College, M.A. in Applied Social Research, [currently enrolled/graduation expected June 2012]

Wesleyan University, B.A., History, June 1999

COMPUTER SKILLS

- Mastery in Microsoft Access, ArcGIS, Maptitude, SAS, Stata, Excel, and Word; proficiency in SPSS, PowerPoint, Adobe Illustrator.

Exhibit 2

Exhibit 3

Pennsylvania: State House Districts

House District
County

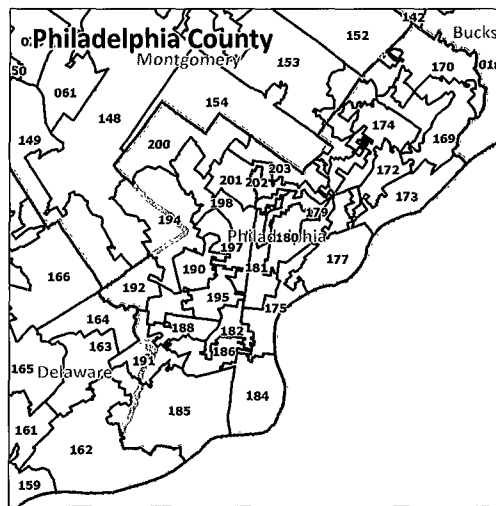
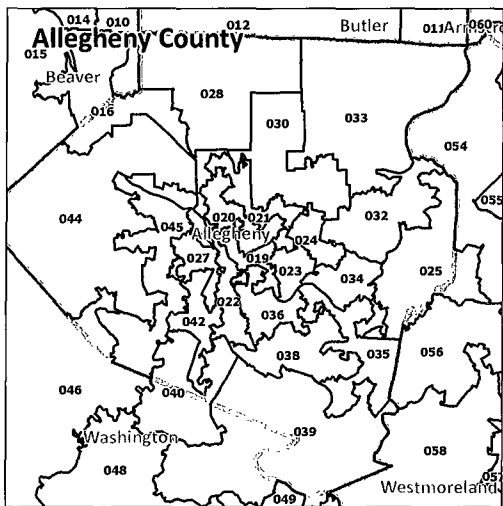
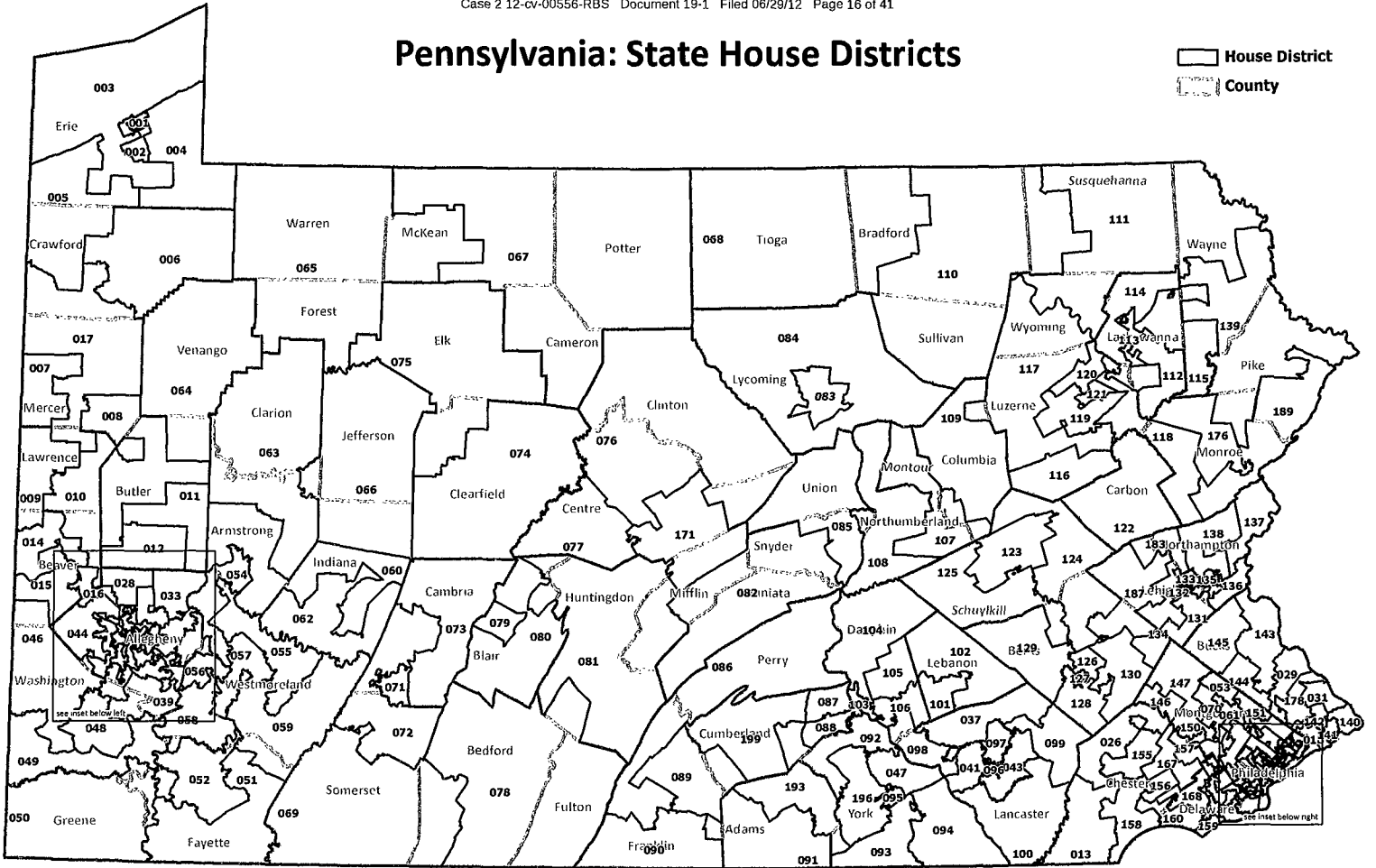


Exhibit 4

| Senate District | TotalPop10 | Dev | DevPct | Latino10 | LatinoPct10 |
|-----------------|------------|---------|----------|----------|-------------|
| 038 | 213,989 | -40,059 | -15.768% | 3,346 | 1.6% |
| 045 | 220,981 | -33,067 | -13.016% | 2,742 | 1.2% |
| 032 | 225,580 | -28,468 | -11.206% | 2,049 | 0.9% |
| 047 | 225,797 | -28,251 | -11.120% | 2,661 | 1.2% |
| 042 | 227,429 | -26,619 | -10.478% | 4,214 | 1.9% |
| 043 | 227,651 | -26,397 | -10.391% | 4,411 | 1.9% |
| 035 | 232,251 | -21,797 | -8.580% | 4,119 | 1.8% |
| 025 | 233,497 | -20,551 | -8.089% | 2,254 | 1.0% |
| 021 | 235,571 | -18,477 | -7.273% | 2,512 | 1.1% |
| 046 | 235,908 | -18,140 | -7.140% | 2,598 | 1.1% |
| 050 | 235,966 | -18,082 | -7.118% | 2,310 | 1.0% |
| 041 | 236,058 | -17,990 | -7.081% | 1,877 | 0.8% |
| 004 | 237,779 | -16,269 | -6.404% | 7,169 | 3.0% |
| 039 | 238,771 | -15,277 | -6.013% | 1,962 | 0.8% |
| 007 | 239,153 | -14,895 | -5.863% | 6,470 | 2.7% |
| 030 | 239,492 | -14,556 | -5.730% | 2,533 | 1.1% |
| 049 | 241,903 | -12,145 | -4.781% | 9,134 | 3.8% |
| 008 | 243,506 | -10,542 | -4.150% | 7,043 | 2.9% |
| 003 | 245,882 | -8,166 | -3.214% | 25,802 | 10.5% |
| 023 | 248,605 | -5,443 | -2.143% | 4,979 | 2.0% |
| 017 | 248,670 | -5,378 | -2.117% | 16,280 | 6.5% |
| 014 | 250,131 | -3,917 | -1.542% | 22,471 | 9.0% |
| 026 | 251,041 | -3,007 | -1.184% | 6,898 | 2.7% |
| 037 | 252,115 | -1,933 | -0.761% | 3,305 | 1.3% |
| 006 | 253,674 | -374 | -0.147% | 13,580 | 5.4% |
| 022 | 255,871 | 1,823 | 0.718% | 16,751 | 6.5% |
| 005 | 255,921 | 1,873 | 0.737% | 24,389 | 9.5% |
| 040 | 256,162 | 2,114 | 0.832% | 2,930 | 1.1% |
| 027 | 256,971 | 2,923 | 1.151% | 5,276 | 2.1% |
| 010 | 259,178 | 5,130 | 2.019% | 8,950 | 3.5% |
| 002 | 259,719 | 5,671 | 2.232% | 99,250 | 38.2% |
| 029 | 260,093 | 6,045 | 2.379% | 9,424 | 3.6% |
| 012 | 263,696 | 9,648 | 3.798% | 9,234 | 3.5% |
| 001 | 266,236 | 12,188 | 4.798% | 23,788 | 8.9% |
| 015 | 266,253 | 12,205 | 4.804% | 19,160 | 7.2% |
| 018 | 267,805 | 13,757 | 5.415% | 34,483 | 12.9% |
| 034 | 268,795 | 14,747 | 5.805% | 5,436 | 2.0% |
| 011 | 269,402 | 15,354 | 6.044% | 61,484 | 22.8% |
| 013 | 272,163 | 18,115 | 7.131% | 34,793 | 12.8% |
| 020 | 273,416 | 19,368 | 7.624% | 12,519 | 4.6% |
| 036 | 275,192 | 21,144 | 8.323% | 11,807 | 4.3% |
| 031 | 275,796 | 21,748 | 8.561% | 7,313 | 2.7% |
| 009 | 277,401 | 23,353 | 9.192% | 21,704 | 7.8% |
| 024 | 278,648 | 24,600 | 9.683% | 15,269 | 5.5% |
| 048 | 278,934 | 24,886 | 9.796% | 18,195 | 6.5% |
| 033 | 280,954 | 26,906 | 10.591% | 13,375 | 4.8% |
| 019 | 280,974 | 26,926 | 10.599% | 10,812 | 3.8% |
| 028 | 284,462 | 30,414 | 11.972% | 19,622 | 6.9% |
| 016 | 288,264 | 34,216 | 13.468% | 58,862 | 20.4% |
| 044 | 288,673 | 34,625 | 13.629% | 12,115 | 4.2% |

| Senate District | TotalPop10 | Dev | DevPct | Latino10 | LatinoPct10 |
|-----------------|------------|-----|--------|----------|-------------|
| Total | 12,702,379 | | | | |
| Ideal Pop | 254,048 | | | | |

total deviation 29.4%

Exhibit 5

| House District | TotalPop10 | Dev | DevPct | Latino10 | LatinoPct10 |
|----------------|------------|---------|----------|----------|-------------|
| 024 | 51,004 | -11,569 | -18.489% | 1,000 | 2.0% |
| 035 | 53,932 | -8,641 | -13.809% | 826 | 1.5% |
| 071 | 54,822 | -7,751 | -12.387% | 1,072 | 2.0% |
| 075 | 54,981 | -7,592 | -12.133% | 402 | 0.7% |
| 027 | 55,311 | -7,262 | -11.606% | 959 | 1.7% |
| 019 | 55,312 | -7,261 | -11.604% | 1,196 | 2.2% |
| 191 | 55,325 | -7,248 | -11.583% | 1,313 | 2.4% |
| 201 | 55,366 | -7,207 | -11.518% | 1,629 | 2.9% |
| 192 | 55,382 | -7,191 | -11.492% | 1,366 | 2.5% |
| 159 | 55,766 | -6,807 | -10.878% | 3,946 | 7.1% |
| 034 | 55,844 | -6,729 | -10.754% | 893 | 1.6% |
| 020 | 55,871 | -6,702 | -10.711% | 928 | 1.7% |
| 198 | 55,889 | -6,684 | -10.682% | 3,557 | 6.4% |
| 014 | 55,975 | -6,598 | -10.544% | 685 | 1.2% |
| 001 | 55,982 | -6,591 | -10.533% | 4,430 | 7.9% |
| 067 | 56,066 | -6,507 | -10.399% | 523 | 0.9% |
| 200 | 56,177 | -6,396 | -10.222% | 1,539 | 2.7% |
| 190 | 56,259 | -6,314 | -10.091% | 1,309 | 2.3% |
| 009 | 56,261 | -6,312 | -10.087% | 639 | 1.1% |
| 022 | 56,304 | -6,269 | -10.019% | 1,039 | 1.8% |
| 073 | 56,680 | -5,893 | -9.418% | 701 | 1.2% |
| 051 | 56,731 | -5,842 | -9.336% | 381 | 0.7% |
| 007 | 56,775 | -5,798 | -9.266% | 639 | 1.1% |
| 052 | 56,814 | -5,759 | -9.204% | 368 | 0.6% |
| 063 | 56,952 | -5,621 | -8.983% | 307 | 0.5% |
| 032 | 56,991 | -5,582 | -8.921% | 759 | 1.3% |
| 197 | 57,125 | -5,448 | -8.707% | 1,744 | 3.1% |
| 084 | 57,244 | -5,329 | -8.516% | 532 | 0.9% |
| 015 | 57,350 | -5,223 | -8.347% | 686 | 1.2% |
| 195 | 57,350 | -5,223 | -8.347% | 2,276 | 4.0% |
| 120 | 57,355 | -5,218 | -8.339% | 1,083 | 1.9% |
| 038 | 57,436 | -5,137 | -8.210% | 762 | 1.3% |
| 123 | 57,523 | -5,050 | -8.071% | 2,480 | 4.3% |
| 021 | 57,711 | -4,862 | -7.770% | 1,144 | 2.0% |
| 121 | 57,813 | -4,760 | -7.607% | 4,977 | 8.6% |
| 194 | 57,842 | -4,731 | -7.561% | 1,686 | 2.9% |
| 188 | 57,899 | -4,674 | -7.470% | 2,327 | 4.0% |
| 114 | 58,068 | -4,505 | -7.200% | 1,230 | 2.1% |
| 163 | 58,096 | -4,477 | -7.155% | 1,379 | 2.4% |
| 072 | 58,097 | -4,476 | -7.153% | 397 | 0.7% |
| 140 | 58,109 | -4,464 | -7.134% | 4,022 | 6.9% |
| 005 | 58,143 | -4,430 | -7.080% | 759 | 1.3% |
| 060 | 58,162 | -4,411 | -7.049% | 327 | 0.6% |
| 169 | 58,190 | -4,383 | -7.005% | 3,070 | 5.3% |
| 066 | 58,212 | -4,361 | -6.969% | 336 | 0.6% |
| 006 | 58,259 | -4,314 | -6.894% | 627 | 1.1% |
| 049 | 58,268 | -4,305 | -6.880% | 630 | 1.1% |
| 036 | 58,332 | -4,241 | -6.778% | 885 | 1.5% |
| 069 | 58,411 | -4,162 | -6.651% | 730 | 1.2% |
| 119 | 58,443 | -4,130 | -6.600% | 1,608 | 2.8% |
| 010 | 58,463 | -4,110 | -6.568% | 503 | 0.9% |

| House District | TotalPop10 | Dev | DevPct | Latino10 | LatinoPct10 |
|----------------|------------|--------|---------|----------|-------------|
| 004 | 58,468 | -4,105 | -6.560% | 647 | 1.1% |
| 107 | 58,546 | -4,027 | -6.436% | 1,008 | 1.7% |
| 016 | 58,551 | -4,022 | -6.428% | 871 | 1.5% |
| 074 | 58,607 | -3,966 | -6.338% | 1,688 | 2.9% |
| 186 | 58,695 | -3,878 | -6.198% | 2,834 | 4.8% |
| 113 | 58,803 | -3,770 | -6.025% | 3,577 | 6.1% |
| 153 | 58,809 | -3,764 | -6.015% | 1,808 | 3.1% |
| 017 | 58,819 | -3,754 | -5.999% | 389 | 0.7% |
| 083 | 58,867 | -3,706 | -5.923% | 1,027 | 1.7% |
| 162 | 58,896 | -3,677 | -5.876% | 1,442 | 2.4% |
| 050 | 59,028 | -3,545 | -5.665% | 808 | 1.4% |
| 068 | 59,039 | -3,534 | -5.648% | 591 | 1.0% |
| 141 | 59,196 | -3,377 | -5.397% | 4,076 | 6.9% |
| 079 | 59,270 | -3,303 | -5.279% | 732 | 1.2% |
| 039 | 59,302 | -3,271 | -5.227% | 521 | 0.9% |
| 064 | 59,331 | -3,242 | -5.181% | 505 | 0.9% |
| 203 | 59,387 | -3,186 | -5.092% | 5,433 | 9.1% |
| 065 | 59,457 | -3,116 | -4.980% | 1,157 | 1.9% |
| 025 | 59,461 | -3,112 | -4.973% | 752 | 1.3% |
| 033 | 59,492 | -3,081 | -4.924% | 567 | 1.0% |
| 110 | 59,579 | -2,994 | -4.785% | 768 | 1.3% |
| 057 | 59,613 | -2,960 | -4.730% | 673 | 1.1% |
| 058 | 59,656 | -2,917 | -4.662% | 542 | 0.9% |
| 181 | 59,807 | -2,766 | -4.420% | 16,688 | 27.9% |
| 142 | 59,847 | -2,726 | -4.357% | 1,804 | 3.0% |
| 111 | 59,947 | -2,626 | -4.197% | 831 | 1.4% |
| 166 | 60,028 | -2,545 | -4.067% | 1,203 | 2.0% |
| 011 | 60,130 | -2,443 | -3.904% | 688 | 1.1% |
| 180 | 60,223 | -2,350 | -3.756% | 41,954 | 69.7% |
| 165 | 60,364 | -2,209 | -3.530% | 1,071 | 1.8% |
| 054 | 60,370 | -2,203 | -3.521% | 607 | 1.0% |
| 152 | 60,493 | -2,080 | -3.324% | 1,815 | 3.0% |
| 170 | 60,573 | -2,000 | -3.196% | 3,713 | 6.1% |
| 081 | 60,600 | -1,973 | -3.153% | 867 | 1.4% |
| 031 | 60,680 | -1,893 | -3.025% | 1,334 | 2.2% |
| 117 | 60,701 | -1,872 | -2.992% | 678 | 1.1% |
| 003 | 60,723 | -1,850 | -2.957% | 952 | 1.6% |
| 056 | 60,727 | -1,846 | -2.950% | 442 | 0.7% |
| 062 | 60,760 | -1,813 | -2.897% | 810 | 1.3% |
| 078 | 60,809 | -1,764 | -2.819% | 543 | 0.9% |
| 055 | 60,812 | -1,761 | -2.814% | 373 | 0.6% |
| 178 | 61,167 | -1,406 | -2.247% | 990 | 1.6% |
| 023 | 61,207 | -1,366 | -2.183% | 1,847 | 3.0% |
| 112 | 61,228 | -1,345 | -2.149% | 4,975 | 8.1% |
| 030 | 61,376 | -1,197 | -1.913% | 607 | 1.0% |
| 042 | 61,391 | -1,182 | -1.889% | 864 | 1.4% |
| 168 | 61,484 | -1,089 | -1.740% | 1,118 | 1.8% |
| 179 | 61,598 | -975 | -1.558% | 23,209 | 37.7% |
| 149 | 61,624 | -949 | -1.517% | 2,724 | 4.4% |
| 040 | 61,637 | -936 | -1.496% | 780 | 1.3% |
| 148 | 61,694 | -879 | -1.405% | 1,399 | 2.3% |

| House District | TotalPop10 | Dev | DevPct | Latino10 | LatinoPct10 |
|----------------|------------|-------|---------|----------|-------------|
| 059 | 61,834 | -739 | -1.181% | 473 | 0.8% |
| 154 | 61,845 | -728 | -1.163% | 2,211 | 3.6% |
| 172 | 61,906 | -667 | -1.066% | 4,393 | 7.1% |
| 173 | 61,955 | -618 | -0.988% | 9,405 | 15.2% |
| 161 | 62,028 | -545 | -0.871% | 1,404 | 2.3% |
| 133 | 62,036 | -537 | -0.858% | 15,442 | 24.9% |
| 184 | 62,220 | -353 | -0.564% | 6,559 | 10.5% |
| 008 | 62,230 | -343 | -0.548% | 621 | 1.0% |
| 108 | 62,303 | -270 | -0.431% | 1,663 | 2.7% |
| 002 | 62,337 | -236 | -0.377% | 2,840 | 4.6% |
| 185 | 62,489 | -84 | -0.134% | 1,721 | 2.8% |
| 046 | 62,516 | -57 | -0.091% | 565 | 0.9% |
| 045 | 62,568 | -5 | -0.008% | 735 | 1.2% |
| 080 | 62,593 | 20 | 0.032% | 447 | 0.7% |
| 103 | 62,609 | 36 | 0.058% | 10,487 | 16.7% |
| 109 | 62,749 | 176 | 0.281% | 1,318 | 2.1% |
| 125 | 62,861 | 288 | 0.460% | 1,074 | 1.7% |
| 143 | 62,909 | 336 | 0.537% | 1,750 | 2.8% |
| 177 | 62,990 | 417 | 0.666% | 15,228 | 24.2% |
| 115 | 63,002 | 429 | 0.686% | 2,059 | 3.3% |
| 018 | 63,223 | 650 | 1.039% | 5,178 | 8.2% |
| 164 | 63,304 | 731 | 1.168% | 3,386 | 5.3% |
| 076 | 63,384 | 811 | 1.296% | 804 | 1.3% |
| 053 | 63,509 | 936 | 1.496% | 3,059 | 4.8% |
| 136 | 63,631 | 1,058 | 1.691% | 8,122 | 12.8% |
| 096 | 63,666 | 1,093 | 1.747% | 24,272 | 38.1% |
| 106 | 64,016 | 1,443 | 2.306% | 3,064 | 4.8% |
| 082 | 64,036 | 1,463 | 2.338% | 1,089 | 1.7% |
| 135 | 64,230 | 1,657 | 2.648% | 13,330 | 20.8% |
| 156 | 64,294 | 1,721 | 2.750% | 3,839 | 6.0% |
| 151 | 64,354 | 1,781 | 2.846% | 1,916 | 3.0% |
| 100 | 64,360 | 1,787 | 2.856% | 1,330 | 2.1% |
| 061 | 64,375 | 1,802 | 2.880% | 1,667 | 2.6% |
| 104 | 64,451 | 1,878 | 3.001% | 2,163 | 3.4% |
| 202 | 64,488 | 1,915 | 3.060% | 9,584 | 14.9% |
| 124 | 64,592 | 2,019 | 3.227% | 1,926 | 3.0% |
| 048 | 64,688 | 2,115 | 3.380% | 803 | 1.2% |
| 116 | 65,038 | 2,465 | 3.939% | 12,711 | 19.5% |
| 145 | 65,216 | 2,643 | 4.224% | 1,890 | 2.9% |
| 122 | 65,249 | 2,676 | 4.277% | 2,145 | 3.3% |
| 101 | 65,280 | 2,707 | 4.326% | 9,778 | 15.0% |
| 199 | 65,380 | 2,807 | 4.486% | 1,587 | 2.4% |
| 098 | 65,433 | 2,860 | 4.571% | 3,328 | 5.1% |
| 088 | 65,490 | 2,917 | 4.662% | 2,455 | 3.7% |
| 182 | 65,510 | 2,937 | 4.694% | 3,652 | 5.6% |
| 167 | 65,638 | 3,065 | 4.898% | 2,017 | 3.1% |
| 095 | 65,794 | 3,221 | 5.148% | 13,595 | 20.7% |
| 183 | 65,862 | 3,289 | 5.256% | 3,073 | 4.7% |
| 099 | 66,007 | 3,434 | 5.488% | 2,080 | 3.2% |
| 041 | 66,113 | 3,540 | 5.657% | 4,897 | 7.4% |
| 085 | 66,182 | 3,609 | 5.768% | 2,854 | 4.3% |

| House District | TotalPop10 | Dev | DevPct | Latino10 | LatinoPct10 |
|----------------|------------|--------|---------|----------|-------------|
| 086 | 66,211 | 3,638 | 5.814% | 1,156 | 1.7% |
| 097 | 66,456 | 3,883 | 6.206% | 3,361 | 5.1% |
| 029 | 66,505 | 3,932 | 6.284% | 3,433 | 5.2% |
| 091 | 66,509 | 3,936 | 6.290% | 3,053 | 4.6% |
| 127 | 66,597 | 4,024 | 6.431% | 36,753 | 55.2% |
| 139 | 67,006 | 4,433 | 7.085% | 3,131 | 4.7% |
| 157 | 67,043 | 4,470 | 7.144% | 2,495 | 3.7% |
| 028 | 67,105 | 4,532 | 7.243% | 943 | 1.4% |
| 118 | 67,168 | 4,595 | 7.343% | 4,792 | 7.1% |
| 171 | 67,294 | 4,721 | 7.545% | 1,485 | 2.2% |
| 037 | 67,379 | 4,806 | 7.681% | 1,571 | 2.3% |
| 128 | 67,410 | 4,837 | 7.730% | 3,385 | 5.0% |
| 193 | 67,435 | 4,862 | 7.770% | 4,605 | 6.8% |
| 126 | 67,603 | 5,030 | 8.039% | 20,056 | 29.7% |
| 174 | 67,746 | 5,173 | 8.267% | 8,806 | 13.0% |
| 070 | 68,081 | 5,508 | 8.803% | 5,928 | 8.7% |
| 129 | 68,094 | 5,521 | 8.823% | 3,516 | 5.2% |
| 138 | 68,208 | 5,635 | 9.005% | 2,696 | 4.0% |
| 131 | 68,254 | 5,681 | 9.079% | 14,202 | 20.8% |
| 102 | 68,288 | 5,715 | 9.133% | 2,632 | 3.9% |
| 043 | 68,386 | 5,813 | 9.290% | 4,369 | 6.4% |
| 144 | 68,397 | 5,824 | 9.308% | 2,305 | 3.4% |
| 187 | 68,541 | 5,968 | 9.538% | 2,074 | 3.0% |
| 105 | 68,669 | 6,096 | 9.742% | 2,803 | 4.1% |
| 158 | 68,769 | 6,196 | 9.902% | 9,077 | 13.2% |
| 094 | 68,912 | 6,339 | 10.131% | 1,142 | 1.7% |
| 092 | 68,932 | 6,359 | 10.163% | 1,514 | 2.2% |
| 196 | 69,920 | 7,347 | 11.741% | 1,846 | 2.6% |
| 044 | 70,046 | 7,473 | 11.943% | 1,120 | 1.6% |
| 090 | 70,210 | 7,637 | 12.205% | 1,563 | 2.2% |
| 130 | 70,334 | 7,761 | 12.403% | 1,541 | 2.2% |
| 175 | 70,369 | 7,796 | 12.459% | 13,145 | 18.7% |
| 077 | 70,466 | 7,893 | 12.614% | 1,864 | 2.6% |
| 146 | 70,472 | 7,899 | 12.624% | 2,965 | 4.2% |
| 132 | 70,484 | 7,911 | 12.643% | 31,455 | 44.6% |
| 012 | 70,527 | 7,954 | 12.712% | 846 | 1.2% |
| 176 | 70,533 | 7,960 | 12.721% | 11,411 | 16.2% |
| 147 | 71,320 | 8,747 | 13.979% | 1,945 | 2.7% |
| 155 | 71,402 | 8,829 | 14.110% | 2,127 | 3.0% |
| 087 | 71,639 | 9,066 | 14.489% | 1,669 | 2.3% |
| 093 | 71,712 | 9,139 | 14.605% | 1,703 | 2.4% |
| 150 | 71,936 | 9,363 | 14.963% | 6,447 | 9.0% |
| 137 | 72,979 | 10,406 | 16.630% | 3,598 | 4.9% |
| 160 | 73,500 | 10,927 | 17.463% | 1,609 | 2.2% |
| 089 | 73,734 | 11,161 | 17.837% | 4,639 | 6.3% |
| 026 | 74,084 | 11,511 | 18.396% | 4,664 | 6.3% |
| 047 | 75,494 | 12,921 | 20.649% | 3,459 | 4.6% |
| 189 | 76,401 | 13,828 | 22.099% | 9,275 | 12.1% |
| 134 | 77,724 | 15,151 | 24.213% | 3,506 | 4.5% |
| 013 | 77,777 | 15,204 | 24.298% | 8,083 | 10.4% |

| House District | TotalPop10 | Dev | DevPct | Latino10 | LatinoPct10 |
|----------------|------------|-----|--------|----------|-------------|
| Total | 12,702,379 | | | | |
| Ideal Pop | 62,573 | | | | |

total deviation 42.787

Berks/Lehigh State House and Senate Districts: Deviation and County Overlap Chart

Senate Districts

| SenateDist | TotalPop | Deviation | DevPct |
|---|----------|-----------|---------|
| 11 | 269,402 | 15,354 | 6.044% |
| 16 | 288,264 | 34,216 | 13.468% |
| 18 | 267,805 | 13,757 | 5.415% |
| 24 | 278,648 | 24,600 | 9.683% |
| 29 | 260,093 | 6,045 | 2.379% |
| 44 | 288,673 | 34,625 | 13.629% |
| 48 | 278,934 | 24,886 | 9.796% |
| Berks/Lehigh District Average (7 districts): | | | |
| | 275,974 | 21,926 | 8.631% |
| Rest of PA District Average (43 districts): | | | |
| | 250,478 | -3,570 | -1.405% |

| | Overlap | | |
|--|---------|-------|----------|
| | Lehigh | Berks | Adjacent |
| | | X | |
| | X | | X |
| | X | | X |
| | X | | X |
| | X | X | X |
| | | X | X |
| | | X | X |

House Districts

| HouseDist | TotalPop | Deviation | DevPct |
|--|----------|-----------|---------|
| 124 | 64,592 | 2,019 | 3.227% |
| 125 | 62,861 | 288 | 0.460% |
| 126 | 67,603 | 5,030 | 8.039% |
| 127 | 66,597 | 4,024 | 6.431% |
| 128 | 67,410 | 4,837 | 7.730% |
| 129 | 68,094 | 5,521 | 8.823% |
| 130 | 70,334 | 7,761 | 12.403% |
| 131 | 68,254 | 5,681 | 9.079% |
| 132 | 70,484 | 7,911 | 12.643% |
| 133 | 62,036 | -537 | -0.858% |
| 134 | 77,724 | 15,151 | 24.213% |
| 135 | 64,230 | 1,657 | 2.648% |
| 183 | 65,862 | 3,289 | 5.256% |
| 187 | 68,541 | 5,968 | 9.538% |
| Berks/Lehigh District Average (14 districts): | | | |
| | 67,473 | 4,900 | 7.831% |
| Rest of PA District Average (189 districts): | | | |
| | 62,210 | -363 | -0.058% |

| | Overlap | | |
|--|---------|-------|----------|
| | Lehigh | Berks | Adjacent |
| | | X | X |
| | | X | X |
| | | X | |
| | | X | |
| | | X | |
| | | X | |
| | | X | |
| | X | | X |
| | X | | X |
| | X | | X |
| | X | X | X |
| | X | | X |
| | X | | X |

Exhibit 7