

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

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Jose Perez

# Exhibit A

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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 2000<sup>1</sup> and 2010<sup>2</sup> United States Census data and publicly available 2001 Legislative Reapportionment Commission materials<sup>3</sup>:

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<sup>1</sup> U.S. Census Bureau. Census 2000 Public Law 94-171 Redistricting Data, [http://www.census.gov/rdo/data/redistricting\\_data.html](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.

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<sup>2</sup> 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](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](http://www.census.gov/geo/www/2010census/baf/baf_main.html).

<sup>3</sup> 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](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](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),<sup>4</sup> 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.

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<sup>4</sup> 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](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,<sup>5</sup> 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

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<sup>5</sup> Compare U.S. Census Bureau. Census 2000 Public Law 94-171 Redistricting Data, [http://www.census.gov/rdo/data/redistricting\\_data.html](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](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](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 districts<sup>6</sup> and 7 Senate districts<sup>7</sup> (*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

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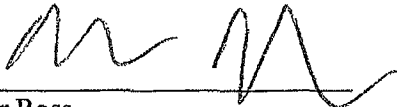
<sup>6</sup> Philadelphia contains all or part of House districts 154, 169, 170, 172-175, 177, 179-182, 184-186, 188, 190, 192, 194, 195, 197, 198, and 200-203

<sup>7</sup> 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

  
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Asher Ross

# Exhibit 1

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## **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

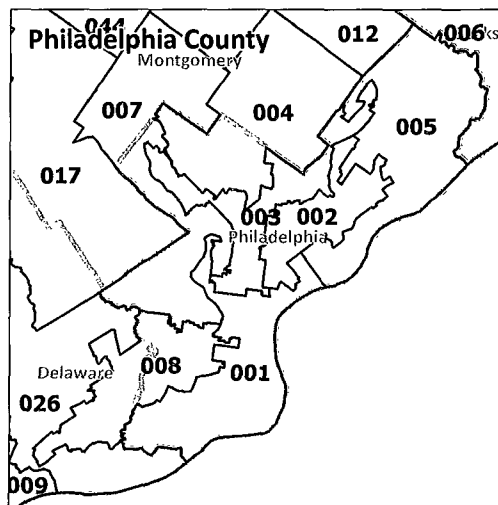
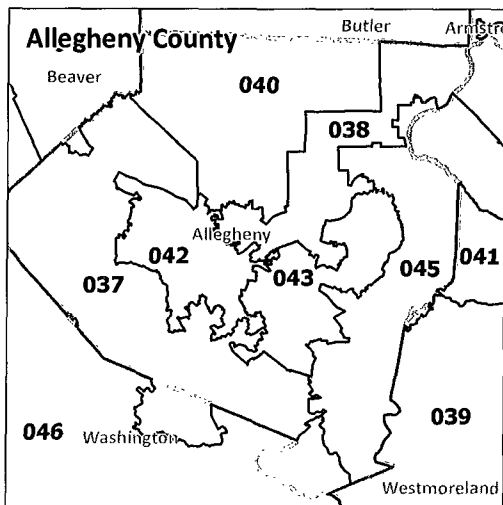
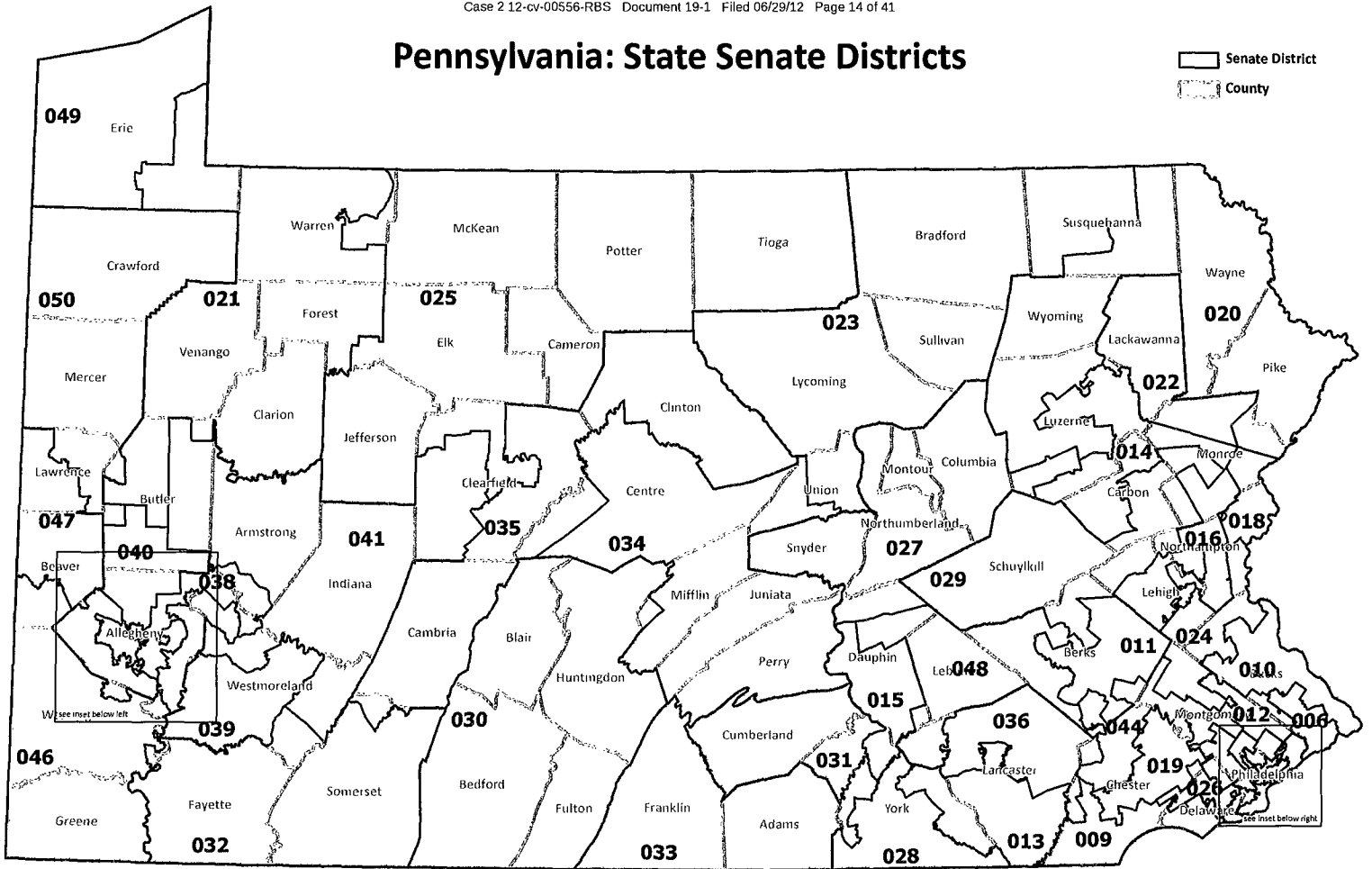
## **COMPUTER SKILLS**

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

# Exhibit 2

# Pennsylvania: State Senate Districts

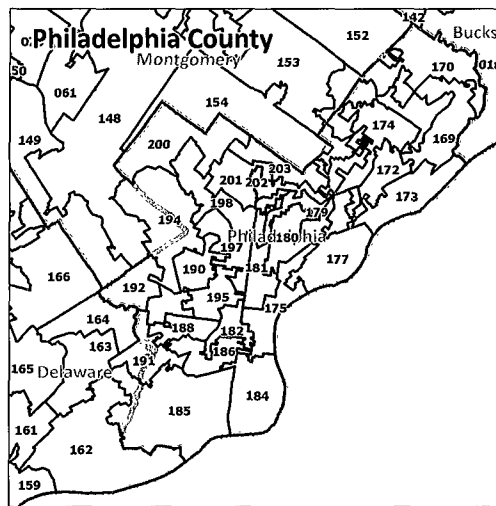
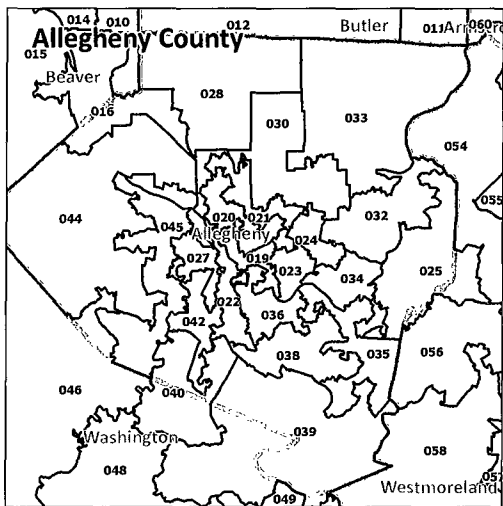
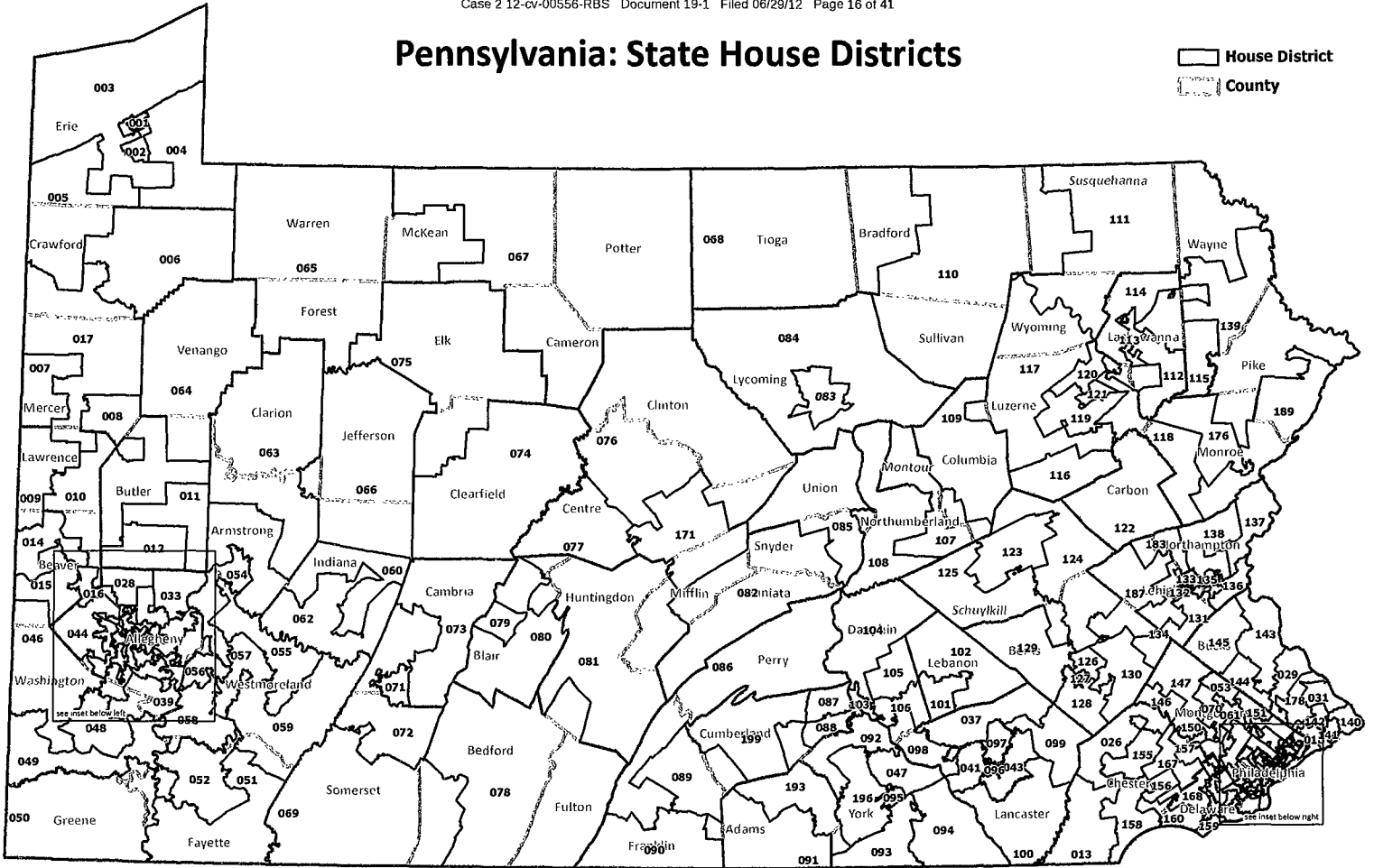
▭ Senate District  
▭ County



# 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	X

# Exhibit 7