2011 Congressional Plan

Perez v. Perry, et al.
THE BURDEN OF PROOF FOR INTENTIONAL VOTE DILUTION

“Viable vote dilution claims require proof that the districting scheme has a discriminatory effect and the legislature acted with a discriminatory purpose.”

2011 LEGISLATIVE SESSION

- Texas gained 4 congressional seats due to total population growth.

- The Legislature began work on the Congressional Plan after it had completed the Texas House, Senate, and State Board of Education redistricting plans.

- Congressional redistricting was added to the special session call on May 31, 2011.

- The Legislature sought to pass a plan that complied with the Voting Rights Act and the Constitution.
### Majority Hispanic CVAP Districts

<table>
<thead>
<tr>
<th>PLAN C100</th>
<th>PLAN C185</th>
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<tr>
<td>15</td>
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<td>29</td>
<td>34</td>
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<td>35</td>
</tr>
</tbody>
</table>

- 8 out of 36 districts are Hispanic-majority CVAP districts.
- Hispanics comprise 24.7% of the citizen voting age population in Texas.
- With 22% of the total districts being Hispanic-majority CVAP districts, Plan C185 reflects the proportional representation of the Hispanic citizen voting age population in Texas.
FAILURE TO CREATE A NEW OPPORTUNITY DISTRICT IS NOT INTENTIONAL VOTE DILUTION

**Plaintiffs’ Claim:** Minority population growth represented 90% of growth in Texas from 2000 to 2010. Therefore, at least 2 opportunity districts should have been created out of the 4 new districts Texas gained.

**Texas’s Position:** Percentage of overall population growth is not the relevant metric. Must look at where citizen voting age population growth occurred.
WHERE DID THE MINORITY CITIZEN VOTING AGE GROWTH OCCUR OVER THE DECADE?

2008-2012 ACS Survey

Estimated Percent Hispanic CVAP/CVAP
By County

Citizen Voting Age Population (CVAP) Special Tabulation
From the 2008-2012 5-Year American Community Survey

Estimated Percent Hispanic CVAP/CVAP by County
- 70.0 to 100
- 60.0 to 69.9
- 50.0 to 59.9
- 40.0 to 49.9
- 30.0 to 39.9
- 20.0 to 29.9
- 0.1 to 19.9
The concentration of Hispanic population growth between 2000 and 2010 occurred in areas that were already heavily Hispanic.

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<tbody>
<tr>
<td>23</td>
<td>397232</td>
<td>57.4%</td>
<td>228011</td>
<td>530830</td>
<td>316375</td>
<td>88364</td>
<td></td>
<td></td>
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<tr>
<td>28</td>
<td>346006</td>
<td>67.8%</td>
<td>234592</td>
<td>445645</td>
<td>311506</td>
<td>70914</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16</td>
<td>358371</td>
<td>70.1%</td>
<td>251218</td>
<td>431515</td>
<td>323636</td>
<td>72418</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>15</td>
<td>366964</td>
<td>69.1%</td>
<td>253572</td>
<td>431700</td>
<td>321185</td>
<td>67613</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>21</td>
<td>467385</td>
<td>17.4%</td>
<td>81325</td>
<td>618565</td>
<td>142270</td>
<td>60945</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>27</td>
<td>398631</td>
<td>60.4%</td>
<td>240773</td>
<td>455980</td>
<td>300491</td>
<td>59718</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>22</td>
<td>418038</td>
<td>15.1%</td>
<td>63124</td>
<td>585265</td>
<td>117053</td>
<td>53929</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>31</td>
<td>443960</td>
<td>12.1%</td>
<td>53719</td>
<td>613480</td>
<td>98770</td>
<td>45051</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>29</td>
<td>301183</td>
<td>46.8%</td>
<td>140954</td>
<td>309110</td>
<td>182375</td>
<td>41421</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>20</td>
<td>420166</td>
<td>60.8%</td>
<td>255461</td>
<td>457040</td>
<td>295705</td>
<td>40244</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Just had a thought I needed to get out before I forget it. The raw data to calculate this is going to be in the PL 94-171 dataset we'll get in March (hopefully), but it would be really useful for someone to go in and calculate a ratio for every census block in the state of CVAP/Total Population, a ratio of Hispanic CVAP/Total Hispanic Population, a ratio of Spanish Surname RV/Hispanic CVAP, and a ratio of Spanish Surname RV/Total Hispanic Population (these last two have to be calculated with the voter file overlaid with census data). It also would be good to calculate a Spanish Surname Turnout/Total Turnout ratio for the 2006-2010 General Elections for all VTDs (I already have the data for this for 2006-2008 in a spreadsheet, just need to gather it for every VTD for 2010). These metrics would be useful for identifying a "Hedge Factor" by which one can analyze which census blocks, when added to a particular district (especially small minority-majority districts) help pull the district's Total Hispanic Pop and Hispanic CVAPs up to majority status, but leave the Spanish Surname RV and TV the lowest. This is especially valuable in sharing up Census numbers.
THE "NUDGE FACTOR" DATA WAS NOT AVAILABLE

1. CVAP/Total Population by Census Block

2. Hispanic CVAP/Total Hispanic Population by Census Block

3. Spanish Surname Voter Registration/Hispanic CVAP by Census Block

Data not available.

4. Spanish Surname Voter Registration/Total Hispanic Population by Census Block

5. Spanish Surname Total Turnout/Total Turnout by VTD

SSVR and Total Turnout only available for 2000 census blocks.

Spanish Surname Turnout not available.
NO EVIDENCE THAT OPIELA'S INITIAL CONFIGURATION FOR DISTRICT 23 WAS EVER INCORPORATED IN PLAN C185

DX 573, Republican Congressional Delegation Proposal for Bexar County Districts

DX 401, Plan C185, Bexar County Districts
Why do this to me? I get the stats to benchmark in 20 and look at the report tonight and y'all dropped them to 55! Please, please say this whole exercise was not for naught. Call me crazy but I could care less about 35 being at 45--the thing will probably perform at 40, why not take that difference and attempt to meet it if we can? I calmed Lee, Holman, et al. down today to have this done?

Date: Mon, 16 Jun 2011 22:29:08
To: Brown, Jennifer Y. <Jennifer.Y.Brown@mail.house.gov>
Cc: 'lamarsmith21@gmail.com' <lamarsmith21@gmail.com>
Subject: Re: okay....this has to stop.

Not that we don't have enough to worry about, as I was making my way through all the reports for each district I finally got to the Solomons amendment. Makes me want to shoot through the roof. I didn't go through all of this for nothing today. I got the stats in CD 20 to benchmark, 58.1 SSVR, etc. just to have them drop it back down to 55.6. I had a voice wondering in the back of my head how they were able to find enough Hispanics to jack Quico up from 52.8 to 54.1. I knew they couldn't do it alone with just 10k more in Maverick. They stole them from CD 20. This was the whole point behind this exercise. I gave them the tools to fix this, and it was used for this. I'm tempted to try to get someone to offer what I gave them as an amendment to Solomons amendment, but know that will blow things up.

Uggghh!

EO
**Plaintiffs’ Position**
District 23 in plan C185 is no longer a Hispanic opportunity district.

**Texas’s Position**
Both HCVAP and SSVR increased from the benchmark plan. The district provides an opportunity for a politically cohesive Hispanic voting population to overcome any equally cohesive Anglo bloc voting against the Hispanic candidate of choice.

<table>
<thead>
<tr>
<th></th>
<th>Anglo</th>
<th>BVAP</th>
<th>HVAP</th>
<th>HCVAP</th>
<th>Other</th>
<th>SSVR</th>
<th>RPVA</th>
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</thead>
<tbody>
<tr>
<td>C100</td>
<td>30.8%</td>
<td>4.0%</td>
<td>62.8%</td>
<td>58.4%</td>
<td>2.9%</td>
<td>52.6%</td>
<td>3</td>
</tr>
<tr>
<td>C185</td>
<td>31.7%</td>
<td>2.7%</td>
<td>63.8%</td>
<td>58.5%</td>
<td>2.1%</td>
<td>54.8%</td>
<td>1</td>
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</table>
### The Evolution of District 23

<table>
<thead>
<tr>
<th>PLAN</th>
<th>HCVAP</th>
<th>SSVR</th>
<th>Reconstituted Election Analysis</th>
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<tbody>
<tr>
<td>Plan 1151C (court-drawn upon failure of 77th Legislature to enact a plan)</td>
<td>57.5%</td>
<td>55.3%</td>
<td>N/A</td>
</tr>
<tr>
<td>Plan 1374C (struck down in <em>LULAC v. Perry</em>)</td>
<td>46%</td>
<td>44%</td>
<td>N/A</td>
</tr>
<tr>
<td>Plan C100 (court-drawn on remand from <em>LULAC v. Perry</em>)</td>
<td>58.4%</td>
<td>52.6%</td>
<td>3 of 10</td>
</tr>
<tr>
<td>Plan C185 (enacted by the 82nd Legislature)</td>
<td>58.5%</td>
<td>54.8%</td>
<td>1 of 10</td>
</tr>
</tbody>
</table>

Plan C185’s District 23 Likely Would Have Performed For The Hispanic Candidate of Choice

Table 4: Estimated 2012 Election Under Plan C185

<table>
<thead>
<tr>
<th>C235 District</th>
<th>Party</th>
<th>Candidate</th>
<th>Votes</th>
<th>Total</th>
<th>Percent</th>
<th>D/R%</th>
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</thead>
<tbody>
<tr>
<td>16</td>
<td>D</td>
<td>O’Rourke</td>
<td>0</td>
<td>93,859</td>
<td>48.8</td>
<td>50.7</td>
</tr>
<tr>
<td>20</td>
<td>D</td>
<td>Castro</td>
<td>10,970</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>23</td>
<td>D</td>
<td>Gallego</td>
<td>76,615</td>
<td>91,342</td>
<td>47.5</td>
<td>49.3</td>
</tr>
<tr>
<td>28</td>
<td>D</td>
<td>Cuellar</td>
<td>6,247</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16</td>
<td>R</td>
<td>Carrasco</td>
<td>0</td>
<td>93,859</td>
<td>48.8</td>
<td>50.7</td>
</tr>
<tr>
<td>20</td>
<td>R</td>
<td>Rosa</td>
<td>6,036</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>23</td>
<td>R</td>
<td>Canseco</td>
<td>80,376</td>
<td>91,342</td>
<td>47.5</td>
<td>49.3</td>
</tr>
<tr>
<td>28</td>
<td>R</td>
<td>Hayward</td>
<td>4,930</td>
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<tr>
<td>16</td>
<td>O</td>
<td>Sodoy</td>
<td>0</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>20</td>
<td>O</td>
<td>Diaz</td>
<td>135</td>
<td></td>
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<td>20</td>
<td>O</td>
<td>Potts</td>
<td>274</td>
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<td>23</td>
<td>O</td>
<td>Blunt</td>
<td>4,893</td>
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<tr>
<td>23</td>
<td>O</td>
<td>Scharf</td>
<td>1,694</td>
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<tr>
<td>28</td>
<td>O</td>
<td>Cary</td>
<td>92</td>
<td></td>
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<tr>
<td>28</td>
<td>O</td>
<td>Hisel</td>
<td>165</td>
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<tr>
<td>Total</td>
<td></td>
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<td>192,454</td>
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DX 428, Supplemental Report of John Alford, PhD
The Nonexistent “Nudge Factor” Effect in District 23

- Areas were moved out of District 23 to create new District 35 and to maintain HCVAP levels in District 20.

- The Spanish-surname turnout as a percentage of Spanish-surname voter registration for the Bexar County precincts removed from District 23 is 25.8% compared to 25.4% in the precincts added to District 23.
Testimony of Hugo Berlanga

“It would be in our best interest to have one Congressman with one port.”

“[B]ecause of the growth in the Valley . . . that Corpus Christi be the anchor for a new Congressional district in any form or shape, whether it goes west to north or any combination thereof, I think would serve our community extremely well.”

DX 3 at 25:19-21; 31:2-8.

DX 3, Transcript from Corpus Christi Field Hearing on June 21, 2010

DX 401, Plan C185
Nueces County became the anchor of District 27 in Plan C185

<table>
<thead>
<tr>
<th>DISTRICT 27</th>
<th>-1</th>
<th>0.00%</th>
<th>Total:</th>
<th>698,487</th>
<th>298,684</th>
<th>42,159</th>
<th>345,730</th>
<th>383,572</th>
<th>16,231</th>
<th>42.8</th>
<th>6.0</th>
<th>49.5</th>
<th>54.9</th>
<th>2.3</th>
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<td></td>
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<td>VAP:</td>
<td>516,473</td>
<td>243,991</td>
<td>28,747</td>
<td>233,071</td>
<td>260,274</td>
<td>12,208</td>
<td>47.2</td>
<td>5.6</td>
<td>45.1</td>
<td>50.4</td>
<td>2.4</td>
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<tr>
<td>Aransas (100%)</td>
<td>23,158</td>
<td>16,350</td>
<td>397</td>
<td>5,690</td>
<td>6,014</td>
<td>794</td>
<td>70.6</td>
<td>1.7</td>
<td>24.6</td>
<td>26.0</td>
<td>3.4</td>
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<tr>
<td>Bastrop (40%)</td>
<td>29,949</td>
<td>16,595</td>
<td>1,991</td>
<td>10,848</td>
<td>12,682</td>
<td>672</td>
<td>55.4</td>
<td>6.6</td>
<td>36.2</td>
<td>42.3</td>
<td>2.2</td>
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<tr>
<td>Caldwell (53%)</td>
<td>20,233</td>
<td>10,239</td>
<td>1,609</td>
<td>8,271</td>
<td>9,753</td>
<td>241</td>
<td>50.6</td>
<td>8.0</td>
<td>40.9</td>
<td>48.2</td>
<td>1.2</td>
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<tr>
<td>Calhoun (100%)</td>
<td>21,381</td>
<td>9,794</td>
<td>655</td>
<td>9,922</td>
<td>10,484</td>
<td>1,103</td>
<td>45.8</td>
<td>3.1</td>
<td>46.4</td>
<td>49.0</td>
<td>5.2</td>
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<tr>
<td>Gonzales (69%)</td>
<td>13,668</td>
<td>5,995</td>
<td>1,380</td>
<td>6,280</td>
<td>7,525</td>
<td>148</td>
<td>43.9</td>
<td>10.1</td>
<td>45.9</td>
<td>55.1</td>
<td>1.1</td>
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<tr>
<td>Jackson (100%)</td>
<td>14,075</td>
<td>8,855</td>
<td>1,072</td>
<td>4,079</td>
<td>5,063</td>
<td>157</td>
<td>62.9</td>
<td>7.6</td>
<td>36.0</td>
<td>36.0</td>
<td>1.1</td>
<td></td>
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<tr>
<td>Lavaca (100%)</td>
<td>19,263</td>
<td>14,674</td>
<td>1,416</td>
<td>3,077</td>
<td>4,398</td>
<td>191</td>
<td>76.2</td>
<td>7.4</td>
<td>16.0</td>
<td>22.8</td>
<td>1.0</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Matagorda (100%)</td>
<td>36,702</td>
<td>17,400</td>
<td>4,431</td>
<td>14,074</td>
<td>18,291</td>
<td>1,011</td>
<td>47.4</td>
<td>12.1</td>
<td>38.3</td>
<td>49.8</td>
<td>2.8</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nueces (100%)</td>
<td>340,223</td>
<td>111,870</td>
<td>15,464</td>
<td>206,293</td>
<td>219,472</td>
<td>8,881</td>
<td>32.9</td>
<td>4.5</td>
<td>60.6</td>
<td>64.5</td>
<td>2.6</td>
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<td></td>
<td></td>
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<tr>
<td>Refugio (100%)</td>
<td>7,383</td>
<td>3,337</td>
<td>534</td>
<td>3,487</td>
<td>3,957</td>
<td>89</td>
<td>45.2</td>
<td>7.2</td>
<td>47.2</td>
<td>53.6</td>
<td>1.2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>San Patricio (68%)</td>
<td>44,379</td>
<td>22,330</td>
<td>1,037</td>
<td>20,151</td>
<td>21,003</td>
<td>1,046</td>
<td>50.3</td>
<td>2.3</td>
<td>45.4</td>
<td>47.3</td>
<td>2.4</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Victoria (100%)</td>
<td>86,793</td>
<td>41,564</td>
<td>6,123</td>
<td>38,113</td>
<td>43,687</td>
<td>1,542</td>
<td>47.9</td>
<td>7.1</td>
<td>43.9</td>
<td>50.3</td>
<td>1.8</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wharton (100%)</td>
<td>41,280</td>
<td>19,681</td>
<td>6,050</td>
<td>15,445</td>
<td>21,243</td>
<td>356</td>
<td>47.7</td>
<td>14.7</td>
<td>37.4</td>
<td>51.5</td>
<td>0.9</td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

DX 401, Plan C185, RedAppl Report RED 100

- Nueces County, with a population of 340,223, makes up almost half of the new District 27 and is four times bigger than the next largest county in the district.

- This provides Nueces County an opportunity to have dominant influence in the determining their Congressional representative.
CONGRESSIONAL DISTRICT 26

C100

C185
“CRACKING” RELATES TO PARTISAN NOT RACIAL MOTIVES

DX 641, Plan C185, Tarrant County, Partisan Shading at VTD Level
Populations in Benchmark District 25 were moved for two purposes:

- To create an emerging Hispanic opportunity district along the heavy population growth I-35 corridor, a district whose concept originated in a MALDEF proposal.

- A political purpose to target Democratic Congressman Lloyd Doggett, a political figure unpopular with Republicans.
- District 35 reflects the significant Hispanic growth in this area.

- District 35 joins two communities of interest.

- Numerous Hispanic legislators and interest groups supported the creation of a such a district.

- No evidence of voting cohesion in the tri-ethnic coalition in contested primary elections.

DX 44, Plan C185 50% Hispanic VTDs
33. The 2011 Congressional plan for Texas removed key economic engines and cultural facilities—such as medical and convention centers, sports arenas, and universities—from several majority-minority Congressional districts but not from majority-Anglo districts.
Multiple key Economic Engines were moved from Republican districts represented by Anglo Congressmen into Democratic districts represented by African-American Congresspersons.
ECONOMIC ENGINES TAKEN FROM ANGLO CONGRESSPERSONS

Joe Barton (CD 6)
University of Texas-Arlington
AT&T Stadium
Globe Life Park in Arlington
Arlington Convention Center
Six Flags Over Texas
GM Arlington Assembly Plant

Lloyd Doggett (CD 25)
Texas State University
Austin-Bergstrom International Apt.
Long Center for the Performing Arts
Auditorium Shores

Ralph Hall (CD 4)
Allen Event Center
Eagle Stadium
Toyota Stadium

Kenny Marchant (CD 24)
Dallas Baptist University
Lone Star Park
QuikTrip Park
Verizon Theatre at Grand Prairie
American Eurocopter Corporation

Kay Granger (CD 12)
Art Institute of Fort Worth
BNSF Railway
Museum of the Americas
More Economic Engines Taken From Anglo Congresspersons

Ted Poe (CD 2)
Lamar University
Port of Beaumont
Port of Port Arthur
Motiva Enterprises Refinery
Valero Refinery
Total Port Arthur Refinery
Conns Corporate Headquarters

Lamar Smith (CD 21)
Texas State Capitol
University of Texas-Austin
Frank Erwin Center
Darrell K Royal-Texas Memorial
Bob Bullock Texas State History Museum
Camp Mabry Texas National Guard

John Culberson (CD 7)
Rice University/Rice Stadium
Baylor College of Medicine
University of Texas Medical School
University of St. Thomas
Memorial Hermann Hospital-Texas Medical Center
Baker Hughes Global Headquarters
Houston Arboretum and Nature Center
Houston Museum of the Fine Arts

Pete Olson (CD 22)
William P. Hobby Airport
Pasadena Convention Center
Armand Bayou Nature Center
34. The 2011 Congressional plan for Texas removed already-established Congressional district offices from several majority-minority Congressional districts but not from majority-Anglo districts.
Removal of District Offices Is Not Evidence Of Intentional Discrimination

- RedAppl does not identify where district offices of incumbents are located.

- District offices of Anglo Republican members of Congress were removed in Plan C185.

- District offices of Congressmen Poe, Barton, Culberson, Brady, McCaul, Paul, Hinojosa, Flores, Smith, Canseco, and Farenthold were all located in a different district under Plan C185.
MEMORANDUM

TO: Members, Texas Senate  
Members, Texas House of Representatives  
Members, 112th Texas Congressional Delegation  
Members, State Board of Education

FROM: Clare Dyer  
Manager, Mapping and Redistricting Section

DATE: January 11, 2011

SUBJECT: Incumbent Locations for Redistricting Project

In preparation for the 82nd Legislative Session, the Texas Legislative Council is finalizing the map database that will be used for redistricting. As we did in 1991 and 2001, we plan to include the census block location of the residence of each member of the 82nd Legislature, the 112th Congress elected from Texas, and the State Board of Education in the database to enable legislators to consider the effect of any proposed district boundary changes on incumbent representatives. The council will not specify the address itself or indicate the precise location of a member's residence within a block, either in the council's redistricting applications or on reports.

Council staff has obtained most members' residence addresses from the permanent address provided on the contest application form filed by candidates with the secretary of state and identified their census block locations. In order to verify that your residence location is correct, we have enclosed a map indicating the census block we have identified as the location of your residence and a form on which you can indicate if our information is incorrect. Unless you notify the council that the address or location indicated is incorrect and provide different information, this is the location that will be included in the redistricting database.

So that we may complete this project by February, please return your form and the attached map with any corrections by January 26, 2011, to:

DX 503

Eddie Bernice Johnson  
U.S. Congressional District 30  
2323 N Houston St  
Dallas, Texas 75219

Legend

Residence  
(2010 Census Block)

Texas Legislative Council  
1/13/2011
THE HOME OF AN AFRICAN-AMERICAN INCUMBENT WAS NOT INTENTIONALLY REMOVED IN PLAN C185

RedAppl had the wrong census block location for Congresswoman Johnson’s home.