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12 UNITED STATES DISTRICT COURT
13 FOR THE NORTHERN DISTRICT OF CALIFORNIA
14 SAN JOSE DIVISION

15 STATE OF CALIFORNIA, et al.,

16 Plaintiffs,

17 v.

18 DONALD J. TRUMP, in his official capacity as
19 President of the United States, et al.,

20 Defendants.

CASE NO. 5:20-cv-05169-LHK-RRC-EMC

**DECLARATION OF JEFFERSON
CRAIN IN SUPPORT OF PLAINTIFFS'
REPLY IN SUPPORT OF MOTION FOR
PARTIAL SUMMARY JUDGMENT
AND IN OPPOSITION TO
DEFENDANTS' MOTION TO DISMISS,
OR IN THE ALTERNATIVE, MOTION
FOR PARTIAL SUMMARY
JUDGMENT**

Date: October 8, 2020, 2020
Time: 1:30 p.m.
Place: Courtroom 8, 4th Floor
Judge: Honorable Richard R. Clifton
Honorable Lucy H. Koh
Honorable Edward M. Chen

1 I, Jefferson Crain, declare as follows:

2 1. I am the Executive Officer to the Board of Education for the Los Angeles Unified
3 School District ("LAUSD" or "District") and have served in this position since 1995.

4 2. As Executive Officer to the Board of Education, I oversee the Board Secretariat.

5 3. The role of the Board Secretariat is to serve as a liaison between the Board of
6 Education and the School District staff, other public agencies, and the general public concerning
7 the operations of the Board of Education. The Board Secretariat staff's mission is to assist the
8 Board Members in carrying out their duties as elected officials and to serve the public by
9 providing information regarding Board actions and activities. The Board Secretariat performs
10 legally mandated duties with respect to the operation of the Board of Education as well as
11 provides administrative assistance to the Board Members and support to their office staff.

12 4. In fulfilling its functions, Board Secretariat staff, myself included, regularly attend
13 and assist with District hearings and meetings impacting the District of potential concern to the
14 Board. This allows us to keep Board Members informed of issues impacting the District and to
15 ensure that the Board of Education's policies are appropriately implemented.

16 5. During the 2001-02 school year, I attended numerous meetings regarding the
17 redistricting of LAUSD's Board Districts in my capacity as Executive Officer to the Board of
18 Education.

19 6. LAUSD's Board District redistricting is compelled by Los Angeles Charter and
20 Administrative Code, art. VIII, section 802.

21 7. During the redistricting process, a redistricting commission is formed by
22 appointment every ten years shortly before the U.S. decennial census data is released.

23 8. The purpose of the commission is to review and prepare a proposed redistricting
24 plan dividing LAUSD into seven Board Districts containing, as nearly as practicable, equal
25 portions of the total population of LAUSD based upon the U.S. decennial census data. Each
26 proposed Board District must be drawn in conformance with the requirements of state and federal
27 law and to the extent feasible shall keep neighborhoods and communities intact, utilize natural
28 boundaries or street lines, be geographically compact, and conform to high school attendance

1 zones.

2 9. In January 2002, census data derived from the 2000 census, the redistricting
3 commission drafted proposed maps.

4 10. Following public hearings, the redistricting commission adopted a recommended
5 map for final approval.

6 11. LAUSD's 2011-2012 redistricting followed a similar process. In January 2012,
7 the redistricting commission held several meetings to review available data and gather public
8 input on local communities of interest. The redistricting commission then began the process of
9 preparing Board District proposals.

10 12. In order to draw the Board District lines, the commission used and relied upon
11 census data derived from the 2010 census and American Community Survey identifying ethnicity,
12 households, housing, families, age, sex, and other significant socio-demographic factors in order
13 to identify and preserve local communities of interest.

14 13. At the redistricting commission's February 23, 2012 meeting, five draft maps were
15 circulated for consideration along with 2010 census data corresponding to each proposal
16 identifying the total populations as well as citizen voting age population data ("CVAP") with
17 race/ethnicity.

18 14. During the 2011-12 school year, I attended numerous meetings regarding the
19 redistricting of LAUSD's Board Districts in my capacity as Executive Officer to the Board of
20 Education.

21 15. At the February 23, 2012 meeting, the redistricting commission adopted a
22 recommended redistricting plan attempting to balance LAUSD's Board District in total
23 population without diluting minority voting rights.

24 16. Census data is necessary to ensure compliance with the federal Voting Rights Act
25 and the California Voting Rights Act by preventing improper dilution of minority voting rights or
26 potential disparate impacts to particularly races, ethnicities, cultures, and local communities
27 within LAUSD. A true and correct copy of the 2010 Census CVAP data used to prepare the
28 recommended redistricting plan on February 23, 2012, is attached hereto as Exhibit 1.

8 19. Public input also relies on this same data to identify strengths and weaknesses in
9 the redistricting commission's proposals.

12 21. I have personal knowledge of the facts set forth in this declaration.

15 Executed September 18, 2020, in Los Angeles, California.

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EXHIBIT 1



LAUSD Redistricting Commission 2012 Final Plan



Dist	Population	Dev.	%Dev.	Black	Asian	Latino	CVAP 05 - 09 (RP)			CVAP 05 - 09 (LA City)			CVAP 2006 to 2010		
							Asian	Black	Latino	Asian	Black	Latino	Asian	Black	Latino
1	641,236	(7,497)	-1.2%	34%	6%	45%	5%	50%	23%	6%	50%	23%	6%	47%	25%
2	645,200	(3,533)	-0.5%	4%	18%	70%	19%	9%	56%	19%	9%	56%	23%	9%	54%
3	657,540	8,807	1.4%	5%	14%	32%	11%	5%	19%	12%	6%	19%	13%	6%	21%
4	655,968	7,235	1.1%	5%	12%	15%	9%	5%	11%	10%	5%	11%	11%	5%	11%
5	640,288	(8,445)	-1.3%	3%	10%	71%	12%	5%	56%	12%	5%	56%	13%	5%	55%
6	661,152	12,419	1.9%	3%	8%	69%	9%	5%	51%	10%	6%	51%	11%	5%	53%
7	639,750	(8,983)	-1.4%	15%	10%	61%	12%	22%	41%	13%	23%	41%	14%	22%	42%

Dist	Tot Voters	Asian	Latino	Jewish	Armenian	18 - 24	25 - 34	35 - 44	45 - 54	55 - 64	65+
1	303,966	3%	20%	4%	0.1%	9%	20%	17%	18%	15%	16%
2	189,302	14%	57%	1%	0.2%	12%	23%	16%	15%	13%	19%
3	326,771	7%	16%	7%	3.3%	7%	17%	17%	19%	18%	19%
4	405,805	5%	8%	11%	1.3%	6%	20%	19%	17%	15%	19%
5	239,386	8%	52%	2%	1.7%	11%	23%	19%	16%	14%	16%
6	226,882	6%	48%	1%	4.0%	10%	20%	16%	19%	17%	16%
7	247,714	8%	36%	1%	0.1%	11%	20%	16%	18%	15%	17%

Dist	Overall Voters				Asian Voters				Latino Voters			
	10P	10G	08P	08G	10P	10G	08P	08G	10P	10G	08P	08G
1	62,376	153,337	65,791	210,776	3%	3%	3%	3%	12%	17%	10%	18%
2	29,937	82,266	25,295	116,842	16%	12%	20%	12%	55%	60%	51%	60%
3	82,599	180,480	59,446	240,535	5%	5%	4%	6%	9%	14%	9%	15%
4	103,779	235,802	78,816	306,613	4%	4%	4%	5%	6%	7%	6%	8%
5	42,659	116,466	32,429	159,510	8%	7%	9%	7%	41%	49%	38%	51%
6	41,347	108,266	29,311	153,493	5%	5%	5%	5%	32%	45%	30%	47%
7	47,513	115,747	41,724	163,462	9%	8%	9%	8%	24%	33%	22%	34%



LAUSD Redistricting Commission
2012 Final Plan



Los Angeles Municipal Elections

African American Voting Turnout								
Dist	11G	11P	09G	09P	07G	07P	05G	05P
1	51%	58%	50%	47%	57%	62%	49%	55%
2	1%	0%	1%	1%	1%	1%	1%	1%
3	0%	0%	0%	0%	0%	0%	0%	0%
4	1%	0%	0%	0%	0%	0%	1%	0%
5	1%	1%	1%	1%	2%	1%	1%	1%
6	1%	1%	1%	1%	1%	1%	1%	1%
7	10%	19%	14%	16%	14%	19%	15%	18%

Latino Voting Turnout								
Dist	11G	11P	09G	09P	07G	07P	05G	05P
1	11%	13%	11%	18%	10%	11%	22%	17%
2	54%	58%	57%	63%	46%	64%	67%	64%
3	9%	10%	9%	12%	10%	10%	16%	13%
4	7%	6%	6%	7%	6%	6%	10%	8%
5	47%	47%	39%	46%	36%	50%	45%	49%
6	31%	33%	31%	42%	43%	44%	52%	45%
7	23%	24%	23%	31%	25%	23%	40%	31%

Asian Voting Turnout								
Dist	11G	11P	09G	09P	07G	07P	05G	05P
1	5%	4%	4%	4%	5%	4%	3%	3%
2	21%	18%	18%	16%	29%	18%	15%	16%
3	6%	5%	5%	4%	5%	5%	5%	5%
4	5%	4%	4%	4%	5%	5%	5%	4%
5	9%	8%	10%	9%	13%	9%	11%	9%
6	7%	6%	5%	5%	6%	5%	5%	5%
7	11%	13%	10%	12%	11%	14%	5%	10%



LAUSD Redistricting Commission
2012 Final Plan



Statewide Elections - Archived Election History Data

Archived African American Turnout											
Dist	10P	09S	08P	08S	06P	06G	05S	04P	04G	03s	02G
1	57%	51%	53%	54%	57%	51%	55%	57%	54%	54%	58%
2	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%
3	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4	1%	0%	1%	1%	1%	1%	1%	1%	1%	1%	1%
5	2%	1%	2%	2%	1%	1%	1%	2%	2%	2%	2%
6	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%
7	17%	15%	25%	19%	19%	18%	19%	20%	20%	18%	21%

Archived Latino Turnout											
Dist	10P	09S	08P	08S	06P	06G	05S	04P	04G	03s	02G
1	11%	10%	10%	16%	13%	15%	15%	10%	14%	14%	12%
2	55%	54%	51%	63%	63%	60%	63%	56%	58%	62%	62%
3	9%	8%	9%	13%	11%	11%	11%	8%	12%	10%	10%
4	6%	5%	6%	7%	6%	6%	7%	5%	7%	6%	6%
5	41%	36%	38%	50%	46%	46%	49%	39%	46%	46%	47%
6	31%	28%	30%	47%	43%	41%	41%	31%	40%	38%	39%
7	24%	21%	22%	33%	28%	30%	30%	22%	29%	28%	27%

Archived Asian Turnout											
Dist	10P	09S	08P	08S	06P	06G	05S	04P	04G	03s	02G
1	3%	4%	3%	3%	3%	3%	3%	3%	3%	1%	2%
2	16%	18%	20%	11%	12%	13%	11%	13%	13%	6%	10%
3	5%	4%	4%	5%	4%	5%	4%	4%	5%	2%	4%
4	4%	4%	4%	4%	4%	4%	4%	3%	4%	1%	3%
5	8%	9%	9%	7%	7%	7%	7%	6%	8%	3%	6%
6	5%	5%	5%	5%	4%	5%	4%	3%	5%	2%	3%
7	9%	10%	9%	8%	8%	8%	7%	8%	8%	2%	7%

CERTIFICATE OF SERVICE

Case Name: **State of California, et al. v.
Donald J. Trump, et al.**

No. **5:20-cv-05169-LHK-RRC-
EMC**

I hereby certify that on September 21, 2020, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**DECLARATION OF JEFFERSON CRAIN IN SUPPORT OF PLAINTIFFS' REPLY IN
SUPPORT OF MOTION FOR PARTIAL SUMMARY JUDGMENT AND IN
OPPOSITION TO DEFENDANTS' MOTION TO DISMISS, OR IN THE
ALTERNATIVE, MOTION FOR PARTIAL SUMMARY JUDGMENT**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on September 21, 2020, at Sacramento, California.

Eileen A. Ennis
Declarant

/s/ Eileen A. Ennis
Signature

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