

1 BENBROOK LAW GROUP, PC
2 BRADLEY A. BENBROOK (SBN 177786)
3 STEPHEN M. DUVERNAY (SBN 250957)
4 1301 Dove Street, 5th Floor
Newport Beach, CA 92660
Telephone: (916) 447-4900
brad@benbrooklawgroup.com

5 PUBLIC INTEREST LEGAL FOUNDATION
6 J. CHRISTIAN ADAMS*
7 KAYLAN PHILLIPS*
8 JOSEPH M. NIXON*
9 JEWEL M. LIGHTFOOT*
10 CAROLYN VALDES*
11 107 S. West Street
Alexandria, VA 22413
12 Tel: (703) 745-5870
adams@publicinterestlegal.org

*Motion to Appear Pro Hac Vice Forthcoming

Attorneys for Plaintiffs

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

16 MITCH NOYES, HOLDEN LOMELI,
17 and ANTHONY MCBROOM,

18 Plaintiffs,

19 v.

20 GAVIN NEWSOM, in his official
21 capacity as Governor of California; and
SHIRLEY WEBER, in her official
22 capacity as California Secretary of State,

23 Defendants.

Case No.:
Three-Judge Court Requested

**COMPLAINT FOR
DECLARATORY, INJUNCTIVE,
OR OTHER RELIEF**

**ACTION SEEKING STATEWIDE
RELIEF**

1 Plaintiffs bring this complaint against the California Governor and Secretary of
2 State (“California”), in their official capacities, seeking declaratory and injunctive
3 relief. Plaintiffs also request a three-judge court pursuant to 28 U.S.C. § 2284(a).

4 INTRODUCTION

5 1. California’s new congressional map was drawn with illegal racial intent
6 and with illegal racial considerations in violation of the Fifteenth Amendment.

7 2. California’s 2025 congressional map unconstitutionally draws racial
8 districts in violation of Plaintiffs’ civil rights protected by the Fifteenth Amendment
9 to the United States Constitution (“Fifteenth Amendment”) and Section 2(a) of the
10 Voting Rights Act of 1965 (“Voting Rights Act”).

11 3. The Fifteenth Amendment states: “[t]he right of citizens of the United
12 States to vote shall not be denied or abridged by the United States or by any State on
13 account of race, color, or previous condition of servitude.” U.S. Const. amend. XV.
14 California’s 2025 congressional map violates this prohibition.

15 4. The Voting Rights Act forbids enforcing election procedures enacted
16 with a racial intent or that results in a denial, or abridgment, of the right of any citizen
17 of the United States to vote, on account of race. 52 U.S.C. § 10101(a). Outside the
18 context of a remedial map under the Voting Rights Act, drawing district lines to
19 preserve specific racial percentages, maintain racial majorities, or the deliberate
20 preservation of racial influence districts violates the Constitution and the Voting
21 Rights Act.

22 5. By intentionally distorting district boundaries along racial lines to
23 preserve a specific number of Hispanic majority districts and two Black influence
24 districts, California violated the Fifteenth Amendment and Voting Rights Act. *See*
25 U.S. Const., amend. 15, § 1; 52 U.S.C. § 10101(a); *see also Shaw v. Reno*, 509 U.S.
26 630, 657 (1993) (“[r]acial gerry-mandering,...may balkanize us into competing racial
27 factions; it threatens to carry us further from the goal of a political system in which
28 race no longer matters”).

1 relative to the current population. *See Wesberry v. Sanders*, 376 U.S. 1, 8 (1964) (“one
2 man’s vote in a congressional election is to be worth as much as another’s”).

3 19. California’s Independent Citizens Redistricting Commission
4 implemented a decennial redistricting map following the 2020 Census.

5 20. In July 2025, California’s Democrat-led legislature ordered new
6 congressional map. *See* Yes on Prop 50: FAQ, CADEM (Nov. 11, 2025),
7 <https://cadem.org/yes-on-proposition-50-faq/>.

8 21. California retained Paul Mitchell from Sacramento-based Redistricting
9 Partners to draw a new congressional map, which was published on August 15, 2025.
10 *See* Proposed Congressional Map, California State Assembly Committee on Elections
11 (Nov. 11, 2025), <https://aelc.assembly.ca.gov/proposed-congressional-map>.

12 22. In an interview, Paul Mitchell admitted to drawing district lines with
13 intentional racial goals. When asked about his decision to place new districts in Los
14 Angeles despite net population loss in the city, Paul Mitchell stated: “we’ve actually
15 gained Latino population, so why would you remove districts from a Latino
16 community that has been historic and has a lot of community of interest arguments in
17 that district. Why take that out when you can just leave it there and let all of the
18 districts in LA push out over the county area.” Rich Ehsen (Host). (2025, August 15).
19 *Mapmaker Paul Mitchell on California’s emergency redistricting proposal* [Audio
20 podcast episode 421]. Capitol Weekley. [https://capitolweekly.net/mapmaker-paul-](https://capitolweekly.net/mapmaker-paul-mitchell-on-californias-emergency-redistricting-proposal/)
21 [mitchell-on-californias-emergency-redistricting-proposal/](https://capitolweekly.net/mapmaker-paul-mitchell-on-californias-emergency-redistricting-proposal/).

22 23. In August 2025, Governor Newsom announced a legislative package that
23 would replace the 2024 map with five more non-competitive Democrat congressional
24 districts. *See* Governor Gavin Newsom, Governor Newsom launches statewide
25 response to Trump rigging Texas’ elections, (Nov. 11, 2025),
26 [https://www.gov.ca.gov/2025/08/14/governor-newsom-launches-statewide-](https://www.gov.ca.gov/2025/08/14/governor-newsom-launches-statewide-response-to-trump-rigging-texas-elections/)
27 [response-to-trump-rigging-texas-elections/](https://www.gov.ca.gov/2025/08/14/governor-newsom-launches-statewide-response-to-trump-rigging-texas-elections/). This legislative package consisted of
28 ACA 8 (a constitutional amendment authorizing the new legislature-enacted

1 congressional map), AB 604 (the statute detailing the new congressional district
 2 boundaries), and SB 280 (the bill calling for a special election for the new
 3 amendment). *See* Proposed Congressional Map, California State Assembly
 4 Committee on Elections (Nov. 11, 2025), [https://aelc.assembly.ca.gov/proposed-](https://aelc.assembly.ca.gov/proposed-congressional-map)
 5 [congressional-map](https://aelc.assembly.ca.gov/proposed-congressional-map).

6 24. On August 18, 2025, the California legislature returned from summer
 7 recess. The legislative package that became Proposition 50 underwent its first reading
 8 that same day. The legislative package was then debated by the Senate Elections and
 9 Constitutional Amendments Committees on August 19, 2025, and passed by the
 10 Assembly and Senate Floor Sessions on August 21, 2025. *See* ACA-8 Congressional
 11 Redistricting, California Legislative Information (Nov. 25, 2025),
 12 [https://leginfo.legislature.ca.gov/faces/billHistoryClient.xhtml?bill_id=202520260A](https://leginfo.legislature.ca.gov/faces/billHistoryClient.xhtml?bill_id=202520260ACA8)
 13 [CA8](https://leginfo.legislature.ca.gov/faces/billHistoryClient.xhtml?bill_id=202520260ACA8). Due to the compressed timeline, Senator David Tangipa noted in his opposition
 14 to ACA 8's passage that he did not have the opportunity to read the bill. In response,
 15 the bill's co-author, Senator Marc Berman, stated that he knew the general content
 16 and trusted the people who drafted ACA 8. *See* August 19, 2025 Hearing, California
 17 State Assembly Committee on Elections (Nov. 11, 2025),
 18 <https://www.assembly.ca.gov/media/assembly-elections-committee-20250819>.

19 25. On November 4, 2025, California voters passed Proposition 50 in a
 20 special election. *See* Proposition 50 Congressional Redistricting, California Statewide
 21 Special Election, [https://electionresults.sos.ca.gov/returns/maps/ballot-](https://electionresults.sos.ca.gov/returns/maps/ballot-measures/prop/50)
 22 [measures/prop/50](https://electionresults.sos.ca.gov/returns/maps/ballot-measures/prop/50) (last visited November 21, 2025).

23 **Race Based Redistricting Lines**

24 26. While Proposition 50 will likely reduce California's Republican
 25 delegation from nine to four members, these new district lines were drawn with racial
 26 goals and using racial means. The map deliberately preserved California's 16 Hispanic
 27 majority districts by narrowing the margin of Hispanic population in all but District
 28 44. *See Exh. 1*, Declaration of John Morgan, at 3-4, ¶ 10.

1 27. These new districts also intentionally maintained Black racial
2 representation and influence in two non-Hispanic majority districts. *See Exh. 1*, at 3-
3 4, ¶ 10. This enabled racial groups to maintain a narrow majority in these two districts.
4 *See Exh. 1*, at 4, ¶ 11.

5 28. California’s racially motivated and racially drawn districts violate the
6 Fifteenth Amendment’s prohibition of state action for which **any** racially
7 discriminatory intent or racial means are used, even to gain political or partisan
8 advantage. *See* U.S. Const. amend. XV. The intent standard of the Fifteenth
9 Amendment is violated by actions taken with the intent of effectuating a racial
10 outcome or using race as a tool to accomplish a particular aim. *See e.g., Garza v. Cnty.*
11 *of Los Angeles*, 918 F.2d 763, 778 (9th Cir. 1990) (Kozinski, J., concurring and
12 dissenting in part). Under the Fifteenth Amendment, “all citizens, regardless of race,
13 have an interest in selecting officials who make policies on their behalf.” *Rice v.*
14 *Cayetano*, 528 U.S. 495, 523 (2000) (holding that, under the Fifteenth Amendment,
15 “voters are treated not as members of a distinct race but as members of the whole
16 citizenry”).

17 29. Defendants are constitutionally prohibited from intentionally racially
18 discriminating against “voters in elections to determine public governmental policies
19 or to select public officials, national, state, or local.” *Terry v. Adams*, 345 U.S. 461,
20 467 (1953); *see also Rice v. Cayetano*, 528 U.S. at 512 (the Fifteenth Amendment
21 “grants protection to all persons, not just members of a particular race”). This
22 “prohibition on race-based voting restrictions is both fundamental and absolute.”
23 *Davis v. Guam*, 932 F.3d 822, 832 (9th Cir. 2019).

24 30. Even facially neutral election procedures violate the Fifteenth
25 Amendment if they are adopted with a racially discriminatory purpose. *See Reno v.*
26 *Bossier Parish Sch. Bd.*, 520 U.S. 471, 481 (1997). “Racial discrimination need only
27 be one purpose, and not even a primary purpose, of an official act” to violate the
28 prohibition on election procedures enacted with racially discriminatory intent.

1 *Velasquez v. City of Abilene*, 725 F.2d 1017, 1022 (5th Cir. 1984) (citing *Arlington*
 2 *Heights v. Metro. Dev. Hous. Corp.*, 429 U.S. 252, 265 (1977)).

3 31. The Fifteenth Amendment’s race neutrality requirement restrains
 4 California’s authority to draw its congressional districts. *Rice v. Cayetano*, 528 U.S.
 5 at 522; *see also Gomillion v. Lightfoot*, 364 U.S. 339, 345 (1960) (declining to
 6 sanction “the achievement by a State of any impairment of voting rights [] so long as
 7 it was cloaked in the garb of the realignment of political subdivisions”). A claim under
 8 the Fifteenth Amendment is distinct from claims brought under the Fourteenth
 9 Amendment. “Unlike the Fourteenth Amendment[], there is no room for a compelling
 10 state interest defense, as the Fifteenth Amendment’s prohibition is absolute.” *Prejean*
 11 *v. Foster*, 227 F.3d 504, 519 (5th Cir. 2000).

12 32. Racial gerrymandering—deliberately drawing district boundaries for
 13 racial purposes and with racial means —circumvents the Fifteenth Amendment. *Shaw*,
 14 509 U.S. at 640.

15 ***I. Evidence of Racial Intent: Passing the Hispanic Population Between***
 16 ***Districts***

17 33. In California’s effort to preserve 16 Hispanic majority Districts, the State
 18 engaged in a deliberate practice of passing Hispanic majority census blocks from one
 19 adjacent district to another to preserve the number of Hispanic majority congressional
 20 districts. This was achieved by reducing Hispanic population with precision in many
 21 districts, but at a level that very carefully and deliberately maintained a floor of 52%
 22 Hispanic population. This “pass the population” resulted in many Hispanic majority
 23 districts falling in a tight, narrow, and implausible band of 52-55% Hispanic
 24 population. It is implausible that this would have occurred without a deliberate
 25 decision to draw district lines based on the Hispanic race of its residents.

26 34. California’s map violates the Fifteenth Amendment by packing Hispanic
 27 and Black voters into districts in such a way as to preserve the number of Hispanic
 28 majority districts at a precise set number, as well as maintaining two Black influence

districts—maximizing the voting strength of these racial minorities. *See Exh. 1*, at 59, ¶ 150. This achieved the intended racially motivated outcome of preserving 16 majority Hispanic citizen voting-age population (CVAP) Districts but narrowing this majority to a tight range between 52-55% Hispanic population in these districts. *See Exh. 1*, at 58-59, ¶ 147 and Table 1 below. The map also violates the Fifteenth Amendment by maintaining two Black influence districts by deliberately steering Hispanic populations away from these two districts and placing it in non-compact, adjacent, Hispanic majority districts. *See Exh. 1*, at 59, ¶ 148.

Table 1 – Distribution of majority Hispanic CVAP districts

2025 Newsom Plan			2024 Enacted Plan		
Hispanic CVAP	Number of Districts	Districts	Hispanic CVAP	Number of Districts	Districts
Over 61%	2	22, 44	Over 61%	1	22
58% to 61%	0		58% to 61%	1	35
55% to 58%	0	-	55% to 58%	7	42, 33, 31, 29, 38, 25, 31
52% to 55%	13	41, 34, 33, 39, 31, 13, 29, 35, 38, 18, 46, 25, 31	52% to 55%	7	44, 34, 39, 13, 18, 46, 52
Under 52%	1	52	Under 52%	0	52

35. Majority Hispanic District 18 lost 57.5% Hispanic CVAP territory to District 16 and 57.5% Hispanic CVAP territory to District 17. *See Exh. 1*, at 10, ¶ 28. California was able to preserve District 18 as a majority Hispanic CVAP district (changing from 52.4% to 52.5%) through carefully selected population transfers from the adjacent Districts 13 and 22 (also Majority Hispanic districts in both maps). *See Exh. 1*, at 8-9, ¶ 25.

36. District 18 was able to achieve this consistency by absorbing a 51.4% Hispanic CVAP territory from District 13 and a 70.8% Hispanic CVAP from District 22. *See Exh. 1*, at 8-9, ¶ 25. This contributed to offsetting District 18's receipt of 25.4%

1 Hispanic CVAP territory from District 16 and 14.6% Hispanic CVAP territory from
2 District 17. *See Exh. 1*, at 9, ¶ 26.

3 37. These deliberate swaps of racial population enabled District 18 to remain
4 within the deliberately tight band of 52-55% Hispanic CVAP range. *See Exh. 1*, at 11,
5 ¶ 30. Despite substantial changes in territory, District 18's Hispanic CVAP population
6 remained consistent between 2024 and 2025. California moved high concentrations
7 of Hispanic CVAP territory into District 18 to offset its losses of high Hispanic CVAP
8 territory. Otherwise, District 18 might not have remained majority Hispanic in 2025.
9 *See Exh. 1*, at 11, ¶ 31.

10 ***II. Evidence of Racial Intent: Replacing District 42 with District 41***

11 38. Districts 42 and 41 demonstrate the intent of the map drawer to preserve
12 districts to maintain racial outcomes. Though District 42 transitioned from a Hispanic
13 majority district to a non-Hispanic majority district, District 41 was drawn deliberately
14 to preserve a racial outcome and replace this Hispanic majority district. Under the
15 2025 Map, Districts 41 and 42 were completely relocated. Despite being moved
16 elsewhere in the State with a new constituent population, those districts were drawn
17 to deliberately maintain the same proportion of Hispanic population. *See Exh. 1*, at
18 24-30. The new District 42 is effectively dismantled (rendering it no longer a majority
19 Hispanic CVAP district) and was replaced in the same geographic area by a new
20 District 41, which is now within the 52-55% Hispanic CVAP range. *See Exh. 1*, at 24-
21 25, ¶ 68-69. District 42 changed its racial composition by discarding a heavily
22 Hispanic area to the north. That population was divided between District 38 and the
23 new District 41. *See Exh. 1*, at 24-25, ¶ 69. This change enabled District 41 to
24 effectively replace District 42.

25 39. Despite District 42 losing a substantial portion of its Hispanic
26 population, this Hispanic majority area was left intact and formed the core of a new
27 Hispanic majority District 41, preserving the number of majority Hispanic CVAP
28 districts at sixteen.

1 40. Similarly, Republican District 48 lost territory to three Democrat
2 districts. District 52 (a Hispanic majority district) only absorbed just enough territory
3 from District 48 to have its Hispanic CVAP population change from 52.0% to 51.7%,
4 preserving its narrow Hispanic majority. *See Exh. 1*, at 18-19, ¶ 50.

5 41. The racial population in the new map demonstrates a carefully and
6 intentionally crafted racial outcome. Despite having altogether new lines, nine of the
7 sixteen majority Hispanic CVAP districts are precisely within 2% of their 2024
8 percentages, and all but one remained above 52% Hispanic CVAP despite substantial
9 changes to the congressional boundaries' location. *See Exh. 1*, at 20, ¶ 55. Two
10 districts' Hispanic CVAP changed within 4%, two changed within 6%, and one
11 changed by 9% (District 44 increased to 62% Hispanic CVAP), however, none of the
12 districts that changed by 4% or 6% had their Hispanic CVAP drop below 52%. *See*
13 *Exh. 1*, at 7, ¶ 20. This is not a coincidence. It is a deliberately racially engineered
14 outcome.

15 42. The new District 38 remained majority Hispanic (52.5%) despite being
16 moved west because it absorbed part of the former Districts 42 and 31. If these
17 components had not been merged into District 38, it likely would not have remained
18 majority Hispanic. *See Exh. 1*, at 42, ¶ 109.

19 43. Despite substantial geographic changes between the 2024 and 2025
20 maps, two majority Hispanic Districts (38 and 42) were effectively reconfigured into
21 the new Districts 38 and 41 to retain their majority Hispanic status. *See Exh. 1*, at 24-
22 44. Proposition 50 not only replaced District 42 with 41 but retained almost the exact
23 same Hispanic CVAP percentage in each district. *See Exh. 1*, at 31, ¶ 85.

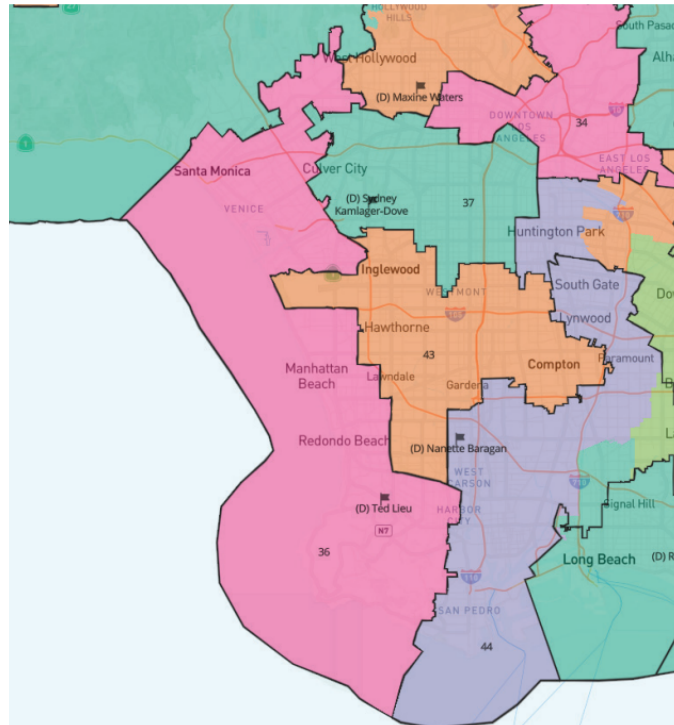
24 ***III. Evidence of Racial Intent: Deliberately Preserving Two Black Influence***
25 ***Districts***

26 44. In addition to the deliberate maintenance of 16 Hispanic majority
27 districts, Proposition 50 deliberately preserved two performing Black influence
28

1 districts. These two districts avoided placing too much Hispanic population to not
2 jeopardize their status as Black-performing districts.

3 45. Districts 37 and 43 lie side-by-side, have the highest portion of Black
4 population in any district in California, and are not majority Hispanic. *See Exh. 1*, at
5 48-49, ¶ 129. Rather than making a new majority Black or majority Hispanic district,
6 California deliberately preserved the Black populations' proportion in both districts
7 and did not mix them with the surrounding Hispanic population. *See Exh. 1*, at 49-50,
8 ¶ 133. Districts 37 and 43 were deliberately drawn in such a way as to preserve the
9 proportion of the Black population and its ability to elect candidates based on race.
10 *See Exh. 1*, 50, ¶ 134-35. As Map 1 shows, District 44 was drawn to avoid taking any
11 Hispanic population from District 43 that would upset the ability to elect Black
12 preferred candidates.

13 Map 1 – Black Influence Districts 37 and 43



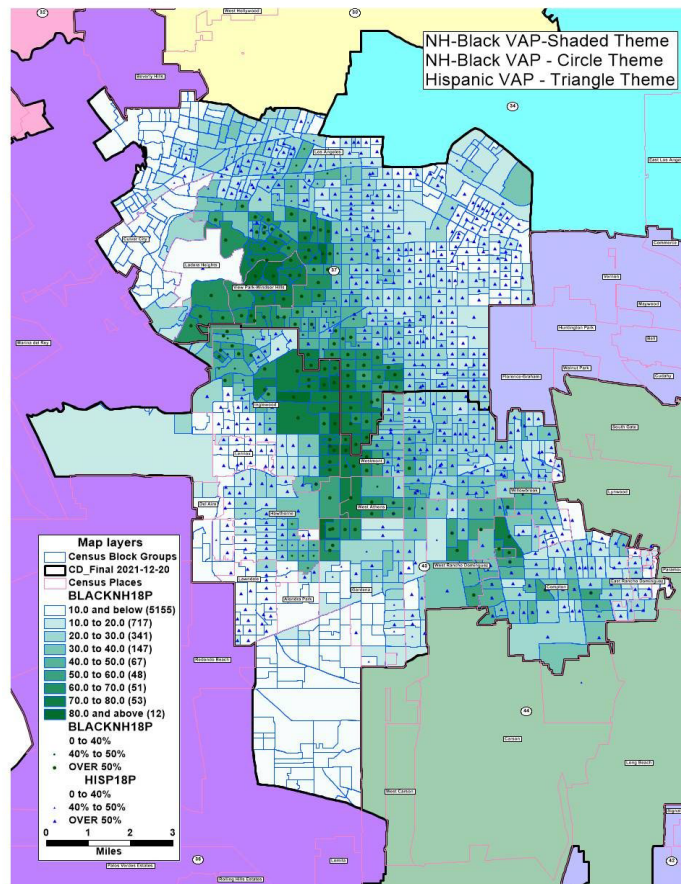
26 46. No racial groups' CVAP populations in Districts 43 and 37 changed.
27 Neighboring Hispanic majority districts 33, 38, 44 and White majority District 40 all
28

1 experienced demographic changes. *See Exh. 1*, at 59, ¶ 148. Maintaining Districts 43
2 and 37 is evidence of California's racial intent in drawing the map.

3 47. Maps 2 and 3 below show that the Black and Hispanic populations are
4 divided in such a way that neither group is the majority of the citizen voting-age
5 population in either district. However, the voter registration data in the census block
6 groups show that the higher concentration of Hispanic population has lower
7 registration as percentage of voting age population. *See Exh. 1*, at 57, ¶ 144. This
8 demonstrates that the Black population has an increased voting strength relative to the
9 Hispanic population in both districts, providing the Black population with an
10 advantage. *See Exh. 1*, at 57, ¶ 144.

11 48. Maintaining Black racial targets in Districts 43 and 37 enables the Black
12 population to maintain Black influence districts. *See Exh. 1*, at 50, ¶ 135. As Map 2
13 demonstrates, the Hispanic population in this area has lower registration as a
14 percentage of VAP. This supports the fact that the Hispanic population in California
15 has a lower citizenship rate than the Black population. This enables the Black
16 populations in Districts 43 and 37 to effectively politically control the district despite
17 lacking any majority or plurality in the census data. *See Exh. 1*, at 57, ¶ 145. By
18 intentionally walling off surrounding Hispanic and White racial populations,
19 California deliberately and illegally created two Black influence districts. *See Exh. 1*,
20 at 50, ¶ 135. The consequence of blocking Hispanic populations from entering in these
21 two districts was shown in the increase of Hispanic population in neighboring District
22 44. *See Exh. 1*, at 61, ¶ 155.

Map 2 – Illustrative community map with districts 37 and 43 (NH Black and Hispanic VAP)

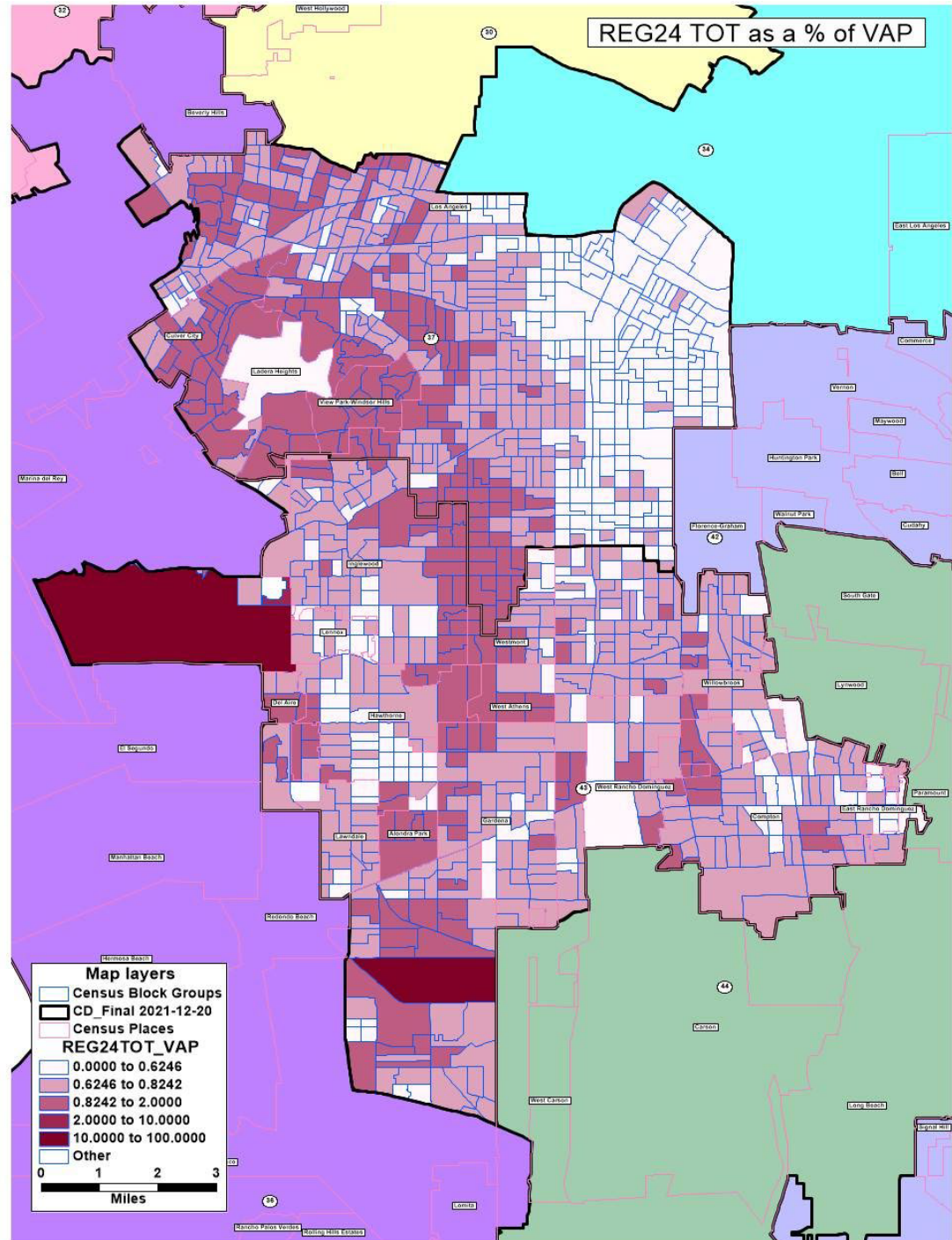


49. Map 2 shows the Hispanic and non-Hispanic Black voting-age population (VAP) and uses triangles to represent the Hispanic population and circles for the Black population.

50. The larger circles indicate 50% or more non-Hispanic Black VAP, and the smaller circles indicate between 40% and 50% Black VAP. *See Exh. 1*, at 55, ¶ 142.

51. The triangles show the strength of the Hispanic community with the larger triangles indicating over 50% Hispanic VAP and the smaller triangles indicating between 40% and 50% Hispanic VAP. *See Exh. 1*, at 55, ¶ 143.

Map 3 – Illustrative community map with districts 37 and 43 (Registration as % of VAP)



52. By deliberately concentrating the Black population in two districts with low Hispanic registration percentages, while walling off the Hispanic and White

1 populations to the surrounding districts, California preserved two influence districts
 2 for the Black population. California intentionally drew district lines to advance the
 3 political control of one racial group over another to the detriment of the Fifteenth
 4 Amendment and the Voting Rights Act.

5 **CLAIMS FOR RELIEF**

6 **Count I. Violation of the Fifteenth Amendment**

7 53. Plaintiffs reallege, as though fully set forth in this paragraph, all the
 8 preceding allegations of this Complaint.

9 54. The Defendants acted under color of state law to deprive Plaintiffs of
 10 rights secured by the Fifteenth Amendment and the Voting Rights Act.

11 55. The Fifteenth Amendment prohibits drawing congressional maps with
 12 any racial intent, goal, or purpose.

13 56. Map drawers in California intentionally used race to draw district lines
 14 in contravention of the Fifteenth Amendment. This is evidenced, in part, by:

- 15 • The intentional preservation of Hispanic majorities in precisely 16 districts
- 16 (despite carefully lowering the percentage);
- 17 • The implausibly tight range (52% to 55%) of Hispanic population in the
- 18 resulting districts; and,
- 19 • The deliberate allocation of Black population in Districts 37 and 43 and
- 20 careful avoidance of adding White and Hispanic population to preserve these
- 21 two racial influence districts to guarantee electoral outcomes based on race.

22 California's intentional distortion of district boundaries for racial purposes violates
 23 Plaintiffs' Fifteenth Amendment rights.

24 **Count II. Violation of Section 2(a) of the Voting Rights Act**

25 57. Plaintiffs reallege, as though fully set forth in this paragraph, all the
 26 preceding allegations of this Complaint.

27 58. Section 2(a) of the Voting Rights Act provides that "[n]o voting
 28 qualification or prerequisite to voting or standard, practice, or procedure shall be

1 imposed or applied by any State or political subdivision in a manner which results in
2 a denial or abridgment of the right of any citizen of the United States to vote on
3 account of race or color.” 52 U.S.C. § 10301(a).

4 59. A violation of Section 2(a) of the Voting Rights Act may be based upon
5 the finding of a discriminatory purpose alone, which can be established by proof that
6 race was a motivating factor in the decision to draw California’s congressional map.
7 *See Rice v. Cayetano*, 528 U.S. 495 (2000). California cannot enforce any voting
8 qualification or prerequisite to voting or any standard, practice, or procedure that has
9 any purpose of denying or abridging the right to vote on account of race, color, or
10 membership in a language minority group. Proposition 50’s map was drawn with this
11 intent.

12 60. By deliberately ensuring that the Hispanic population maintains a slight
13 majority in all 16 previously Hispanic majority districts and ensuring the two Black
14 influence districts (Districts 37 and 43) were untouched, California’s boundaries
15 disperse the non-Hispanic population into districts in which they will remain an
16 ineffective minority. In doing this, California intentionally concentrated Hispanic and
17 Black populations into districts where they either constitute a slight majority or enjoy
18 an influence district, violating Section 2(a) of the Voting Rights Act.

19 61. Defendants acted under color of California law to engage in
20 discrimination based on race, color, and/or national origin in violation of: (1) Section
21 2(a) of the Voting Rights Act; and (2) the Fifteenth Amendment to the United States
22 Constitution, which can be enforced through 42 U.S.C. § 1983.

23 PRAYER FOR RELIEF

24 WHEREFORE, Plaintiffs respectfully pray for entry of a judgment:

25 1. Declaring that Proposition 50’s map violates the prohibitions on
26 discriminatory purpose contained in the Fifteenth Amendment to the United States
27 Constitution and Section 2(a) of the Voting Rights Act;
28

2. Declaring that Proposition 50 was adopted with an impermissible racial intent in violation of the guarantee of the Fifteenth Amendment to the United States Constitution and Section 2(a) of the Voting Rights Act;

3. An order enjoining Defendants from enacting or implementing the map contained in Proposition 50;

4. Ordering the Defendants pay Plaintiffs' reasonable attorney's fees, expert fees, including litigation expenses and costs, pursuant to 52 U.S.C § 10310(e);

5. Ordering the Defendants pay Plaintiffs' reasonable attorney's fees including litigation expenses and costs, pursuant to 42 U.S.C. § 1988 and any other applicable law;

6. Granting Plaintiffs such further relief the Court deems just and proper including all other injunctive relief available to the Court.

Dated: December 2, 2025

BENBROOK LAW GROUP, PC

By s/ Bradley A. Benbrook

Bradley A. Benbrook
Stephen M. Duvernay

PUBLIC INTEREST LEGAL
FOUNDATION

J. Christian Adams*

Kaylan Phillips*

Joseph M. Nixon*

Jewel M. Lightfoot*

Carolyn Valdes*

107 S. West Street

Alexandria, VA 22413

Tel: (703) 745-5870

adams@publicinterestlegal.org

kphillips@publicinterestlegal.org

jnixon@publicinterestlegal.org

jlightfoot@publicinterestlegal.org

cvaldes@publicinterestlegal.org

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Attorneys for Plaintiffs