

Plaintiffs' Exhibit 2, John Morgan Supplemental Report

EXPERT REPORT OF JOHN B. MORGAN

Pursuant to 28 U.S.C. § 1746, Fed. R. Civ. P. 26, and F.R.E. 702 and 703, I, JOHN B. MORGAN, make the following declaration:

1. My name is John B. Morgan. I am over the age of 21 years, and I am under no legal disability which would prevent me from giving this declaration. If called to testify, I would testify under oath to these facts.

2. I hold a B.A. in History from the University of Chicago. As detailed in my CV, attached as Exhibit 01, I have extensive experience over many years in the field of redistricting. I have worked on redistricting plans in the redistricting efforts following the 1990 Census, the 2000 Census, the 2010 Census and the 2020 Census. I have drawn redistricting plans in more than twenty states, including work for both legislatures and redistricting commissions. I have testified as an expert witness in demographics and redistricting.

3. I am being compensated at a rate of \$350 per hour for my services in this case.

4. I have been asked to draw a race-blind California congressional redistricting plan which changes five Republican seats to five Democratic seats, without using race in the drawing of the plan. I have been asked to compare this Illustrative Plan to the 2022-2024 enacted California

congressional redistricting Plan, the Proposition-50 2025 congressional redistricting Plan and to offer opinions regarding my analysis.

5. As a result of the experience of drawing the Illustrative Plan and this analysis, my opinion is that it is possible to draw a race-blind California congressional redistricting plan which changes five Republican seats to five Democratic seats, without using race in the drawing of the plan.

Data utilized for drawing the Illustrative Plan and analysis

6. Redistricting geographic information system (GIS) software from ESRI was used for this analysis as well as GIS software from Caliper Corporation. The redistricting software was loaded with the 2020 census data and American Community Survey data from the Census Bureau, Group Quarters Adjusted population data and 2024 election data from California, and the census geography for California. The 2024 congressional plan and the Proposition-50 2025 congressional plan were loaded into the software.

7. For the drawing of the Illustrative Plan, I did not use racial data. Population data and political data were used during the drawing of the Illustrative Plan. I applied traditional redistricting principles to the drawing of the Illustrative Plan, including population equality, contiguity, respect for civic boundaries, such as cities and towns, and compactness. In addition to my

experience in drawing maps, I referenced the 2024 congressional plan and the Proposition-50 2025 plan for population-related guidance on splitting of cities and towns as well as for general compactness.

8. California currently has 52 congressional districts. For purposes of population equalization, California uses Group Quarters Adjusted population (GQA) which differs from the official census population. The GQA assigns people housed in certain group quarters to other associated addresses.

9. After the Illustrative Plan was drafted, racial data was appended to the plan for analysis purposes. The appended data is included at the end of the report. References to that data are included in the report for comparison purposes. Portions of this analysis use official Census populations as well as American Community Survey data, also provided by the Bureau of the Census.

10. The California redistricting commission created the congressional districts that are in effect for the 2022 through 2030 elections. This will be referred to as the 2024 Plan.

11. By enactment of Proposition-50, the congressional districts are being replaced with a new map. In this discussion and analysis, this new replacement congressional district plan will be referred to as the Proposition-50 2025 Plan.

12. In this discussion and analysis, the congressional district plan I drafted for this report will be referred to as the Illustrative Plan or race-blind (RB) Illustrative Plan.

13. Throughout my analysis, I make comparisons between the Illustrative Plan, the Proposition-50 2025 Plan and the 2024 Plan (benchmark plan) using data and maps. The full tables for the Illustrative Plan, from which the data are extracted, are provided at the end of the report as exhibits listed below:

POP- by District (Exhibit 02- Illustrative Plan Analysis)

President 2024 by District (Exhibit 03- Illustrative Plan Analysis)

Party Registration 2024 by District (Exhibit 04- Illustrative Plan Analysis)

Compactness reports (Exhibit 05- Illustrative Plan, Exhibit 06- 2024, Exhibit 07- 2025 Prop50)

Split cities and towns (Exhibit 08- Illustrative Plan, Exhibit 09- 2024, Exhibit 10- 2025 Prop50)

AP-Black- by District (Exhibit 11- Illustrative Plan Analysis)

CVAP by District (Exhibit 12- Illustrative Plan Analysis)

VAP- by District (Exhibit 13- Illustrative Plan Analysis)

GQA- by District (Exhibit 14- Illustrative Plan Analysis)

Plan-Comparison-CONG24-PRES24 (Exhibit 15- Illustrative & 2024 Plan & 2025 Prop50)

Plan-Comparison-Hispanic-CVAP (Exhibit 16- Illustrative Plan Analysis & 2024 Plan)

District Component Composition (Exhibit 17- Illustrative Plan Analysis)

Map Appendix (Exhibit 18 Illustrative Plan Analysis & 2024 Plan)

14. I also created a series of maps showing the Illustrative Plan in comparison to the 2024 plan. These maps are reproduced in a map appendix as Exhibit 18.

Overview of California

15. A brief orientation tour around the state helps to identify districts by geographic regions to facilitate locating a district when discussing it in the redistricting plans. The districts with lower numbers are in the northern part of California, and the districts continue more or less in numerical order from north to south.

16. The northern California and Sacramento region has seven seats: District 1 through District 4 and then District 6 through District 8. In the San Francisco Bay Area are nine seats: District 10 through District 12 and then District 14 through District 19. Then moving into the Central Valley and Mountain region, there are six seats: District 5, District 9, District 13, and District 20 through District 22. The Greater Los Angeles area (including the coast) has 15 seats: District 24, District 26 through District 32, Districts 34, 36, 37, 38, 42, 43, and 44. In San Bernardino and Orange County, there are seven seats: Districts 23, 33 and 35 in San Bernardino County, and Districts 40, 45, 46, and 47 in Orange County. Then in the southern part of the state,

Riverside, the Inland Empire and San Diego have eight seats: District 25, District 39, District 41, and District 48 through District 52.

17. One metric used to understand the scale of change between two redistricting plans is what is called core retention. This kind of analysis compares how much of the predecessor district is kept in the successor district, and this is expressed as a percentage. For example, if 80 percent of the population of a predecessor district is included in the successor district, then one would say that the district has 80% core retention.

18. The table below shows the core retention of the individual namesake districts.

Table 1- Illustrative Plan- District Core Retention

Less than 50% retained		50% -70% retained		70% -90% retained		Over 90% retained	
Illust. Plan	core retained	Illust. Plan	core retained	Illust. Plan	core retained	Illust. Plan	core retained
23	9.9%	37	53.9%	4	71.7%	38	90.2%
44	19.3%	46	54.6%	34	75.6%	5	93.0%
42	37.2%	28	55.8%	39	79.0%	27	95.8%
51	38.0%	33	59.4%	52	80.9%	31	99.8%
3	38.3%	41	60.3%	36	82.9%	8	100.0%
43	40.6%	7	61.3%	49	85.3%	9	100.0%
47	41.1%	45	62.2%	32	86.6%	10	100.0%
6	43.0%	50	62.5%	35	88.3%	11	100.0%
1	47.2%	25	63.8%	29	88.6%	12	100.0%
40	47.3%	30	66.5%	9 Districts		13	100.0%
48	48.2%	2	69.3%			14	100.0%
11 Districts		11 Districts				15	100.0%
						16	100.0%
						17	100.0%
						18	100.0%
						19	100.0%
						20	100.0%
						21	100.0%
						22	100.0%
						24	100.0%
						26	100.0%
						21 Districts	

19. The Illustrative Plan makes changes to 35 of the 52 congressional districts; seventeen districts remain exactly the same as in the 2024 Plan

20. The core retention in the Illustrative Plan is as follows: eleven districts retain less than 50% of their population, eleven districts retain between 50% and 70%; nine districts retain between 70% and 90%; and 21 districts retain over 90% of their population.

21. The information in the table above is extracted from Exhibit 17, which shows the components of predecessor districts which comprise the successor districts as well as the core retention information.

Political effect of the Illustrative Plan

22. The Illustrative Plan changes the representation of California to be less Republican affecting many districts but leaving many politically unchanged. While California is considered to be a Democratic state, there are regional areas of Republican strength, and several members of congress are Republican.

23. Looking back, the last time a Republican won California in a presidential election was in 1988. George H.W. Bush won the election nationwide, and in California he won the state and its electoral votes for

President. The last time a Republican won a constitutional statewide office was in 2006, when Governor Schwarzenegger was re-elected.

24. In creating this Illustrative Plan, several districts which are currently held by Republican incumbents in Congress are redrawn to become Democratic.

25. Throughout the analysis I discuss relative partisan strength and in some cases I use district component tables, which show the population and political information about the predecessor district components that combine to create the successor district.

Treatment of Republican Seats

26. Currently, there are nine Republican members of Congress, and 43 Democratic members of Congress elected. In the Illustrative Plan, the districts of five of the Republican members of Congress were changed to favor the Democrats – these Republican districts are “flipped” to the Democrats. Before discussing the “flipped” districts, below is a review of the current status of the districts.

27. Starting in the north, the Republican members of Congress are: Representative Doug LaMalfa in District 1, Representative Ken Kiley in District 3 and Representative Tom McClintock in District 5. Moving down into

the Central Valley the Republicans are Representative Vince Fong in District 20 and Representative David Valadao in District 22. Representative Jay Obernolte is in District 23 in San Bernardino County. Republican Representative Young Kim represents District 40, anchored in Orange County. In southern California, Republican Representative Ken Calvert represents District 41, entirely within Riverside County, and Representative Daryl Issa represents District 48, primarily anchored in suburban San Diego County.

28. The table below shows the nine Republican-held districts and the 2024 results for Congress and President. Then the table shows the 2024 presidential election results for the Illustrative Plan and the Proposition-50 2025 Plan, matched by district number.

Table 2 – Republican-held congressional seats (2024 Plan / Illustrative Plan / 2025 Prop-50)

Congressional Election 2024			2024 Enacted Plan				Illustrative Plan1				2025 Prop-50			
Dist No.	Member 2025 / Party	PARTY / Margin	GE24PRS D	GE24PRS R	GE24PRS O	GE24 PRS TOT	GE24PRS D	GE24PRS R	GE24PRS O	GE24 PRS TOT	GE24PRS D	GE24PRS R	GE24PRS O	GE24 PRS TOT
D1	Doug LaMalfa (R)	(R)	118,071	199,592	9,153	326,816	185,986	144,572	10,896	341,455	186,282	144,440	11,060	341,783
	Win: 65.3% / Opp: 34.7%	31%	36.1%	61.1%	2.8%		54.5%	42.3%	3.2%		54.5%	42.3%	3.2%	
D3	Kevin Kiley (R)	(R)	201,882	218,376	13,628	433,886	187,959	152,780	11,745	352,484	195,095	158,117	12,670	365,882
	Win: 55.5% / Opp: 44.5%	11%	46.5%	50.3%	3.1%		53.3%	43.3%	3.3%		53.3%	43.2%	3.5%	
D5	Tom McClintock (R)	(R)	149,296	217,842	9,391	376,529	146,382	213,834	9,324	369,540	137,148	214,219	8,622	359,988
	Win: 61.8% / Opp: 38.2%	24%	39.7%	57.9%	2.5%		39.6%	57.9%	2.5%		38.1%	59.5%	2.4%	
D20	Vince Fong (R)	(R)	110,562	210,075	7,556	328,194	110,562	210,075	7,556	328,194	103,087	206,175	7,165	316,427
	Win: 65.1% / Opp: 34.9%	30%	33.7%	64.0%	2.3%		33.7%	64.0%	2.3%		32.6%	65.2%	2.3%	
D22	David Valadao (R)	(R)	79,289	89,281	4,544	173,114	79,289	89,281	4,544	173,114	81,518	83,163	4,494	169,175
	Win: 53.4% / Opp: 46.6%	7%	45.8%	51.6%	2.6%		45.8%	51.6%	2.6%		48.2%	49.2%	2.7%	
D23	Jay Obernolte (R)	(R)	110,109	156,005	7,286	273,401	143,451	119,966	7,096	270,513	107,634	161,233	7,215	276,083
	Win: 60.1% / Opp: 39.9%	20%	40.3%	57.1%	2.7%		53.0%	44.3%	2.6%		39.0%	58.4%	2.6%	
D40	Young Kim (R)	(R)	184,756	193,707	13,010	391,473	184,317	159,845	13,244	357,405	161,617	208,476	11,332	381,425
	Win: 55.3% / Opp: 44.7%	11%	47.2%	49.5%	3.3%		51.6%	44.7%	3.7%		42.4%	54.7%	3.0%	
D41	Ken Calvert (R)	(R)	165,734	187,102	9,445	362,281	141,023	202,290	9,937	353,250	172,625	128,621	9,525	310,772
	Win: 51.7% / Opp: 48.3%	3%	45.8%	51.7%	2.6%		39.9%	57.3%	2.8%		55.6%	41.4%	3.1%	
D48	Darrell Issa (R)	(R)	152,853	209,605	9,173	371,631	174,858	158,593	9,785	343,235	165,403	153,300	8,529	327,233
	Win: 59.3% / Opp: 40.7%	19%	41.1%	56.4%	2.5%		50.9%	46.2%	2.9%		50.6%	46.9%	2.6%	

29. The red to darker blue coloration in the table highlights the changes in partisan performance for President 2024 that the Illustrative Plan makes to the predecessor Republican-held districts – the districts that were “flipped”. The light blue coloration shows the Republican-held districts that were similarly “flipped” in the Proposition-50 2025 Plan.

30. The table above shows that changes were made to seven of the nine Republican districts in the Illustrative Plan. Districts 20 and 22 were completely unchanged and District 5 was only slightly changed. District 5 and District 41 become more Republican, Districts 20 and District 22 are exactly the same, and Districts 1, 3, 23, 40 and 48 become more Democratic.

31. Though the Illustrative Plan “flips” a different group of Republican-held seats than the Prop-50 Plan, the Illustrative Plan meets or exceeds the partisan performance employed in Prop-50 “flipped” seats, in most cases. The changes made to those five districts are politically substantial, flipping them from Republican to Democratic. The report now focuses on how the Illustrative Plan achieves the partisan outcome of making five more Democratic congressional seats without using race.

Northern California

32. In the northern part of the state, The Illustrative Plan changes District 1, and District 3, both held by Republicans, to become Democratic

seats. A similar effort was made in the Proposition-50 2025 Plan but involving many more districts than were changed in the Illustrative Plan.

33. Looking at the district configuration in the 2024 Plan, District 1 was not close in the congressional elections and voted only 36% for vice president Kamala Harris in the 2024 presidential election; both the Illustrative Plan and the Proposition-50 Plan alter the district so that it goes from 36% for Kamala Harris to 54.5% for Kamala Harris, a change of eighteen points.

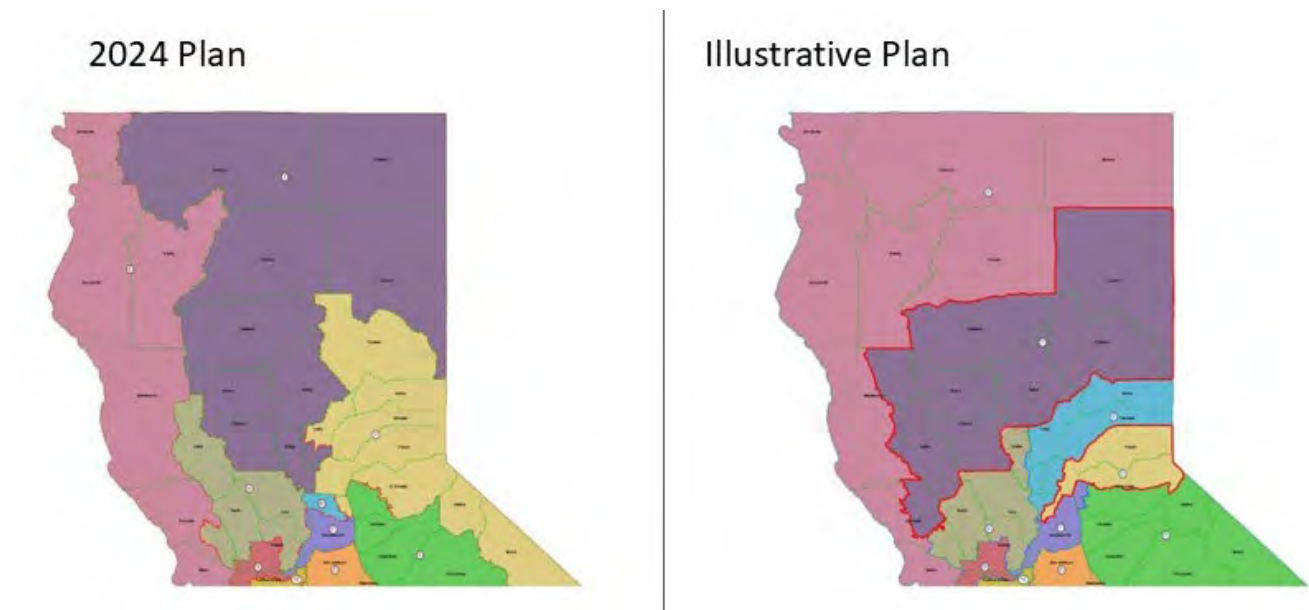
34. Likewise, District 3 is altered in political composition. The 2024 Enacted district was 46.5% for Kamala Harris to 50% for President Trump. In the Illustrative Plan the new District 3 is altered to favor Democrats, at 53.3% for Kamala Harris and 43.3% for President Trump, a change of 6.8% on the Harris numbers. Only fragments of the original district remain in the new district, which appends strong Democratic territory to affect the change. So those two districts are changed substantially in favor of the Democrats.

35. On the other hand, District 5, which currently elects Congressman Tom McClintock, has been altered to absorb or to take in some Republican territory from neighboring Republican District 3. District 5 remains a Republican district, but it becomes even stronger.

36. The techniques that are used to accomplish the partisan outcome are, generally speaking, efforts to absorb Republican areas into Democrat areas in such a way that the Republican strength is reduced. Sometimes this is referred to as “cracking” - cracking the Republican strongholds and pairing them with Democratic strongholds in such a way to favor the Democrats. But in the case of District 5, the opposite is true, where Republican territory is consolidated. In this case, it makes it a stronger Republican seat, or rather, it changes the surrounding districts and packs the Republicans into one seat.

37. The map below shows the changes to the districts in northern California from the 2024 Plan on the left to the Illustrative Plan on the right.

Map 1 -Northern California comparison 2024 Plan / Illustrative Plan



38. The district numbers have the same color theme and the “flipped” districts are outlined in red (District 1 and District 3).

39. District 1 and District 3 take in substantial Democratic territory from surrounding districts in order to accomplish the “flipping” of the districts from Republican to Democratic. The tables below show the political composition of the predecessor district components which make up District 1 and District 3 in the Illustrative Plan.

Table 3 – District 01 component composition (Illustrative Plan)

Illust. Plan	CD	% of Dist. 24 Pop	TOTAL		GE24PRS			
			GQA	POP	TOT	D	R	O
1	1	core	354622	360947	149818	59793	85568	4457
		47%				39.9%	57.1%	3.0%
1	2		168699	168412	84672	57908	23794	2970
		22%				68.4%	28.1%	3.5%
1	3		19839	19790	10067	4020	5725	322
		3%				39.9%	56.9%	3.2%
1	4		216906	216339	96897	64266	29485	3147
		28%				66.3%	30.4%	3.2%
1 Total			760066	765488	341454	185987	144572	10896
						54.5%	42.3%	3.2%

Table 4 – District 03 component composition (Illustrative Plan)

Illust. Plan	CD	% of Dist. 24 Pop	TOTAL		GE24PRS			
			GQA	POP	TOT	D	R	O
3	3	core	290443	290076	160750	72075	83730	4945
		38%				44.8%	52.1%	3.1%
3	6		314463	313177	131529	71928	55097	4505
		41%				54.7%	41.9%	3.4%
3	7		155159	154273	60205	43957	13953	2295
		20%				73.0%	23.2%	3.8%
3 Total			760065	757526	352484	187960	152780	11745
						53.3%	43.3%	3.3%

40. The table above shows that District 1 in the Illustrative Plan retains 47% of its core, still strong Republican territory, but it is paired with stronger Democratic territory from predecessor Districts 2, 3 and 4. The next table above shows that District 3 in the Illustrative Plan retains 38% of its core, still Republican territory, but it is paired with stronger Democratic territory in Sacramento from predecessor District 6, and District 7.

41. In addition to utilizing District 5 as discussed above to consolidate Republican territory, the changes to “flip” District 1 and District 3 from Republican to Democratic seats also involve changes to Democratic Districts 2, 4, 6 and 7. By contrast, the Proposition-50 Plan makes changes to more seats in order to accomplish the same “flip” of two seats. In the Illustrative Plan none of the Democratic districts (2, 4, 6 and 7) are meaningfully reduced in Democratic strength.

Table 5 – Change in Democratic performance for Dists -2, 4, 6 & 7 (2024 Plan / Illustrative Plan)

Congressional Election 2024			2024 Enacted Plan				Illustrative Plan1			
Dist No.	Member 2025 / Party	PARTY	GE24PRS D	GE24PRS R	GE24PRS O	GE24 PRS TOT	GE24PRS D	GE24PRS R	GE24PRS O	GE24 PRS TOT
D2	Jared Huffman (D) Win: 71.9% / Opp: 28.1%	(D) 44%	276,631 70.9%	100,334 25.7%	13,246 3.4%	390,212 2.5%	227,155 59.6%	141,877 37.2%	12,021 3.2%	381,052
D4	Mike Thompson (D) Win: 66.5% / Opp: 33.5%	(D) 33%	225,063 64.1%	115,220 32.8%	11,049 3.1%	351,332 2.2%	214,469 60.8%	127,198 36.1%	10,898 3.1%	352,565
D6	Ami Bera (D) Win: 57.6% / Opp: 42.4%	(D) 15%	166,448 55.2%	124,630 41.4%	10,281 3.4%	301,360 1.9%	185,190 53.4%	150,486 43.4%	11,367 3.3%	347,043
D7	Doris Matsui (D) Win: 66.8% / Opp: 33.2%	(D) 34%	195,098 63.1%	103,121 33.4%	10,976 3.6%	309,196 2.0%	185,350 53.7%	148,367 43.0%	11,475 3.3%	345,193

42. District 6 drops 2 points in Democratic performance from 55.2% for Kamala Harris to 53.4%, but the district still holds a ten-point advantage on the Presidential election with 53.4% for Harris / 43.4% for Trump. Districts 2, 4 and 7 drop even more in performance, but likewise hold an advantage on the Democratic performance, with District 7 the lowest at a ten-point advantage: 53.7% for Harris and 43.0% for Trump. As the district data

confirms, the Illustrative Plan “flips” District 1 and District 3 from Republican to Democratic with little impact on surrounding Democratic districts.

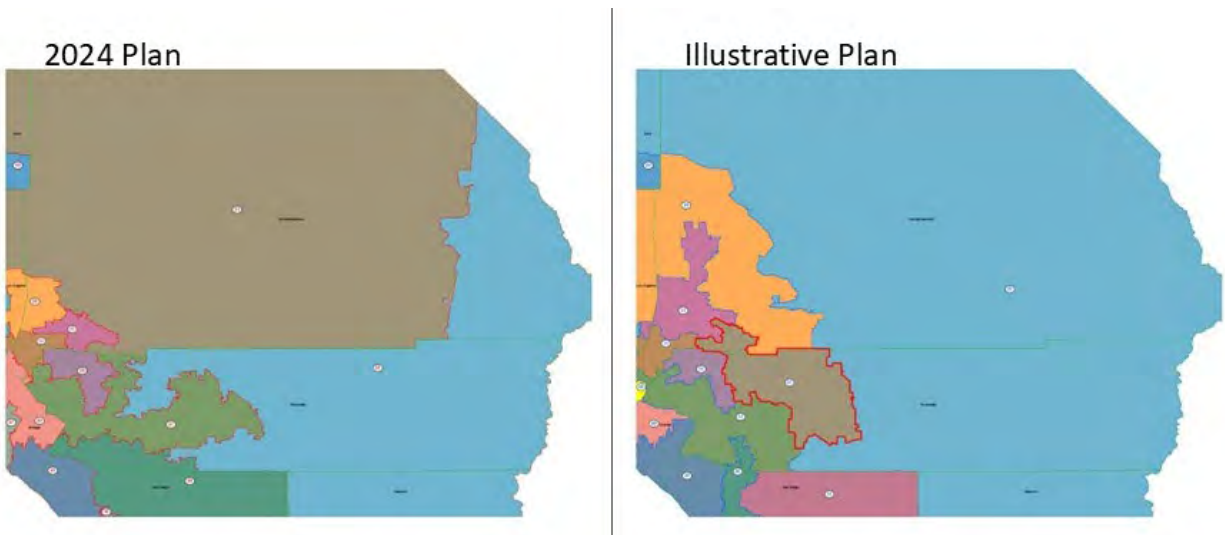
San Bernardino County to Riverside County

43. The Illustrative Plan converts Republican-held District 23 in San Bernardino County into a Democratic district. District 23 in the Illustrative Plan is changed a great deal, retaining only 10% of its core and is essentially reconfigured in to district which takes in Democratic portions of San Bernardino and Riverside Counties. Conceptually, the first step is to disgorge the more Republican areas to the north in San Bernardino County, which allows for taking in more Democratic territory, changing the overall partisan performance.

44. After shedding Republican territory, District 23 takes in strong Democratic areas from the neighboring City of San Bernardino in predecessor District 33; then it expands into Riverside County, taking Democrat-performing territory from predecessor District 41, pushing the new Illustrative District 41 west and from predecessor District 25, pushing the new Illustrative District 25 east. District 23 in the Illustrative Plan also takes in Democratic territory from District 39 in Riverside County.

45. The map below shows the changes in the San Bernardino area; with the 2024 Plan on the left to the Illustrative Plan on the right.

Map 2 -San Bernardino-Riverside comparison 2024 Plan / Illustrative Plan



46. From predecessor District 23, the strongest Republican territory is absorbed by Democratic District 28, already in San Bernardino County, which moves east to pick up this discarded Republican territory. To make this move, District 28 sheds almost half of its population in Los Angeles County, leaving half a district surplus to be resolved later.

47. The balance of the discarded San Bernardino predecessor District 23 population is split between District 33 and District 25. District 33, which has donated some strong Democratic territory to the new District 23 needs to pick up Democratic territory, so it moves north into the Democratic areas of Victorville and Adelanto as well as picking up strong Democratic territory in

Claremont. The table below shows the political composition of the components of the predecessor districts which make up Illustrative District 23.

Table 6 – District 23 component composition (Illustrative Plan)

Illust. Plan	CD 24	% of Dist. Pop	TOTAL GQA	TOTAL POP	GE24PRS TOT	GE24PRS D	GE24PRS R	GE24PRS O
23	23	core	74952	74753	35341	18142	16107	1091
		10%				51.3%	45.6%	3.1%
23	25		148738	148035	56392	25819	29183	1390
		20%				45.8%	51.8%	2.5%
23	33		301087	299885	91005	46860	41497	2648
		40%				51.5%	45.6%	2.9%
23	39		155716	154943	46047	26605	18195	1248
		20%				57.8%	39.5%	2.7%
23	41		79572	79351	41727	26024	14985	719
		10%				62.4%	35.9%	1.7%
23 Total			760065	756967	270512	143450	119967	7096
						53.0%	44.3%	2.6%

48. District 35 in San Bernardino County is slightly affected by the changes in this area, but it retains 88% of its core, remains politically similar, and keeps its footprint solidly in the southwest corner of San Bernardino County.

49. In order to maintain its Democratic balance, District 25 absorbs some strong Democratic territory in Palm Desert and Rancho Mirage from District 41, which allows it to then absorb some modestly Republican territory in San Bernardino County (though also containing submerged Democratic territory in Twenty-nine Palms and Barstow). District 25 also picks up a little orphaned part of predecessor District 23 in California City. While District 25 in the Illustrative Plan undergoes many changes, it retains 65% of its core and

the partisan performance remains the same as it was in the predecessor District 25. Below is the table showing the political performance of the Democratic districts in the area.

Table 7 – Change in Democratic performance: Dists -25, 28, 33, 35 & 39 (2024 Plan / Illustrative Plan)

Congressional Election 2024			2024 Enacted Plan				Illustrative Plan1			
Dist No.	Member 2025 / Party	PARTY	GE24PRS D	GE24PRS R	GE24PRS O	GE24 PRS TOT	GE24PRS D	GE24PRS R	GE24PRS O	GE24 PRS TOT
D25	Raul Ruiz (D)	(D)	125,421	119,223	5,865	250,509	133,531	124,339	6,062	263,932
	Win: 56.3% / Opp: 43.7%	13%	50.1%	47.6%	2.3%	1.6%	50.6%	47.1%	2.3%	
D28	Judy Chu (D)	(D)	204,304	115,216	11,014	330,534	176,777	142,541	9,983	329,301
	Win: 64.9% / Opp: 35.1%	30%	61.8%	34.9%	3.3%	2.1%	53.7%	43.3%	3.0%	
D33	Pete Aguilar (D)	(D)	129,030	107,789	7,084	243,904	137,037	118,901	7,512	263,450
	Win: 58.8% / Opp: 41.2%	18%	52.9%	44.2%	2.9%	1.5%	52.0%	45.1%	2.9%	
D35	Norma Torres (D)	(D)	130,933	105,906	7,170	244,010	135,745	113,564	7,579	256,888
	Win: 58.4% / Opp: 41.6%	17%	53.7%	43.4%	2.9%	1.5%	52.8%	44.2%	3.0%	
D39	Mark Takano (D)	(D)	125,941	103,092	7,257	236,291	127,408	113,405	8,029	248,842
	Win: 56.7% / Opp: 43.3%	13%	53.3%	43.6%	3.1%	1.5%	51.2%	45.6%	3.2%	

50. Similarly, the other Democrat-held districts in the area remain Democratic. District 28 does most of the work of absorbing Republican territory and the remaining districts hold their own, reducing partisan performance only slightly.

Riverside County to San Diego County

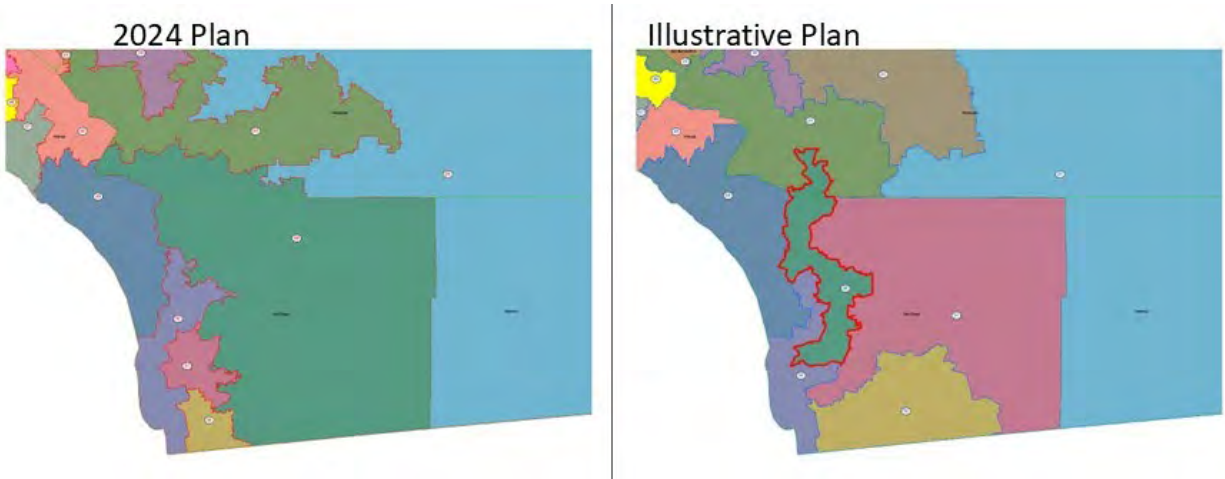
51. As discussed, Republican-held congressional District 48 in San Diego is one of the districts “flipped” from Republican to Democratic.

52. The current District 48, as it is drawn in the 2024 Plan, is in San Diego County consisting of suburban areas such as Glen Oaks and Harbison

Canyon and going north into Riverside County. Politically the seat is Republican, with only 41 percent for Kamala Harris and 56 percent for President Trump. The Illustrative Plan alters the configuration of District 48 to become more centered on Escondido. Illustrative District 48 discards Republican areas of Riverside County and Suburban San Diego County. On the presidential margin, it changes by nine points, going from 41.1% for Harris to 50.9% - it swings almost 10% in favor of the Democrats.

53. The illustrative map below shows the interplay of the redistricting moves in San Diego, Riverside and Orange counties.

Map 3 -San Diego comparison 2024 Plan / Illustrative Plan



54. District 48 in the 2024 Plan is already set in Riverside County, in the cities of Temecula and Murietta. In the Illustrative Plan, District 48 retains almost half of its core population, which is slightly Republican in performance, then it takes in Democratic areas in Vista, the balance of Escondido and parts

of the City of San Diego. The table below shows the political composition of the components of the predecessor districts which make up Illustrative District 48.

Table 8 – District 48 component composition (Illustrative Plan)

Illust. Plan	CD 24	% of Dist. Pop	TOTAL GQA	TOTAL POP	GE24PRS TOT	GE24PRS D	GE24PRS R	GE24PRS O
48	48	core	366139	365334	169636	77757	87339	4540
		48%				45.8%	51.5%	2.7%
48	49		111565	111202	44406	23303	19840	1263
		15%				52.5%	44.7%	2.8%
48	50		162766	162364	75255	41586	31355	2313
		21%				55.3%	41.7%	3.1%
48	51		119596	119397	53939	32211	20060	1668
		16%				59.7%	37.2%	3.1%
48 Total			760066	758297	343236	174857	158594	9784
						50.9%	46.2%	2.9%

55. In the newly configured District 48, much of the Republican territory in San Diego is split between the other Democratic districts in San Diego County, Districts 52, 51, 50, and to a lesser extent District 49, which goes up into San Clemente and Orange County and retains its partisan performance at +8 points for Kamala Harris. Below is the table showing the political performance of the Democratic districts in the area.

Table 9 – Change in Democratic performance: Dists -49, 50, 51& 52 (2024 Plan / Illustrative Plan)

Congressional Election 2024			2024 Enacted Plan				Illustrative Plan1			
Dist No.	Member 2025 / Party	PARTY	GE24PRS D	GE24PRS R	GE24PRS O	GE24 PRS TOT	GE24PRS D	GE24PRS R	GE24PRS O	GE24 PRS TOT
D49	Mike Levin (D)	(D)	202,070	172,117	10,896	385,083	213,135	179,726	11,667	404,528
	Win: 52.2% / Opp: 47.8%	4%	52.5%	44.7%	2.8%	2.4%	52.7%	44.4%	2.9%	
D50	Scott Peters (D)	(D)	234,783	124,822	12,430	372,035	225,861	126,143	12,012	364,016
	Win: 64.3% / Opp: 35.7%	29%	63.1%	33.6%	3.3%	2.4%	62.0%	34.7%	3.3%	
D51	Sara Jacobs (D)	(D)	204,034	124,420	10,360	338,814	186,827	134,275	9,696	330,798
	Win: 60.7% / Opp: 39.3%	21%	60.2%	36.7%	3.1%	2.1%	56.5%	40.6%	2.9%	
D52	Juan Vargas (D)	(D)	159,611	102,581	7,108	269,300	161,319	129,719	7,384	298,423
	Win: 66.3% / Opp: 33.7%	33%	59.3%	38.1%	2.6%	1.7%	54.1%	43.5%	2.5%	

56. As the district data confirms, the Illustrative Plan “flips” District 48 from Republican to Democratic with little impact on surrounding Democratic districts.

Orange County

57. Next, we move on to the final district “flipped” from Republican to Democrat in the Illustrative Plan, District 40. In the 2024 Plan, predecessor District 40, was a Republican district, voting 47.2% for Harris and 49.5% for Trump. In terms of core retention, District 40 in the Illustrative Plan is only 47% retained. It is substantially changed, moving south from its current location, taking in the Democratic-performing city of Irvine from District 47.

58. The table below shows the political composition of the components of the predecessor districts which make up Illustrative District 40.

Table 10 – District 40 component composition (Illustrative Plan)

Illust. Plan	CD 24	% of Dist. Pop	TOTAL GQA	TOTAL POP	GE24PRS TOT	GE24PRS D	GE24PRS R	GE24PRS O
40	40	core	359920	359479	183774	92338	85373	6063
		47%				50.2%	46.5%	3.3%
40	47		400147	399756	173631	91979	74471	7181
		53%				53.0%	42.9%	4.1%
40 Total			760067	759235	357405	184317	159844	13244
						51.6%	44.7%	3.7%

59. The table above shows that the portion of District 40 retained is Democratic already and the addition of stronger Democratic territory from District 47 accomplishes the goal of turning District 40 into a Democratic district overall. Illustrative District 40 is no longer a Republican district, going from a 2-point Republican advantage to a nearly 7-point Democratic advantage on the results for President 2024.

60. In the Illustrative Plan, District 41 is performing the double duty of consolidating Republican territory to help “flip” District 40 and shedding Democratic territory in the eastern portion of the predecessor district to District 23, which “flips” from Republican to Democratic. In the Illustrative Plan District 41 becomes much more Republican, going from 47.2% for Vice President Kamala Harris to 39.9%, a decrease in Democrat vote share by almost seven points.

61. Yorba Linda is a strong Republican city in Orange County, and it is removed from District 40 to be absorbed in District 41, rather than moved to a Democratic-held district in Orange County.

62. In order to accomplish the political reorganization, some Democratic-held seats are reduced in strength. The reduction in voting

strength still keeps the seats Democratic in performance. In the Illustrative Plan, District 46 retains its core in Anaheim, but donates the city of Santa Ana to neighboring District 47, which needs to replace the City of Irvine. In the Illustrative Plan District 46 still holds a five-point advantage to the Democrats for President at 50.9% for Harris to 45.9% for Trump.

Table 11 – Change in Democratic performance: Dists -45, 46, & 47 (2024 Plan / Illustrative Plan)

Congressional Election 2024			2024 Enacted Plan				Illustrative Plan1			
Dist No.	Member 2025 / Party	PARTY	GE24PRS D	GE24PRS R	GE24PRS O	GE24 PRS TOT	GE24PRS D	GE24PRS R	GE24PRS O	GE24 PRS TOT
D45	Derek Tran (D)	(D)	159,784	154,916	9,582	324,282	162,086	143,515	9,058	314,659
	Win: 50.1% / Opp: 49.9%	0%	49.3%	47.8%	3.0%	2.1%	51.5%	45.6%	2.9%	
D46	Lou Correa (D)	(D)	125,330	86,688	6,738	218,756	151,892	136,890	9,598	298,381
	Win: 63.4% / Opp: 36.6%	27%	57.3%	39.6%	3.1%	1.4%	50.9%	45.9%	3.2%	
D47	Dave Min (D)	(D)	182,350	167,272	12,698	362,320	148,506	136,925	8,610	294,040
	Win: 51.4% / Opp: 48.6%	3%	50.3%	46.2%	3.5%	2.3%	50.5%	46.6%	2.9%	

63. In Orange County, Democratic District 47 is already favoring Kamala Harris by almost four points, the Illustrative Plan keeps District 47 at essentially the same political performance, going from 50.3% for Harris to 50.5% for Harris.

64. District 38 in the Illustrative Plan is also slightly affected (less than 10% changed), losing La Habra (which is in Orange County) then making up this population loss by picking up Rosemead from District 28 and some of the city of Downey, which is already split with District 44.

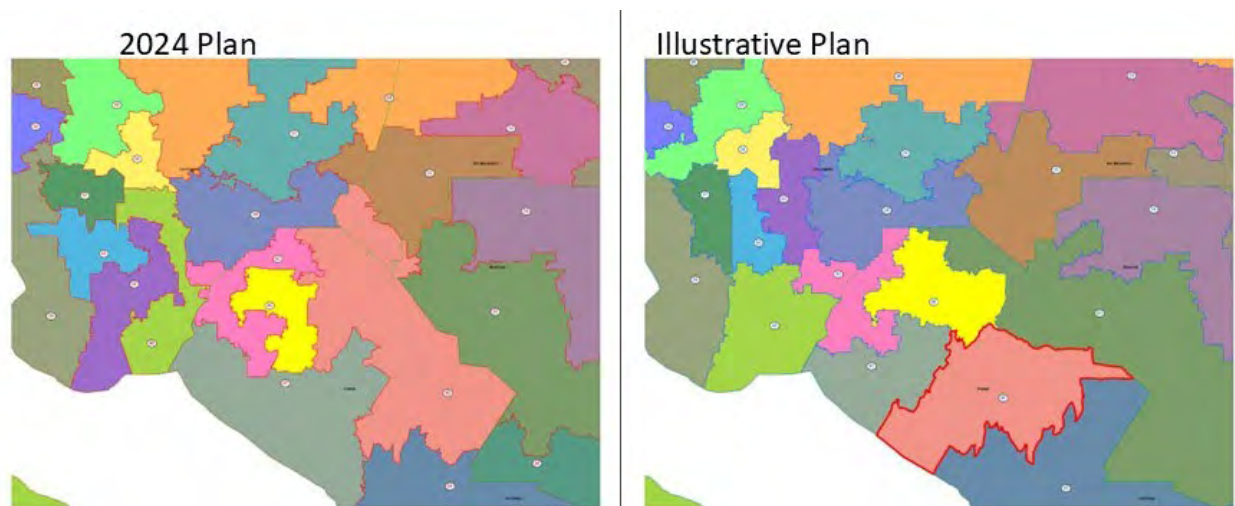
65. The current District 45 is a point and a half Democratic advantage already at 49.3% Harris versus 47.8% for Trump; and in the Illustrative Plan

District 45 increases the performance to 51.5% for Harris versus 45.6% for Trump.

66. As the district data confirms, the Illustrative Plan retains districts 45, 46 and 47 as Democratic seats. The Illustrative Plan “flips” District 40 from a Republican to a Democratic seat with little impact on surrounding Democratic districts.

The map below shows the changes in Orange County described above and the changes in Los Angeles County described below.

Map 4 -Orange County and Los Angeles County comparison 2024 Plan / Illustrative Plan



67. In the map above, the districts in Orange County and Los Angeles County in this area appear to be drawn in a more compact way than the 2024 Plan. In the Illustrative Plan District 45 does not form a “C” around District

46 as it appears to do in the 2024 Plan. In the Illustrative Plan, District 40 and District 46 appear more compact than in the 2024 Plan.

Closing the Loop in Los Angeles

68. The redistricting effort is closed out in Los Angeles County where the changes in Orange County and San Bernardino County, including District 28, meet and are resolved. District 45 from Orange County has unsplit Bellflower taken in more of Lakewood to round out its population.

69. District 42 unites the City of Long Beach in one district, taking in the neighboring city of Carson as well as Terminal Island in the City of Los Angeles, creating a compact district in this area. In both the Illustrative Plan and in the 2024 Plan, District 42 also includes the Channel Islands of Santa Catalina and San Clemente which are part of Los Angeles County.

70. District 36 makes the City of Torrance whole, takes in Lawndale and Alondra Park from District 43, then sheds Beverly Hills to District 30.

71. In the Illustrative Plan, District 43 moves north taking in parts of the City of Los Angeles, the entirety of City of Lynwood, and appears more compact than the predecessor District 43 in the 2024 Plan.

72. For District 37, the boundary in Los Angeles is essentially Western Ave, with District 37 to the east and District 43 to the west.

73. District 32 donates a little territory to District 30 (8% of a district), then makes up this loss by taking territory from District 29

74. District 29 makes up the population donated to District 32 by taking in population from District 30.

75. In the Illustrative Plan, District 30 remains anchored in Burbank and Glendale, taking in Beverly Hills as noted above, then shedding its northern extension into District 27.

76. In the Illustrative Plan, District 27 has moved east a little to take in Lake Los Angeles from District 28. The partisan performance for District 27 is similar to the 2024 Plan, with 50.5% for Harris in the 2024 Plan and 50.2% for Harris in the Illustrative Plan. District 27 still retains an advantage of 3.4% in the residential election results of 2024.

77. Despite all the population moves discussed above in the resolving the redistricting changes in the Los Angeles area, the partisan effects are not significant. The Democratic districts in this area tend to be strongly Democratic. Below is the table showing the political performance of the Democratic districts in the area.

Table 11 –Dem performance: Dists -27, 29, 30, 32, 34, 36, 37 & 42-44 (2024 Plan / Illustrative Plan)

Congressional Election 2024			2024 Enacted Plan				Illustrative Plan1			
Dist No.	Member 2025 / Party	PARTY	GE24PRS D	GE24PRS R	GE24PRS O	GE24 PRS TOT	GE24PRS D	GE24PRS R	GE24PRS O	GE24 PRS TOT
D27	George T. Whitesides (D) Win: 51.3% / Opp: 48.7%	(D) 3%	156,650 50.5%	144,526 46.6%	9,172 3.0%	310,348 2.0%	153,243 50.2%	142,958 46.8%	8,990 2.9%	305,191
D29	Luz Rivas (D) Win: 69.8% / Opp: 30.2%	(D) 40%	154,317 65.8%	72,748 31.0%	7,344 3.1%	234,409 1.5%	156,508 65.0%	76,862 31.9%	7,383 3.1%	240,753
D30	Laura Friedman (D) Win: 68.4% / Opp: 31.6%	(D) 37%	233,167 68.8%	94,058 27.8%	11,644 3.4%	338,869 2.1%	231,045 66.8%	104,639 30.2%	10,402 3.0%	346,086
D32	Brad Sherman (D) Win: 66.2% / Opp: 33.8%	(D) 32%	224,103 64.2%	114,757 32.9%	10,206 2.9%	349,066 2.2%	211,926 62.4%	117,410 34.6%	10,170 3.0%	339,506
D34	Jimmy Gomez (D) Win: 55.6% / Opp: 44.4%	(D) 11%	156,804 73.1%	48,141 22.4%	9,710 4.5%	214,655 1.4%	183,229 75.6%	48,308 19.9%	10,961 4.5%	242,498
D36	Ted Lieu (D) Win: 68.7% / Opp: 31.3%	(D) 37%	261,935 67.9%	111,117 28.8%	12,598 3.3%	385,651 2.4%	252,927 67.2%	110,456 29.4%	12,769 3.4%	376,153
D37	Sydney Kamlager-Dove (D) Win: 78.3% / Opp: 21.7%	(D) 57%	185,020 78.7%	42,999 18.3%	7,228 3.1%	235,247 1.5%	220,797 79.9%	46,999 17.0%	8,639 3.1%	276,434
D42	Robert Garcia (D) Win: 68.1% / Opp: 31.9%	(D) 36%	159,995 64.5%	79,531 32.1%	8,630 3.5%	248,156 1.6%	189,833 66.9%	84,710 29.8%	9,272 3.3%	283,814
D43	Maxine Waters (D) Win: 75.1% / Opp: 24.9%	(D) 50%	162,853 72.9%	53,458 23.9%	7,169 3.2%	223,480 1.4%	114,797 73.7%	36,064 23.1%	4,931 3.2%	155,792
D44	Nanette Barragán (D) Win: 71.4% / Opp: 28.6%	(D) 43%	164,109 65.3%	79,177 31.5%	7,919 3.2%	251,205 1.6%	140,011 65.5%	65,754 30.7%	8,125 3.8%	213,890

78. As discussed above, District 27 remains stable and similar in partisan performance in the Illustrative Plan when compared to the 2024 Plan. The remaining nine districts are Democratic by more than +25 points in results for President in 2024, ranging from +27 points in District 32 to +55 points in District 34.

79. In the Illustrative Plan, District 44 moves north and it appears more compact than the predecessor District 44 in the 2024 Plan. By releasing the southern portion of its predecessor district, District 44 in the Illustrative Plan moves north picking up East Los Angeles, then finally absorbing

Monterey Park and Alhambra from District 28, thus completing the loop started back in San Bernardino County with District 23.

80. Like both the 2024 Plan and the 2025, the Illustrative Plan makes efforts to respect city and town municipal boundaries. In drafting the Illustrative Plan, I made efforts to consider where to split and how to split cities and towns. Because racial data was not utilized in the drafting of the Illustrative Plan, cities and towns were not split for racial reasons in the districts that were changed in the Illustrative Plan.

81. Utilizing data from the Census, there are 482 incorporated cities and towns in California. Some cities are very large such as Los Angeles at almost 3.9 million people (2020), and some are much smaller such as Weed City at just over 2,800 people.

82. Using this metric, the Illustrative Plan keeps 428 incorporated cities and towns together, splitting 45 involving population and splitting 9 involving no population.

83. By comparison, the 2024 Plan keeps 422 incorporated cities and towns together, splitting 56 involving population and splitting 4 involving no population. The 2025 Prop-50 Plan keeps 401 incorporated cities and towns together, splitting 55 involving population and splitting 26 involving no population.

84. I ran compactness tests on the districts in the Illustrative Plan as well as the 2024 Plan and the Proposition-50 2025 Plan. The results for each district for the compactness tests for the Illustrative Plan and the other plans are found in Exhibits 6, 7 and 8 at the end of the report.

85. Generally speaking, compactness tests usually compare an aspect of the district, such as its area, to an idealized shape, such as a circle. In my experience, both the Reock compactness test and the Polsby-Popper compactness test are often used in discussions of compactness, so I will discuss those metrics here.

86. Below are definitions from the Maptitude for Redistricting Users Guide:

87. “The Reock test is an area-based measure that compares each district to a circle, which is considered to be the most compact shape possible. For each district, the Reock test computes the ratio of the area of the district to the area of the minimum enclosing circle for the district. The measure is always between 0 and 1, with 1 being the most compact.”

88. “The Polsby-Popper test computes the ratio of the district area to the area of a circle with the same perimeter: $4\pi\text{Area}/(\text{Perimeter}^2)$. The measure is always between 0 and 1, with 1 being the most compact.”

89. For the Illustrative Plan, the Reock compactness scores range from ratio of .54 on the high end to a ratio of .12 on the low end. The three lowest

compactness scores for the Reock compactness test in the Illustrative Plan are: District 11 (.12), District 42 (.14) and District 19 (.15).

90. For the Illustrative Plan, the Polsby-Popper compactness scores range from ratio of .47 on the high end to a ratio of .08 on the low end. The three lowest compactness scores for the Polsby compactness test in the Illustrative Plan are: District 48 (.08), District 19 (.10) and District 20 (.10).

91. The compactness scores for the 2024 Plan and the Proposition-50 2025 Plan are discussed below.

92. For the 2024 Plan, the Reock compactness scores range from ratio of .60 on the high end to a ratio of .11 on the low end. The three lowest compactness scores for the Reock compactness test in the 2024 Plan are: District 42 (.11), District 11 (.12) and District 3 (.14).

93. For the 2024 Plan, the Polsby-Popper compactness scores range from ratio of .47 on the high end to a ratio of .06 on the low end. The three lowest compactness scores for the Polsby compactness test in the Illustrative Plan are: District 41 (.06), District 45 (.08) and District 19 (.10).

94. For the Proposition-50 2025 Plan, the Reock compactness scores range from ratio of .52 on the high end to a ratio of .12 on the low end. The three lowest compactness scores for the Reock compactness test in the

Proposition-50 2025 Plan are: District 11 (.12), District 19 (.15) and District 42 (.16).

95. For the Proposition-50 2025 Plan, the Polsby-Popper compactness scores range from a ratio of .48 on the high end to a ratio of .08 on the low end. The three lowest compactness scores for the Polsby compactness test in the Proposition-50 2025 Plan are: District 38 (.08), District 9 (.09) and District 19 (.10).

96. By comparison, the compactness scores for the Illustrative Plan fall within a similar range to the 2024 Plan and the Proposition-50 2025 Plan.

97. To review, the Illustrative Plan “flips” five Republican districts to become Democratic districts. The Illustrative Plan was drawn race-blind, without using race in the drawing of the plan. The Illustrative Plan has split cities in keeping with both the both the 2024 Enacted plan and the Propostion-50 2025 Plan. The Illustrative Plan has compactness scores in keeping with both the 2024 Enacted plan and the Propostion-50 2025 Plan.

98. Now that the traditional redistricting principles applied to the drawing of the Illustrative Plan, including population equality, contiguity, respect for civic boundaries, such as cities and towns, and compactness as well as political considerations have been discussed, the racial data can be added to the analysis.

Unboxing the racial data

99. After the racially blind Illustrative Plan was drawn, I appended the racial data to the plan to produce data tables similar to my previous report and to allow for comparisons to other plans. The data tables produced have a variety of racial data based on the GQA population, the voting-age population and the citizen voting-age population (CVAP).

100. The data tables indicate that the Illustrative plan did not produce any majority-Asian CVAP districts or any majority-Black CVAP districts. Eleven districts in the Illustrative plan are majority-Hispanic CVAP districts.

101. By comparison, the 2024 Plan and the Proposition-50 2025 Plan each have 16 majority-Hispanic CVAP districts.

102. The table following shows the districts in the Illustrative Plan sorted by Hispanic CVAP with the corresponding district number and data for the 2024 Plan.

Table 12 – Illustrative Districts sorted by Hispanic CVAP

2025 Illustrative Plan 1					2024 Enacted Plan				
District No.	ACS23 5 yr CVAP - NH Asian Alone	ACS23 5 yr CVAP - NH Black Alone	ACS23 5 yr CVAP - Hispanic	ACS23 5 yr CVAP - White	District No.	ACS23 5 yr CVAP - NH Asian Alone	ACS23 5 yr CVAP - NH Black Alone	ACS23 5 yr CVAP - Hispanic	ACS23 5 yr CVAP - White
44	16.0%	2.8%	71.9%	7.9%	44	13.0%	13.4%	52.7%	17.7%
43	3.8%	24.4%	64.8%	5.3%	43	9.5%	30.8%	46.6%	10.2%
22	4.1%	5.8%	63.6%	24.2%	22	4.1%	5.8%	63.6%	24.2%
35	12.4%	6.8%	56.4%	21.7%	35	11.2%	7.8%	58.4%	20.0%
21	9.4%	5.5%	56.0%	26.6%	21	9.4%	5.5%	56.0%	26.6%
31	20.2%	3.4%	55.3%	19.0%	31	20.3%	3.4%	55.3%	19.0%
38	25.1%	2.2%	54.6%	16.2%	38	21.2%	2.3%	56.5%	18.1%
13	7.0%	3.9%	53.7%	32.1%	13	7.0%	3.9%	53.7%	32.1%
39	9.0%	8.1%	52.6%	27.7%	39	6.5%	10.7%	54.3%	25.9%
18	13.4%	2.9%	52.4%	28.5%	18	13.4%	2.9%	52.4%	28.5%
29	8.7%	5.3%	51.9%	31.6%	29	9.1%	5.4%	55.3%	27.7%
33	7.4%	13.2%	49.3%	27.1%	33	6.6%	11.8%	55.8%	23.0%
25	2.4%	4.4%	48.4%	41.7%	25	3.0%	5.3%	56.5%	32.5%
52	13.4%	7.6%	48.0%	27.4%	52	15.6%	9.0%	52.0%	19.7%
23	6.0%	10.4%	46.4%	34.1%	23	4.1%	8.5%	36.1%	47.3%
34	20.1%	7.1%	41.6%	27.9%	34	19.2%	6.4%	54.8%	16.9%
42	14.6%	13.8%	38.0%	29.6%	42	8.6%	7.7%	55.1%	26.0%
27	8.5%	11.2%	37.6%	39.9%	27	9.2%	11.1%	37.0%	39.8%
47	18.2%	1.3%	37.4%	40.0%	47	19.7%	1.8%	14.7%	59.4%
37	7.6%	38.3%	35.5%	14.9%	37	6.9%	31.7%	39.9%	18.4%
46	19.4%	2.2%	35.1%	40.2%	46	19.3%	2.2%	54.0%	22.3%
26	7.8%	2.2%	34.2%	52.4%	26	7.8%	2.2%	34.2%	52.5%
9	15.9%	8.2%	33.3%	38.3%	9	15.9%	8.2%	33.3%	38.3%
41	8.5%	6.3%	33.0%	48.6%	41	7.4%	5.7%	33.4%	50.3%
45	32.0%	4.4%	30.7%	29.9%	45	37.5%	2.3%	24.6%	32.4%
20	6.8%	3.6%	28.9%	57.0%	20	6.8%	3.6%	28.9%	57.0%
24	4.5%	1.9%	28.1%	62.1%	24	4.5%	1.9%	28.1%	62.1%
28	19.0%	5.5%	27.9%	44.3%	28	34.6%	4.6%	24.7%	33.3%
51	6.9%	6.9%	26.2%	55.6%	51	14.7%	6.2%	21.5%	52.9%
8	18.6%	17.0%	26.1%	32.6%	8	18.6%	17.0%	26.1%	32.6%
48	13.1%	3.4%	25.4%	53.7%	48	6.6%	3.2%	23.9%	61.9%
32	12.1%	4.7%	24.2%	55.3%	32	11.3%	4.9%	20.9%	59.2%
4	9.3%	3.4%	23.6%	59.2%	4	7.4%	3.2%	23.4%	61.7%
5	4.3%	2.3%	21.4%	67.7%	5	4.9%	2.4%	21.2%	67.6%
15	37.1%	3.2%	20.6%	35.3%	15	37.1%	3.2%	20.6%	35.3%
14	34.1%	6.7%	20.6%	33.7%	14	34.1%	6.7%	20.6%	33.7%
1	3.4%	1.8%	19.3%	70.9%	1	4.8%	2.1%	16.9%	71.2%
19	17.0%	2.2%	19.0%	57.7%	19	17.0%	2.3%	19.0%	57.7%
36	17.7%	4.4%	18.5%	54.8%	36	16.2%	4.2%	14.6%	60.4%
6	10.4%	7.1%	18.4%	58.8%	6	10.6%	9.9%	18.4%	55.1%
49	7.5%	2.5%	18.2%	68.0%	49	6.7%	2.8%	21.6%	64.9%
7	20.7%	9.8%	17.3%	46.2%	7	21.5%	11.1%	22.3%	38.7%
50	14.5%	3.3%	17.2%	60.3%	50	11.5%	3.2%	18.4%	62.6%
12	20.3%	17.3%	16.4%	40.5%	12	20.3%	17.3%	16.4%	40.5%
3	7.2%	5.7%	16.3%	66.1%	3	6.0%	1.8%	11.7%	76.4%
17	48.0%	2.7%	15.8%	29.8%	17	48.0%	2.7%	15.8%	29.8%
40	23.2%	1.9%	15.2%	55.6%	40	18.3%	1.9%	20.4%	56.1%
16	26.9%	2.3%	15.2%	51.8%	16	27.0%	2.4%	15.2%	51.8%
30	12.1%	4.5%	15.1%	64.4%	30	11.8%	4.6%	19.9%	59.9%
10	18.7%	5.6%	14.7%	56.4%	10	18.7%	5.6%	14.7%	56.4%
11	31.0%	5.6%	11.5%	47.1%	11	31.0%	5.6%	11.5%	47.1%
2	3.5%	1.6%	10.5%	78.7%	2	3.8%	1.7%	13.3%	75.9%

103. Examining the table of Hispanic-majority CVAP districts in the Illustrative Plan shows that some of the districts have similar racial compositions before and after the redistricting changes.

104. Not surprisingly, the districts closest to having the same percentages of Hispanic CVAP population were the districts which were changed very little. That is because four of the districts in the Illustrative Plan were exactly the same as the 2024 Plan (Districts 13, 18, 21, 22) and District 31 was 99.8% the same territory.

105. Setting aside the five exact or near-exact districts, two majority-Hispanic CVAP districts saw their Hispanic CVAP percentages go up substantially (District 43 and 44), and in four districts the Hispanic CVAP percentages went down (Districts 29, 35, 38 and 39) as compared to the 2024 Plan districts.

106. As described in the methodology in this report, race was not used drafting the Illustrative Plan and the districts were not racially engineered. The distribution of the Hispanic CVAP percentages of the majority-Hispanic CVAP districts does not show a pattern of the use of a racial threshold.

107. The use of political data and not racial data allowed for the drawing of five additional Democratic seats, changing five districts from a Republican majority for President 2024 to a Democratic majority for President 2024.

Conclusion

108. My analysis demonstrates that it is possible to draw a race-blind California congressional redistricting plan which changes five Republican seats to five Democratic seats, without using race in the drawing of the plan. The Illustrative Plan changed five Republican-held congressional districts, each of which was won by President Trump to become five Democratic districts each of which was won by Vice President Harris in the 2024 presidential election.

109. The political change in those five districts is meaningful, making these five formerly Republican districts into five Democratic districts. The political changes to the five “flipped” Republican districts in the Illustrative Plan are in line with the political changes employed in the “flipped” Republican districts in the 2025 Proposition-50 Plan.

110. The Illustrative Plan did not use race in the drawing of the plan. After the Illustrative Plan was drafted, racial data was appended to the plan for analysis purposes. The appended racial data regarding Hispanic-majority CVAP districts was discussed in this report and the appended racial data is included in full in the exhibit appendices to the report.

111. As discussed in my previous report about the Proposition-50 2025 California congressional redistricting plan, racial intent was evident in the

construction of Proposition-50 2025 California congressional redistricting plan and race was used throughout the plan in the drawing of the lines. The deliberate use of racial thresholds and component swaps revealed a layer of design focused on managing racial representation and influence. Those and other factors detailed in my previous report led me to the opinion in that report that race was a motivating factor in the drawing of the Proposition-50 2025 Congressional Plan.

112. As the drafting of the Illustrative map and the analysis in this report demonstrates, the partisan goal of eliminating five Republican congressional seats could have been accomplished without using race.

A handwritten signature in black ink, appearing to be "M. E. [unclear]", followed by a long horizontal line.