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11
12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
14 WESTERN DIVISION

15 **DAVID TANGIPA, *et al.*,**

16 Plaintiffs,

17 and

18 **UNITED STATES OF AMERICA,**

19 Plaintiff-Intervenor

20 v.

21 **GAVIN NEWSOM, in his official**
22 **capacity as the Governor of California,**
***et al.*,**

23 Defendants,

24 and

25 **DEMOCRATIC CONGRESSIONAL**
26 **CAMPAIGN COMMITTEE, *et al.*,**

27 Defendant-Intervenors.
28

2:25-cv-10616-JLS-WLH-KKL
Three-Judge Court

VOLUME 3 OF 15

EXHIBITS 2 -39

**TO THE DECLARATION OF
RYAN EASON IN SUPPORT OF
DEFENDANTS' OPPOSITION
TO PLAINTIFFS' AND
PLAINTIFF-INTERVENOR'S
MOTIONS FOR PRELIMINARY
INJUNCTION**

EXHIBIT 2

TO DECLARATION OF RYAN EASON

 **David Tangipa** 
@DavidTangipa

 **BREAKING:** The DOJ has joined our lawsuit against Gov. Newsom!

We promised to fight this partisan gerrymandering every step of the way and now the DOJ is standing with us to stop this power grab.



From kcra.com

12:07 PM · Nov 13, 2025 · **26.6K** Views

 37  99  529  9 


 **Read 37 replies**

EXHIBIT 3

TO DECLARATION OF RYAN EASON

About the Hispanic Population and its Origin

NOTE: On March 28, 2024, the U.S. Office of Management and Budget (OMB) published the results of its review of Statistical Policy Directive No. 15 (SPD 15) and issued updated standards for maintaining, collecting, and presenting race/ethnicity data across federal agencies. The Census Bureau is working to implement the updates in all its programs as expeditiously as possible. The information on this page references the 1997 SPD 15.



[View more information about the 2024 SPD 15](#)

About Hispanic Origin

The U.S. Office of Management and Budget (OMB) requires federal agencies to use a minimum of two ethnicities in collecting and reporting data: Hispanic or Latino and Not Hispanic or Latino. OMB defines "Hispanic or Latino" as a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race.

People who identify with the terms "Hispanic" or "Latino" are those who classify themselves in one of the specific Hispanic or Latino categories listed on the decennial census questionnaire and various Census Bureau

survey questionnaires – “Mexican, Mexican Am., Chicano” or “Puerto Rican” or “Cuban” – as well as those who indicate that they are “another Hispanic, Latino, or Spanish origin.”

The 2010 Census question on Hispanic origin included five separate response categories and one area where respondents could write in a specific Hispanic origin group. The first response category was intended for respondents who do not identify as Hispanic. The remaining response categories (“Mexican, Mexican Am., Chicano”; “Puerto Rican”; “Cuban”; and “another Hispanic, Latino, or Spanish origin”) and write-in answers can be combined to create the OMB category of Hispanic.

Products by Hispanic Origin and Race

U.S. federal government agencies must adhere to standards issued by the Office of Management and Budget (OMB)

[https://obamawhitehouse.archives.gov/omb/fedreg_1997standards/]

, which specify that race and Hispanic origin (also known as ethnicity) are two separate and distinct concepts. These standards generally reflect a social definition of race and ethnicity recognized in this country, and they do not conform to any biological, anthropological, or genetic criteria. The standards include two minimum categories for data on ethnicity: “Hispanic or Latino” and “Not Hispanic or Latino.” Persons who report themselves as Hispanic can be of any race and are identified as such in our data tables.

The following sources provide population data on Hispanic origin and race:

- Population estimates by age, sex, race, and Hispanic origin are produced annually for the nation, states, and counties. Historical data are also provided in the Archive Files. Population projections out to 2060 are provided by race and Hispanic origin for the nation.
- The Current Population Survey (CPS) provides national-level data on the social, economic, and demographic characteristics of selected race groups, both current and past. Tables on the Hispanic population in the United States are also available, both current and past.
- The American Community Survey (ACS) provides sample data from the 1-year, 3-year, and 5-year estimates based on population size. Selected Population Profiles

[<https://factfinder.census.gov/>]

enable you to select characteristics by Race or Ethnic Groups (Mexican, Puerto Rican, Cuban, etc.) and by Country of Birth.

- The 2010 Census brief Overview of Race and Hispanic Origin describes these concepts and also provides information on how the race categories used in the 2010 Census were defined.

Data on Hispanic Subgroups Other Than Mexican, Puerto Rican, and Cuban

The American Community Survey (ACS) has data on these groups. In the survey questionnaire, the Hispanic-origin question obtained write-in responses of Hispanic subgroups other than the major groups of Mexican, Cuban, and Puerto Ricans. Persons with other Hispanic origins (e.g., Salvadoran, Nicaraguan, Argentinean) were able to write in their specific origin group. The Census Bureau's code list contains over 30 Hispanic or Latino subgroups.

The 2010 Census, Summary File 2

[<https://www2.census.gov/programs-surveys/decennial/2010/technical-documentation/complete-tech-docs/summary-file/sf2.pdf>]

[PDF - 4.5 MB] allows users to access any table in the files for a particular Hispanic subgroup, provided the group meets certain population criteria for the geographic area under consideration. At present, census data provide information on geographic areas smaller than those reported in the ACS.

Race and Ethnicity Research

The Census Bureau has a long history of conducting research to improve questions and data on race and ethnicity. Since the 1970s, the Census Bureau has conducted content tests to research and improve the design and function of different questions, including questions on race and ethnicity.

For the latest information on Race and Ethnicity Research visit:

Contact Us

For assistance, please contact the Census Call Center at 1-800-923-8282 (toll free) or visit ask.census.gov [<https://ask.census.gov/>] for further information.

Related Information

Research to Improve Data on Race and Ethnicity

Page Last Revised - December 20, 2024

EXHIBIT 4

TO DECLARATION OF RYAN EASON

No. 25A608

In the Supreme Court of the United States

GREG ABBOTT, GOVERNOR OF TEXAS, ET AL., APPLICANTS

v.

LEAGUE OF UNITED LATIN AMERICAN CITIZENS, ET AL.

**BRIEF FOR THE UNITED STATES AS AMICUS CURIAE
IN SUPPORT OF APPLICANTS**

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INTEREST OF THE UNITED STATES

The Solicitor General, on behalf of the United States, respectfully submits this brief as amicus curiae in support of the application for a stay of the November 18, 2025, order issued by the United States District Court for the Western District of Texas. The district court preliminarily enjoined Texas officials from using a congressional map adopted by the Texas legislature for the 2026 election cycle, on the ground that certain districts likely constitute unconstitutional racial gerrymanders. The United States has a strong interest in protecting citizens from race discrimination in voting, and it has an equally strong interest in ensuring that federal courts do not erroneously interfere with federal elections and usurp the constitutional primacy of States in the drawing of congressional districts. The United States also has a particular interest in this case in correcting the district court's misinterpretation and misuse of a letter sent to the Texas Governor and Attorney General by a senior official in the United States Department of Justice (DOJ).

INTRODUCTION AND SUMMARY OF ARGUMENT

“The Constitution entrusts state legislatures with the primary responsibility for drawing congressional districts, and redistricting is an inescapably political enterprise.” *Alexander v. South Carolina State Conference of the NAACP*, 602 U.S. 1, 6 (2024). This case involves an openly avowed partisan gerrymander: earlier this summer, the Texas legislature enacted a new congressional map for the express purpose of “improv[ing] Republican political performance” (in the words of the bill’s sponsor), Op. 77 n.274, by creating “five districts that Republicans could gain that [they] did not currently hold” (in the words of the Republican operative who drew the map), Op. 93 n.334. Objections to such partisan gerrymandering are not justiciable in federal court. *Rucho v. Common Cause*, 588 U.S. 684, 718 (2019).

Respondents challenged the Texas redistricting as an unconstitutional racial gerrymander. Because “federal-court review of districting legislation represents a serious intrusion on the most vital of local functions,” and “a legislature’s redistricting calculus” involves a “complex interplay of forces,” this Court has held that plaintiffs bringing a racial-gerrymander claim have the heavy burden “to show that race was the predominant factor motivating the legislature’s decision to place a significant number of voters within or without a particular district.” *Alexander*, 602 U.S. at 7 (brackets and quotation marks omitted). Respondents thus had to “prove that the State ‘subordinated’ race-neutral districting criteria,” such that race “was the criterion that, in the State’s view, could not be compromised” when the district lines were drawn. *Ibid.*

Critically, because “race and partisan preference are highly correlated” in parts of Texas, respondents “must disentangle race and politics” to refute the State’s partisan-gerrymandering defense. *Alexander*, 602 U.S. at 6. In *Alexander*, this Court

set forth two related principles governing the inquiry. First, in determining whether plaintiffs have shown that race predominated in the redistricting process, courts must “start with a presumption that the legislature acted in good faith.” *Ibid.* Courts must “draw the inference that cuts in the legislature’s favor when confronted with evidence that could plausibly support multiple conclusions.” *Id.* at 10. Second, to overcome that presumption, plaintiffs generally must produce “an alternative map showing that a rational legislature sincerely driven by its professed partisan goals [c]ould have drawn a different map” that achieved those goals without the challenged racial demographics. *Ibid.* Courts “should draw an adverse inference from a plaintiff’s failure to submit” such a map since one would not be “difficult to produce” if the State in fact had relied on race rather than party, and that adverse inference is effectively “dispositive” absent “direct evidence or some extraordinarily powerful circumstantial evidence” that race predominated in the drawing of district lines. *Id.* at 35. Those principles apply with particular force here, where there is overwhelming evidence—both direct and circumstantial—of partisan objectives, and any inference that the State inexplicably chose to use racial means is implausible.

Yet the district court violated both of those principles. As Judge Jerry Smith emphasized in his dissent, the judges in the majority “flout[ed] *Alexander*’s presumption of good faith,” Dissent 47, and “ma[de] excuses for plaintiffs * * * for failing to produce an *Alexander* [alternative] map,” Dissent 17. Despite extensive testimony from the mapmaker and the chairs of the legislative redistricting committees that they did not consider race when drawing and adopting the 2025 congressional map on partisan grounds, the district court concluded that race predominated in the creation of certain districts, relying on an uncharitable view of that testimony and tenuous inferences from other, extrinsic evidence. In particular, the court first miscon-

strued a letter from DOJ as having demanded that Texas redraw its map in order to racially gerrymander certain districts, even though the letter denounced racial gerrymandering and asked Texas to rectify alleged racial gerrymanders in the prior map. The court then proceeded to treat any mention of DOJ by a state official as compelling evidence of racial predominance, even though none of those officials said that they needed to engage in *race-based* redistricting to address DOJ's concerns. The court compounded those errors by holding that, in light of the DOJ letter and the creation of certain districts where racial minorities are a numerical majority, respondents had produced sufficient direct evidence of racial predominance to overcome their failure to produce an alternative map, notwithstanding that everything the court cited was, at best, weak circumstantial evidence. And the court further held that an alternative map is unnecessary at the preliminary-injunction stage, notwithstanding that respondents had ample time to produce one and that the adverse inference from their failure to do so precludes them from establishing any likelihood of success.

In sum, respondents “seek to transform federal courts into weapons of political warfare that will deliver victories that eluded them in the political arena,” *Alexander*, 602 U.S. at 11 (quotation marks omitted), and the district court erroneously allowed them to do so by “repackag[ing] a partisan-gerrymandering claim as a racial-gerrymandering claim [and] exploiting the tight link between race and political preference,” *id.* at 21. Because the district court's legal errors under *Alexander* are clear, and the harm to Texas from enjoining the use of its congressional map is irreparable and substantial, this Court should stay the district court's order.

ARGUMENT

A stay of a preliminary injunction pending appeal is warranted where the applicant establishes a reasonable probability that the Court will note probable jurisdiction, a fair prospect of success on the merits, and a likelihood of irreparable harm. *Indiana State Police Pension Trust v. Chrysler LLC*, 556 U.S. 960, 960 (2009) (per curiam). In “close cases,” the Court will also balance the equities and weigh the relative harms. *Hollingsworth v. Perry*, 558 U.S. 183, 190 (2010) (per curiam).

This is not a close case. “Any time a State is enjoined by a court from effectuating statutes enacted by representatives of its people, it suffers a form of irreparable injury.” *Maryland v. King*, 567 U.S. 1301, 1304 (2012) (Roberts, C.J., in chambers) (brackets omitted). That irreparable injury is especially significant here because enjoining use of the State’s congressional map “represents a serious intrusion on the most vital of local functions.” *Alexander v. South Carolina State Conference of the NAACP*, 602 U.S. 1, 7 (2024). Texas is also highly likely to succeed on the merits. While that is true for many reasons, the United States focuses in this amicus brief on respondents’ failure to offer an “alternative map” under *Alexander*. *Id.* at 35. That failure is “dispositive” here, *ibid.*, because it means that respondents in turn failed to disentangle race from party, overcome the presumption that the Texas legislature enacted the 2025 congressional map in good faith, or demonstrate that race predominated in the drawing of district lines, see *id.* at 10. Where, as in *Alexander* and this case, a “trial court bases its findings upon a mistaken impression of applicable legal principles”—such as whether an alternative map is unnecessary and how the presumption of legislative good faith operates—“the reviewing court is not bound by the clearly erroneous standard.” *Id.* at 18.

Indeed, the record here affirmatively shows that the 2025 map was drawn in a race-blind manner. The mapmaker, Adam Kincaid, “testified unequivocally that he drew the 2025 Map completely blind to race” and based “entirely on partisan, political, and other race-neutral criteria.” Op. 91-92; see *id.* at 92-95 (listing criteria). His testimony, provided “totally without notes,” offered a “district by district—sometimes line by line—expla[nation]” of “his decisions at every step of the mapdrawing process,” which the district court acknowledged “was compelling.” Op. 95-96 & n.349. Likewise, the chair of the state House redistricting committee (Cody Vasut), the chair of the state Senate redistricting committee (Phil King), and the state representative who introduced the redistricting bill (Todd Hunter) all repeatedly insisted that the map was “primarily driven by non-racial partisan motivations.” Op. 77; see Op. 80, 89. Given the extensive record evidence that race did not predominate in the drawing of the 2025 map—to say nothing of the presumption of good faith—respondents were required under *Alexander*, at a bare minimum, to provide an alternative map that would satisfy the State’s partisan goal of adding five Republican seats but that would not have the racial demographics challenged by respondents.

Yet the district court relieved respondents of that burden for two reasons, both of which lack merit. Op. 130-134. First, the court held that an alternative map was unnecessary because respondents had sufficient direct evidence of racial predomination. Op. 132. But, as in *Alexander*, respondents offered at most weak circumstantial evidence that cannot overcome the presumption of legislative good faith absent an alternative map. Second, the court held that an alternative map is unnecessary at the preliminary-injunction stage. Op. 132-134. But precisely because it is so easy and quick for experts to create alternative maps—as *Alexander* recognized and the record in this case confirms—respondents’ failure to offer one at the preliminary-in-

junction stage warrants an equally fatal adverse inference as to their likelihood of success on the merits.

A. When A State Raises A Partisan-Gerrymandering Defense To A Racial-Gerrymandering Claim, An Alternative Map Generally Is Required To Disentangle Race From Party And To Overcome The Presumption Of Legislative Good Faith

This Court has “repeatedly emphasized that federal courts must ‘exercise extraordinary caution in adjudicating claims that a State has drawn district lines on the basis of race.’” *Alexander*, 602 U.S. at 7 (citation omitted). “Such caution is necessary because federal-court review of districting legislation represents a serious intrusion on the most vital of local functions,” as “[r]edistricting constitutes a traditional domain of state legislative authority.” *Ibid.* (brackets and quotation marks omitted). Accordingly, federal courts addressing racial-gerrymandering claims must apply a “starting presumption that the [state] legislature acted in good faith.” *Id.* at 10. That presumption “reflects the Federal Judiciary’s due respect for the judgment of state legislators,” avoids “declaring that the legislature engaged in offensive and demeaning conduct,” and prevents “transform[ing] federal courts into weapons of political warfare that will deliver victories [to plaintiffs] that eluded them in the political arena.” *Id.* at 11 (quotation marks omitted).

To overcome the presumption of legislative good faith, plaintiffs bringing racial-gerrymandering claims must “untangle race from other permissible considerations” by showing that race was the “predominant factor motivating the legislature’s decision to place a significant number of voters within or without a particular district.” *Alexander*, 602 U.S. at 7. A plaintiff can make that showing “through some combination of direct and circumstantial evidence.” *Id.* at 8. “Direct evidence” is akin to “a relevant state actor’s express acknowledgment that race played a [predominant]

role in the drawing of district lines,” which can be revealed through discovery or even conceded by the State. *Ibid.* “Such concessions are not uncommon because States often admit to considering race for the purpose of satisfying” the perceived mandate of Section 2 of the Voting Rights Act of 1965 (VRA), Pub. L. No. 89-110, 79 Stat. 437 (52 U.S.C. 10301). *Alexander*, 602 U.S. at 8; see, e.g., U.S. Supp. Br. at 7-8, *Louisiana v. Callais*, No. 24-109 (Sept. 24, 2025).

“Proving racial predominance with circumstantial evidence alone is much more difficult,” and “especially difficult when,” as here, “the State raises a partisan-gerrymandering defense.” *Alexander*, 602 U.S. at 8-9. Because of the “high correlation between race and partisan preference,” a “map that has been gerrymandered to achieve a partisan end can look very similar to a racially gerrymandered map.” *Id.* at 9. While the State cannot use voters’ “race as a proxy” for their partisan affiliation, *id.* at 7 n.1, the State may place voters in a district based on political data “even if it so happens that [those voters] happen to be [a particular race] and even if the State were *conscious* of that fact,” *id.* at 9. Accordingly, “disentangl[ing] race from politics” requires a plaintiff to prove that race “*drove* a district’s lines” and to “rul[e] out the competing explanation that political considerations dominated the legislature’s redistricting efforts.” *Id.* at 9-10. “If either race or politics *could* explain a district’s contours,” a federal court must accept the latter explanation, because the “presumption of legislative good faith directs district courts to draw the inference that cuts in the [state] legislature’s favor when confronted with evidence that could plausibly support multiple conclusions.” *Id.* at 10 (emphasis added).

Alexander thus recognized that a plaintiff generally cannot overcome the presumption of legislative good faith without providing “an alternative map showing that a rational legislature sincerely driven by its professed partisan goals [c]ould have

drawn a different map” that achieved those goals without the challenged racial demographics. 602 U.S. at 10. Such a map “can perform the critical task of distinguishing between racial and political motivations.” *Id.* at 34. And such maps are not “difficult to produce” because “[a]ny expert armed with a computer can easily churn out redistricting maps that control for any number of specified criteria.” *Id.* at 35 (quotation marks omitted). Indeed, “[a] plaintiff’s failure to submit an alternative map—precisely because it can be designed with ease—should be interpreted by district courts as an implicit concession that the plaintiff cannot draw a map that undermines the legislature’s [partisan-gerrymandering] defense.” *Ibid.*

Accordingly, district courts should “draw an adverse inference from a plaintiff’s failure to submit” an alternative map satisfying the State’s partisan goals without the challenged racial demographics. *Alexander*, 602 U.S. at 35. And that adverse inference “may be dispositive in many, if not most, cases where the plaintiff lacks direct evidence or some extraordinarily powerful circumstantial evidence” that race predominated in the drawing of district lines. *Ibid.* Such a map is not required when the relevant state actors expressly “announced” and “admitted” that they “purposefully established a racial target” in drawing district boundaries and “subordinated other districting criteria” to that target. *Cooper v. Harris*, 581 U.S. 285, 299-300, 322 (2017). But absent such “direct evidence,” “‘only an alternative map of that kind’ can ‘carry the day.’” *Alexander*, 602 U.S. at 34-35 (quoting *Cooper*, 581 U.S. at 322) (emphasis added; brackets omitted). Respondents produced no such map here. Op. 132.

B. Respondents Produced No Direct Evidence Of Racial Predominance That Could Remove Their Burden To Provide An Alternative Map

The district court erroneously held that respondents did not need to provide an alternative map because the court believed that they “ha[d] produced substantial di-

rect evidence indicating that race was the predominant driver in the 2025 redistricting process.” Op. 132. The court relied on four alleged categories of such evidence: a letter from DOJ; statements by the Texas Governor; the creation of three majority-minority districts in the 2025 map with just over 50% minority CVAP (citizen voting age population); and various statements of Texas state legislators. Op. 59-104. But *none* of those constitutes “[d]irect evidence” akin to “a relevant state actor’s express acknowledgment that race played a [predominant] role in the drawing of district lines.” *Alexander*, 602 U.S. at 8. At most, they are weak “circumstantial evidence” that “could plausibly support multiple conclusions,” *id.* at 10—especially given that partisan and racial gerrymanders “are capable of yielding similar oddities in a district’s boundaries,” *id.* at 9—thereby requiring an “alternative map” to overcome the “starting presumption that the legislature acted in good faith,” *id.* at 10.

1. The district court misconstrued both the DOJ letter and its relevance to the challenged redistricting

The district court heavily emphasized its finding that the Texas legislature was persuaded to engage in racial gerrymandering by a July 7, 2025, letter to the Texas Governor and Attorney General sent by the head of DOJ’s Civil Rights Division. See Op. 17-19 (reproducing text of letter). The court, however, misinterpreted the letter’s meaning; and more importantly, the court misunderstood the letter’s significance to the legislature’s adoption of the 2025 map.

a. The DOJ letter expressed “serious concerns regarding the legality of four of Texas’s congressional districts” (Districts 9, 18, 29, and 33) under the 2021 map. Op. 17. The letter stated that those districts were “unconstitutional ‘coalition districts’” that had been created using “race-based considerations.” *Ibid.* A “coalition district,” in voting-rights vernacular, is a district where no single racial minority

group constitutes an effective voting majority, but where “two minority groups form a coalition to elect the candidate of the coalition’s choice.” *Bartlett v. Strickland*, 556 U.S. 1, 13 (2009) (plurality opinion). Although a State’s creation of such a district is not necessarily unconstitutional, it does trigger strict scrutiny if race predominated in the drawing of the district lines. See *id.* at 21-24. And that is what the DOJ letter asserted: namely, that Districts 9 and 18 “sort[ed] Houston voters along strict racial lines to create two coalition seats, while creating [District 29 as] a majority Hispanic district; and that District 33 was “another racially-based coalition district that resulted from a federal court order years ago.” Op. 18; see Op. 19 (urging the State “to rectify the racial gerrymandering of” these districts).

The DOJ letter acknowledged that longstanding circuit precedent had interpreted Section 2 of the VRA to require coalition districts under certain circumstances, but the letter emphasized that the Fifth Circuit’s recent en banc decision in *Pettaway v. Galveston County*, 111 F.4th 596 (2024), had overruled that precedent. Op. 18. Accordingly, the letter deemed these districts to be “nothing more than vestiges of an unconstitutional racially based gerrymandering past, which must be abandoned, and must now be corrected by Texas.” Op. 18.

The district court, however, mischaracterized DOJ’s letter as itself “direct[ing] Texas to engage in racial gerrymandering.” Op. 58. That mischaracterization was based on two related errors.

First, the district court asserted that the DOJ letter adopted an erroneous “reading of *Pettaway*” that coalition districts are “*per se* unconstitutional,” when *Pettaway* held only that Section 2 of the VRA does not require the creation of coalition districts. Op. 20; see Op. 19-20 (characterizing the letter as saying that “whenever a legislature enacts a map that happens to contain one or more coalition districts, that

legislature has necessarily and unconstitutionally engaged in ‘racial gerrymandering’”); Op. 59 (asserting that “the districts [were] objectionable to DOJ solely because of their racial composition”). But while the letter contained a single sentence stating that “so-called ‘coalition districts’ run afoul [of the] Voting Rights Act and the Fourteenth Amendment,” that sentence must be read in light of the immediately preceding sentence, which objected only to districts “[w]hen race is the predominant factor above other traditional redistricting considerations.” Op. 18. The letter thus did not claim that, as a legal matter, coalition districts are always unconstitutional even when created using race-neutral principles. Rather, it claimed that, as a factual matter, the four identified districts had been created using “race-based considerations” that “sort[ed] * * * voters along strict racial lines” in order “to comply with” VRA precedent that had since been abrogated by *Petteway*. Op. 17-18. Whether or not that factual assertion is correct—and the United States acknowledges that Texas disputes it, see D. Ct. Doc. 1380-25, at 3; Op. 14-15, 24—DOJ never asserted that the four districts would have been unconstitutional even if they had not been created by racial gerrymandering in the first place.

Second, the district court viewed the DOJ letter as claiming that the only “remedy” was “to change the offending districts’ racial makeup so that they no longer qualify as coalition districts,” Op. 20, by “redraw[ing] [them] so a single racial group constitutes a 50% majority by CVAP,” Op. 59. But again, the letter said no such thing. It did not urge any particular course of action “to rectify the racial gerrymandering of” the identified districts. Op. 19; see Op. 17-18. It did not, for instance, insist that the districts be converted into ones where a single racial group constitutes a 50% majority—after all, a “coalition” district can be eliminated, without any racial group’s being a majority, so long as the three or more racial groups present have *different*

“candidate[s] of * * * choice.” *Bartlett*, 556 U.S. at 13. Likewise, the letter did not insist that the districts be converted into ones that were majority-*minority* rather than majority-*white*. And the letter certainly did not demand that Texas redraw the districts in a manner that was race-predominant rather than race-neutral: racial gerrymandering was itself the problem that the DOJ letter asserted regarding the districts, and a State obviously can remedy racial gerrymandering without engaging in more racial gerrymandering. In short, the court badly misinterpreted DOJ’s letter as urging Texas to make race predominant in eliminating the identified districts, when in fact the letter urged Texas to eliminate race from consideration when redrawing those four districts (and all other districts as well).

b. Even if the district court’s mischaracterization of the DOJ letter were correct—that is, even if the letter had directed Texas to engage in racial gerrymandering to eliminate the identified districts—that still would not constitute direct evidence that the *Texas legislature* actually engaged in racial gerrymandering when redrawing the congressional map. That is so for three reasons.

First, as the district court itself acknowledged, “[w]hat ultimately matters is the Legislature’s motivation for devising and enacting the 2025 Map—not the motivations of [other] actors outside the legislative branch.” *Op.* 65; see *Brnovich v. DNC*, 594 U.S. 647, 689 (2021) (“The ‘cat’s paw’ theory has no application to legislative bodies” because “legislators have a duty to exercise their judgment.”). The DOJ letter is thus at most circumstantial evidence of the legislative motive, not direct evidence.

Second, the district court failed to cite any direct evidence that its flawed interpretation of the DOJ letter was even shared by, let alone acted on by, the Texas legislature. The court did not identify a single legislator who understood DOJ to be demanding that the State engage in race-predominant districting to eliminate the

four specified districts. Instead, the court merely cited some legislators who characterized the new map as addressing DOJ's concerns. See Op. 66-68. But their statements are equally consistent with an effort to placate DOJ by resolving its gerrymandering concerns—whether or not they agreed with those concerns—by redistricting the entire electoral map using race-blind methods to achieve partisan goals. See *ibid.* At minimum, that construction of equivocal evidence is compelled by the presumption of legislative good faith. See *Alexander*, 602 U.S. at 10-11.

Third, contrary to the district court's assertion (Op. 35, 105), the record shows that Texas did not actually follow any purported DOJ directive to engage in racial gerrymandering. Most obviously, District 33 in the 2025 map remains a coalition district. Op. 39. If Texas were truly responding to a DOJ directive to eliminate coalition districts because they are per se unconstitutional, it would not have preserved one of the four districts DOJ had specifically identified in its letter. Moreover, while Districts 9 and 18 are no longer coalition districts in the 2025 map, they have become majority-Hispanic (50.3% CVAP) and majority-black (50.5% CVAP) districts, respectively. Op. 35-36, 38. It would be nonsensical for Texas to have responded to a DOJ directive "to rectify the racial gerrymandering" of two coalition districts, Op. 17-18, by intentionally gerrymandering two majority-minority districts instead. As for District 29, that was not a coalition district in the first place, as the DOJ letter itself recognized. Op. 18 (describing District 29 as "a majority Hispanic district"). Yet in the 2025 map, District 29's Hispanic CVAP dropped to 43.3%, *creating* a potential coalition district, see Op. 38—precisely the opposite of what the district court claimed DOJ ordered the State to do. The court speculated that Texas may have been "perplexed," *ibid.*, but the only perplexing thing is how the court could have concluded that Texas was doing DOJ's bidding when DOJ (in the court's view) asked it to elim-

inate four coalition districts—and in response, Texas ignored the request as to one district, acted on two by purportedly considering race (the very thing DOJ had complained about), and created a potential coalition district in the fourth.

In sum, the evidence clearly demonstrates that Texas was *not* doing DOJ's supposed bidding—much less in a race-conscious way—but instead was engaged in a race-blind partisan gerrymander that happened to affect the districts DOJ identified (along with every other district in the State but one). In fact, that is precisely what the *actual* direct evidence shows: namely, the consistent testimony of the chairs of the legislative redistricting committees and the sponsor of the bill that they paid no heed to the DOJ letter. See Op. 77, 80, 89. At minimum, nothing about the Texas legislature's response to the DOJ letter constitutes “direct evidence” or even “extraordinarily powerful circumstantial evidence” that would obviate the need for respondents to produce an alternative map. *Alexander*, 602 U.S. at 35.

2. The district court's reliance on the governor's statements was misplaced

The district court next relied on the governor's July 9, 2025, proclamation adding redistricting to the legislative agenda and comments he made to the press touting the creation of majority-Hispanic districts in the 2025 map. Op. 62-64. But as explained, the governor's statements, like DOJ's letter, are not direct evidence of the Texas legislature's motive. See p. 13, *supra*. Moreover, the governor's statements are especially weak circumstantial evidence of racial gerrymandering.

The July 9 proclamation added to the legislative agenda consideration of “[l]egislation that provides a revised congressional redistricting plan in light of constitutional concerns raised by the U.S. Department of Justice.” D. Ct. Doc. 1326-1, at 3. From that single sentence (one of eighteen similarly terse line items in the proclama-

tion), the district court concluded that the governor “was asking the Legislature to give DOJ the racial rebalancing it wanted.” Op. 31; see Op. 61-62. Again, however, that conclusion is doubly wrong: (1) the DOJ letter asserted that Districts 9, 18, 29, and 33 had been racially gerrymandered, but did not purport to dictate any particular remedy to that problem, much less a “racial rebalancing” that would replicate the very flaw that DOJ identified with those districts in the first place, see pp. 10-13, *supra*; and (2) nothing in the governor’s proclamation suggests that he wanted the legislature to address DOJ’s perceived concerns by enacting a racial gerrymander, as opposed to the race-blind map pursuing partisan goals that the legislature actually enacted, see pp. 13-15, *supra*.

Likewise, the governor’s “contemporaneous” press statements (Op. 62) touting the majority-Hispanic districts in the 2025 map do not suggest that the legislature engaged in racial gerrymandering. The only such statements the district court identified were from August 2025, see Op. 62-64 & nn.207-209 (citing August 7 and August 11 interviews), even though the 2025 map was completed in July, see Appl. App. 473. Especially given the timing, “there is nothing nefarious about [the Governor’s] awareness of the [map’s] racial demographics.” *Alexander*, 602 U.S. at 37. That he personally viewed the majority-Hispanic districts as a “sellable” feature of the map does not come close to being direct evidence that the “legislators use[d] race as their predominant districting criterion” in creating those districts. See *Cooper*, 581 U.S. at 308 n.7. Indeed, unless “the legislature subordinated traditional race-neutral districting principles,” even the “intentional creation of majority-minority districts” would not trigger strict scrutiny (and the governor’s statements are not even direct evidence of that). *Bush v. Vera*, 517 U.S. 952, 958 (1996) (plurality opinion).

In short, the district court again flouted *Alexander*'s directive to presume legislative good faith. 602 U.S. at 10-11. The court adopted the least charitable reading of the governor's statements and then assumed that the legislature shared that reading without citing a single legislator who actually said so. That illogic cannot possibly excuse respondents' failure to produce an alternative map under *Alexander*.

3. The district court's reliance on three majority-minority districts with just over 50% minority CVAP was also misplaced

The district court similarly treated as a smoking gun the fact that the 2025 map creates three majority-minority districts with minority CVAP percentages just over 50%. See Op. 97-98, 105. Specifically, the court observed that District 9 is a majority-Hispanic district with 50.3% Hispanic CVAP, and Districts 18 and 30 are majority-black districts with 50.5% and 50.2% black CVAPs, respectively. Op. 97. According to the court, "it is very unlikely" that a purely partisan gerrymander "would have hit a barely 50% CVAP *three times* by pure chance." Op. 98. But the court offered no basis (statistical or otherwise) for that layman's conjecture. Op. 97-98. Nor did it identify any flaw in the mapmaker's detailed explanation of the race-neutral line-drawing decisions that, in fact, happened to result in those racial percentages. *Ibid.*; see Dissent 31-32, 34-36, 55 (detailing the mapmaker's testimony about those three districts). In all events, this Court already has rejected the proposition that supposedly suspicious minority CVAP percentages themselves constitute direct evidence that race predominated in the redistricting process.

In *Alexander*, this Court observed that "where race and partisan preferences are very closely tied, as they are here, the mere fact that [a challenged district's] BVAP stayed more or less constant proves very little." 602 U.S. at 20. The same is true with respect to the mere fact that Districts 9, 18, and 30 happened to wind up

containing Hispanic or black CVAPs slightly above 50%, which is in no way inconsistent with a purely partisan gerrymander. In fact, some districts wound up with white CVAP percentages within a fraction of a percentage point from 50% as well, yet the district court (correctly) did not view those CVAP percentages as suspicious. See D. Ct. Doc. 1326-12 (CVAP table for 2025 map) (Districts 8, 22). The bottom line is that Texas engaged in a statewide redistricting effort with the ambitious goal of shifting five seats from Democrats to Republicans; given the correlation between race and party, it is unsurprising that a few districts ended up with minority CVAP percentages just above 50%. See *Alexander*, 602 U.S. at 9 (noting that partisan and racial gerrymanders “are capable of yielding similar oddities in a district’s boundaries”).

Thus, contrary to the district court’s suggestion (Op. 96-97), this case is a far cry from *Cooper*, where the “on-the-nose attainment of a 50% BVAP,” 581 U.S. at 313, was the “purposefully established,” “announced racial target” of key legislators, *id.* at 299-300. Indeed, the court committed precisely the same error that the district court in *Alexander* committed: “inferring bad faith based on the racial effects of a political gerrymander in a jurisdiction in which race and partisan preference are very closely correlated”—an error that “would, if accepted, provide a convenient way for future litigants and lower courts to sidestep [the] holding in *Rucho* that partisan-gerrymandering claims are not justiciable in federal court.” *Id.* at 21. As in *Alexander*, particular minority CVAP percentages are not direct evidence of a racial gerrymander absent additional evidence showing those percentages were the intended target rather than the incidental and correlative effects of a partisan gerrymander, 602 U.S. at 20-21; and as in *Alexander*, without such additional evidence, an alternative map is needed to disentangle race from party, *id.* at 35.

4. The district court erred in its evaluation of statements and testimony from the mapmaker and legislators

This Court has recognized that testimony and statements of legislators who voted on an electoral map and the individuals who drew the map can constitute direct evidence for purposes of a racial-gerrymandering claim. See, *e.g.*, *Alexander*, 602 U.S. at 13-14; *Cooper*, 581 U.S. at 299-300. But the district court here improperly treated ambiguous statements of legislators with minimal involvement in the redistricting process as direct evidence of a racial gerrymander, while erroneously disregarding unequivocal statements of the mapmaker and legislators who led the redistricting efforts that race played no role in the process.

a. This Court has recognized that among the most probative direct evidence of racial gerrymandering is the testimony of the mapmaker. See, *e.g.*, *Cooper*, 581 U.S. at 299-300. After all, the “plaintiff must prove that race was the predominant factor motivating the legislature’s decision *to place a significant number of voters within or without a particular district.*” *Id.* at 291 (emphasis added; quotation marks omitted). The decision to “place” voters “within or without a particular district” is made in the first instance by the person actually drawing the district lines.

The person who drew those lines here, Adam Kincaid, did not consider race at all in making those placement decisions. A Republican operative, Kincaid “testified unequivocally that he drew the 2025 Map completely blind to race”; “testified that he instead based his districting choices entirely on partisan, political, and other race-neutral criteria”; and “went district by district—sometimes line by line—explaining the logic behind each of the redistricting choices he made,” giving “political or practical—*i.e.*, non-racial—rationales for his decisions at every step of the mapdrawing process.” Op. 93-96. The district court itself acknowledged that Kincaid’s testimony—

delivered “‘totally without notes’”—was “compelling.” Op. 96 & n.349. In fact, the court recognized that “nothing that Mr. Kincaid said at the preliminary-injunction hearing was self-contradictory,” Op. 97 n.356—underscoring that the court could not identify even a single thing Kincaid said that belied the credibility of his race-neutral account of how he drew the challenged lines.

Nevertheless, the district court entirely discounted Kincaid’s testimony as not credible for four reasons. Three of them have already been refuted above: (1) Districts 9, 18, and 30 wound up being majority-minority districts with CVAPs close to 50%, Op. 96-98; but see pp. 17-18, *supra*; (2) the 2025 map purportedly followed the supposed directive in the DOJ letter to engage in racial gerrymandering, Op. 98; but see pp. 10-15, *supra*; and (3) the 2025 map achieved Governor Abbott’s alleged goal of creating majority-Hispanic districts, Op. 99; but see pp. 15-17, *supra*. As for the fourth reason, the district court noted “significant inconsistencies between Mr. Kincaid’s testimony and [Senator] King’s testimony and his contemporaneous statements on the Senate floor.” Op. 99. In particular, Kincaid testified that he and King, who chaired the Senate redistricting committee, discussed details of the redistricting efforts at a conference in mid-July 2025, whereas King initially testified that they had not discussed those efforts in detail before “conced[ing] that either he was misremembering or Mr. Kincaid’s testimony was incorrect.” Op. 84; see Op. 83-84. In late August 2025, King also told a colleague on the Senate floor that “he didn’t know” “‘who physically drew the maps’” or whether “the mapdrawer had looked at race.” Op. 85-86. The court viewed those memory lapses as reasons to discredit *King*, Op. 87; but that does not remotely justify finding *Kincaid* non-credible because someone else misremembered their conversations—especially given Kincaid’s concededly “compelling” ability to recount his redistricting decisions line by line (without notes), Op. 96.

b. This Court also has considered statements and testimony of legislators involved in the redistricting process as direct evidence of the legislature's intent. See, e.g., *Cooper*, 581 U.S. at 299. Here, the three most important legislators—the chairs of the House and Senate redistricting committees and the legislator who introduced and championed the redistricting bill—repeatedly testified that the 2025 map was drawn with only partisan goals in mind and without considering race.

The House chair (Vasut) “insisted that the 2025 Map was motivated by partisan rather than racial considerations,” that “the DOJ Letter did not influence the Legislature in the redistricting process,” and that “he wasn’t influenced by the Governor’s media statements conveying a desire to eliminate coalition districts.” Op. 89. The Senate chair (King) “insisted that the DOJ Letter did not motivate his votes and actions during the 2025 redistricting process,” that “he did not look at racial data at all,” and that “to his knowledge, the 2025 Map was drawn blind to race.” Op. 80. And the bill’s sponsor (Hunter) “stated repeatedly that the bill was primarily driven by non-racial partisan motivations,” that “he was ‘not guided’ by the DOJ Letter in the redistricting process,” and that “he ‘didn’t go at’ any coalition districts.” Op. 77-78.

Yet the district court discounted that evidence on the flimsiest of grounds. The court discredited Hunter’s statements because he employed “value-laden” language praising the majority-Hispanic districts, Op. 73, and referred to *Petteway* in addition to *Rucho* as justification for mid-decade redistricting, Op. 79. But as with the governor’s press comments, touting majority-Hispanic districts as a selling point after they have been drawn is not direct evidence of a racial gerrymander because it proves nothing about whether race-neutral principles were subordinated in creating the districts in the first place. See p. 16, *supra*. Moreover, Hunter *correctly* described *Petteway* as holding that “Section 2 does not require” coalition districts and thereby free-

ing the State to redraw such districts on race-neutral grounds, Op. 74, which refutes the court's theory that the DOJ letter misled Texas legislators into thinking that *Petteway* prohibited coalition districts and compelled race-predominant efforts to eliminate them. As for King's statements, the court discounted them on the even shakier ground that he misremembered his discussions with Kincaid, Op. 83-87, even though those discussions have no bearing on King's *own* consideration of race. And the court could not muster any objections whatsoever to Vasut's statements. Op. 89-90.

c. On the other side of the ledger, the district court highlighted a few statements from legislators who had far less involvement in the redistricting process—and those stray statements also do not remotely qualify as direct evidence of a racial gerrymander, especially when viewed in light of the presumption of legislative good faith. The court emphasized a snippet in a press release from Speaker Burrows stating that the map “*address[ed] concerns raised by [DOJ]*.” Op. 66. For the reasons already discussed, responding to the DOJ letter is not direct evidence of racial predominance, particularly since the same press release is also “peppered with statements that could suggest a partisan motive,” Op. 67. Likewise, isolated snippets from press interviews of Representatives Oliverson and Toth at most suggest that they viewed redistricting as required by *Petteway*. Op. 67-69. That, however, falls far short of direct evidence that they viewed *Petteway* as not just eliminating the justification for the past race-predominant creation of coalition districts, but as further requiring the use of race-predominant means to eliminate all coalition districts (which, to repeat, the 2025 map did *not* do).

* * * * *

At bottom, the district court did not identify any direct evidence that race predominated in the redistricting process; the court relied at best on weak circumstantial

evidence that it misconstrued in light of the presumption of legislative good faith. Respondents thus needed to produce an alternative map disentangling race from party because this case bears no resemblance to *Cooper* and is essentially a retread of *Alexander*.

In *Cooper*, the state Senate and House chairs of the relevant committees “repeatedly told their colleagues that [the challenged district] had to be majority-minority.” 581 U.S. at 299; see *id.* at 299-300 (recounting some of the statements). “And that objective was communicated in no uncertain terms” to the mapmaker, who “testified multiple times at trial that [the legislators] instructed him ‘to draw [the district] with a BVAP in excess of 50 percent,’” and who then “followed those directions to the letter.” *Id.* at 300. Indeed, the mapmaker testified that “he sometimes could not respect county or precinct lines as he wished because ‘the more important thing’ was to create a majority-minority district.” *Ibid.*

Contrast that to this case, where the Senate and House chairs of the relevant committees repeatedly and unequivocally testified that they wanted to pursue only partisan goals, and the mapmaker testified at length that he drew the districts in an entirely race-blind manner. See pp. 19-22, *supra*. That echoes the testimony in *Alexander*, where the mapmaker “testified that he used only political data, and his colleagues likewise steadfastly denied using race in drawing the” map. 602 U.S. at 19. Indeed, *Alexander* rejected reliance by the district court on the same sort of evidence on which the district court relied in this case—such as a suspicious BVAP percentage (there, one that stayed the same; here, one that was too close to 50% for the court’s liking), *id.* at 20-21, and testimony from individuals involved in the redistricting process that they were “aware of racial demographics,” *id.* at 22. Just as that was insuf-

ficient to relieve the plaintiffs in *Alexander* of their burden to show an alternative map, so too is the evidence on which the district court relied insufficient here.

C. The Preliminary-Injunction Posture Does Not Remove Respondents' Burden To Provide An Alternative Map

Finally, the district court also held that *Alexander*'s alternative-map requirement does not apply because "this case is still at the preliminary injunction phase." Op. 133. But a preliminary injunction is "an extraordinary remedy that may only be awarded upon a *clear showing* that the plaintiff is entitled to such relief." *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 22 (2008) (emphasis added). And absent "direct evidence or some extraordinarily powerful circumstantial evidence," the "adverse inference from a plaintiff's failure to submit [an alternative map]" is effectively "dispositive," *Alexander*, 602 U.S. at 35, which logically forecloses any showing that the plaintiff "is likely to succeed on the merits," *Winter*, 555 U.S. at 20.

The district court, however, reasoned that *Alexander*'s adverse inference is "improper here" based on speculation that respondents' experts "simply didn't have time" to create an alternative map. Op. 134. That reasoning conflicts with a core rationale of the adverse inference, which is that alternative maps are *not* "difficult to produce" since "[a]ny expert armed with a computer can easily churn out redistricting maps that control for any number of specified criteria." *Alexander*, 602 U.S. at 35 (quotation marks omitted). Tellingly, the court cited no testimony by respondents' experts that they lacked sufficient time or data to create an alternative map that would satisfy *Alexander*. See Op. 134 n.498 (citing only testimony about time constraints in performing *other* analyses). Any such testimony would have been utterly implausible: "[t]he parties had approximately one month to prepare for [the] preliminary-injunction hearing," Op. 147; and one of respondents' experts had sufficient time to

generate “approximately 40,000 hypothetical maps” that the State “could have conceivably passed,” Op. 109, yet “didn’t offer any of [them] as an *Alexander* map,” Op. 134. So *Alexander* fully applies to this preliminary-injunction proceeding. Respondents’ “failure to submit an alternative map—precisely because it can be designed with ease—should be interpreted * * * as an implicit concession that [they] cannot draw a map” without the challenged racial demographics that achieves the State’s partisan goals. *Alexander*, 602 U.S. at 35. That concession is fatal to respondents’ claim.

CONCLUSION

The application for a stay should be granted.

Respectfully submitted.

D. JOHN SAUER
Solicitor General

NOVEMBER 2025

EXHIBIT 5

TO DECLARATION OF RYAN EASON

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About Us

is the Commission?

Every 10 years, after the federal government publishes updated census information, California must redraw the boundaries of its Congressional, State Senate, State Assembly and State of Equalization districts, so that the districts correctly reflect the state's population.

California voters authorized the creation of the Commission when they passed the Voters FIRST Act (Act) in 2008. It authorized the Commission to draw the new district lines. The Congressional Voters FIRST Act added the responsibility of drawing Congressional districts to the Commission.

The 14-member Commission is made up of five Republicans, five Democrats, and 4 nonpartisan members with either of those two parties. The Commission must draw the district lines in conformance with strict, nonpartisan rules designed to create districts of relatively equal population that provide fair representation for all Californians.

EXHIBIT 6

TO DECLARATION OF RYAN EASON

11/20/25, 9:54 PM

White House Pushes Texas to Redistrict, Hoping to Blunt Democratic Gains - The New York Times

The New York Times<https://www.nytimes.com/2025/06/09/us/politics/trump-texas-redistricting.html>

White House Pushes Texas to Redistrict, Hoping to Blunt Democratic Gains

A rare mid-decade redistricting push has unnerved some Texas Republicans, who worry a drive to harm Democrats could end up endangering G.O.P. incumbents in 2026.



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By J. David Goodman and Shane Goldmacher

Reporting from Houston and Shane Goldmacher from New York

June 9, 2025

President Trump's political team is encouraging Republican leaders in Texas to examine how House district lines in the state could be redrawn ahead of next year's midterm elections to try to save the party's endangered majority, according to people in Texas and Washington who are familiar with the effort.

The push from Washington has unnerved some Texas Republicans, who worry that reworking the boundaries of Texas House seats to turn Democratic districts red by adding reliably Republican voters from neighboring Republican districts could backfire in an election that is already expected to favor Democrats.

Rather than flip the Democratic districts, new lines could endanger incumbent Republicans.

11/20/25, 9:54 PM

White House Pushes Texas to Redistrict, Hoping to Blunt Democratic Gains - The New York Times

But a person close to the president, who spoke on condition of anonymity because the person was not authorized to talk publicly, nevertheless urged a “ruthless” approach and said Mr. Trump would welcome any chance to pick up seats in the midterms. The president would pay close attention to those in his party who help or hurt that effort, the person warned.

At an “emergency” meeting on Monday night in the Capitol, congressional Republicans from Texas professed little interest in redrawing their districts, according to a person briefed on the gathering who was not authorized to comment publicly. The 20-minute meeting, organized by Representative Michael McCaul, a senior member of the state delegation, focused on the White House push.

Representative Pete Sessions, Republican of Texas, said lawmakers plan to gather again to share data and “be on the same page” on the possible redrawing of the map.

“We assured each other, you need to bone up. We need to have a conversation. We need to think about what those impacts would be on the entire delegation,” Mr. Sessions said.

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Other members exiting the meeting, including Mr. McCaul, declined to comment.

Redistricting of states is supposed to come at the beginning of each decade, when new census data requires the reapportionment of House seats to match population shifts within the states. Mid-decade redistricting is rare and almost always contentious.

The maps that were drawn by the Republican Legislature in 2021, after the last census, are still being fought over, in forums including a trial that began last month in a federal court in El Paso.

11/20/25, 9:54 PM

White House Pushes Texas to Redistrict, Hoping to Blunt Democratic Gains - The New York Times

But talk among Republicans of taking the task on again has been swirling around the Texas Capitol since the Legislature was in session earlier this year. The governor, the lieutenant governor and the attorney general have all discussed the possibility in recent weeks, according to a person familiar with the discussions.

In recent days, that talk has become more serious. It appeared to be driven in part by President Trump's concern that the Republican Party could lose its slim majority in the House, derailing the second half of his term and empowering Democratic investigations of his administration.

Representative Michael McCaul called on congressional Republicans from Texas to an "emergency" meeting on Monday night. Haiyun Jiang for The New York Times

Trying to push through new maps would almost certainly set off a bruising political fight of the sort last seen in 2003, when Representative Tom DeLay, a senior Republican House leader from Texas, forced through a redrawing of the Texas political maps. Democrats in the Texas Legislature fled the state in an attempt to stop them. Ultimately, Republicans prevailed, drawing new maps and securing a majority of the Texas House delegation, which they have held ever since.

11/20/25, 9:54 PM

White House Pushes Texas to Redistrict, Hoping to Blunt Democratic Gains - The New York Times

But that effort came at a time when the state had been shifting from Democratic to Republican control, and there were many opportunities for map drawers to craft new districts for Republicans to win.

With Republicans now holding a 25-to-12 advantage in the state's House delegation over Democrats, those opportunities would be more limited. (There is one vacant seat, in a deeply blue district of Houston.)

Still, those pushing for the plan believe that Republicans could potentially pick up as many as four or five House seats in 2026, according to two of the people with knowledge of the discussions.

To do that would involve pushing Republican voters from safe Republican districts into neighboring Democratic districts to make them more competitive. In a wave year for Democrats, that could endanger incumbent Republicans as well as Democrats.

"The only way you make the state more competitive congressionally is you do it at their expense," State Representative Trey Martinez Fischer, a San Antonio Democrat, said of congressional Republicans. "I think the Republicans have already maximized their map, given the demographic changes in the state."

Just this week, the Texas Democratic Party announced that it would start a vast organizing effort across the state in partnership with a Texas Majority PAC, a group that has received significant funding from the billionaire George Soros. Democrats have already been eyeing a potential opportunity in Texas for a pickup in the Senate if the state's polarizing attorney general, Ken Paxton, prevails in his primary over Senator John Cornyn.

Any attempt at a mid-decade redistricting would require the Texas Legislature to approve new maps. Since the Legislature is not in session again until 2027, Gov. Greg Abbott, a Republican, would have to call a special session.

"From my understanding, this would be in July," said Ron Reynolds, a Texas House Democrat from the Houston area, saying his information had come indirectly from a Republican member of the Texas House. "This is something that they're keeping

11/20/25, 9:54 PM

White House Pushes Texas to Redistrict, Hoping to Blunt Democratic Gains - The New York Times

very tight-lipped.”

Mr. Abbott, Mr. Paxton and the state’s lieutenant governor, Dan Patrick, did not respond to requests for comment. Neither did a spokesman for the White House.

The lawsuit over the current maps, drawn in 2021, is being fought before a panel of U.S. District Court judges in El Paso. Organizations representing Black and Hispanic voters argue that the maps illegally disadvantage their communities.

The Justice Department under President Joseph R. Biden Jr. had sued over the 2021 maps, but the Trump administration dropped the government’s challenge earlier this year.

Megan Mineiro contributed reporting from Washington.

J. David Goodman is the Houston bureau chief for The Times, reporting on Texas and Oklahoma.

Shane Goldmacher is a Times national political correspondent.

EXHIBIT 7

TO DECLARATION OF RYAN EASON



cagovernor  > **California**
Redistricting 8/18/25



California is proposing to hold a special election on November 4th to give voters the power to fight back against Donald Trump's tyranny.


We will not sit back while Trump and his Republican lapdogs in Texas attempt to rig the next election.



EXHIBIT 8

TO DECLARATION OF RYAN EASON



cagovernor  > **California**
Redistricting 8/21/25



California is countering
@realDonaldTrump's attempt to rig the
2026 election and redistrict his way out
of accountability in states like Texas.

We're fighting fire with fire — giving the
power to the people to fight back and
demand nationwide independent
redistricting.

EXHIBIT 9

TO DECLARATION OF RYAN EASON

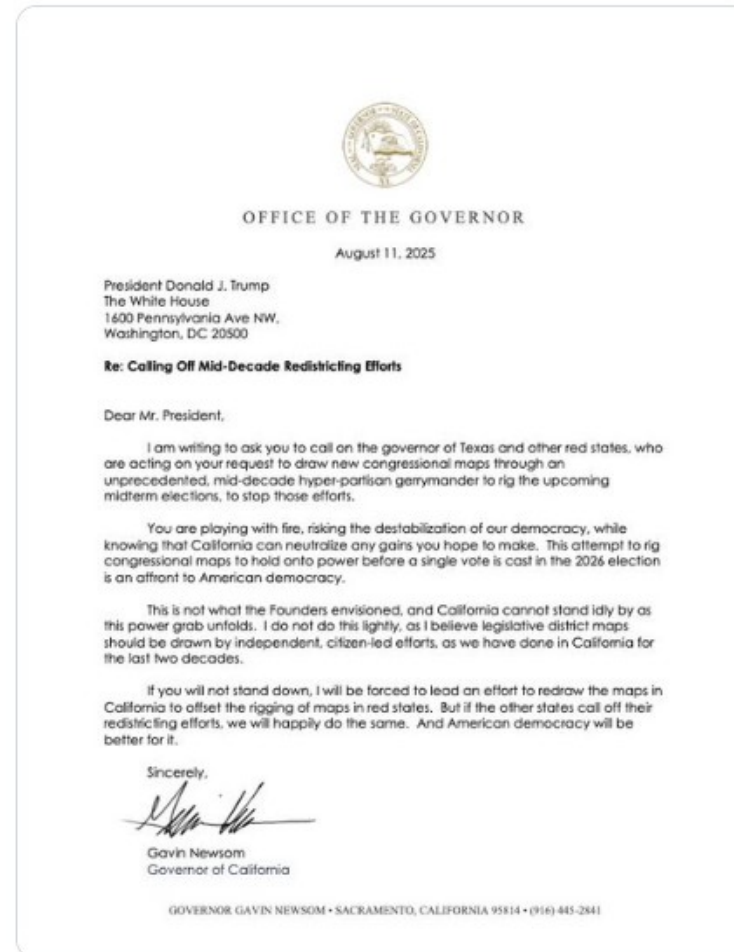


Governor Gavin Newsom
@CAgovernor

...

.@realDonaldTrump, if you will not stand down, California will be forced to lead an effort to redraw our maps to offset the rigging of maps in red states.

If the other states call off their redistricting efforts, we will do the same. And American democracy will be better for it.



7:07 AM · Aug 11, 2025 · 971.7K Views

EXHIBIT 10

TO DECLARATION OF RYAN EASON

News

Aug 14, 2025

Governor Newsom launches statewide response to Trump rigging Texas' elections

What you need to know: Governor Newsom, alongside state and legislative leaders and advocates representing the Golden State, announced plans to introduce a legislative package next week for a state constitutional amendment to enable California voters the opportunity to fight back against Trump's attempted power grab in Texas.

LOS ANGELES — Alongside state leaders and advocates representing the Golden State and our values, Governor Gavin Newsom today officially announced the launch of a statewide effort that will enable Californians to fight back against President Trump's attempts to rig Texas' elections next

<https://www.gov.ca.gov/2025/08/14/governor-newsom-launches-statewide-response-to-trump-rigging-texas-elections/>

11/20/25, 11:28 PM

Governor Newsom launches statewide response to Trump rigging Texas' elections | Governor of California

tight back against President Trump's attempts to rig Texas' elections next year — gerrymandering democratically elected representatives out of office to immunize Trump from the unpopularity of his policies and keep Trump's power unchecked by Congress.

"California will not sit idle as Trump and his Republican lapdogs shred our country's democracy before our very eyes. In just six months, Trump's unchecked power has cost Americans billions and taken an ax to the greatest democracy we've ever known. This moment calls for urgency and action – that is what we are putting before voters this November, a chance to fight back against his anti-American ways."

Governor Gavin Newsom

As part of today's announcement, Governor Newsom unveiled the framework for the proposed constitutional amendment — which will be known as The Election Rigging Response Act — that would go before California voters this November. The key provisions are:

- Retains California's Citizens Redistricting Commission and declares state policy supporting the use of fair, nonpartisan redistricting commissions nationwide.
- Temporarily adopts new California congressional districts for use in congressional elections through 2030.

Preserves California's current congressional maps if Texas or other states also keep their original maps.



11/20/25, 11:28 PM

Governor Newsom launches statewide response to Trump rigging Texas' elections | Governor of California



The legislative package announced today will also include: **1)** a bill calling a special election on November 4 for the voters to decide whether to adopt the corresponding proposed constitutional amendment and establish timelines and procedures for that election; and **2)** a bill that established the new congressional map that could be triggered to take effect under the proposed constitutional amendment if other states engage in redistricting; and 3) a bill authorizing reimbursement of costs to administer the election.

In **July** and in **August**, Governor Newsom hosted Texas state leaders to discuss the special session currently underway in the Lone Star State, the real threats to democracy Governor Abbott is pursuing behind closed doors at the request of President Trump, and the need for real action to help survivors of the deadly storms earlier this summer — the original intent of the special session. However, President Trump has publicly and repeatedly **pressured an uneasy** state legislature to redraw their congressional map — mid cycle — to more favorably support Republicans. And, recent polling found 63% of likely Texas voters view its Trump-backed redistricting plan **as unnecessary**.

Earlier this week, **Governor Newsom offered President Trump** an off-ramp, a chance to de-escalate. Rather than put this country and our founding values first, Trump chose personal power, and Californians will now be presented with the chance to nullify any gains he seeks from Texas, or any other state that tries to rig its congressional maps. In the coming week, Governor Newsom will work closely with state legislative leaders to ensure California voters have a voice in this fight to defend our nation's democracy.



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*"California Democrats will not allow Trump's Republican Party to rig the system and take permanent control of the U.S. House of Representatives," said **Assembly Speaker Robert Rivas**. "We are prepared and we will fight fire with fire. We will do whatever it takes to defend our democracy. We will do whatever it takes to protect the voices, the votes, and the rights of every American."*

*"President Trump and Texas Republicans are responsible for all of this. This is not a fight California chose, but it's a fight California can't run from," said **Senate President pro Tempore Mike McGuire**. "Trump chose to rewrite the rules and Texas Republican leaders are all too happy to do his dirty work. We've seen this playbook. When Trump doesn't have the votes to win an election, he orders others to manufacture them. Trump's cynical ploy is rotten to its core. It is our sacred responsibility to defend the people of California and our democracy from this madness, so if Texas moves forward, we will be forced to do the same."*

*"The damage the Trump administration is causing to our country is clear: masked agents terrorizing communities, tax dollars wasted on military stunts, allies alienated, and loyalists hired to replace public servants," said **Senator Alex Padilla**. "This administration is out of control—and the Election Rigging Response Act is how California defends our democracy and fights back. I am proud to stand alongside Governor Newsom and California leaders in supporting this critical measure."*

*"Donald Trump is terrified of facing voters in the midterms after taking away their food and healthcare, and failing to bring down prices. In a fair fight, he knows he will lose his majority in Congress," said **Senator Adam Schiff**. "That's why he's demanded that Republicans in*

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Texas further gerrymander their lines in a state that is already badly gerrymandered.

California will not stand idly by while Donald Trump tries to dictate the result of the next election in advance. If Texas moves forward with their new lines, California must respond. We will ask voters to fight fire with fire, and ensure they are not made irrelevant by the pernicious actions of Trump and Texas Republicans."

"Republicans know their agenda is unpopular, but rather than responding to the voices of the voters, Donald Trump and Republicans in states like Texas are engaging in a blatant power grab to rig the 2026 election before a single vote has been cast. I am proud to stand strongly to resist this power grab with our state legislative partners, the entire California Democratic Congressional Delegation and our Governor," said California Democratic Congressional Delegation Chair Rep. Zoe Lofgren. "If Republicans continue along this path, they will be met with the full force of California. We are united in this because we know what is at stake. California cannot stand idly by and watch as Republicans and Donald Trump strip food programs from California schools, cut millions of Californians from their health insurance, do permanent damage to California's clean air and clean water, make life more expensive for working Americans through their hairbrained tariff scheme, and defund Planned Parenthood. If Texas and other Republican states move forward with their efforts to redraw the maps mid-cycle, so will California. We are ready to fight back.

"President Trump has said that Republicans are 'entitled' to five more congressional votes in Texas. Well, they aren't entitled to steal the 2026 election. California's unions refuse to stand by as democracy is tested," said Lorena Gonzalez, President of the California Federation of Labor Unions, AFL-CIO. "California Labor is unified in our resolve to fight back against President Trump's anti-worker agenda. We are 2.3 million union members strong and we will use our collective power to campaign for this redistricting effort and win."

"Over the past several months, we have seen the Trump administration freeze funds for critical education programs, cut healthcare for millions of our students and their families, attempt to dismantle the Department of Education, and pass a new voucher program designed to destroy public education entirely," said California Teachers Association (CTA) President David B. Goldberg. "It is clear that we are also now facing an unprecedented power grab by Texas and other states to steal congressional seats and rig the 2026 election in favor of the current federal administration. This is a direct and urgent attack on our democracy. If this power grab goes unchecked, we will only see more drastic cuts to public education, healthcare, and other critical services and a further erosion of basic civil and human rights in our communities. California union educators will fight back against any and all attacks on our democracy and public education."

"Trump and his MAGA loyalists are trying to steal the next election and establish one-party rule, but California has a way to respond, and SEIU members stand ready to defend our rights," said SEIU California President David Huerta. "We did not choose this path, but

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we're not going to let Texas and Trump manipulate our Democracy. We will fight fire with fire. SEIU members and our communities have worked too hard to protect and strengthen our democracy to stand by while President Trump attempts to silence our voice – we are ready to move forward now and lead this fight for California and every American whose voices and votes are at stake."

*"The reality is reproductive freedom and abortion access in California is on the line every election, every time. Just six weeks ago, the Trump administration and its backers in Congress 'defunded' Planned Parenthood — severely threatening sexual and reproductive health care access in our state," said **Jodi Hicks, CEO and President of Planned Parenthood Affiliates of California**. "If Republicans continue to consolidate federal power, a nationwide abortion ban is not off the table. Planned Parenthood Affiliates of California is all in on supporting the state's plan to counter Texas' redistricting efforts and stop Republicans' unprecedented power grab. As a reproductive freedom state that values democracy, we simply have no other choice."*

*"In the current mid-decade redistricting battle, we recognize that President Trump and Republican leaders are pursuing a calculated, asymmetric strategy to redraw districts mid-decade in states like Texas, to lock in unaccountable power and silence voters," said **Common Cause**. "This is not an isolated political tactic; it is part of a broader march toward authoritarianism, dismantling people-powered democracy, and stripping away the people's ability to have a political voice and say in how they are governed."*

*"I stand with Governor Newsom, Speaker Rivas, and legislative colleagues in supporting redistricting efforts and its importance in protecting our democracy. We didn't ask for this fight and need to be prepared to fight back against President Trump's power grab. This is more than lines on a map—it's about defending our democracy and making sure every voice counts. This is our chance to stand up, raise our voices and defend the future of fair representation. The stakes couldn't be higher: President Trump and Congressional Republicans are denying wildfire relief, targeting our diverse immigrant communities, and pulling millions off health care. We will stand up and defend the Voting Rights Act and protect historically marginalized communities," said **Assemblymember Mike Fong, Chair of the California Legislative AAPI Caucus**.*

*"California will not sit idly by while Republicans attempt to rig the electoral system to continue pushing the policies of an administration that has made life less affordable, worsened public health, weakened our educational system, and made it harder for our most vulnerable communities to get ahead," said **State Senator Akilah Weber Pierson, M.D., Chair of the California Legislative Black Caucus**. "Instead of proving to voters that its policies are working, the Trump administration is trying to silence dissent by directing Texas to gerrymander the state and create five new Republican congressional districts. That is why California is responding to this attack on our democracy by giving voters the opportunity to*

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weigh in, protect our democratic process, and preserve the will of the people."

"The Californian Latino Caucus has always fought to ensure a fair redistricting process that respects voter interests and promotes greater opportunities for greater Latino representation," said Senator Lena Gonzalez. "We will continue to work hard to further these goals, uplift Latino voices regardless of immigration status, and fight to protect hard fought gains in every corner of California."

"As Vice Chair of the Latino Caucus, I believe that any redistricting effort must ensure our Latino communities are not just represented on paper, but truly empowered at the ballot box," said Assemblymember Juan Carrillo, Vice Chair of the Latino Caucus. "With more than 22 million voters in California, these changes must re-engage our communities, strengthen our voice, and protect the progress we've fought for."



This historic response by the Golden State comes as key leaders from across the country have voiced interest in fighting back as well.

- **AZ Senator Ruben Gallego:** "It's time for Democrats to understand the existential threat."

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- **MI Senator Elissa Slotkin:** "I'm not going to ... fight with one arm tied behind my back"
- **NY Governor Kathy Hochul:** "All's fair in love and war. We are following the rules. We do redistricting every 10 years, but if there are other states that are violating the rules and trying to give themselves an advantage, all I say is I'll look at it closely with Hakeem Jeffries."
- **IL Governor JB Pritzker:** "We all ought to stand up against it"
- **NJ Governor Phil Murphy:** "if that's the way we're going, we're from Jersey, baby, and we won't be laying down."

MD House Majority Leader: "I'm introducing legislation to redraw Maryland congressional districts if any other state cheats & draws new maps outside of the census period."

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EXHIBIT 11

TO DECLARATION OF RYAN EASON

News

Aug 21, 2025

Governor Newsom signs 'Election Rigging Response Act' legislative package; Gives people power to push back on Trump's attempts to shred democracy

***Proposition 50 – named for fair elections in all 50 states – heads to
ballot this November***

SACRAMENTO — Governor Gavin Newsom, alongside Speaker Robert Rivas and Senate pro Tempore Mike McGuire, signed the “Election Rigging

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Response Act" legislative package – giving Californians an opportunity this November to push back against President Trump's power grab in Texas and other Republican-led states. In doing so, Proposition 50 – named for the 50 United States – would allow Californians an opportunity to bring some much-needed accountability to the Trump Administration.

"Californians have been uniquely targeted by the Trump Administration, and thanks to the hard work of the California legislature, they will have a choice to fight back — and bring much needed accountability to Trump's efforts to undermine the democratic process."

Governor Gavin Newsom



About the legislative package

<https://www.gov.ca.gov/2025/08/21/governor-newsom-signs-election-rigging-response-act-legislative-package-gives-people-power-to-push-back-on-tru...> 2/5

CA448

Exhibit 11 to Eason Declaration

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- Assembly Constitutional Amendment 8 (Rivas, McGuire): allows Californians the ability to adopt a new, temporary Congressional map, in response to the congressional redistricting in Texas, that neutralizes Trump's power grab.
- Senate Bill 280 (Cervantes, Pellerin): establishes timelines and procedures to conduct a statewide special election for Proposition 50, and provides the funding for the special election, set to take place on November 4, 2025.
- Assembly Bill 604 (Aguilar-Curry, Gonzalez): establishes the temporary Congressional District Maps that would take effect if the people vote to pass ACA 8 on November 4.

This bill package implements **Governor Newsom's framework** announced last week in Los Angeles at the Democracy Center, alongside leaders from across the Golden State like Planned Parenthood, labor unions, community organizations and educators, as well as key elected officials at the federal, state, and local level.



<https://www.gov.ca.gov/2025/08/21/governor-newsom-signs-election-rigging-response-act-legislative-package-gives-people-power-to-push-back-on-tru...>

3/5

CA449

Exhibit 11 to Eason Declaration

"California will not be a bystander to Trump's power grab," **said Speaker Robert Rivas (D-Salinas)**. "We are acting to defend our state from his attacks, by taking it directly to the voters. Californians believe in democracy and freedom, and we will not stand by while the House is hijacked by authoritarianism. Today, we gave every Californian the opportunity to stop Trump by saying yes to our people, to our state, and to American democracy."

"The Election Rigging Response Act legislation allows voters the chance to stop Trump and Republican attempts to blatantly steal our election," **said pro Tempore Mike McGuire (D-North Coast)**. "This legislation is temporary, and it's all about fairness. And, today's action means we're fighting back for our democracy and our future — not with fire — but with the power of the voters and millions of folks across the Golden State."

Governor Newsom also issued a Proclamation calling the special election for November 4, 2025. A copy of the Proclamation is [here](#).

Newsom fights back against Trump Administration's harmful policies

The Trump Administration has been particularly harmful to Californians. However, thanks to California's proactive efforts to defend its values against the federal administration, the state and ultimately the people have been able to **recoup at least \$168 billion in federal funding**. This effort is a direct result of the special session to safeguard Californians earlier this year – so far spending \$5 million to support the litigation, representing a 3,360,000% (3.4 million percent) return on investment.

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EXHIBIT 12

TO DECLARATION OF RYAN EASON

Date of Hearing: August 19, 2025

ASSEMBLY COMMITTEE ON ELECTIONS

Gail Pellerin, Chair

ACA 8 (Rivas and McGuire) – As Amended August 18, 2025

SUBJECT: Congressional redistricting.

SUMMARY: Provides for the use of new congressional district maps for elections held through 2030 if Texas, Florida, or other states voluntarily put a new congressional map into effect, as specified, and if voters approve this measure. Specifically, **this measure:**

- 1) Provides that this measure shall be known and may be cited as “The Election Rigging Response Act.”
- 2) Makes various findings and declarations, including the following:
 - a) President Donald Trump has called on Republican-led states to undertake an unprecedented mid-decade redistricting of congressional seats to rig the 2026 election before voting begins.
 - b) President Trump and Republicans are attempting to gain enough seats through redistricting to rig the 2026 election outcome regardless of how the people vote.
 - c) California has long stood as a national leader for fair independent, nonpartisan redistricting.
 - d) California calls on all other states to commit to fair and impartial drawing of maps.
 - e) The 2026 midterm elections for Congress must be conducted on a level playing field without an extreme and unfair advantage for Republicans.
 - f) The people of California, not politicians, should have the power to approve temporary congressional district maps in response to President Trump’s election-rigging scheme.
 - g) It is the intent of the people that California’s temporary maps be designed to neutralize the partisan gerrymandering being threatened by Republican-led states without eroding fair representation for all communities.
- 3) States the policy of the State of California to support the use of fair, independent, and nonpartisan redistricting commissions nationwide, and declares that the people of California call on Congress to pass federal legislation and propose an amendment to the United States Constitution to require the use of fair, independent, and nonpartisan redistricting commissions nationwide.
- 4) Requires the single-member districts for Congress reflected in AB 604 (Aguiar-Curry and Lena Gonzalez) to temporarily be used for every congressional election for a term of office commencing after this measure becomes operative, and prior to the operative date of new congressional boundary lines drawn by the Citizens Redistricting Commission (CRC) pursuant to the state constitution. Provides that this provision becomes operative only if

Texas, Florida, or another state adopts a new congressional district map that takes effect after August 1, 2025, and before January 1, 2031, and such redistricting is not required by a federal court order. Provides that this provision becomes operative if Ohio adopts a new congressional district map only if that map is not approved with bipartisan support, as specified.

- 5) Gives the Attorney General the sole legal standing to defend any action, and gives the California Supreme Court original and exclusive jurisdiction in all proceedings, related to a congressional map adopted pursuant to this measure.
- 6) Specifies that the CRC shall continue to adjust the boundary lines of the congressional, State Senatorial, Assembly, and Board of Equalization (BOE) districts in conformance with the standards and process set forth in the California Constitution in 2031 and every 10 years thereafter.
- 7) Contains a severability clause.

EXISTING LAW:

- 1) Establishes the CRC, and requires it to adjust the boundary lines of the congressional, State Senatorial, Assembly, and BOE districts in the year following the year in which the national census is taken under the direction of Congress at the beginning of each decade, as specified. (California Constitution, Article XXI, §§1 & 2)
- 2) Provides that the California Supreme Court has original and exclusive jurisdiction in all proceedings in which a CRC-drawn map is challenged. (California Constitution, Article XXI, §3)
- 3) Permits the Legislature to propose an amendment or revision of the Constitution by a two-thirds vote of each house of the Legislature. Provides that a proposed amendment or revision shall be submitted to the electors and takes effect if approved by a majority of votes cast thereon, as specified. (California Constitution, Article XVIII, §§1 & 4)

FISCAL EFFECT: Unknown.

COMMENTS:

- 1) **Purpose of the Measure:** According to the author:

President Trump and Republicans in Texas and other states are attempting to redraw congressional districts mid-decade in an effort to rig the upcoming election to keep their own party in power in Washington. Californians deserve better and demand a response to this undemocratic and un-American power grab. ACA 8 is that response.

ACA 8, also known as the Election Rigging Response Act, would allow for the temporary use of voter-approved congressional district boundaries through the 2030 congressional term if—and only if—Texas or another state chooses to partisanly gerrymander its congressional districts before the 2030 census. With the next census, ACA 8 would return all congressional district line drawing

powers back to the Citizens Redistricting Commission. Importantly, ACA 8 would empower the voters to decide whether to use these temporary congressional district lines if another state decides to redraw its congressional map mid-decade. Additionally, through ACA 8, the voters would call on Congress to pass federal legislation and an amendment to the U.S. Constitution to require fair, nonpartisan, and independent redistricting nationwide.

The Election Rigging Response Act sends a strong message to other states that they cannot play by different rules when it comes to redistricting. It upholds California's values by neutralizing partisan gerrymandering by other states, all while giving voters the final say on the matter.

- 2) **Redistricting Overview:** "Redistricting" is the process by which the boundaries of districts of a governmental body are adjusted. Redistricting generally occurs at the beginning of each decade following the decennial federal census, when new district lines are adopted based on the census data so that the populations of each district of a governmental body are roughly equal. Over the course of the decade, districts can become significantly unequal in population due to differential growth rates in various locations of a jurisdiction. Redistricting is the way this inequality is corrected.
- 3) **California Redistricting and the Citizens Redistricting Commission:** The California Legislature last redrew the boundary lines of the congressional, State Senatorial, Assembly, and BOE districts in 2001 based on the results of the 2000 census. Those district lines were finalized and approved in September 2001.

In 2008, California voters approved Proposition 11, which created the CRC, and gave it the responsibility for drawing district lines for the state Senate, Assembly, and the BOE. It also changed the criteria used when drawing those lines. In 2010, voters approved Proposition 20, which expanded the CRC's duties to include drawing California's congressional districts, and made additional changes to the procedures and criteria to be used by the CRC. The passage of Propositions 11 and 20 meant that the California Legislature did not play a direct role in adopting district boundaries for congressional, legislative, and BOE districts following the 2010 and 2020 federal censuses.

Under current law, the districts drawn by the CRC after the 2020 census are scheduled to remain in place until the CRC adopts new maps following the 2030 census. Those new districts would take effect for regularly-scheduled elections in 2032 and beyond.

If this ACA is approved by voters, California could use different districts for its congressional elections as soon as the 2026 statewide elections. Those districts, which are provided for in AB 604 (Aguiar-Curry and Lena Gonzalez) of the current legislative session, would only go into effect if one or more other states also voluntarily conducted mid-decade congressional redistricting. States required to redraw districts because of a federal court order would not trigger California's new congressional district maps. (Ohio must redraw its congressional district maps this year under its state constitution. Ohio's action would trigger the use of California's AB 604 maps only if Ohio adopts its new district maps without bipartisan support, as provided in a specific provision of the Ohio Constitution.)

- 4) **Mid-Decade Redistricting Efforts in Other States:** As noted above, redistricting normally takes place once a decade, following the federal census. After new maps are adopted, they may be challenged in court. These lawsuits can take years to resolve, and result in revised maps or entirely new plans. Aside from these court-ordered redistricting efforts, it has historically been rare for jurisdictions to undertake major redistricting before the next decennial census.

On July 9, 2025, Texas Governor Greg Abbott called a special session of the Texas Legislature to begin on July 21. One of the topics for that session was “[l]egislation that provides a revised congressional redistricting plan.” Press reports indicate that this topic was added after aides to President Donald Trump urged Texas to redraw its congressional map, following allegations from the United States Justice Department that the existing map could be illegal. President Trump was later quoted as saying that Republicans were “entitled to five more seats” in Texas.¹

The Texas Constitution (Article III, Section 40), limits special sessions to 30 days, meaning that the session that began on July 21 could not extend beyond this week. According to news reports, dozens of Democratic legislators left the state to deny the Texas House a quorum, stalling the redistricting effort. The special session was adjourned sine die on August 15 without a new congressional map being adopted, but Governor Abbott immediately called a second special session to begin later the same day. Earlier in the week, Governor Abbott announced that if the special session ended without a quorum, he would “continue to call special session after special session” until the agenda for the special session is enacted.²

Following Texas’ push for mid-decade redistricting, press reports suggest that leaders in several other states are considering mid-decade congressional redistricting in time for the 2026 elections, including California, Florida, Illinois, Indiana, Maryland, Missouri, Nebraska, and South Carolina.

- 5) **Support and Opposition:** At the time this analysis was prepared, the committee had not received position letters specifically addressing this measure. However, the committee has received significant public input through a Redistricting Public Comment portal that was made available on the Committee’s website on August 13, 2025. As of 8:00 AM on August 18, 2025, the committee has received more than 13,100 comments through the portal. Many of these submissions cannot be clearly categorized as either supportive of or opposed to the effort to provide new congressional district maps for elections if this measure is approved by voters and other states voluntarily put a new congressional map into effect.

The arguments summarized below reflect public comments that generally expressed support for, or opposition to, the proposal for California to use new congressional district maps for elections through 2030 if Texas, Florida, or other states voluntarily implement new congressional maps. The positions of organizations and individuals to that proposal generally, however, may not necessarily be the same as their positions on this specific measure, or on other related legislation identified below. For that reason, this analysis refers

¹ <https://www.politico.com/news/2025/08/05/trump-texas-redistricting-00493624>, visited 8/13/25.

² <https://gov.texas.gov/news/post/governor-abbott-statement-on-texas-legislature-plan-to-sine-die>, visited 8/13/25.

to those perspectives as arguments for or against the broader “Congressional Redistricting Proposal.”

- a) **Arguments in Support of Congressional Redistricting Proposal:** Organizations and individuals that have submitted public comment in support argue that it is a necessary response to efforts by President Trump, Texas Republicans, and other Republican-led states to redraw congressional maps mid-decade for partisan advantage. They contend that these moves are designed to rig the outcome of the 2026 midterm elections, regardless of how people actually vote, and pose an existential threat to American democracy.

Backers also emphasize that California voters—not politicians—would ultimately decide whether to approve the proposed new congressional districts. Furthermore, those maps would take effect only if one or more other states voluntarily engages in mid-decade redistricting.

Finally, many supporters stress their strong commitment to the CRC and to expanding independent redistricting commissions nationwide. They view this proposal as a temporary safeguard, and support it because it preserves the CRC’s role in future redistricting efforts.

The following organizations have submitted public comment in support of the congressional redistricting proposal: AAPI Equity Alliance, Alliance for a Better Community, Altadena Chamber of Commerce, Arab Resource & Organizing Center Action, California Donor Table, Democracy Strategy Partners, Democratic Party of Orange County, Democratic Party of San Fernando Valley, Little Manila Rising, Los Angeles County Young Democrats, Outdoor Outreach, Planned Parenthood Affiliates of California, San Francisco Democratic Party, SEIU California, The Unity Council, TruEvolution, Voices for Progress, and WDN Action.

Based on submissions that have been reviewed and categorized by committee staff, thousands of public comments have been submitted by individuals in support of the congressional redistricting proposal.

- b) **Arguments in Opposition to Congressional Redistricting Proposal:** Organizations and individuals that have submitted public comment in opposition warn that overriding the work of the CRC would set a dangerous precedent and weaken California’s commitment to independent redistricting. They stress that political gerrymandering erodes democracy, even when done in response to partisan moves in other states.

Opponents also raise concerns about the financial burden of a special election, arguing it would strain an already challenged state budget. Many argue that Republicans are already underrepresented in California’s congressional delegation compared to the Party’s share of the statewide vote. Others indicate that they feel disenfranchised and unrepresented under our current system, and believe that this proposal would exacerbate those issues.

Finally, critics point out that the proposed maps were released only recently, leaving little time for meaningful public review, analysis, or input on the new district lines before consideration by the Legislature.

ACA 8
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The League of Women Voters of California submitted public comment in opposition to the proposal to provide new congressional district maps for elections. Additionally, in late July, prior to the announcement of more details about the congressional redistricting proposal, the following organizations submitted a letter in opposition to an effort that would “dismantle California’s Independent Citizens Redistricting Commission and return control over congressional maps to elected officials”: California Business Roundtable, California Consumer Advocates for Affordability and Safety, California Hispanic Chamber of Commerce, California Manufacturers and Technology Association, Govern for California, Greater San Fernando Valley Chamber of Commerce, Independent Voter Education, Independent Voter Project, NFIB, Protect the Voters FIRST Act, Simi Valley Chamber of Commerce, The Two Hundred for Homeownership, and United Latinos Action.

Based on submissions that have been reviewed and categorized by committee staff, thousands of public comments have been submitted by individuals in opposition to the congressional redistricting proposal.

- 6) **Related Legislation:** SB 280 (Cervantes and Pellerin), which is also being heard in this committee today, calls a special statewide election to be held on November 4, 2025, provides for the administration of that election, and provides for this constitutional amendment to be submitted to voters at that election, among other provisions.

AB 604 (Aguiar-Curry and Lena Gonzalez), which is pending in the Senate Elections & Constitutional Amendments Committee, and which this committee is discussing as an informational item at today’s hearing, specifies the boundaries for California’s congressional districts that will take effect if the voters approve this measure and if another state voluntary engages in mid-decade congressional redistricting, as specified.

- 7) **Approval by Voters:** As a constitutional amendment, this measure requires the approval of the voters to take effect.

REGISTERED SUPPORT / OPPOSITION:

See comment #5 above for an explanation about support for and opposition to this measure.

Analysis Prepared by: Ethan Jones / ELECTIONS / (916) 319-2094

EXHIBIT 13

TO DECLARATION OF RYAN EASON

Date of Hearing: August 19, 2025

ASSEMBLY COMMITTEE ON ELECTIONS

Gail Pellerin, Chair

AB 604 (Aguilar-Curry and Lena Gonzalez) – As Amended August 18, 2025

INFORMATIONAL HEARING – NO VOTE TO BE TAKEN

SUBJECT: Redistricting: congressional districts.

SUMMARY: Specifies the boundaries for California's congressional districts, to take effect only if the voters approve ACA 8 (Rivas and McGuire), and if another state voluntarily engages in mid-decade congressional redistricting, as specified. Specifically, **this bill:**

- 1) Contains legal descriptions of the boundaries of 52 congressional districts.
- 2) Provides that the district boundaries in this bill become operative only if ACA 8 (Rivas and McGuire) is approved by the voters, takes effect, and becomes operative because another state voluntarily puts a new congressional map into effect.
- 3) Provides that if any ambiguity or dispute arises regarding the location of a boundary line for the districts contained in this bill, the Secretary of State (SOS) and the elections official of each county shall rely on the detailed maps of the congressional districts prepared by this committee and the Senate Committee on Elections and Constitutional Amendments.
- 4) Sunsets the provisions of this bill once a new congressional map is certified by the Citizens Redistricting Commission (CRC) pursuant to the California Constitution.
- 5) Contains a severability clause, and contains an urgency clause, allowing this bill to take effect immediately upon enactment.

EXISTING LAW:

- 1) Establishes the CRC, and requires it to adjust the boundary lines of the congressional, State Senatorial, Assembly, and Board of Equalization (BOE) districts in the year following the year in which the national census is taken under the direction of Congress at the beginning of each decade, as specified. (California Constitution, Article XXI, §§1 & 2)
- 2) Permits the Legislature to propose an amendment or revision of the Constitution by a two-thirds vote of each house of the Legislature. Provides that a proposed amendment or revision shall be submitted to the electors and takes effect if approved by a majority of votes cast thereon, as specified. (California Constitution, Article XVIII, §§1 & 4)

FISCAL EFFECT: Unknown

COMMENTS:

- 1) **Informational Hearing:** The committee is discussing the subject matter of this bill today as an informational item, as the bill is currently pending in the Senate Elections and

Constitutional Amendments Committee, and is not in the possession of this committee. No vote will be taken on this bill at this committee hearing.

2) **Purpose of the Bill:** According to the author:

AB 604 will protect Californians' interests in the national democratic process by presenting the voters with a temporary congressional district map to use if Texas or other states decide to conduct mid-decade, partisan gerrymandering of their congressional district maps.

The temporary congressional district boundaries laid out in AB 604 follow the principles that California voters value most in establishing legislative districts. The proposed map maintains the geographic integrity of even more cities than the current map adopted by the Citizens Redistricting Commission. Importantly, the temporary map in AB 604 will also ensure that communities of interest remain intact — a key principle of the constitutional amendment establishing the Citizens Redistricting Commission — to exercise their collective voice and vote to elect officials who truly represent them. AB 604 does all of this without diluting or favoring the voting power of any one voter over another. And, unlike any other congressional maps in use across the country today, the district map in AB 604 will go directly to California voters for their approval.

AB 604 not only appropriately responds to the mid-cycle redistricting attempts by President Trump and Republicans in Texas and other states, but also adheres to redistricting principles that Californians hold dear — from protecting the many types of communities of interest in our state, to not favoring incumbents, to maintaining the geographic integrity of neighborhoods. The temporary congressional district lines proposed in AB 604 provide an effective response to the partisan gerrymander attempted by Texas and other states without eroding fair representation for all California voters and communities.

- 3) **Redistricting Overview:** “Redistricting” is the process by which the boundaries of districts of a governmental body are adjusted. Redistricting generally occurs at the beginning of each decade following the decennial federal census, when new district lines are adopted based on the census data so that the populations of each district of a governmental body are roughly equal. Over the course of the decade, districts can become significantly unequal in population due to differential growth rates in various locations of a jurisdiction. Redistricting is the way this inequality is corrected.
- 4) **California Redistricting and the Citizens Redistricting Commission:** The California Legislature last redrew the boundary lines of the congressional, State Senatorial, Assembly, and BOE districts in 2001 based on the results of the 2000 census. Those district lines were finalized and approved in September 2001.

In 2008, California voters approved Proposition 11, which created the CRC, and gave it the responsibility for drawing district lines for the state Senate, Assembly, and the BOE. It also changed the criteria used when drawing those lines. In 2010, voters approved Proposition 20,

which expanded the CRC's duties to include drawing California's congressional districts, and made additional changes to the procedures and criteria to be used by the CRC. The passage of Propositions 11 and 20 meant that the California Legislature did not play a direct role in adopting district boundaries for congressional, legislative, and BOE districts following the 2010 and 2020 federal censuses.

Under current law, the districts drawn by the CRC after the 2020 census are scheduled to remain in place until the CRC adopts new maps following the 2030 census. Those new districts would take effect for regularly-scheduled elections in 2032 and beyond.

However, if ACA 8 (Rivas and McGuire) of the current legislative session is approved by voters and becomes operative because another state voluntarily engages in mid-decade congressional redistricting, the congressional district boundaries in this bill could be used for congressional elections in California as soon as the 2026 statewide elections.

More detailed information about the congressional districts proposed by this bill, including demographic details for each of the 52 proposed districts, an interactive map of the proposed district boundaries, and downloadable computer files (shapefiles and a block equivalency file) with geographic details about the proposed districts are available on the committee's website at <https://aelc.assembly.ca.gov/proposed-congressional-map>.

- 5) **District Boundary Disputes:** This bill contains a provision that specifies that if an ambiguity or dispute arises regarding the location of a boundary line in this bill, the SOS and county elections officials may rely on detailed maps prepared by this committee and the Senate Committee on Elections and Constitutional Amendments to resolve that ambiguity or dispute. This language is similar to language that was included in legislation (AB 632 (Cedillo), Chapter 348, Statutes of 2001 and SB 802 (Elections and Reapportionment Committee), Chapter 349, Statutes of 2001) when the California Legislature last redrew district boundary lines in 2001. As noted above, this committee's website already includes detailed information about the proposed districts, including an interactive map of the district boundaries.
- 6) **Support and Opposition:** At the time this analysis was prepared, the committee had not received position letters specifically addressing this bill. However, the committee has received significant public input through a Redistricting Public Comment portal that was made available on the committee's website on August 13, 2025. Those public comments generally were focused on the proposal for California to use new congressional district maps for elections through 2030 if Texas, Florida, or other states voluntarily implement new congressional maps. For a discussion of the comments received through the portal, please see this committee's analysis of ACA 8 (Rivas and McGuire).
- 7) **Related Legislation:** ACA 8 (Rivas and McGuire), which is being heard in this committee today, provides for the use of new congressional district maps for elections held through 2030 if Texas, Florida, or other states voluntarily put a new congressional map into effect, as specified.

SB 280 (Cervantes and Pellerin), which is being heard in this committee today, calls a special

statewide election to be held on November 4, 2025, provides for the administration of that election, and provides for ACA 8 to be submitted to voters at that election, among other provisions.

REGISTERED SUPPORT / OPPOSITION:

See comment #6 above for an explanation about support for and opposition to this bill.

Analysis Prepared by: Ethan Jones / ELECTIONS / (916) 319-2094

EXHIBIT 14

TO DECLARATION OF RYAN EASON

Delivery Method:

MMS sent via P2P (requiring human intervention). Using 10-digit phone number to send (no short code). Using pre-existing list purchased from Grassroots Targeting.

CA Copy + Image 1

Gavin Newsom's Prop 50 political power grab is a scheme to gerrymander more congressional seats for Democrats so they can take control of Congress, impeach President Trump, and derail the America First agenda. Newsom is wasting \$300 million of our tax dollars on Prop 50 – while we are tens of billions of dollars in debt – all so he can run for president and impose his radical failed policies on the rest of America. It is critical that you vote NO on Prop 50! Vote on or before the election on Tuesday, November 4, 2025. The easiest way to vote to stop Newsom's scheme is to return your mail ballot TODAY!

Ad paid for by the California Republican Party. Reply STOP to opt out.

PLAINTIFFS_000001

CA465

Exhibit 14 to Eason Declaration

Delivery Method:

MMS sent via P2P (requiring human intervention). Using 10-digit phone number to send (no short code). Using pre-existing list purchased from Grassroots Targeting.

CA Copy + Image 2

Gavin Newsom wants to paint California blue to stop Trump and launch his wannabe presidential campaign. Newsom is wasting \$300 million of our tax dollars to do it, all while we are tens of billions of dollars in debt. Prop 50 will help Democrats retake control of Congress by gutting our independent redistricting commission and eliminating 5 California Republicans from Congress. Prop 50 is a pure political power grab that puts Gavin Newsom first and Californians last. Don't delay - return your mail ballot and vote NO on Prop 50 today! The special election is Tuesday, November 4, 2025. Learn more at www.CAGOP.org.

Ad paid for by the California Republican Party. Reply STOP to opt out.

Delivery Method:

MMS sent via P2P (requiring human intervention). Using 10-digit phone number to send (no short code). Using pre-existing list purchased from Grassroots Targeting.

CA Copy + Image 3

Prop 50 is a waste of \$300 million of our tax dollars to further Gavin Newsom's political ambition to be president. Our state is tens of billions of dollars in debt, but Newsom would rather spend our tax dollars to help Democrats retake Congress and impeach Trump than help Californians. You can stop Newsom's power grab by returning your mail ballot today and voting NO on Prop 50! The special election is November 4, 2025, and you can't stay home. It's too important – vote NO on Prop 50 NOW! Learn more at www.CAGOP.org.

Ad paid for by the California Republican Party. Reply STOP to opt out.

Delivery Method:

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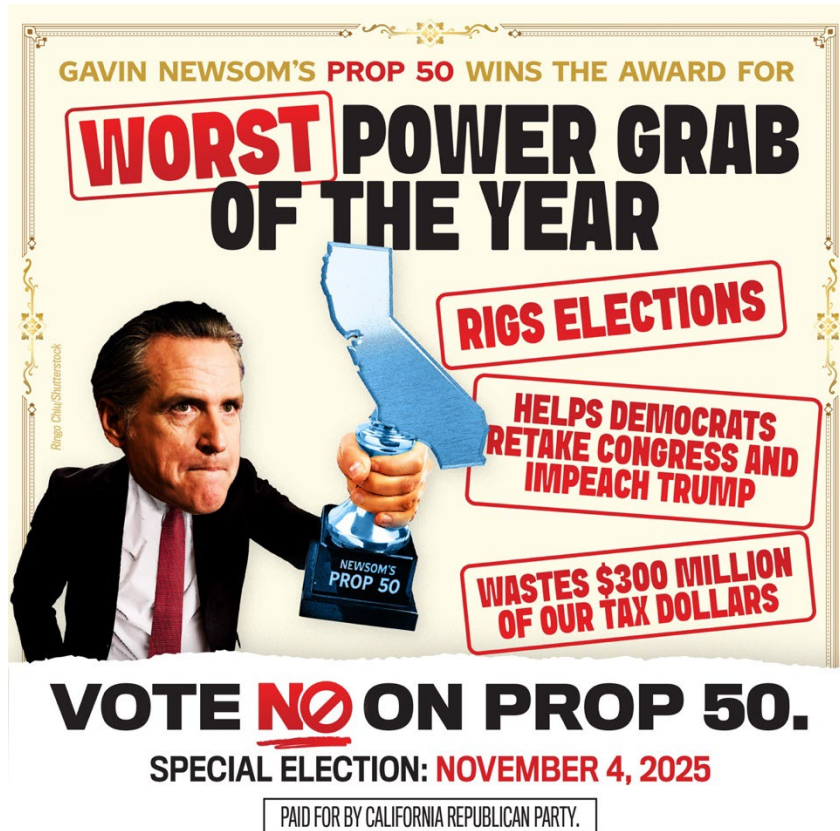
CA Copy + Image 4

Gavin Newsom's Prop 50 political power grab stinks to high heaven. Prop 50 is a rotten scheme funded by \$300 million of our tax dollars to help Gavin Newsom run for president, help Democrats retake Congress, impeach Trump, and derail the America First agenda. Don't let him get away with. You MUST get out and vote NO on Prop 50. The fastest way to stop Newsom is to return your mail ballot today. The special election is Tuesday, November 4, 2025. Visit <https://vote.cagop.org> to learn more about how you can vote to protect Gavin Newsom from silencing your voice.

Ad paid for by the California Republican Party. Reply STOP to opt out.

Delivery Method:

MMS sent via P2P (requiring human intervention). Using 10-digit phone number to send (no short code). Using pre-existing list purchased from Grassroots Targeting.

CA Copy + Image 4

Gavin Newsom and the Radical Democrats are trying to silence your voice by gutting our independent redistricting commission so they can eliminate 5 California Republicans from Congress and send more of their own to Washington. Their scheme is called Prop 50, and it's the worst political power grab we've seen. If we don't stop them, Newsom will help Democrats take control of Congress, raise our taxes, open our borders, and impeach Trump. Worst of all, he's wasting \$300 million of our tax dollars on this special election to do it. Election Day is Tuesday, November 4, 2025. But you don't have to wait – you can stop Newsom's scheme TODAY by returning your mail ballot. Forgetting to vote is NOT an option. Visit <https://vote.cagop.org> to learn more about how you can stop Prop 50!

Ad paid for by the California Republican Party. Reply STOP to opt out.

Delivery Method:

MMS sent via P2P (requiring human intervention). Using 10-digit phone number to send (no short code). Using pre-existing list purchased from Grassroots Targeting.

CA Copy + Image 6

Don't let Gavin Newsom shut the door on fair elections in California! Return your ballot TODAY and vote NO on Prop 50. Prop 50 takes the power to draw districts from the people and gives it to the Sacramento politicians. Once the politicians take our power away, they'll never give it back. Election Day is Tuesday, November 4, 2025. But you don't have to wait – you can stop Newsom TODAY by returning your mail ballot. Visit <https://cagop.org/counties/> to find your nearest voting location. If you don't vote, Newsom and the Sacramento politicians will use Prop 50 to rig our elections and make sure we the people can never hold them accountable.

Ad paid for by the California Republican Party. Reply STOP to opt out.

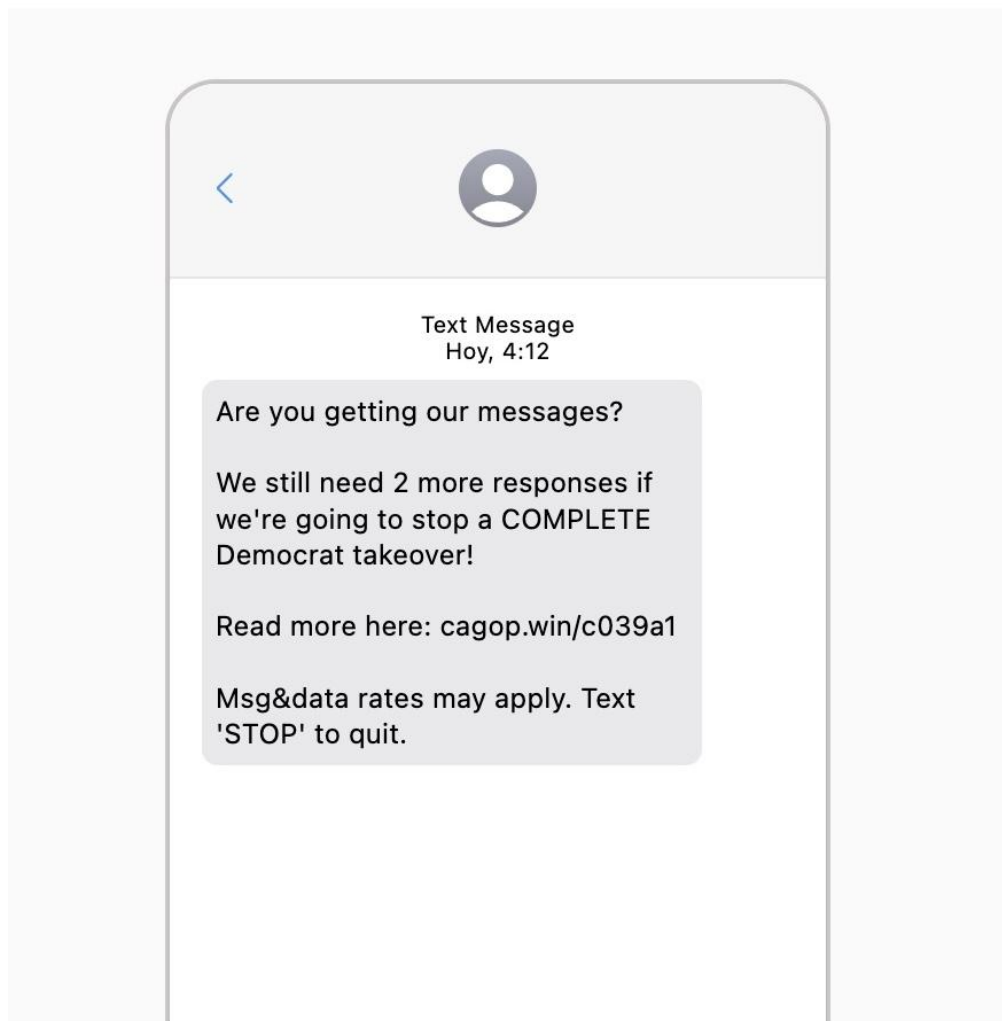
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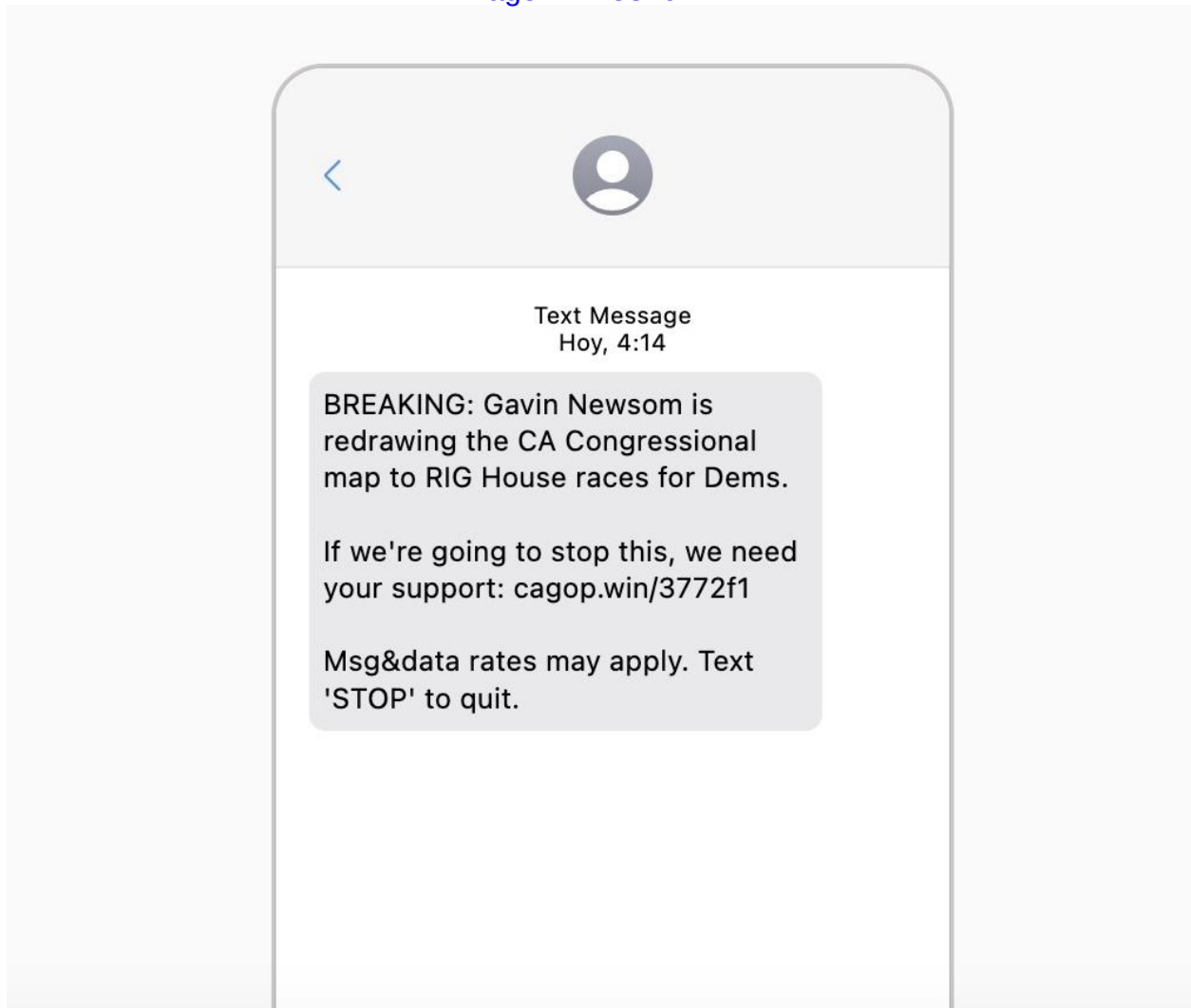
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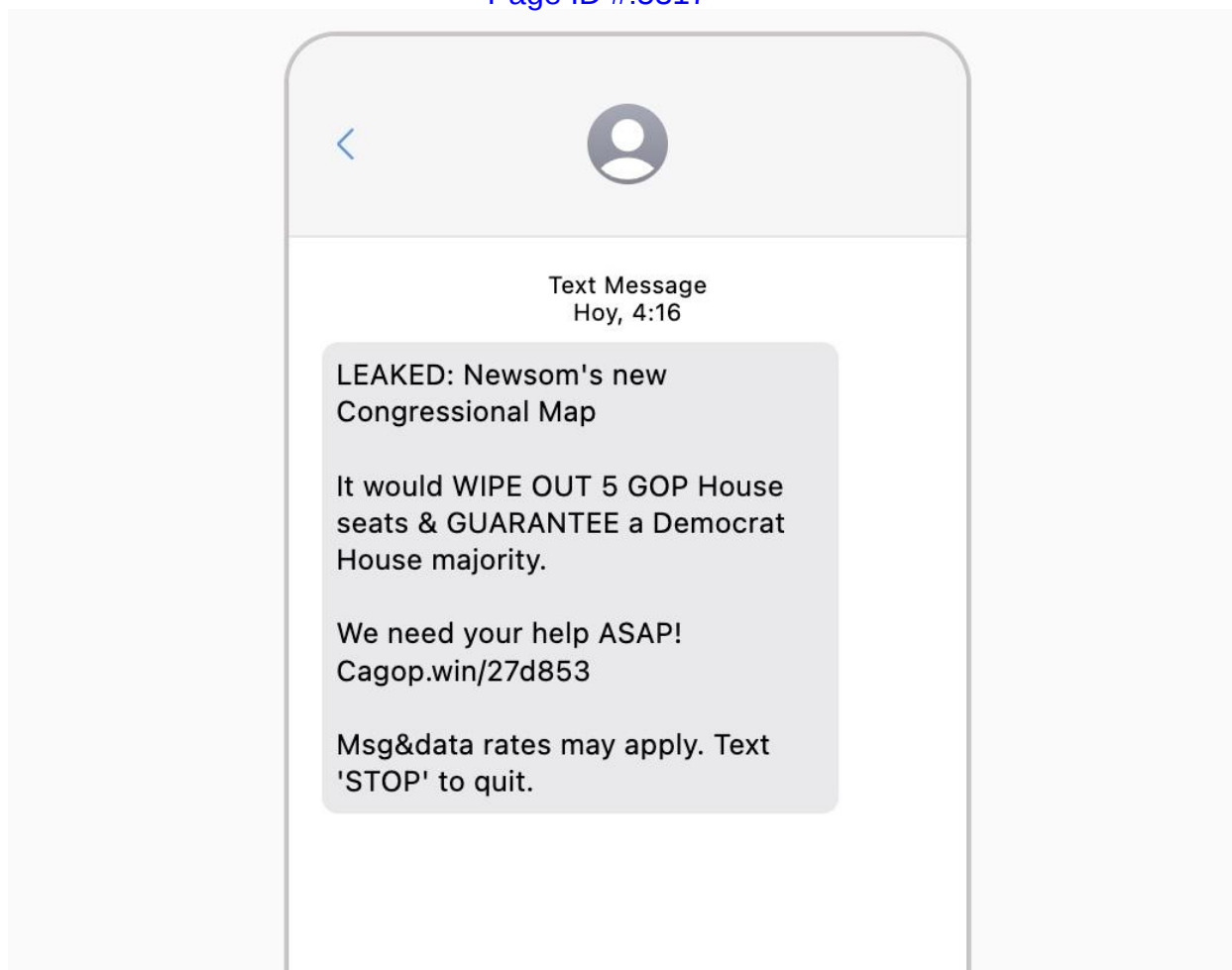
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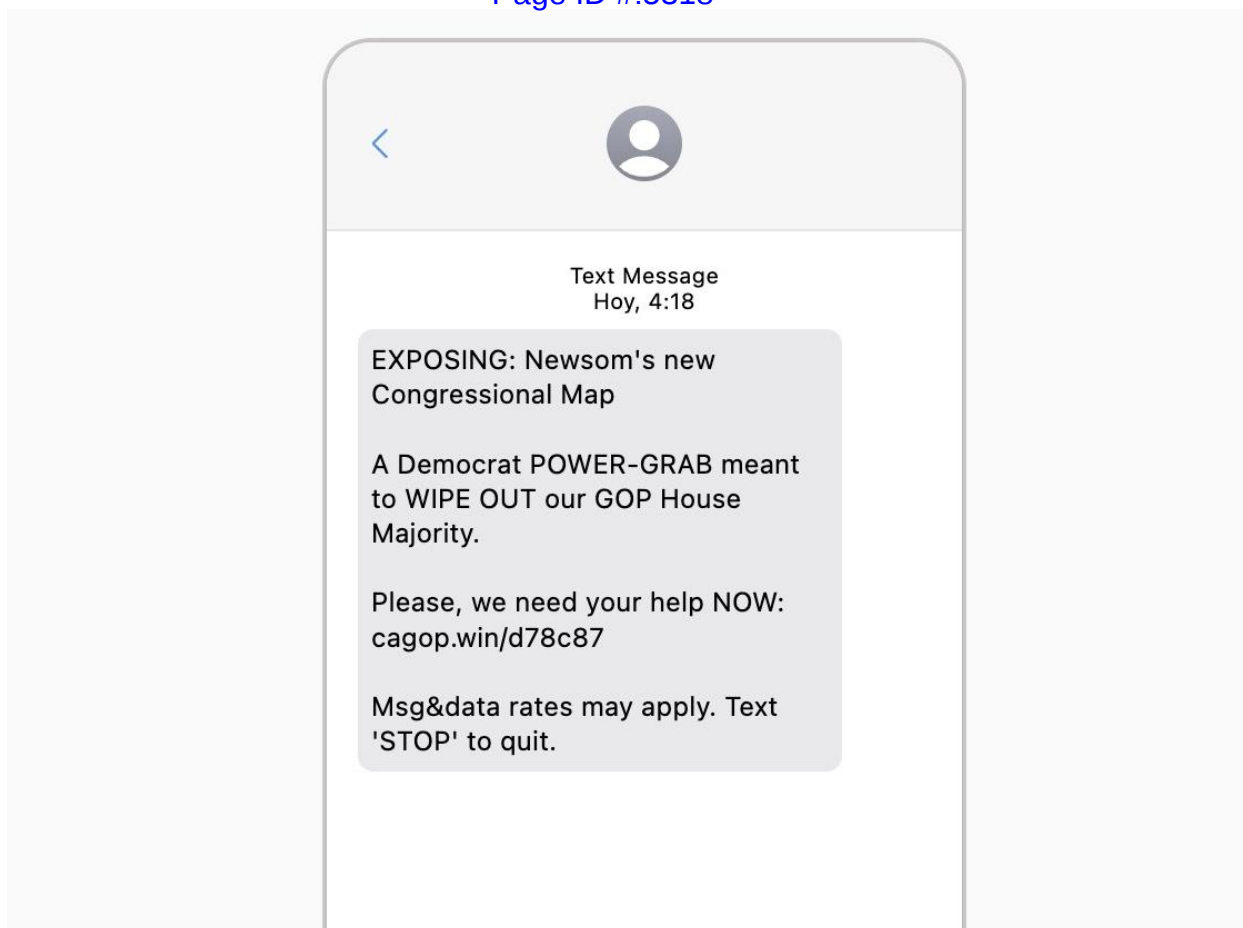
This is a red alert. Election Day is today, Tuesday, November 4 – your vote is needed to STOP Gavin Newsom and the Sacramento politicians from rigging California's elections. Vote NO on Prop 50 TODAY! Don't let Prop 50 take the power of drawing districts away from the people and give it back to the politicians. Once the politicians take our power away, they'll never give it back. This is a pure power grab to help Democrats take control of Congress, impeach Trump, and derail his agenda. Visit <https://cagop.org/counties/> to find the voting location nearest you. This is too important to stay home – get out and vote TODAY to stop Prop 50!

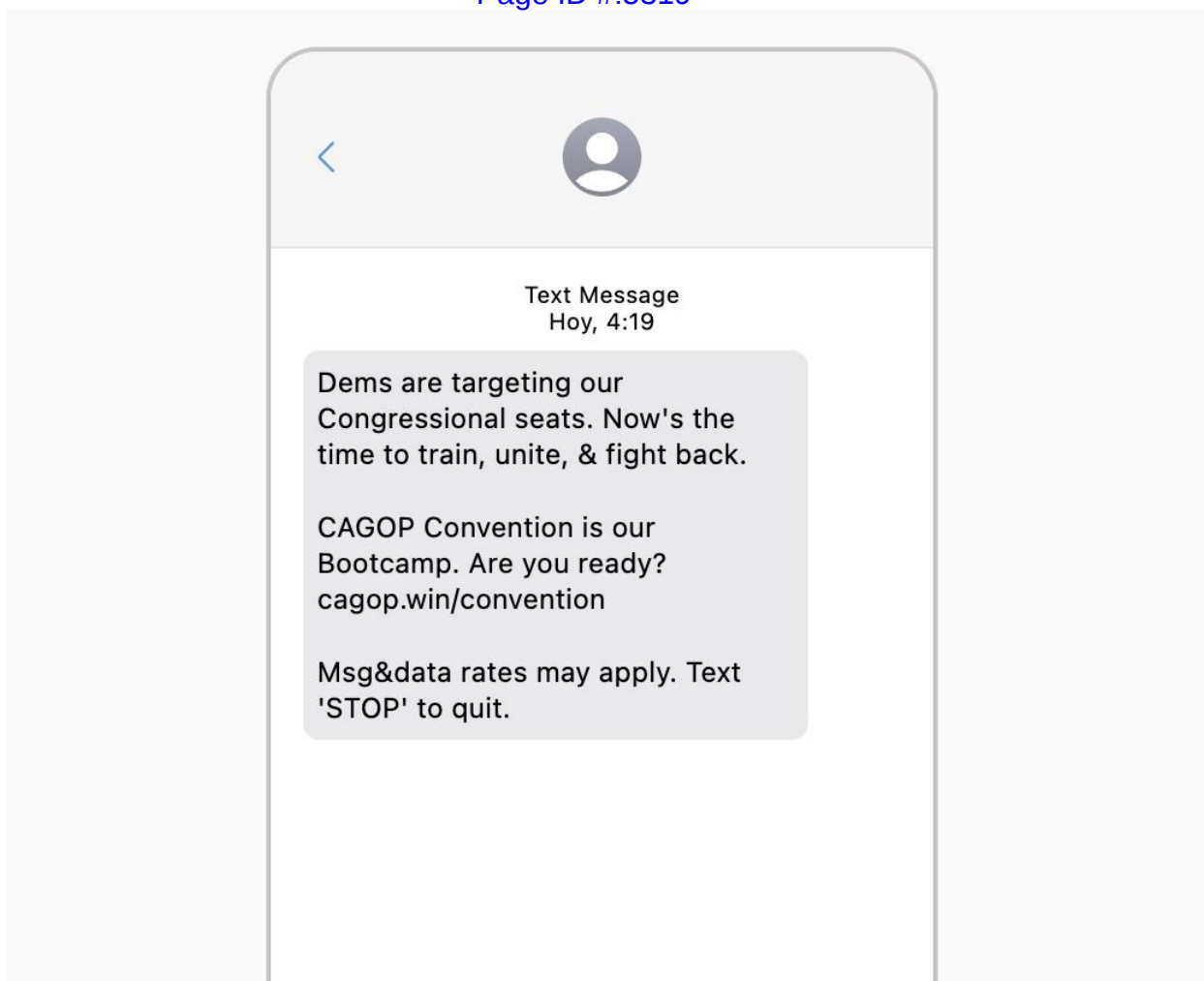
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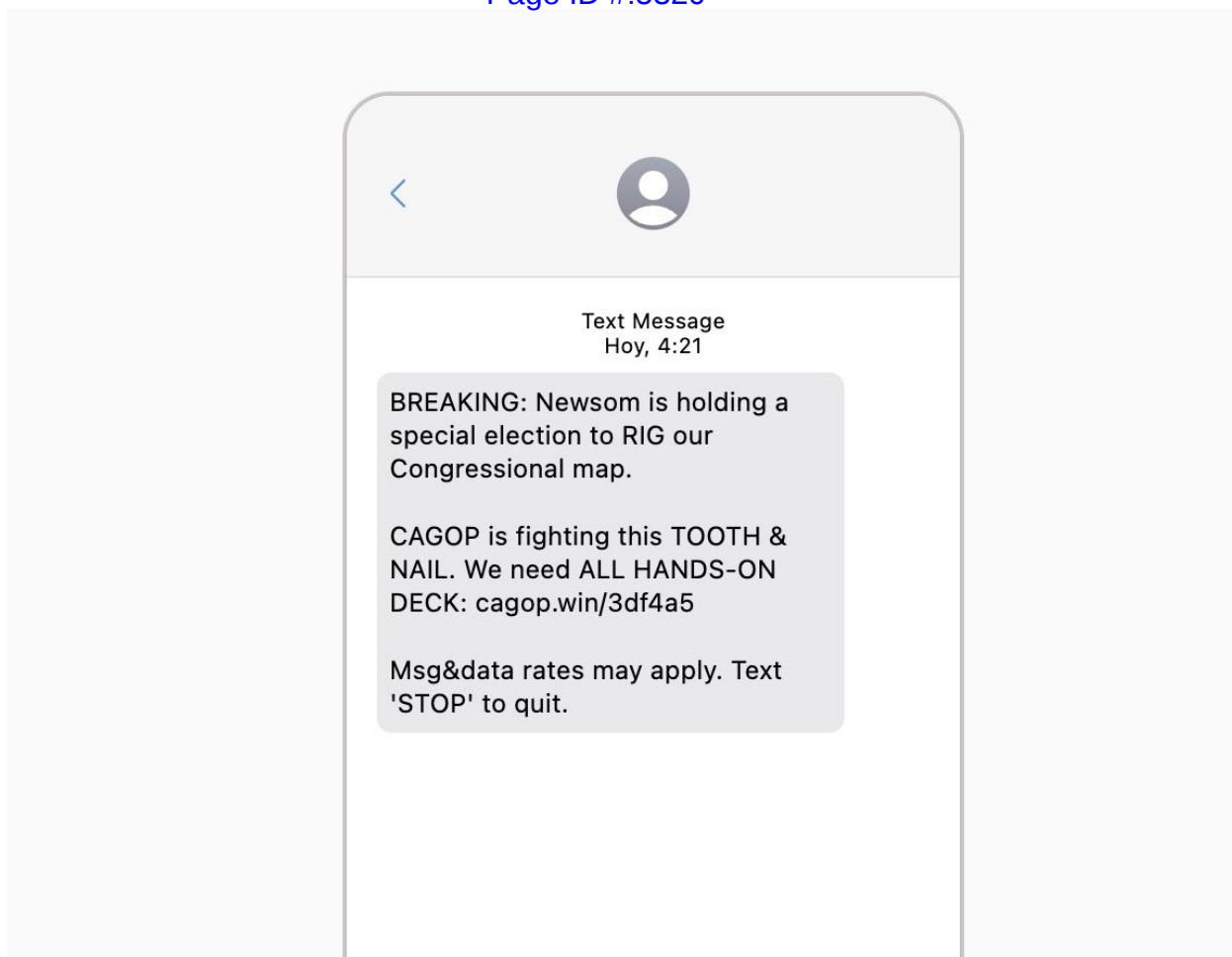


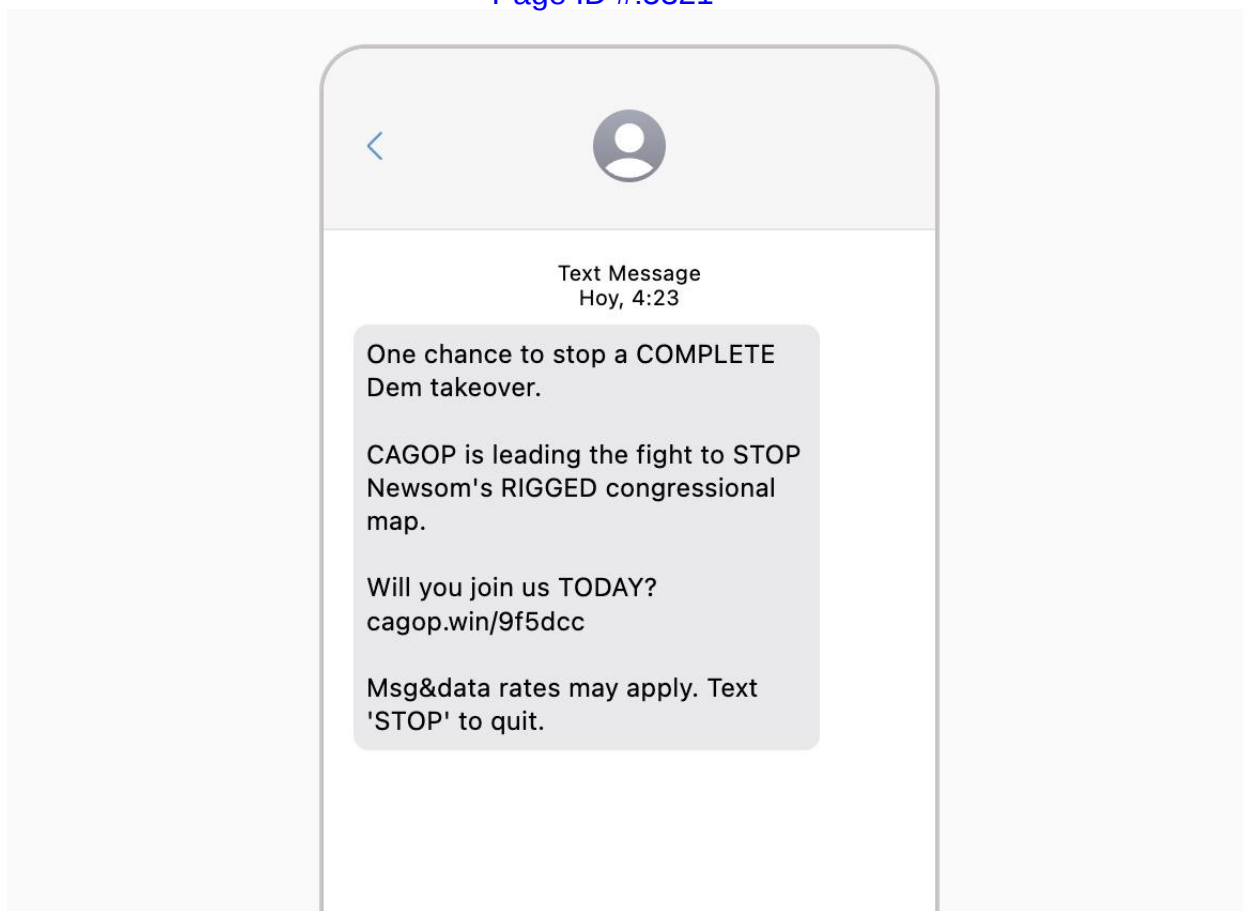


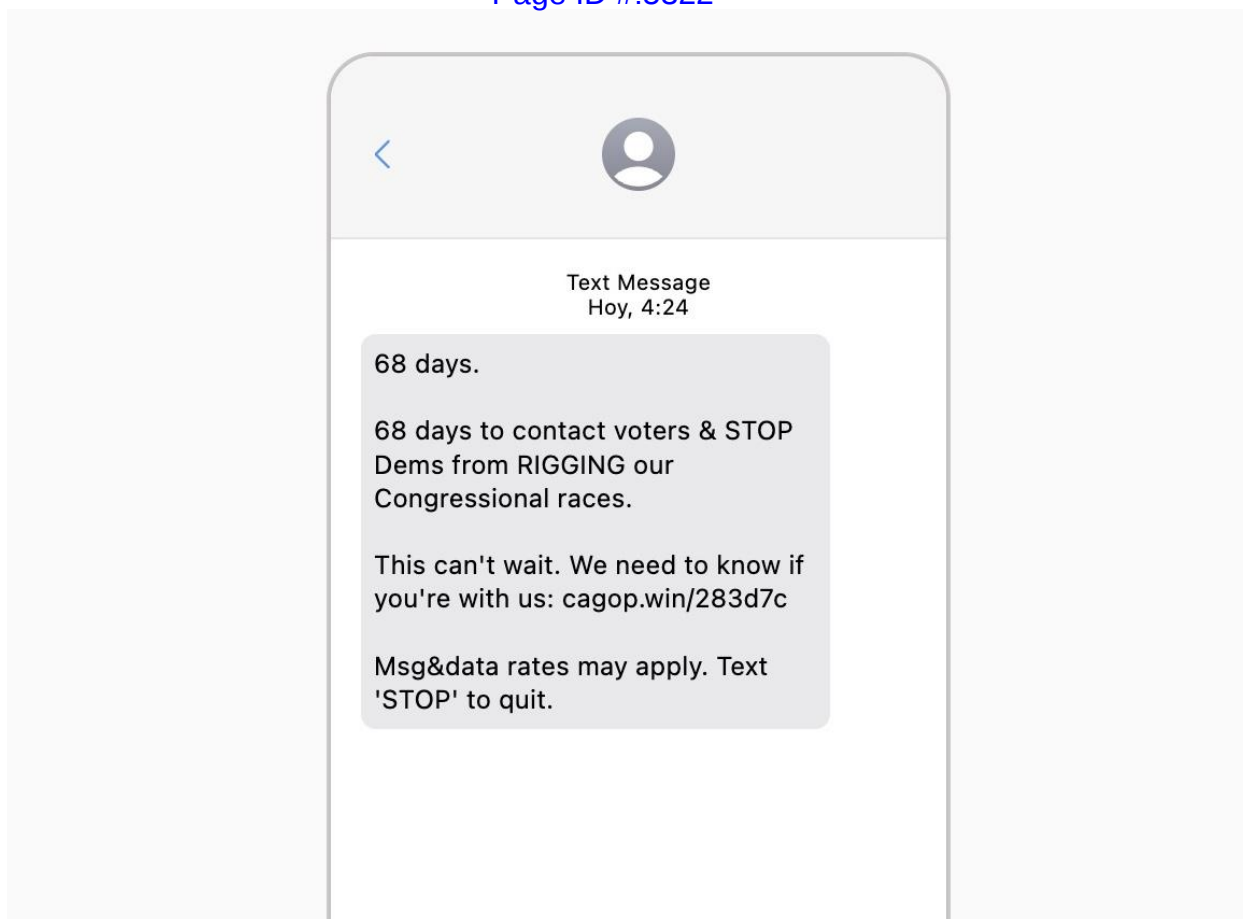


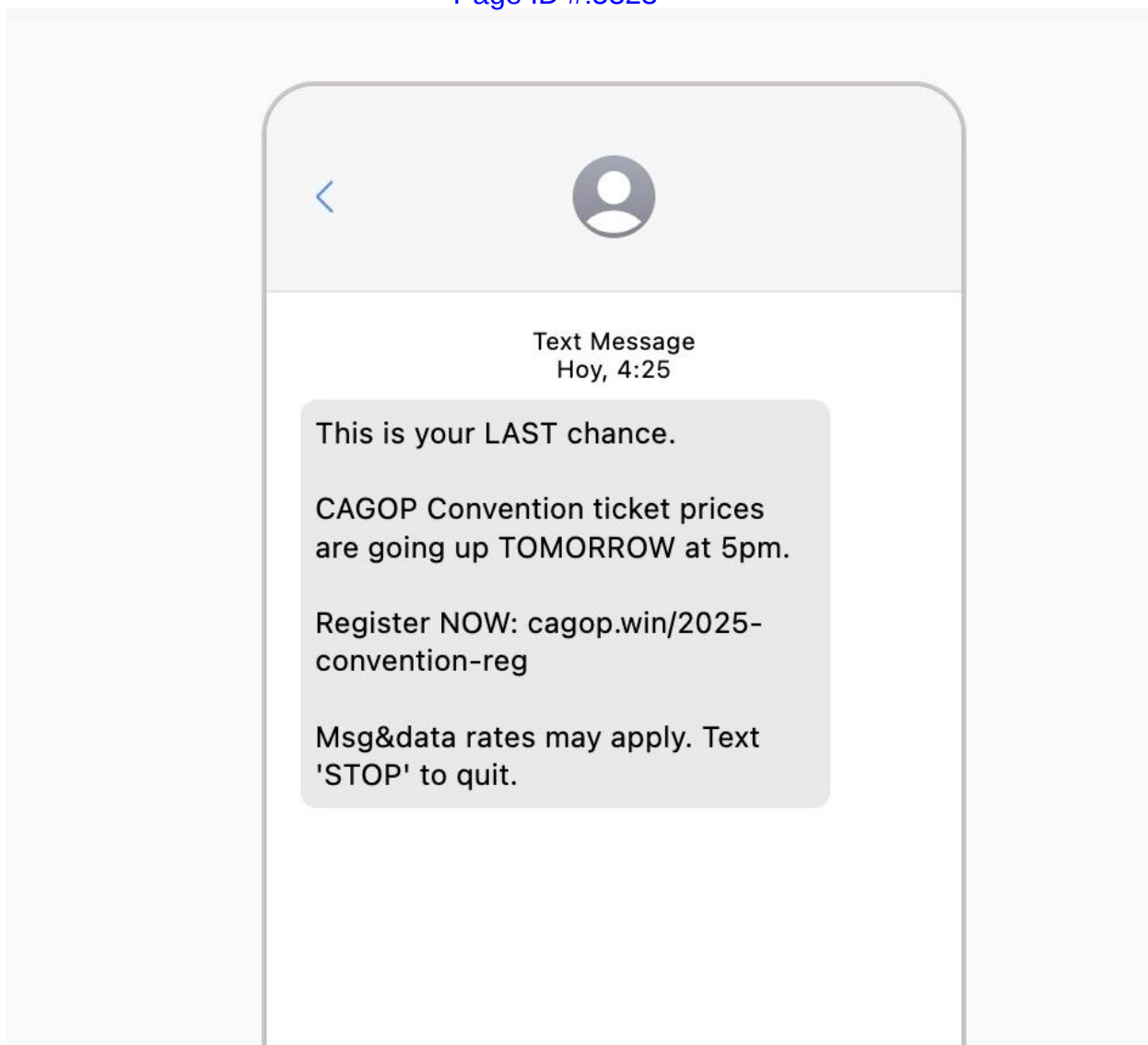


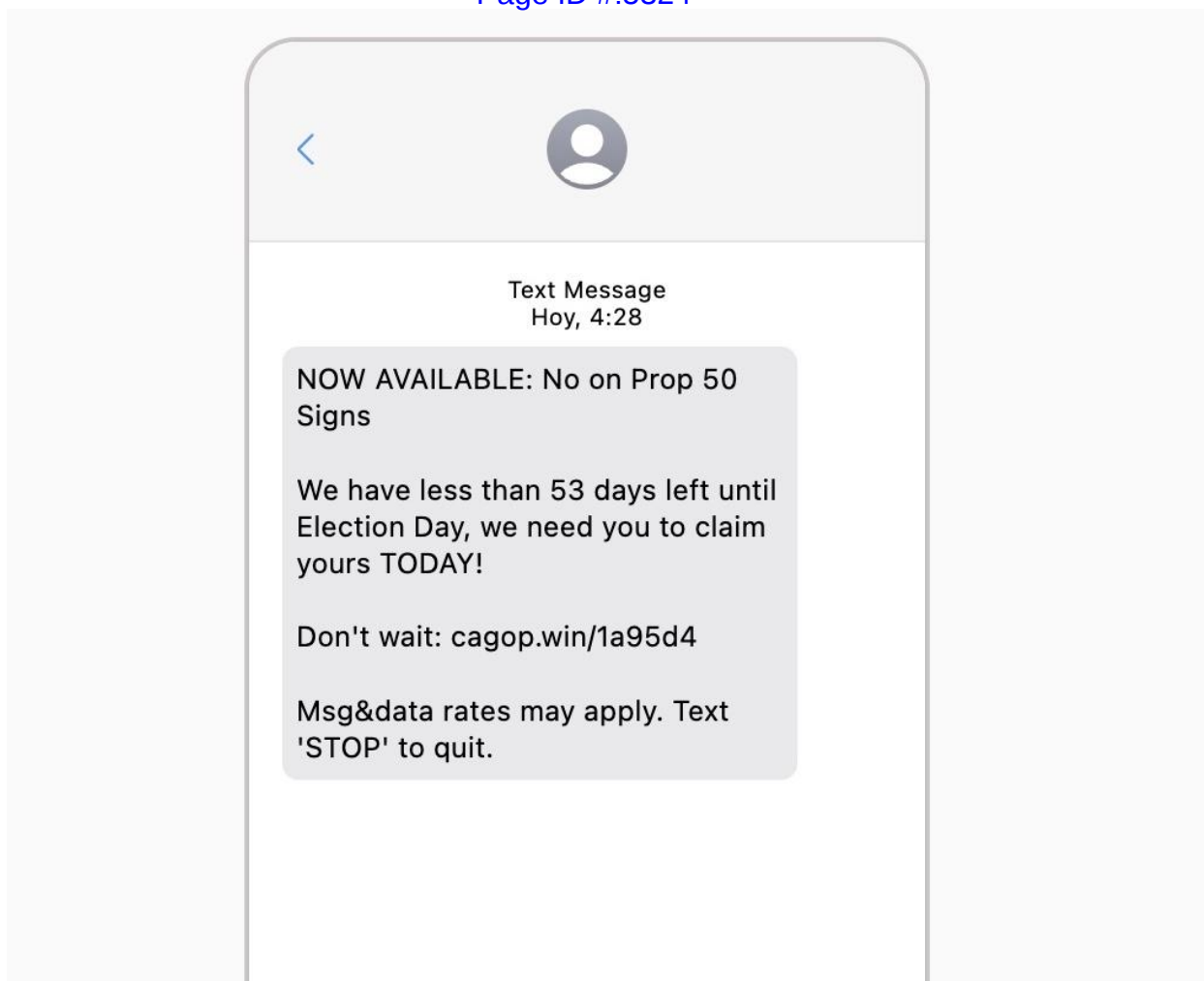


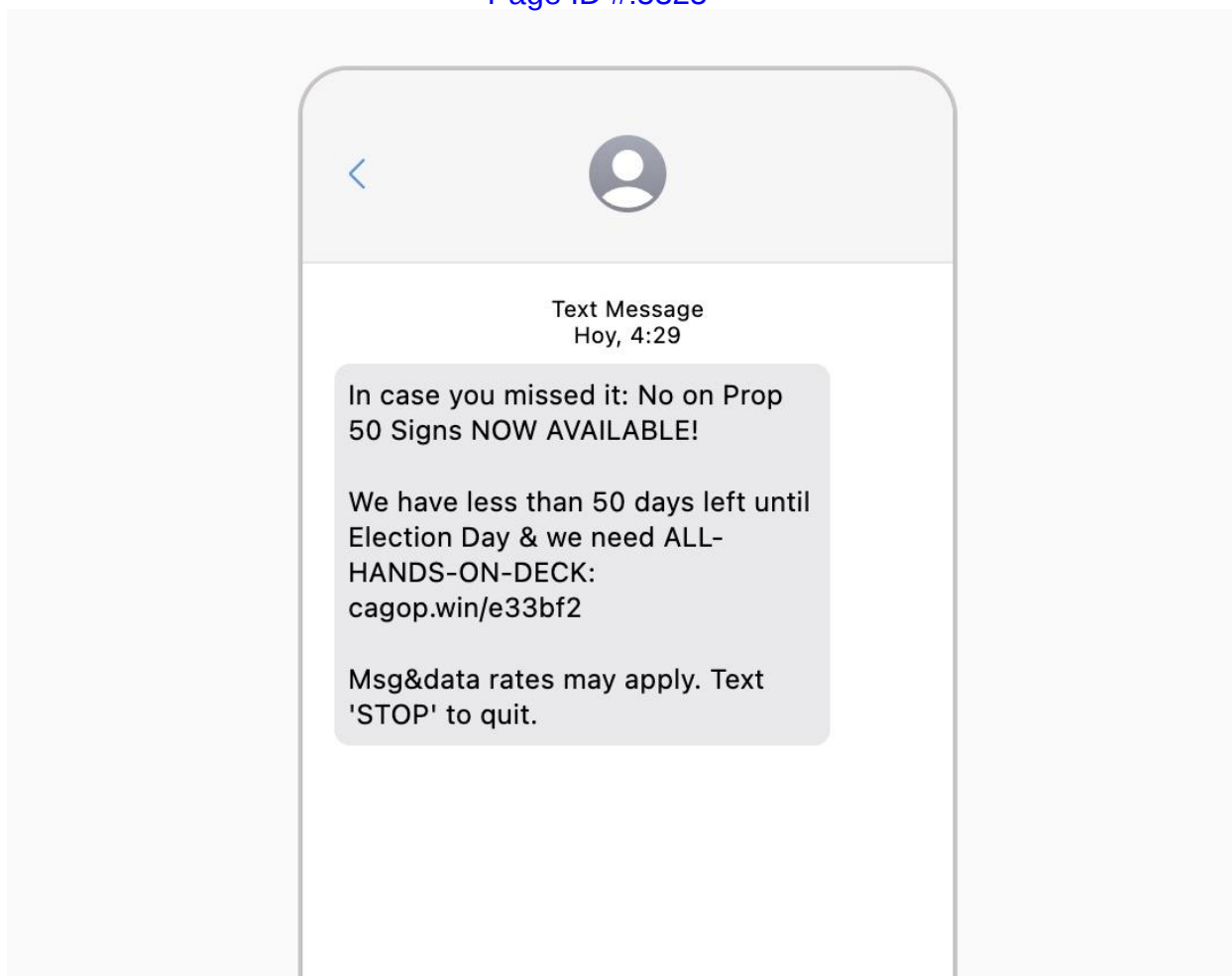


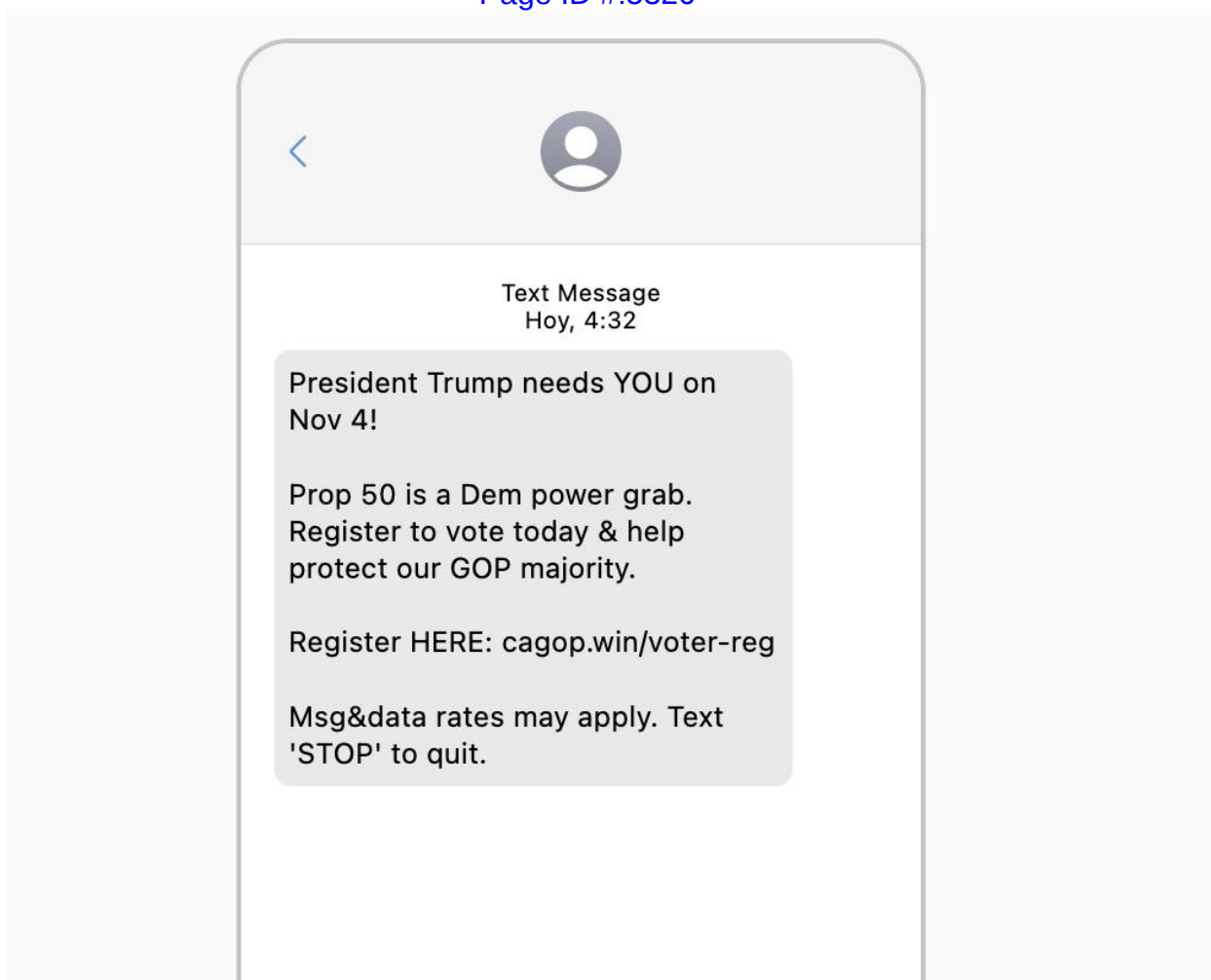


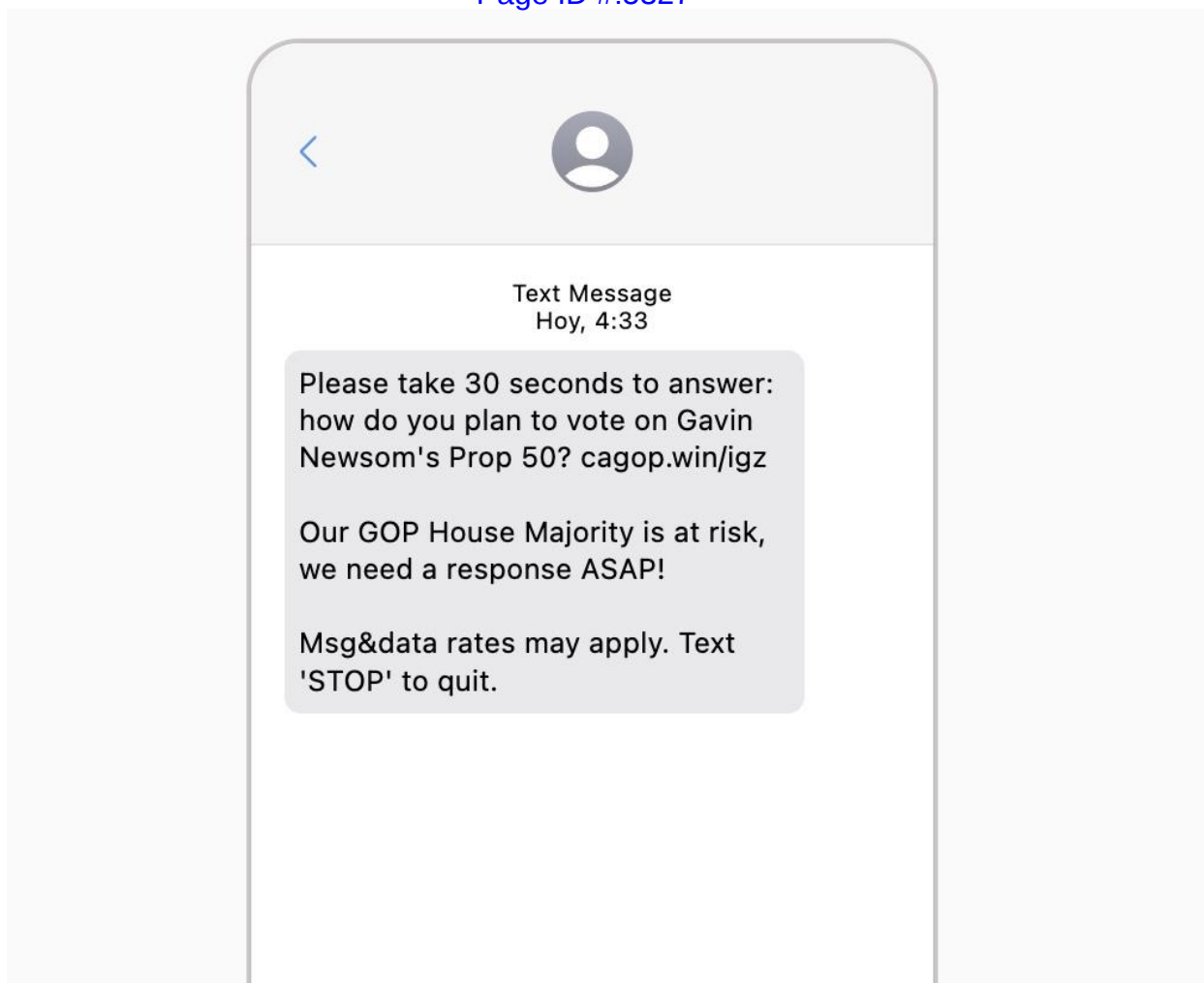


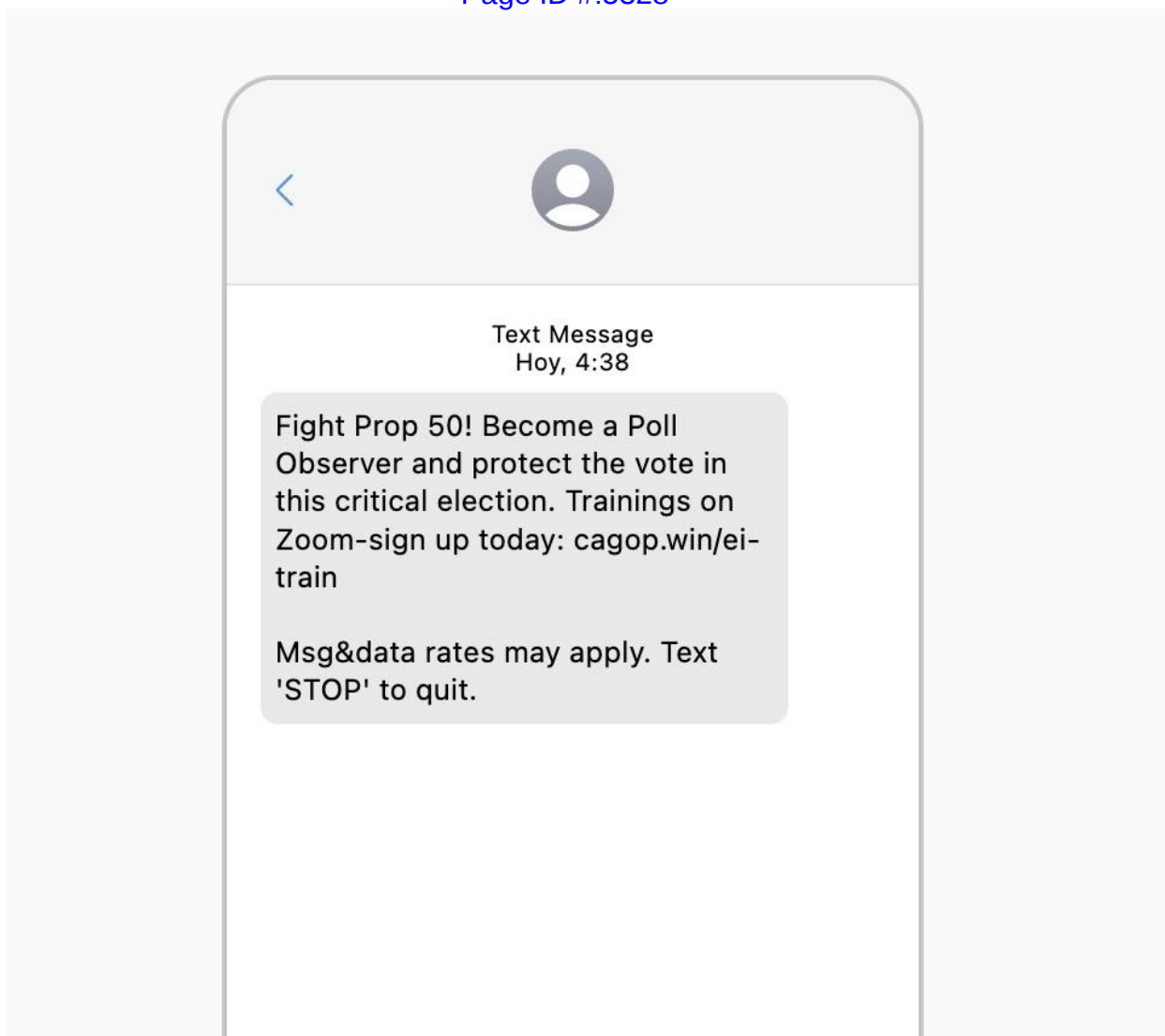


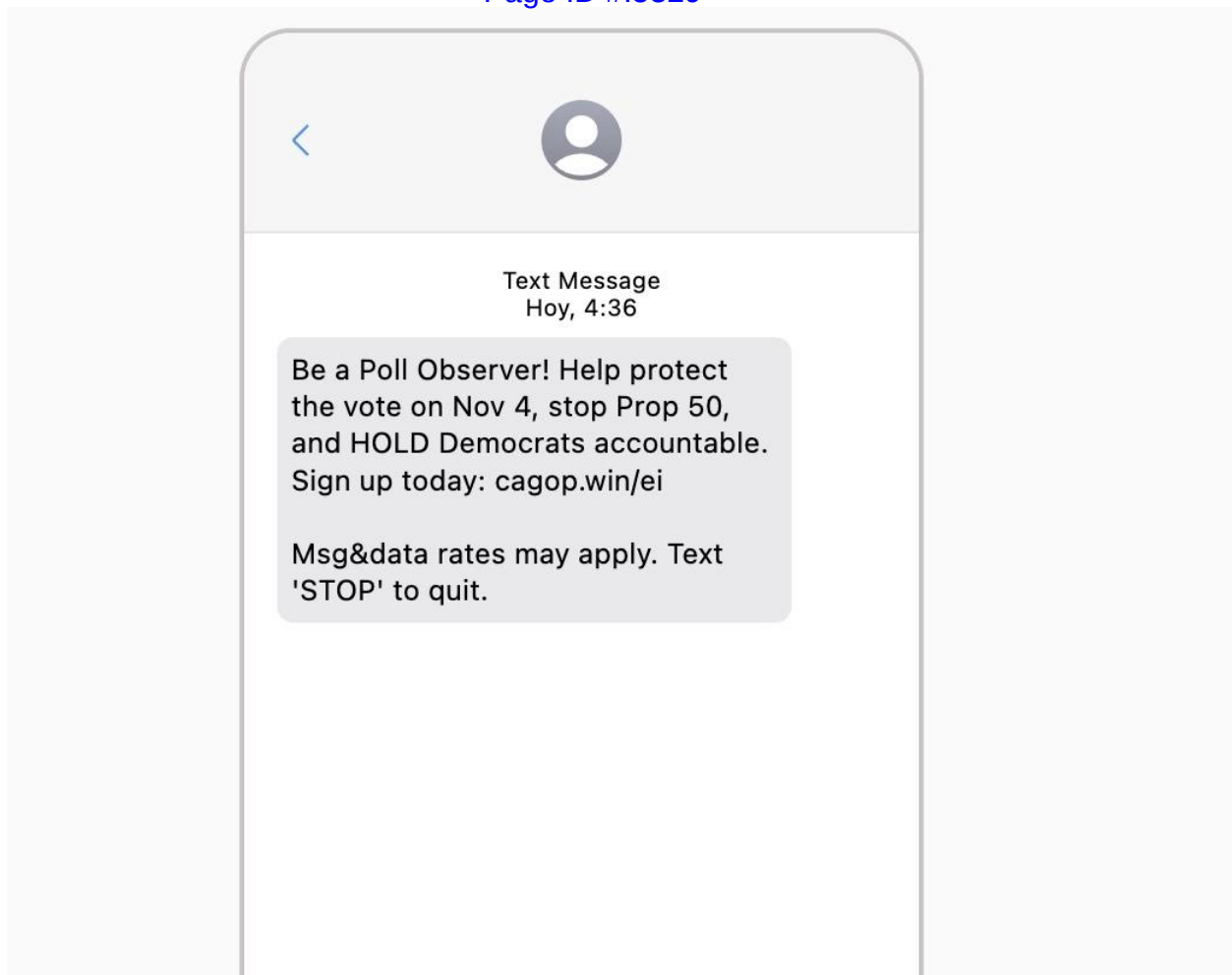


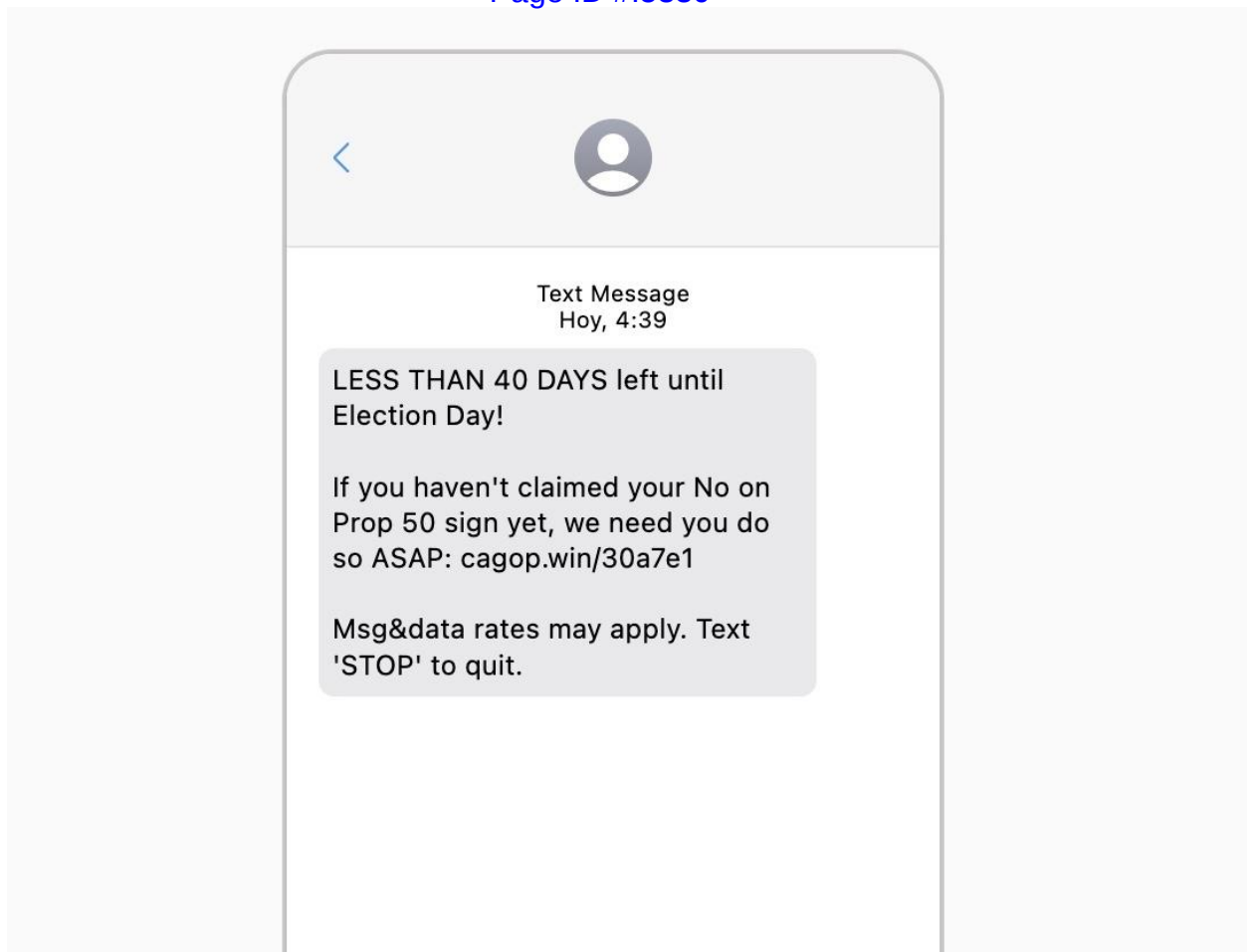


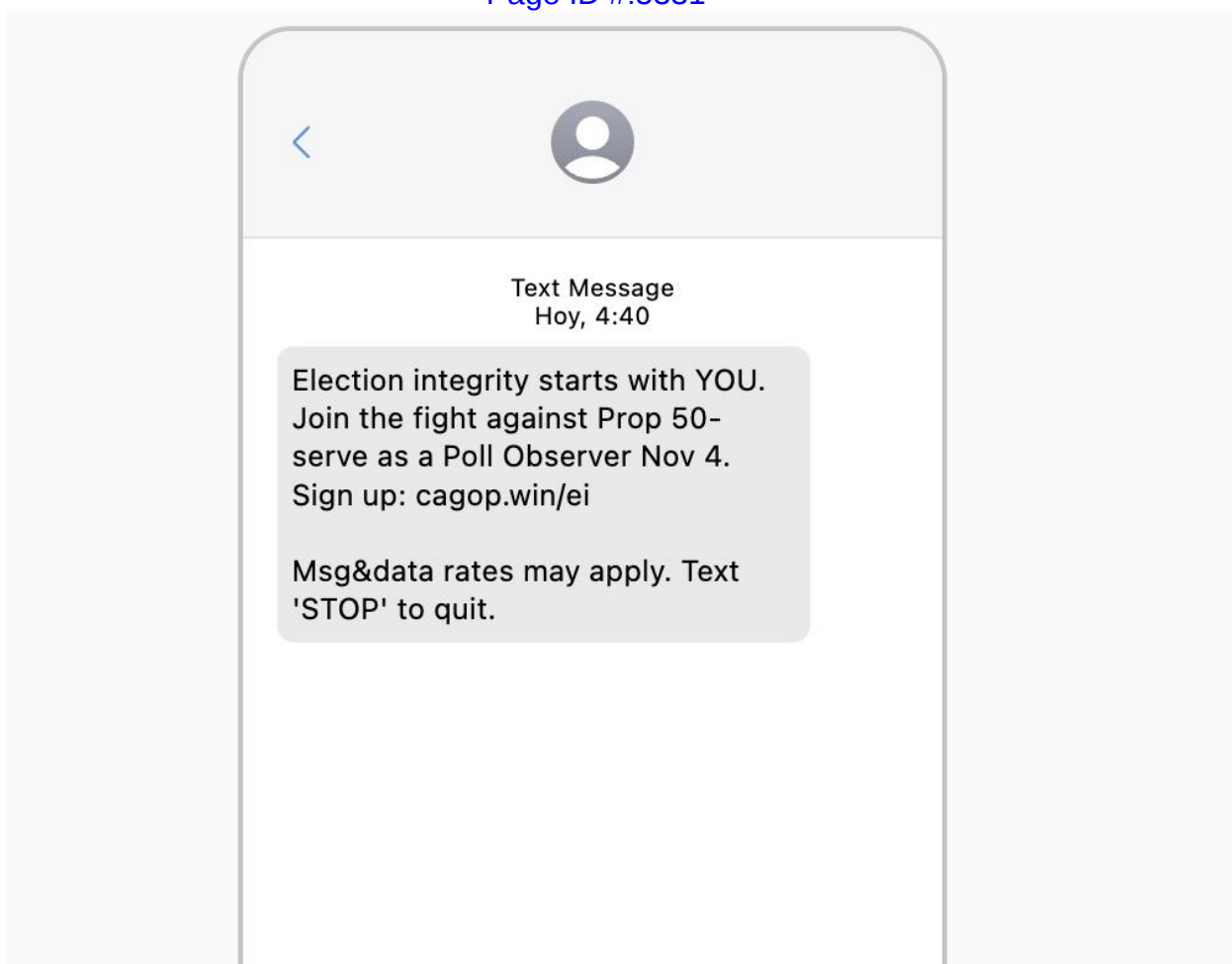


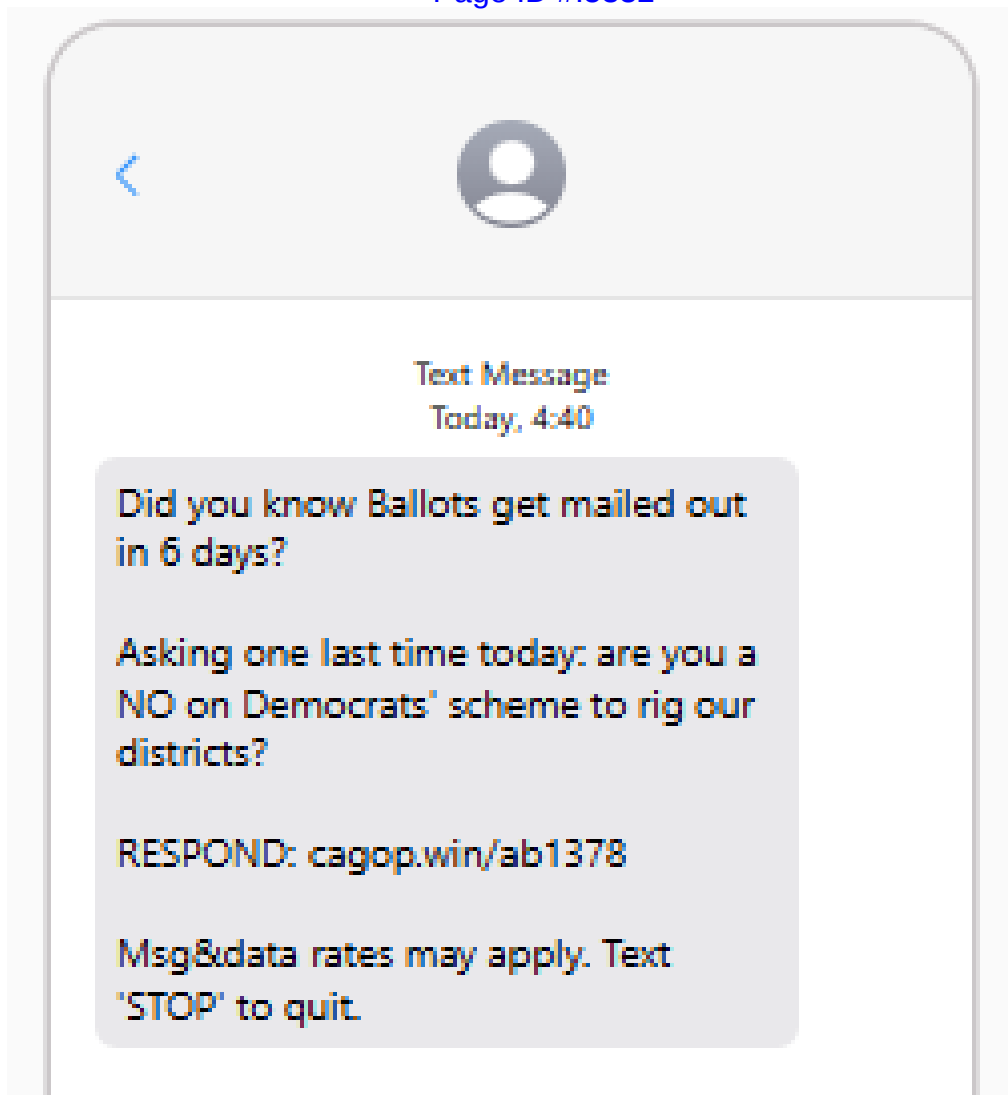


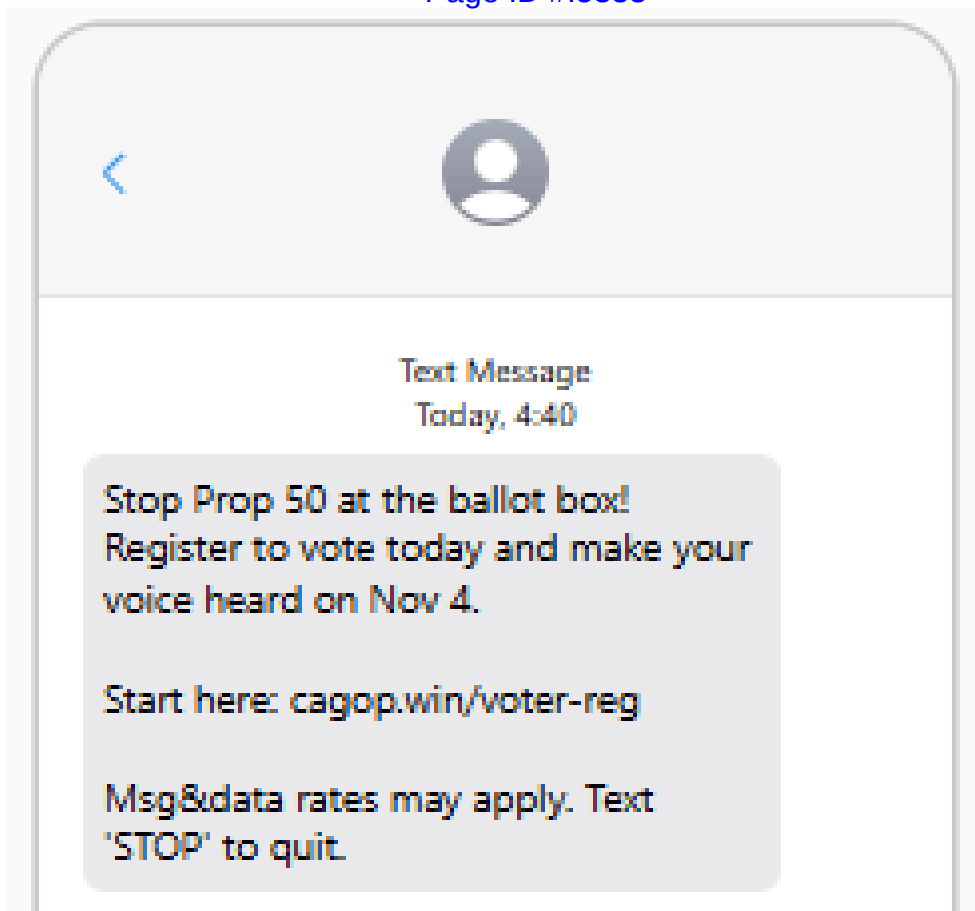


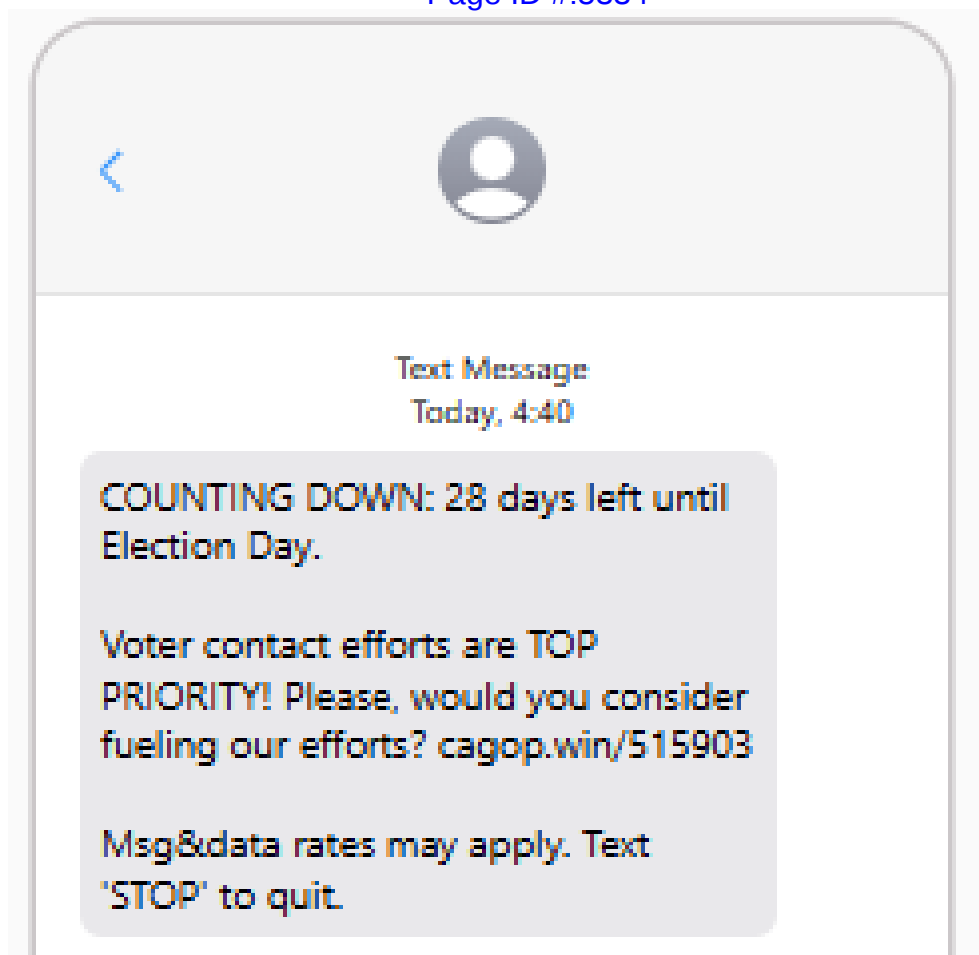


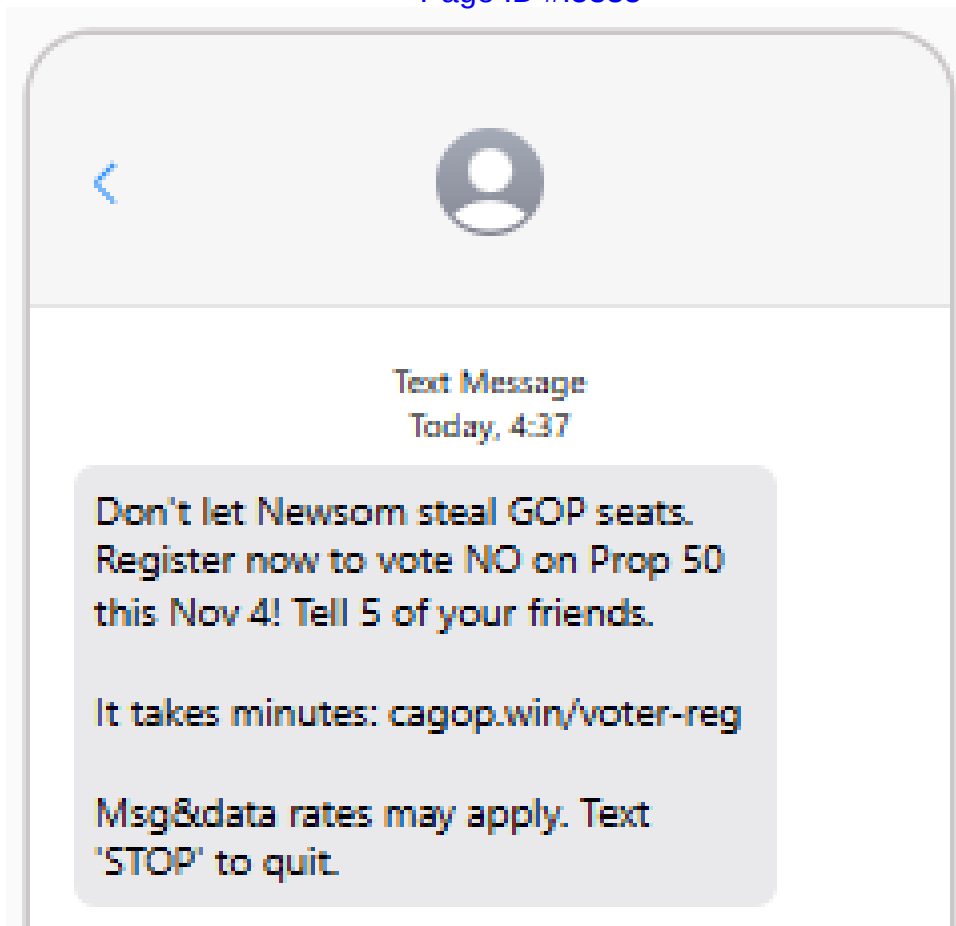


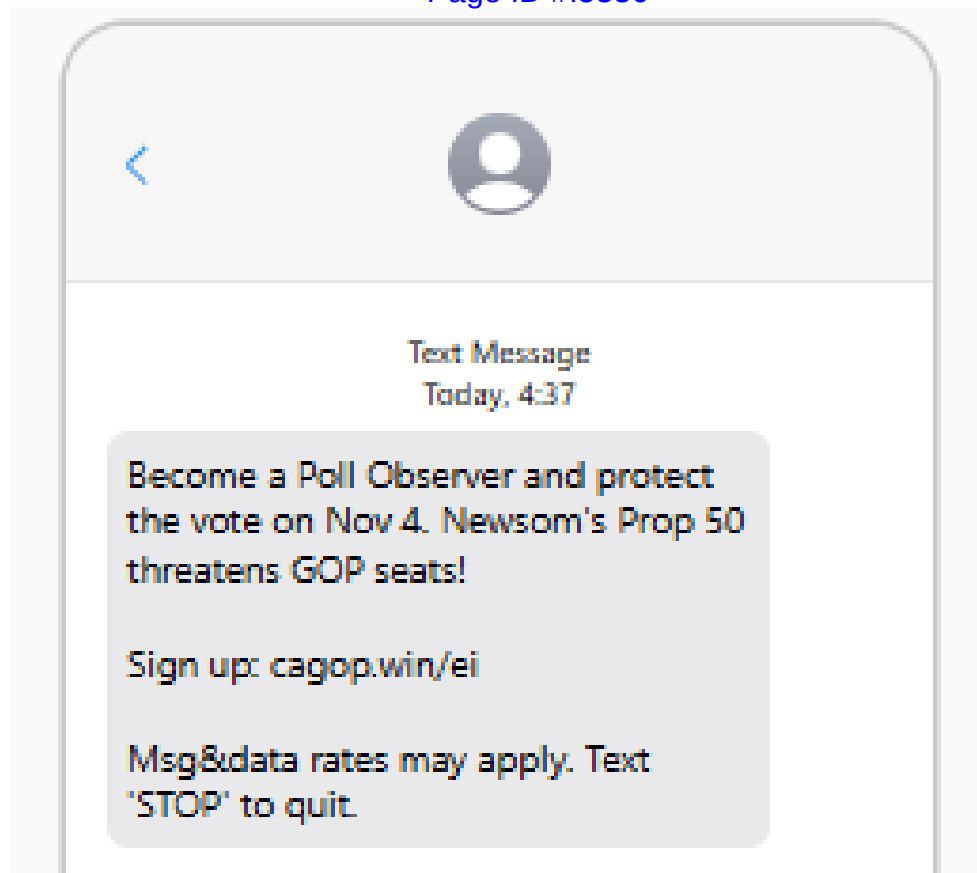


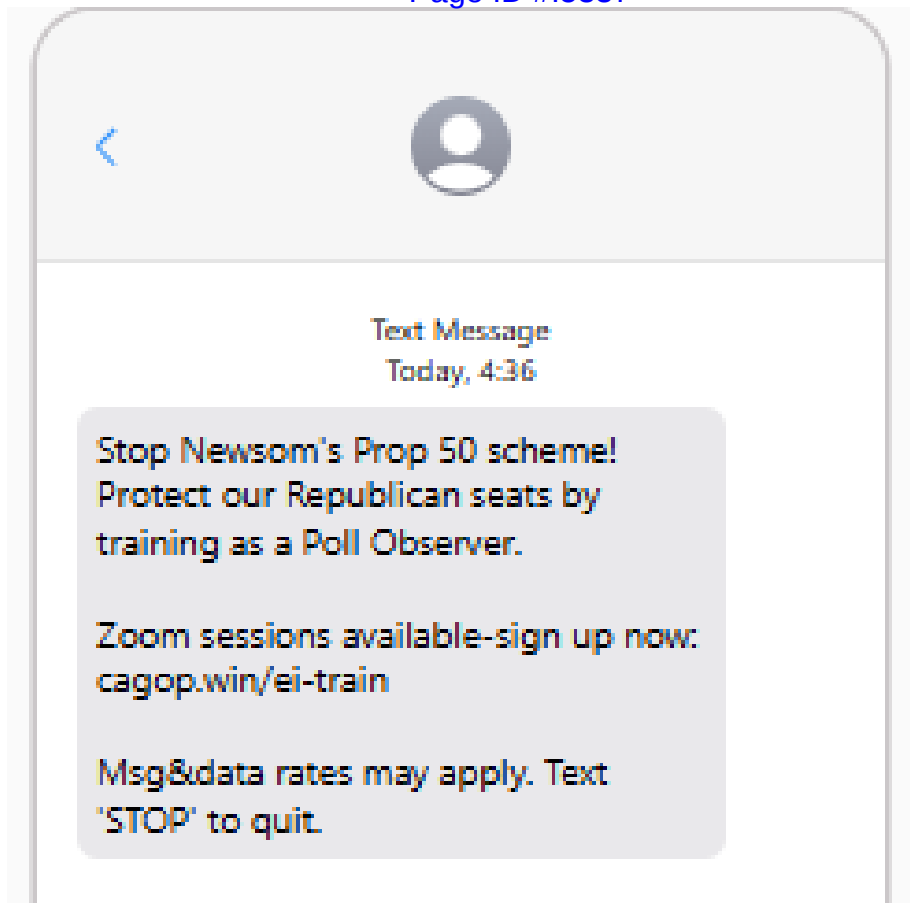


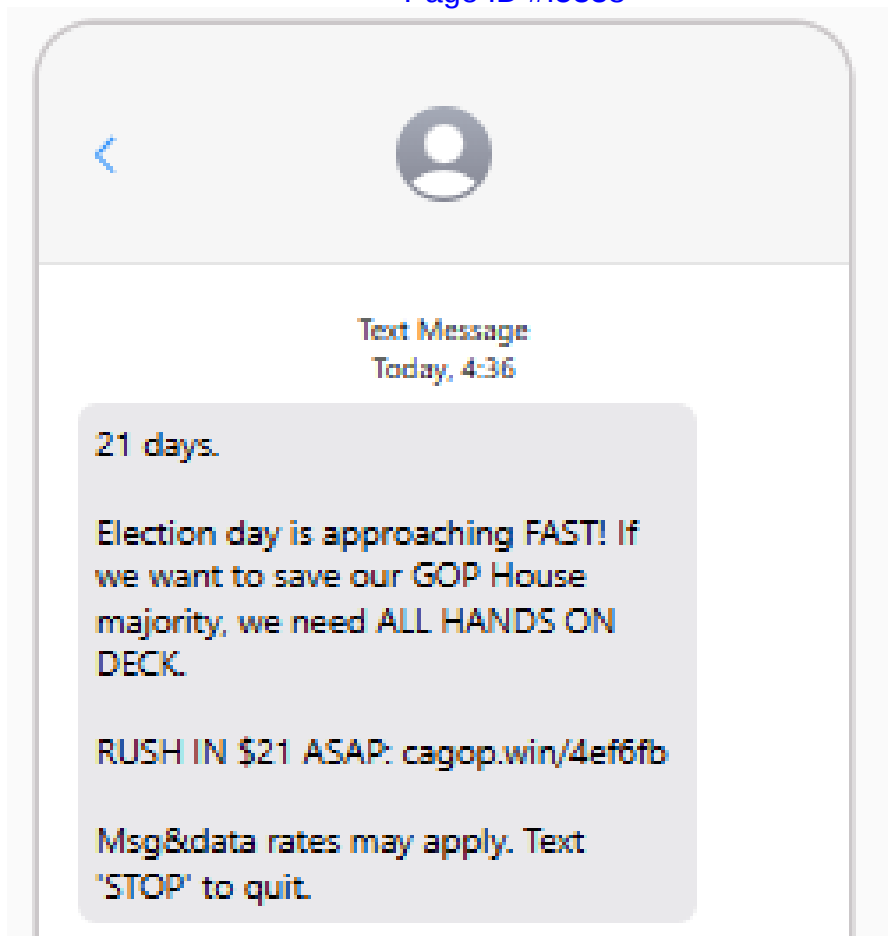


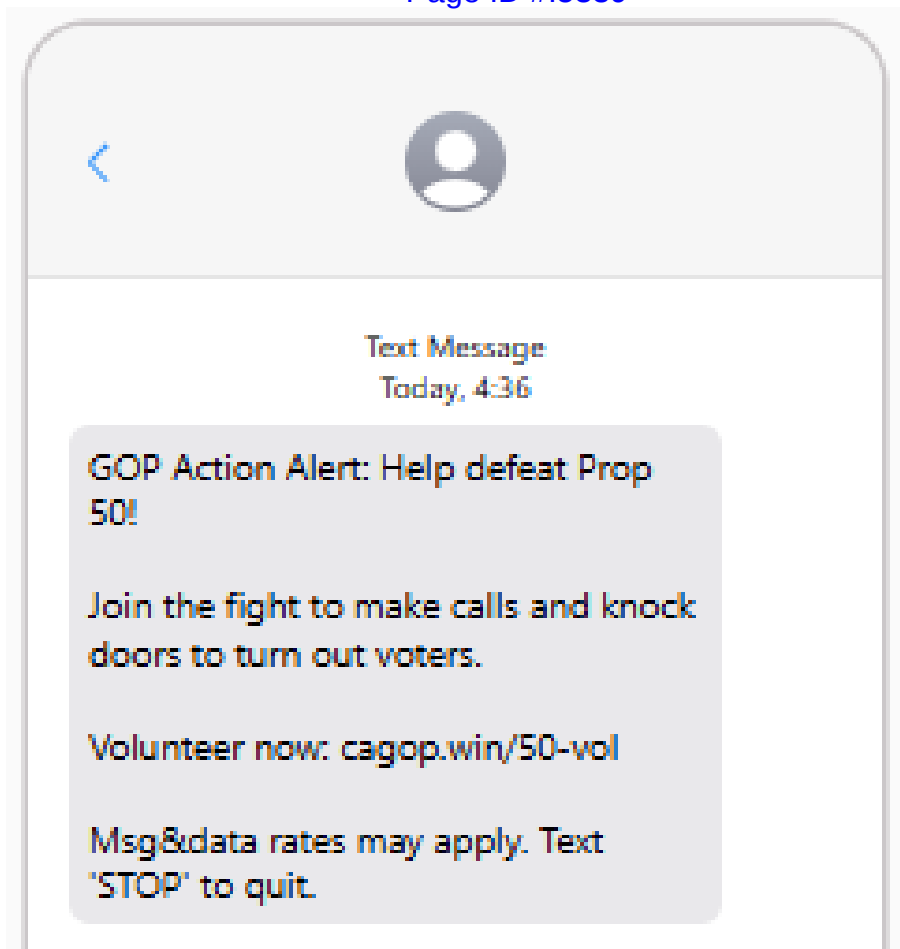


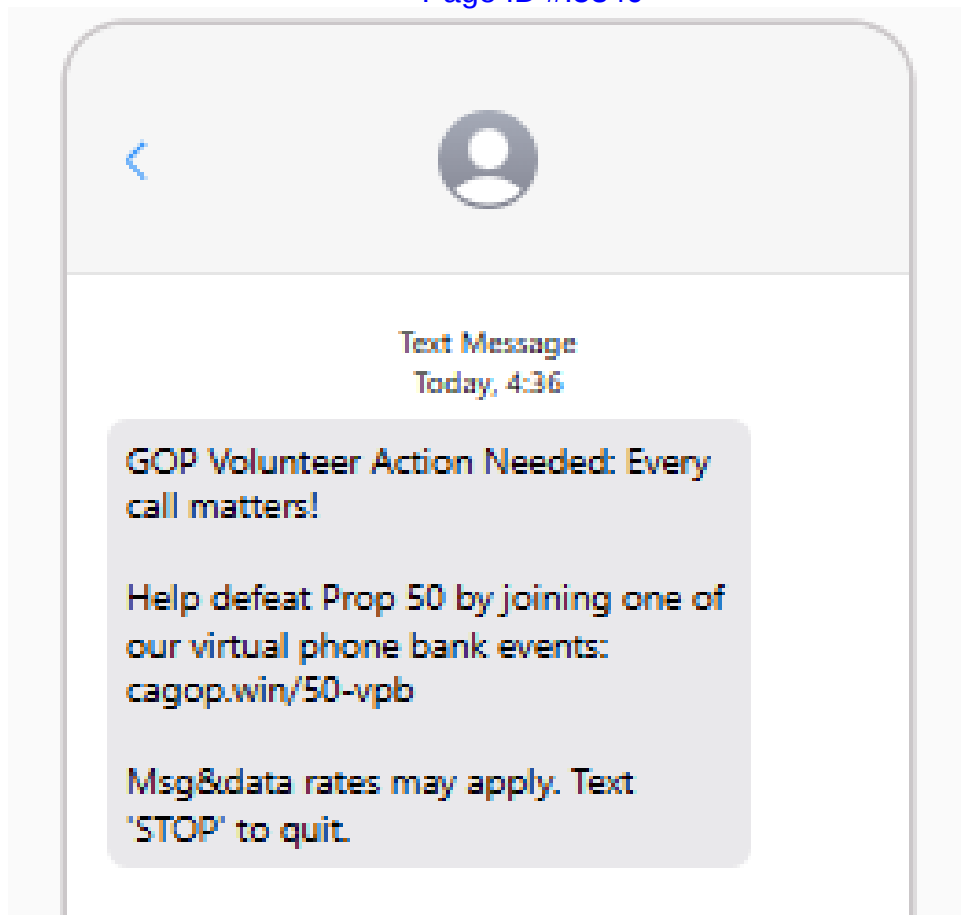


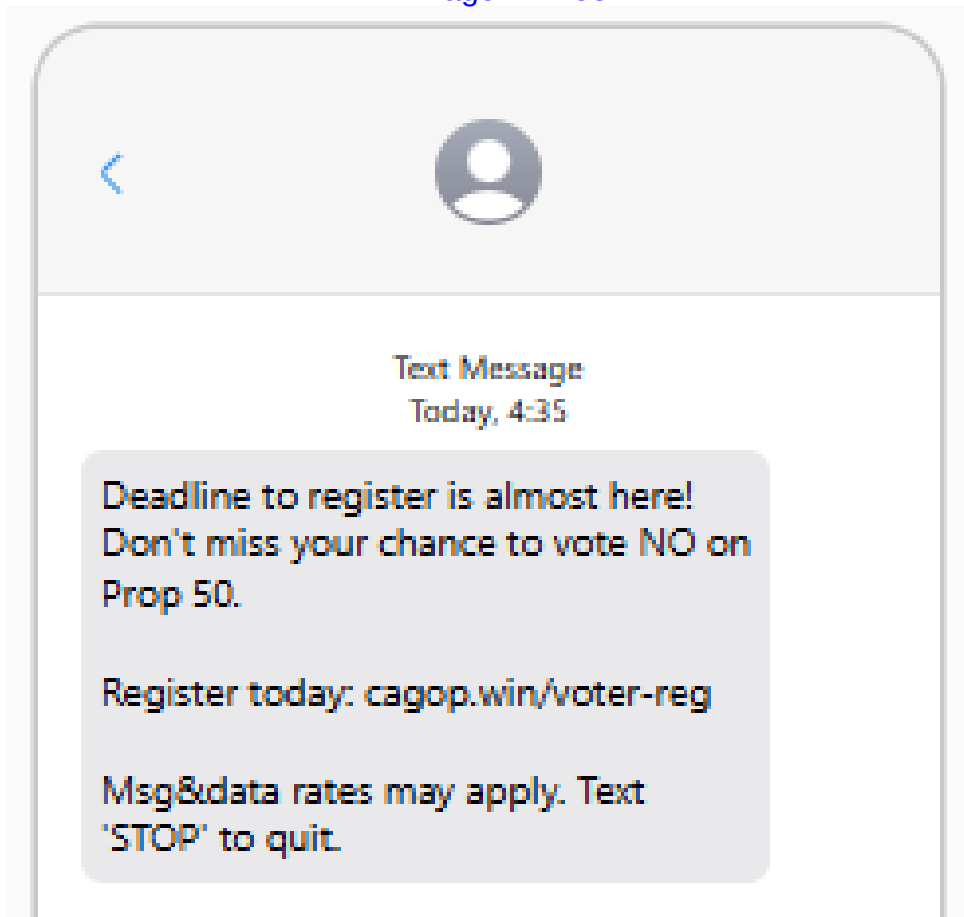


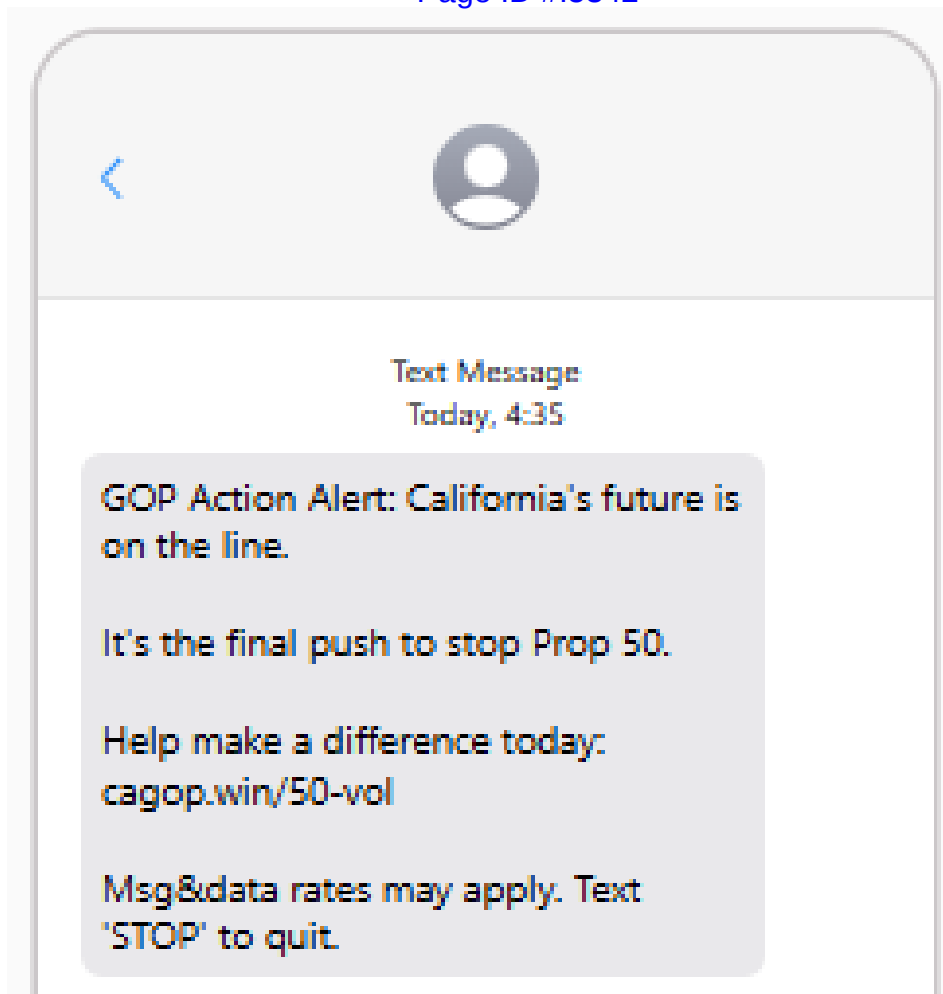


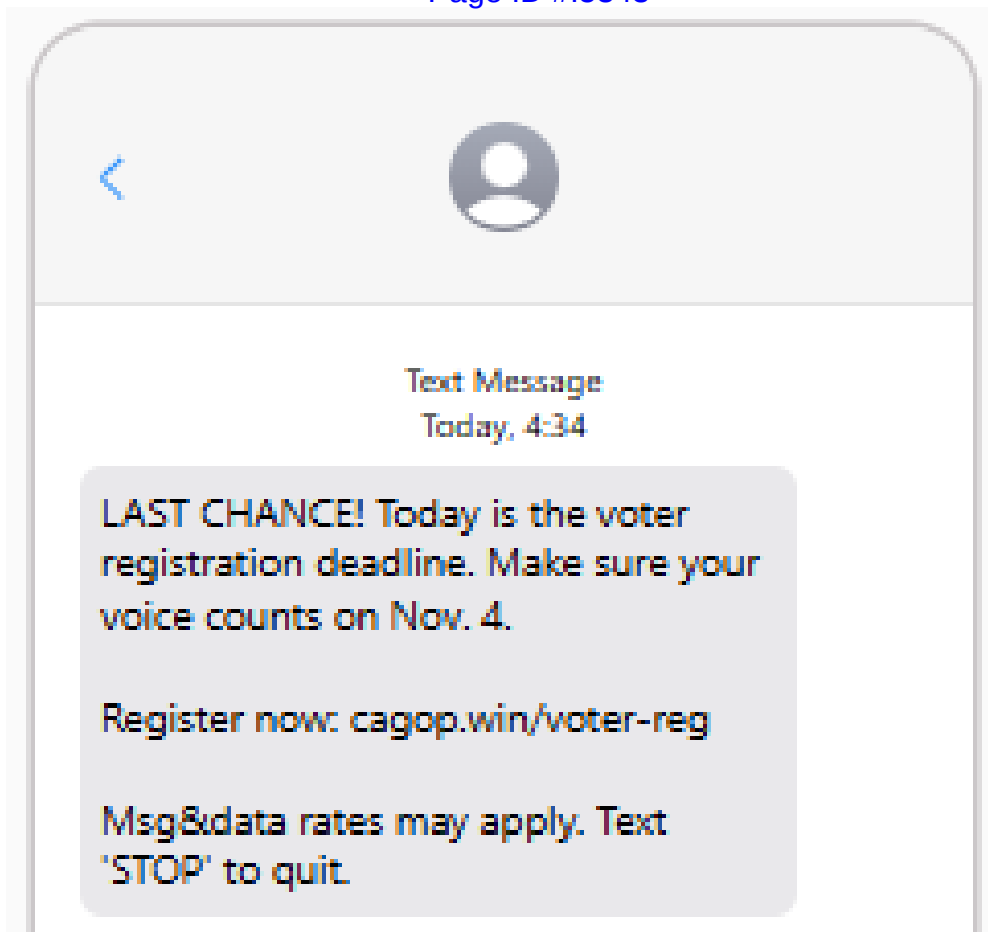


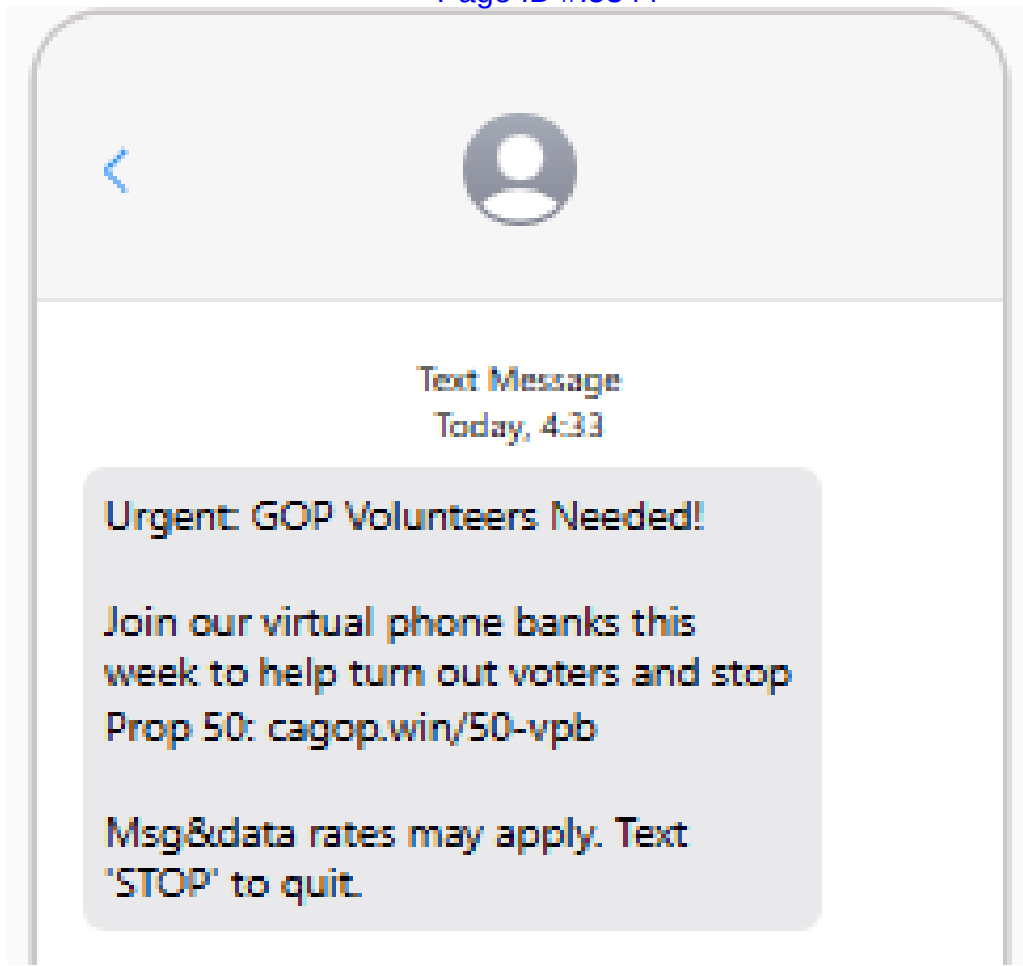


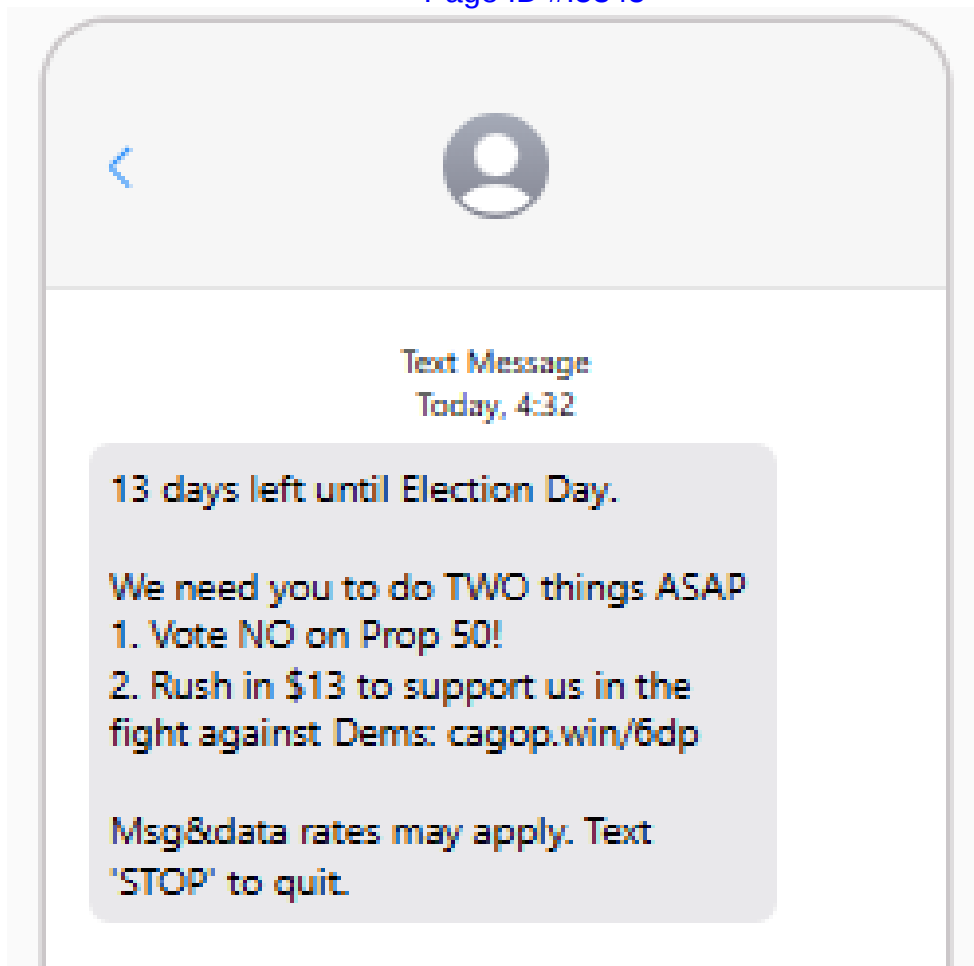


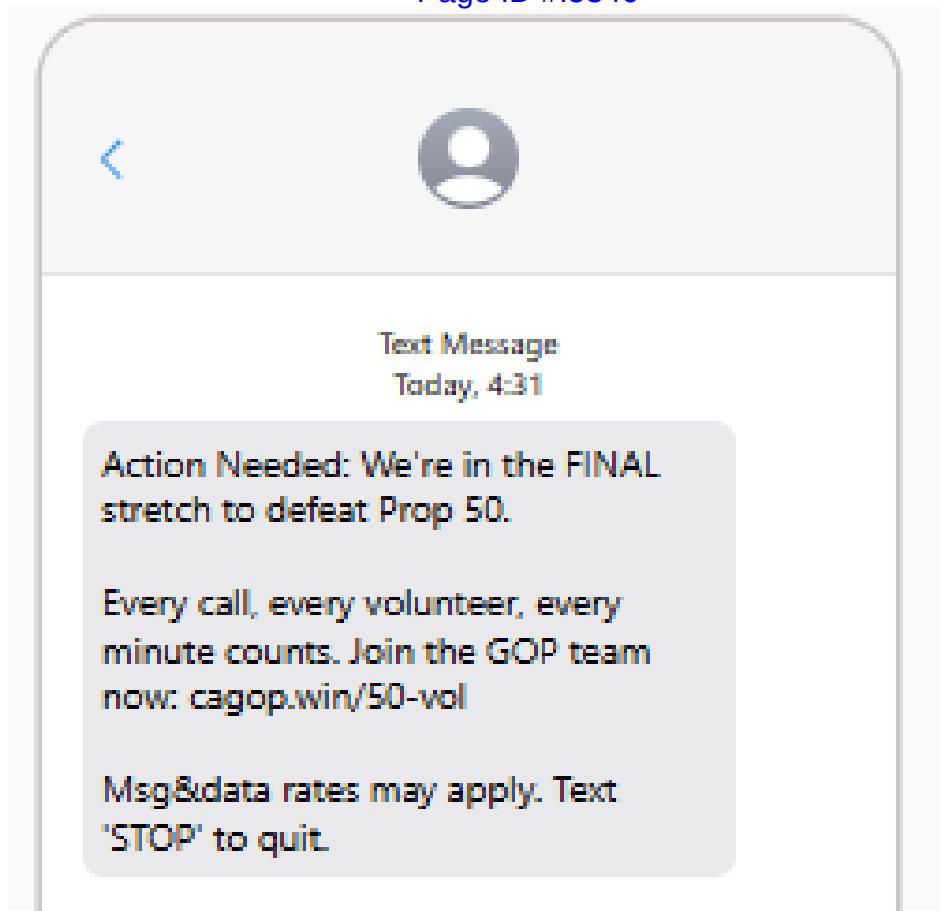


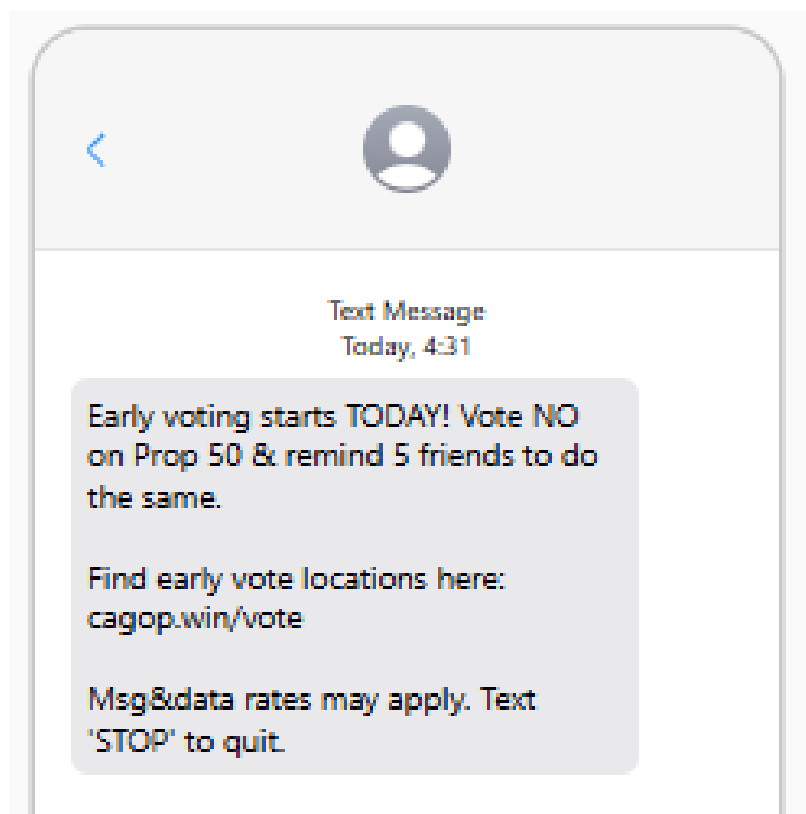


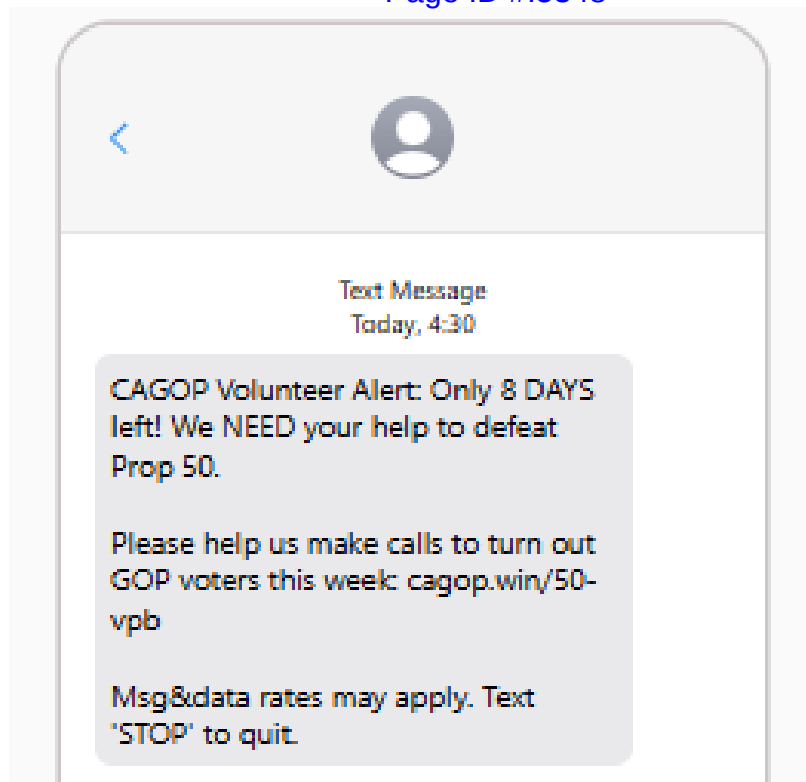


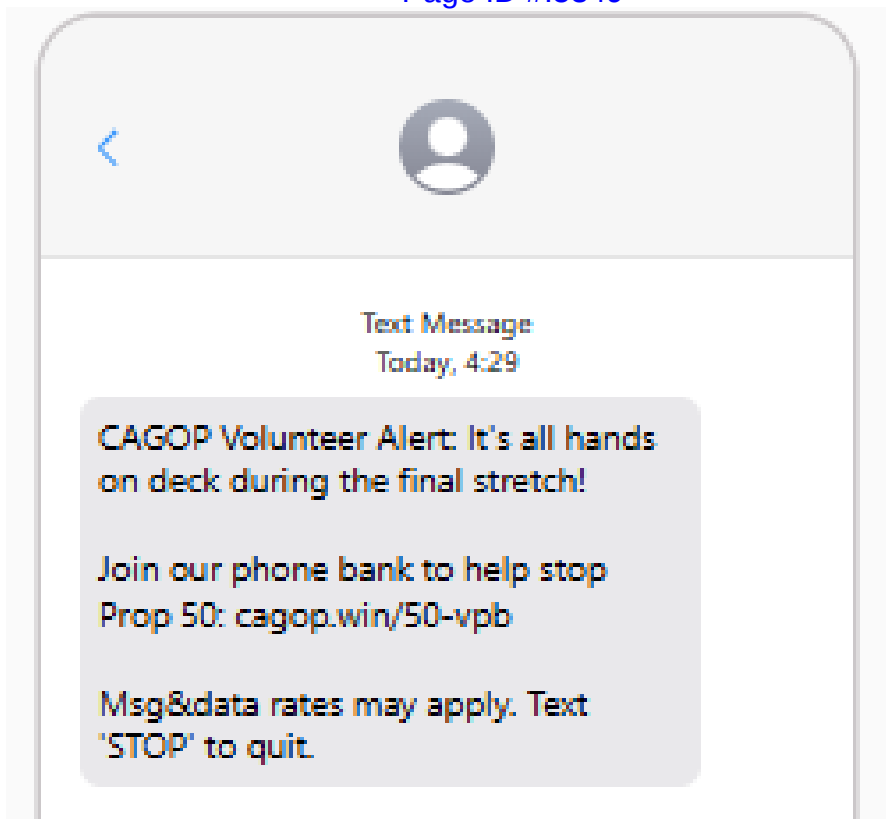


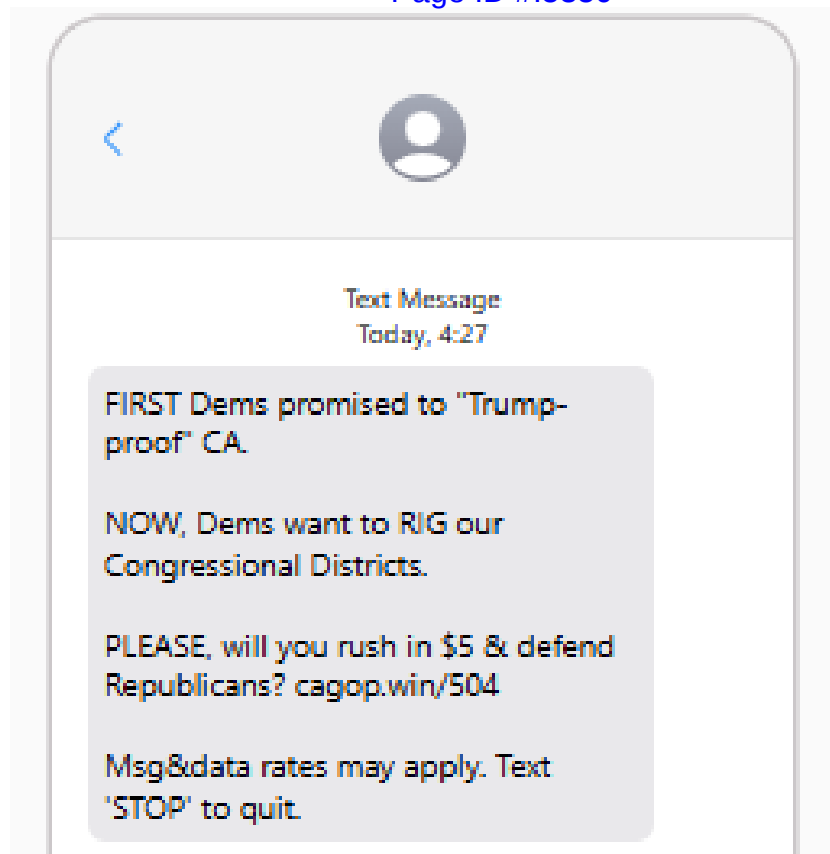


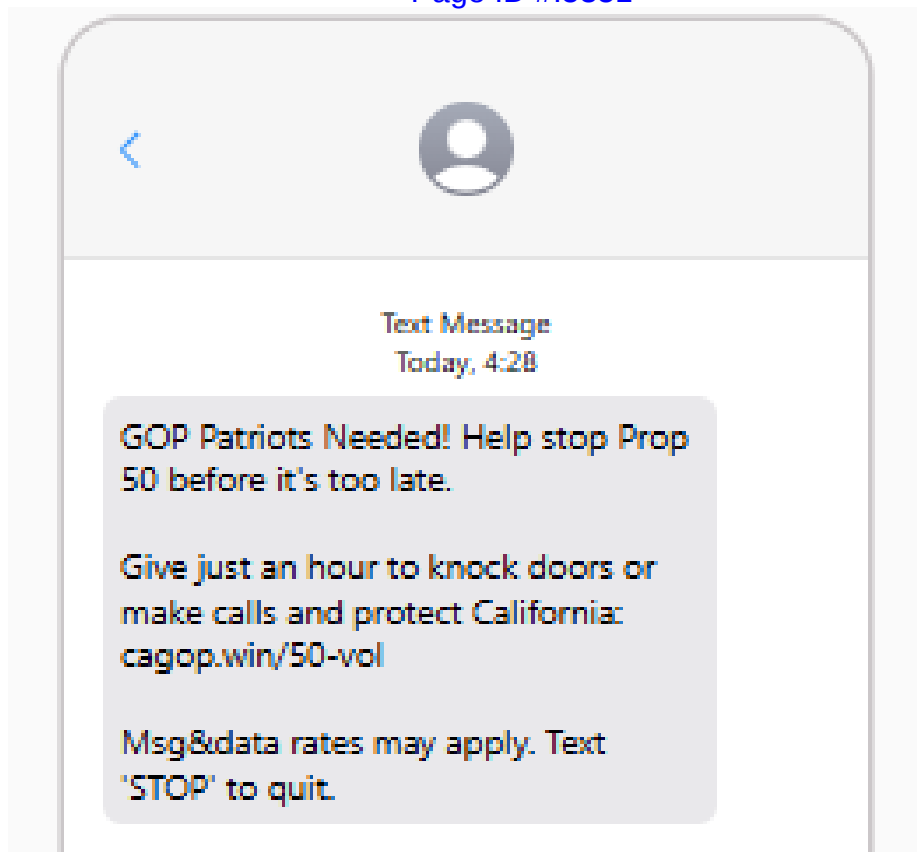


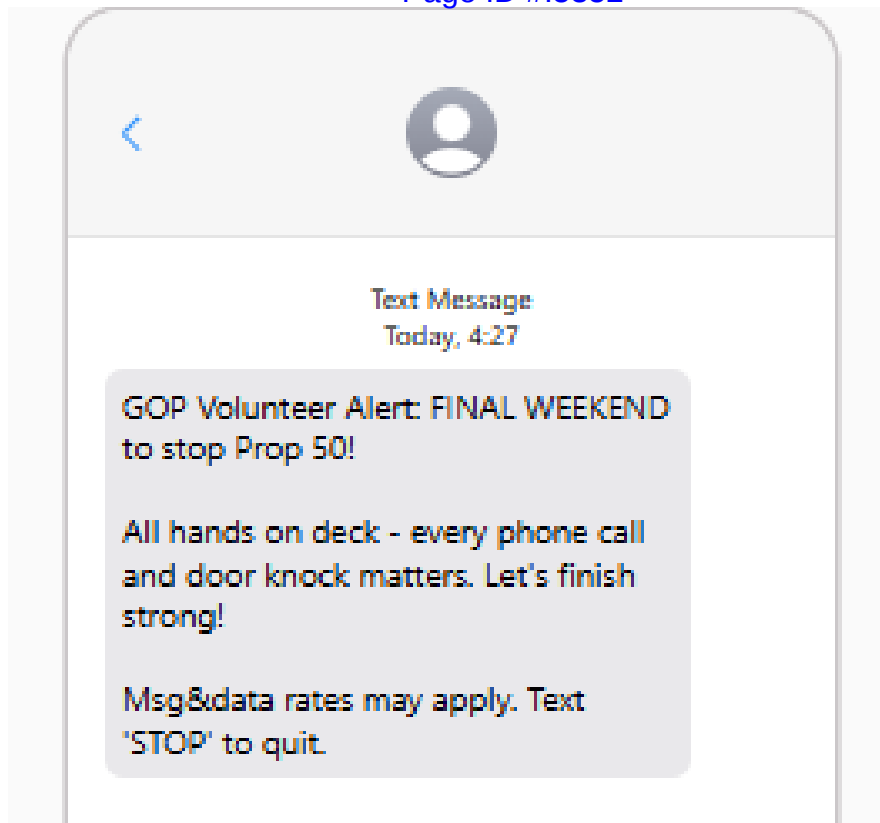


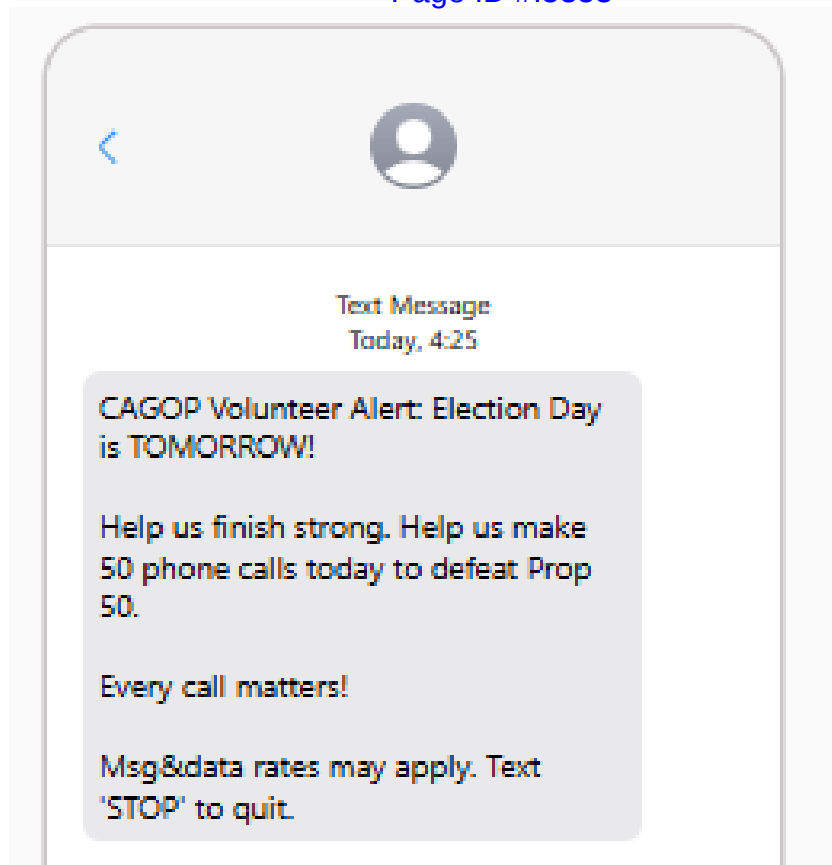


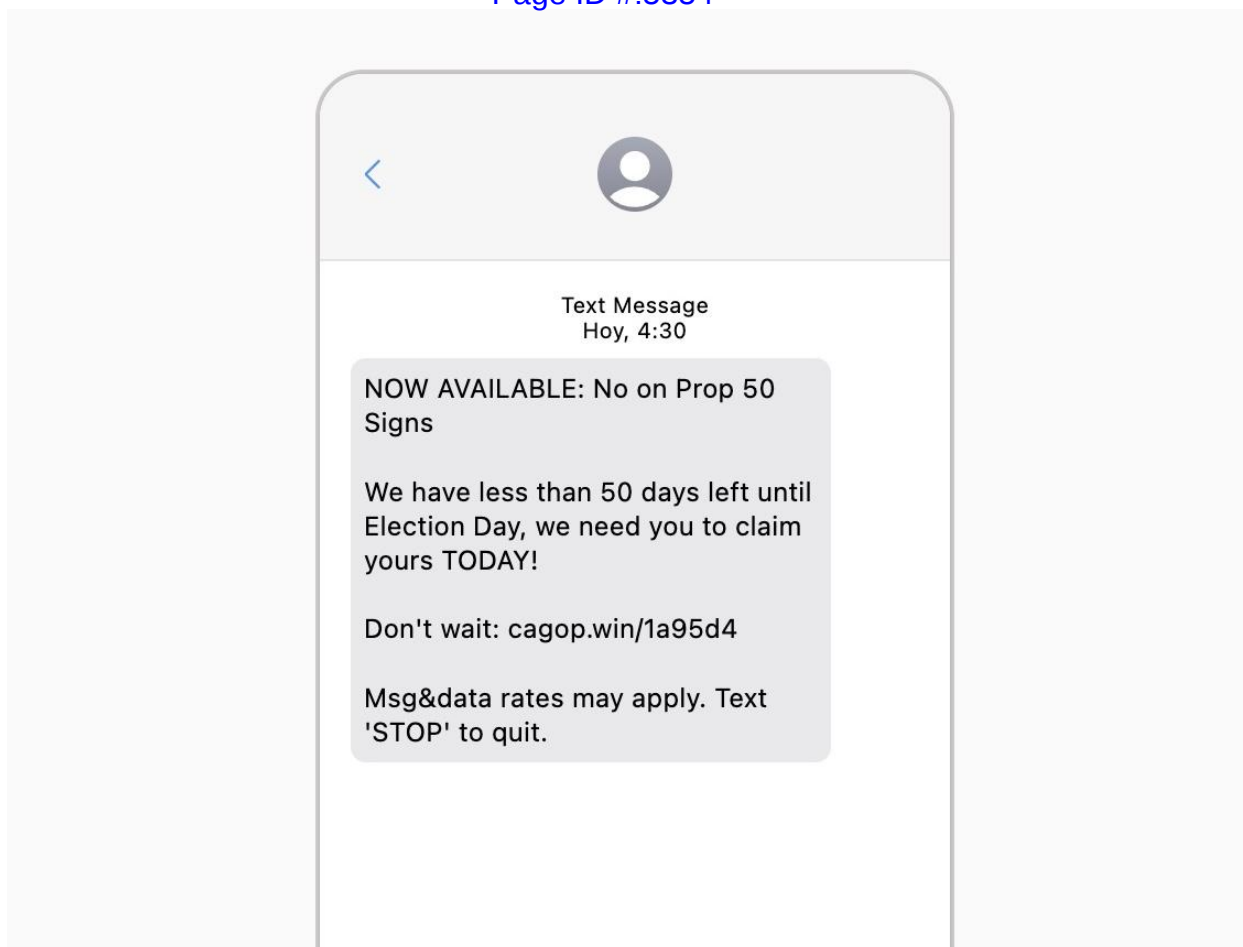












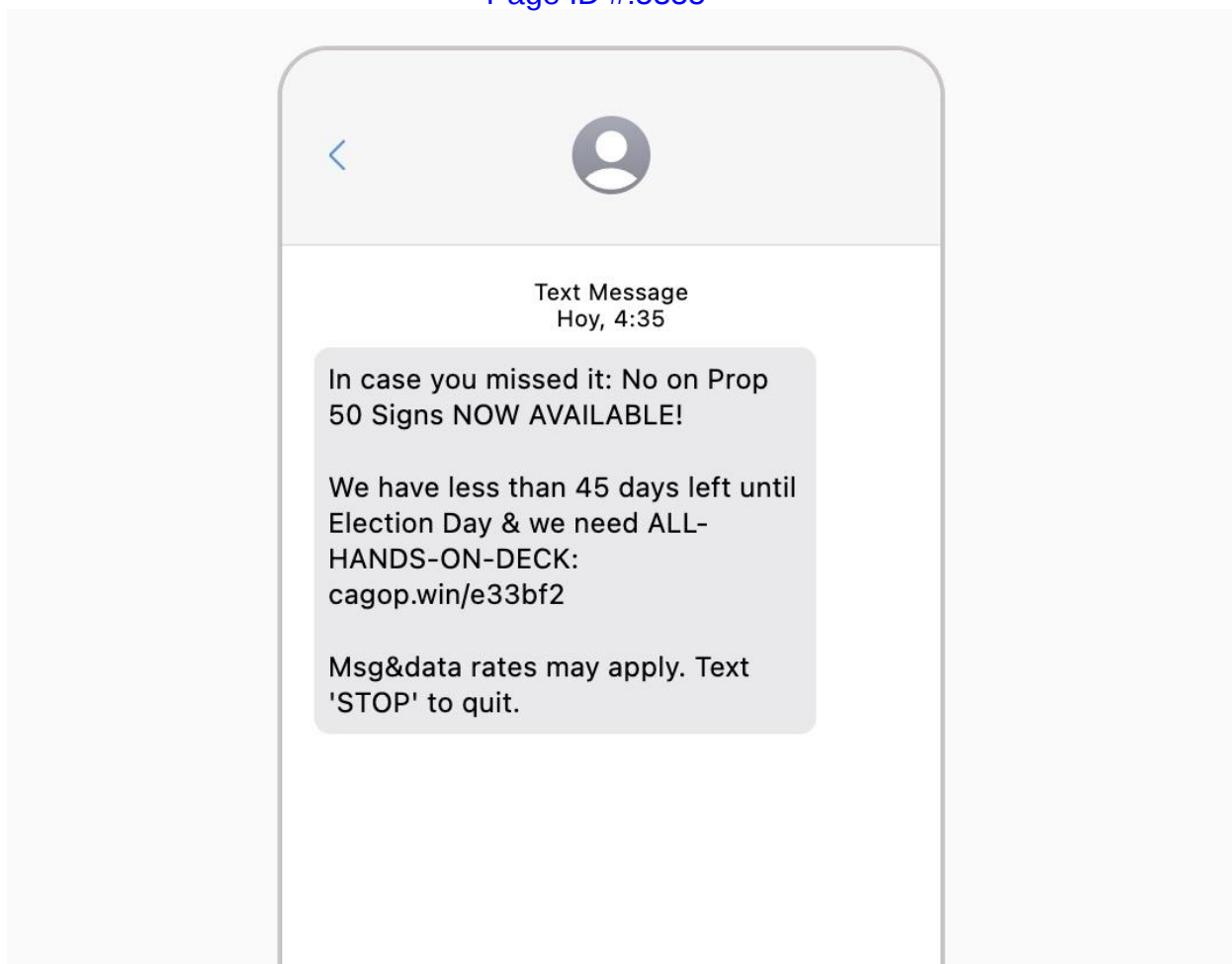


EXHIBIT 15

TO DECLARATION OF RYAN EASON

Supreme Court of California
Jorge E. Navarrete, Clerk and Executive Officer of the Court
Electronically RECEIVED on 8/25/2025 10:37:11 AM

Supreme Court of California
Jorge E. Navarrete, Clerk and Executive Officer of the Court
Electronically FILED on 8/25/2025 by M. Chang, Deputy Clerk

S292592

Case No.

**IN THE SUPREME COURT
OF THE STATE OF CALIFORNIA**

ASSEMBLYWOMAN KATHRYN SANCHEZ; ASSEMBLYMAN TRI
TA; SENATOR SUZETTE VALLADARES; SENATOR TONY
STRICKLAND; ERIC CHING; MIKE WARD; ANDREW PANDOL; and
ROGER HOLLAND,
Petitioners,

v.

SHIRLEY N. WEBER,
California Secretary of State, In Her Official Capacity,
Respondent,
and
LEGISLATURE OF THE STATE OF CALIFORNIA,
Real Party in Interest.

**EMERGENCY PETITION FOR WRIT OF MANDATE
OR OTHER EXTRAORDINARY OR IMMEDIATE RELIEF;
MEMORANDUM OF POINTS AND AUTHORITIES;
DECLARATIONS OF MICHAEL A. COLUMBO; SEAN TRENDE;
ANDREW PANDOL; AND TONY STRICKLAND**

LEGISLATIVE ACTION IN VIOLATION OF CALIFORNIA
CONSTITUTION ARTICLE XXI, §§ 1, 2, ARTICLE IV, § 8(a), AND
ARTICLE XVIII, § 1

**IMMEDIATE RELIEF REQUESTED –
NO LATER THAN SEPTEMBER 08, 2025**

MICHAEL A. COLUMBO (SBN: 271283)
MARK P. MEUSER (SBN: 231335)
JESSE FRANKLIN-MURDOCK (SBN: 339034)
DHILLON LAW GROUP INC.
177 Post Street, Suite 700
San Francisco, California 94108
Telephone: (415) 433-1700
Attorneys for Petitioners

DECLARATION OF SEAN P. TRENDE

I, Sean Patrick Trende, declare:

1. I am over the age of eighteen and am competent to testify as to the matters herein. The following is based upon personal knowledge and, if I were called to testify, I would and could competently and accurately testify to the same.

BACKGROUND AND EXPERIENCE

2. I am currently the Senior Elections Analyst at RealClearPolitics. I joined Real Clear Politics in January of 2009 and assumed a fulltime position in March of 2010. Real Clear Politics is a company of approximately 50 employees, with its main offices in Washington D.C. It produces one of the most heavily trafficked political websites in the world, which serves as a one-stop shop for political analysis from all sides of the political spectrum and is recognized as a pioneer in the field of poll aggregation. Real Clear Politics produces original content, including both data analysis and traditional reporting.

3. My main responsibilities with Real Clear Politics consist of tracking, analyzing, and writing about elections. I collaborate in rating the competitiveness of Presidential, Senate, House, and gubernatorial races. As a part of carrying out these responsibilities, I have studied and written extensively about demographic trends in the country, exit poll data at the state and federal level, public opinion polling, and voter turnout and voting behavior. In particular, understanding the way that districts are drawn and how geography and demographics interact is crucial to predicting United States House of Representatives races, so much of my time is dedicated to that task.

4. I am currently a Visiting Scholar at the American Enterprise Institute, where my publications focus on the demographic and coalitional aspects of American politics.

5. I am also a Lecturer at The Ohio State University.

6. I am the author of the 2012 book *The Lost Majority: Why the Future of Government is up For Grabs and Who Will Take It*. In this book, I explore realignment theory. It argues that realignments are a poor concept that should be abandoned. As part of this analysis, I conducted a thorough analysis of demographic and political trends beginning in the 1920s and continuing through modern times, noting the fluidity and fragility of the coalitions built by the major political parties and their candidates.

7. I also co-authored the 2014 *Almanac of American Politics*. The Almanac is considered the foundational text for understanding congressional districts and the representatives of those districts, as well as the dynamics in play behind the elections. My focus was researching the history of and writing descriptions for many of the 2012 districts, including tracing the history of how and why they were drawn the way that they were drawn. I have also authored a chapter in Dr. Larry Sabato's post-election compendium after every election dating back to 2012.

8. I received my Ph.D. in political science at The Ohio State University in 2023. I passed comprehensive examinations in both Methodology and American Politics. The first chapter of my dissertation involves voting patterns on the Supreme Court from 1900 to 1945; the second chapter involves the application of integrated nested LaPlace approximations to enable the incorporation of spatial statistical analysis in the study of United States elections. The third chapter of the dissertation involves the use of communities of interest in redistricting simulations. In pursuit of this degree, I also earned a Master's Degree in Applied Statistics. My coursework for my Ph.D. and M.A.S. included, among other things, classes on G.I.S. systems, spatial statistics, issues in contemporary redistricting, machine learning, non-parametric hypothesis tests and probability theory. I also earned a B.A. from Yale University in history and political science in 1995, a Juris Doctor from Duke University in 2001, and a Master's Degree in political science from Duke University in 2001.

9. In the winter of 2018, I taught American Politics and the Mass Media at Ohio Wesleyan University. I taught Introduction to American Politics at The Ohio State University for three semesters from Fall of 2018 to Fall of 2019, and again in Fall of 2021. In the Spring semesters of 2020, 2021, 2022 and 2023, I taught Political Participation and Voting Behavior at The Ohio State University. This course spent several weeks covering all facets of redistricting: how maps are drawn, debates over what constitutes a fair map, measures of redistricting quality, and similar topics. It also covers the Voting Rights Act and racial gerrymandering claims. I also taught survey methodology in Fall of 2022 and Spring of 2024. In Spring of 2025 I taught Introduction to the Policy Process.

10. A full copy of all cases in which I have testified or been deposed is included on my C.V., attached as Exhibit 1. In 2021, I served as one of two special masters appointed by the Supreme Court of Virginia to redraw the districts that will elect the Commonwealth's representatives to the House of Delegates, state Senate, and U.S. Congress in the following

decade. The Supreme Court of Virginia accepted those maps, which were praised by observers from across the political spectrum. *See, e.g., New Voting Maps, and a New Day, for Virginia*, The Washington Post (Jan. 2, 2022), \ available at <https://www.washingtonpost.com/opinions/2022/01/02/virginia-redistricting-voting-maps-gerrymander>.

11. In 2019, I was appointed as the court’s expert by the Supreme Court of Belize. In that case I was asked to identify international standards of democracy as they relate to malapportionment claims, to determine whether Belize’s electoral divisions (similar to our congressional districts) conformed with those standards, and to draw alternative maps that would remedy any existing malapportionment.

12. I served as a Voting Rights Act expert to counsel for the Arizona Independent Redistricting Commission in 2021 and 2022.

SCOPE OF WORK

13. I was retained by Petitioners in the above-captioned case, who asked me to compare (1) the Congressional map approved by the California Citizens Redistricting Commission in 2021 for use in the 2022 election (“Commission Map”) with (2) the map the legislature created, reflected in Assembly Bill 604 (“Proposed Map”).

14. Specifically, I analyzed the contiguity of the two maps as well as the degree to which they separate communities of interest; metrics required by the California Constitution and which demographers commonly employ to analyze maps. I was also asked to examine the two maps using partisan fairness metrics, which are commonly used by demographers and elections analysts when examining legislative maps.

OPINIONS

15. I was asked first to analyze the partisan fairness of the Proposed Map, to determine whether the Districts were “drawn for the purpose of favoring or discriminating against an incumbent, political candidate, or political party.” First, it seems obvious that the purpose of this map is to favor one party or the other, as leaders in the state have not been particularly shy that the purpose of the map is to “neutralize” a Republican gerrymander in Texas. *See* Lauren Gambino, “California: Newsom Signs Proposal for New Voting Map Favoring Democrats,” *The Guardian* (Aug. 21, 2025), available at <https://www.theguardian.com/us->

news/2025/aug/21/california-legislature-redistricting-plan. Regardless, there are multiple ways to examine this. Here, I was asked to examine partisan fairness metrics, which examine election outcomes and determine whether there is a bias in favor of one party or the other.

16. As a simple test, I was asked to analyze the competitiveness of districts, which assesses how many swing seats exist. For purposes of this, I was asked to consider a swing seat to be a district where both parties' vote share is between 45% and 55%. Using data from the last four elections, I calculated that 6.5 of 52 seats would be considered swing seats.

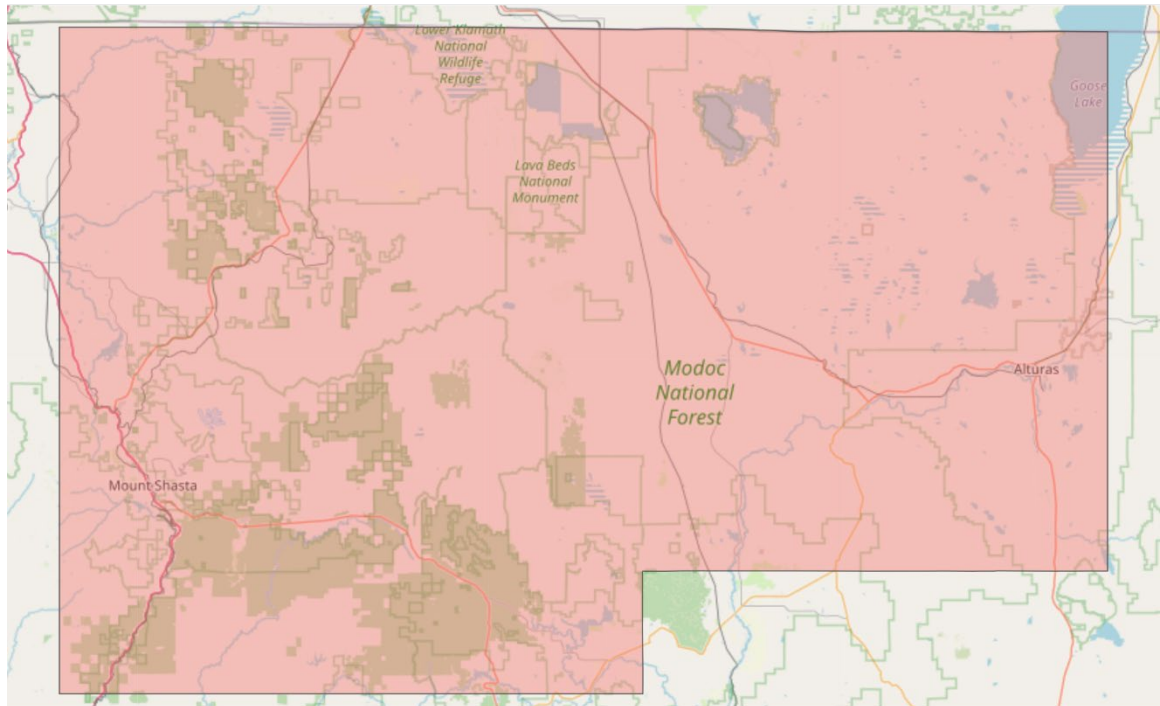
17. I also employed a uniform swing test, which tests the "responsiveness" of a map. That is to say, it examines the effect of a shift of the vote share on the number of seats each party would win under various vote shares. I examined the effect of 5% swings in the electorate in favor of both Democrats and Republicans, and calculated a Uniform Swing Test value of 19.75, suggesting that Democrats would hold nearly 40% of the seats in the state regardless of swings in the electorate.

18. One can also simply analyze shifts in vote share. For example, President Trump, despite winning almost 40% of the two-party vote in the state, would have carried four seats under the Proposed Map. Gov. Gavin Newsom would have lost six seats under this map; under the Commission Map he lost 14. In 2020, President Trump would have won four districts under the Proposed Map; under the Commission Map he won seven.

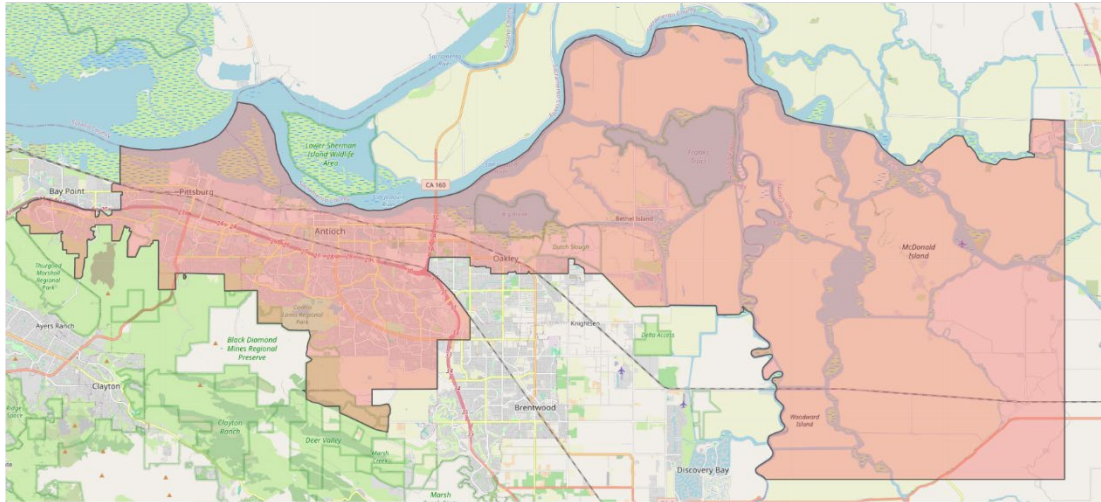
19. Next, I analyzed the districts for contiguity. Although California law is unclear precisely what type of contiguity is required, there are two types of contiguity that are typically considered: "Census" contiguity and "functional" contiguity. Census contiguity simply asks whether all of the blocks in a precinct touch another block in the precinct. Functional contiguity, by contrast, asks whether you can travel through a district without leaving the district.

20. At a minimum, the Proposed Map creates more non-functionally contiguous districts than the Commission Map. In particular, Districts 2, 9, 30, 40 and 47 are no longer functionally contiguous.

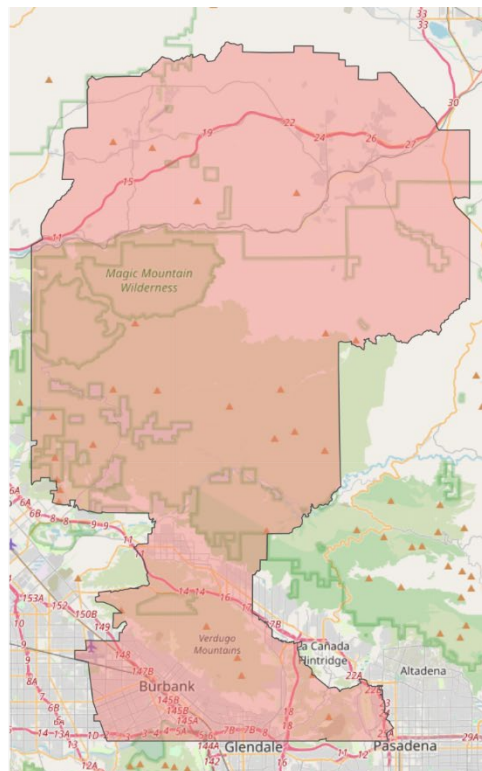
21. In CA-02, a resident cannot travel from Alturas to Weed (to the North of Mt. Shasta) without leaving the district.



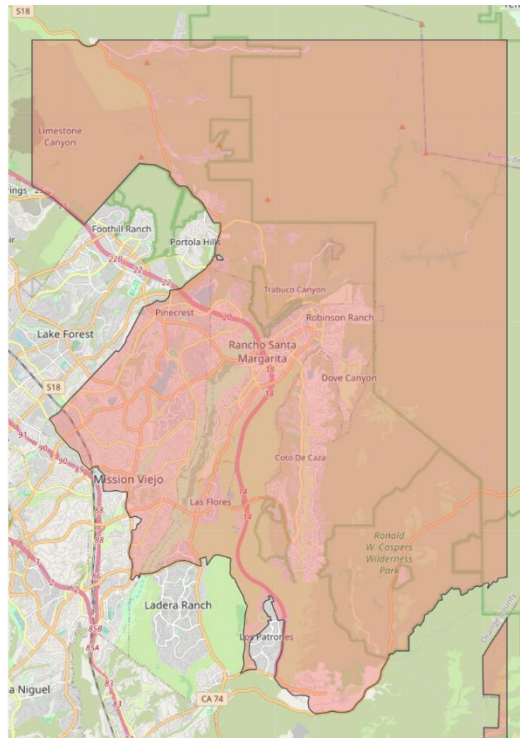
22. In CA-09, a resident cannot travel from Oakley to San Joaquin County without leaving the district; the entire western end of the district is cut off from the remainder of the district; the only bridge across the Old River is well south of the district's boundary.



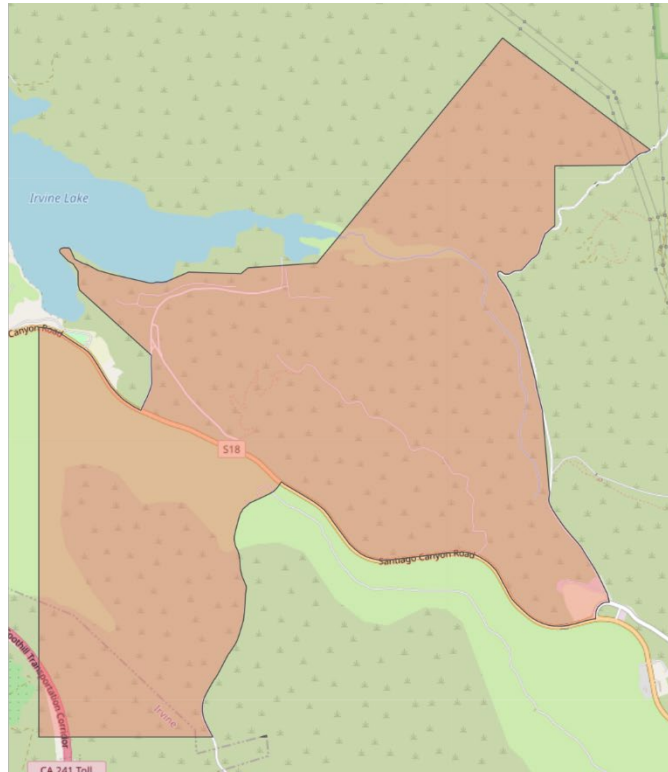
23. In CA-30, a resident cannot travel from the Agua Dulce area north of to Burbank without leaving the district.



24. In CA-40, a resident cannot travel from Rancho Santa Margarita to Murrieta without leaving the district; it is separated from the rest of the district by the Santa Ana Mountains.



25. In CA-47, the area north of Santiago Creek is not functionally contiguous with the rest of the district. The road which could hypothetically connect it to the rest of the district leaves the district near Baker Canyon Rd.



26. Finally, I examined how the Legislature's Map disrupted various communities. For example:

- a. The Commission's Map grouped the communities in Walnut, Diamond Bar, and Rowland Heights in a single District. The Proposed Map removes Walnut. Chino Hills remains in another separate district.
- b. The Commission's Map groups communities like El Monte, Baldwin Park, Covina, West Covina, and La Puente in the same district. The Proposed Map splits them into two districts.
- c. The Proposed Map divides the county seat of San Joaquin County, Stockton, into two districts. San Joaquin County is split into five separate districts.
- d. The Commission's Map places Richmond, Pittsburgh, Bay Point, and Antioch in a single district. The Proposed Map splits Bay Point off. The Map also splits Oakley into two districts.
- e. The Commission Map only splits two federal recognized Indian Reservations: Agua Caliente and Hopland Rancheria. The Proposed Map splits Agua

Caliente and an additional ten reservations: Campo, La Posta, Mesa Grande, Morongo, Rincon, Round Valley, San Manuel, San Pasqual, Santa Rosa, and Sycuan.

27. Based on my review of the Proposed Map and Commission Map, using quantitative and qualitative measures regularly employed by demographers and political scientists, I conclude that the Proposed Map reduces the contiguity of districts and separates communities of interest in comparison to the Commission Map. I also conclude that the Commission Map was drawn with partisan objectives in mind; in particular it was drawn to improve Democratic prospects in congressional elections in the state and to increase the share of seats that they would expect to win in an election.

I declare under penalty of perjury of the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed on August 25, 2025.

Sean P. Trende

Sean P. Trende

EXHIBIT 1

Exhibit 1 – Sean Trende C.V. —

SEAN P. TRENDE

1146 Elderberry Loop
Delaware, OH 43015
strende@realclearpolitics.com

EDUCATION

Ph.D., The Ohio State University, Political Science, 2023. Dissertation titled *Application of Spatial Analysis to Contemporary Problems in Political Science*, September 2023.

M.A.S. (Master of Applied Statistics), The Ohio State University, 2019.

J.D., Duke University School of Law, *cum laude*, 2001; Duke Law Journal, Research Editor.

M.A., Duke University, *cum laude*, Political Science, 2001. Thesis titled *The Making of an Ideological Court: Application of Non-parametric Scaling Techniques to Explain Supreme Court Voting Patterns from 1900-1941*, June 2001.

B.A., Yale University, with distinction, History and Political Science, 1995.

PROFESSIONAL EXPERIENCE

Law Clerk, Hon. Deanell R. Tacha, U.S. Court of Appeals for the Tenth Circuit, 2001-02.

Associate, Kirkland & Ellis, LLP, Washington, DC, 2002-05.

Associate, Hunton & Williams, LLP, Richmond, Virginia, 2005-09.

Associate, David, Kamp & Frank, P.C., Newport News, Virginia, 2009-10.

Senior Elections Analyst, RealClearPolitics, 2010-present.

Columnist, Center for Politics Crystal Ball, 2014-17.

Visiting Scholar, American Enterprise Institute, 2018-present.

BOOKS AND BOOK CHAPTERS

Larry J. Sabato, ed., *The Red Ripple*, Ch. 15 (2023).

Larry J. Sabato, ed., *A Return to Normalcy?: The 2020 Election that (Almost) Broke America* Ch. 13 (2021).

Larry J. Sabato, ed., *The Blue Wave*, Ch. 14 (2019).

Larry J. Sabato, ed., *Trumped: The 2016 Election that Broke all the Rules* (2017).

Larry J. Sabato, ed., *The Surge: 2014's Big GOP Win and What It Means for the Next Presidential Election*, Ch. 12 (2015).

Larry J. Sabato, ed., *Barack Obama and the New America*, Ch. 12 (2013).

Barone, Kraushaar, McCutcheon & Trende, *The Almanac of American Politics* 2014 (2013).

The Lost Majority: Why the Future of Government is up for Grabs – And Who Will Take It (2012).

PREVIOUS EXPERT TESTIMONY AND/OR DEPOSITIONS

Dickson v. Rucho, No. 11-CVS-16896 (N.C. Super. Ct., Wake County) (racial gerrymandering).

Covington v. North Carolina, No. 1:15-CV-00399 (M.D.N.C.) (racial gerrymandering).

NAACP v. McCrory, No. 1:13CV658 (M.D.N.C.) (early voting).

NAACP v. Husted, No. 2:14-cv-404 (S.D. Ohio) (early voting).

Ohio Democratic Party v. Husted, Case 15-cv-01802 (S.D. Ohio) (early voting).

Lee v. Virginia Bd. of Elections, No. 3:15-cv-357 (E.D. Va.) (early voting).

Feldman v. Arizona, No. CV-16-1065-PHX-DLR (D. Ariz.) (absentee voting).

Exhibit 1 – Sean Trende C.V. —

A. Philip Randolph Institute v. Smith, No. 1:18-cv-00357-TSB (S.D. Ohio) (political gerrymandering).

Whitford v. Nichol, No. 15-cv-421-bbc (W.D. Wisc.) (political gerrymandering).

Common Cause v. Rucho, No. 1:16-CV-1026-WO-JEP (M.D.N.C.) (political gerrymandering).

Mecinas v. Hobbs, No. CV-19-05547-PHX-DJH (D. Ariz.) (ballot order effect).

Fair Fight Action v. Raffensperger, No. 1:18-cv-05391-SCJ (N.D. Ga.) (statistical analysis).

Pascua Yaqui Tribe v. Rodriguez, No. 4:20-CV-00432-TUC-JAS (D. Ariz.) (early voting).

Ohio Organizing Collaborative, et al v. Ohio Redistricting Commission, et al, No. 2021-1210 (Ohio) (political gerrymandering).

NCLCV v. Hall, No. 21-CVS-15426 (N.C. Sup. Ct.) (political gerrymandering).

Szeliga v. Lamone, Case No. C-02-CV-21-001816 (Md. Cir. Ct.) (political gerrymandering).

In the Matter of 2022 Legislative Districting of the State, Misc. No. 25 (Md. Ct. App.) (political gerrymandering)

Montana Democratic Party v. Jacobsen, DV-56-2021-451 (Mont. Dist. Ct.) (early voting; ballot collection).

Carter v. Chapman, No. 464 M.D. 2021 (Pa.) (map drawing; amicus).

NAACP v. McMaster, No. 3:21-cv-03302 (D.S.C.) (racial gerrymandering).

Alexander v. NAACP, Case No. 3:21-cv-03302-MBS-TJH-RMG (D.S.C.) (racial gerrymandering).

Graham v. Adams, No. 22-CI-00047 (Ky. Cir. Ct.) (political gerrymandering).

Exhibit 1 – Sean Trende C.V. —

Harkenrider v. Hochul, No. E2022-0116CV (N.Y. Sup. Ct.) (political gerrymandering).

LULAC v. Abbott, Case No. 3:21-cv-00259 (W.D. Tex.) (racial/political gerrymandering/VRA).

Moore et al., v. Lee, et al., (Tenn. 20th Dist.) (state constitutional compliance).

Milligan v. Allen, Case No. 2:21-cv-01530-AMM (N.D. Ala.) (VRA).

Nairne v. Ardoin, NO. 22-178-SDD-SDJ (M.D. La.) (VRA).

Robinson v. Ardoin, NO. 22-211-SDD-SDJ (M.D. La.) (VRA).

Republican Party v. Oliver, No. D-506-CV-2022-00041 (N.M. Cir. Ct. (Lea County)) (political gerrymandering).

Palmer v. Hobbs, Case No. 3:22-CV-5035-RSL (W.D. Wash) (VRA; remedial phase only).

Clarke v. Evers, No. 2023AP001399-OA (Wisc.) (Political gerrymandering; remedial phase only).

Stone v. Allen, No. 2:21-cv-1531-AMM (N.D. Ala.) (VRA).

Milligan v. Allen, No. 2:21-cv-01530-AMM (S.D. Ala.) (VRA).

Agee et al. v. Benson, et al., (W.D. Mich.) (racial gerrymandering/VRA).

Faatz, et al. v. Ashcroft, et al., (Cir. Ct. Mo.) (state constitutional compliance).

Coca, et al. v. City of Dodge City, et al., Case No. 6:22-cv-01274-EFM-RES (D. Kan.) (VRA).

Pierce v. NC State Board of Elections, Case No. 4:23-cv-193 (E.D.N.C.) (VRA).

Williams v. Hall, Civil Action No. 23 CV 1057 (M.D.N.C.) (VRA, Racial Gerrymandering).

Exhibit 1 – Sean Trende C.V. —

Hodges v. Passidomo, Case No. 8:24-cv-879-CEH-TPB-ALB (M.D. Fla.) (Racial Gerrymandering).

Cubanos Pa’Lante v. Florida House of Representatives, Case No. 24-cv-21983-JB (S.D. Fla.) (Racial Gerrymandering).

Coads v. Nassau County, Index No. 611872/2023 (N.Y. Sup. Ct., Nassau County) (political gerrymandering, racial gerrymandering, NYVRA).

Harris v. DeSoto County, Civil No. 3:24-CV-00289-GHD-RP (N.D. Miss.) (VRA).

COURT APPOINTMENTS

Appointed as Voting Rights Act expert by Arizona Independent Redistricting Commission (2020)

Appointed Special Master by the Supreme Court of Virginia to redraw maps for the Virginia House of Delegates, the Senate of Virginia, and for Virginia’s delegation to the United States Congress for the 2022 election cycle.

Appointed redistricting expert by the Supreme Court of Belize in *Smith v. Perrera*, No. 55 of 2019 (one-person-one-vote).

INTERNATIONAL PRESENTATIONS AND EXPERIENCE

Panel Discussion, European External Action Service, Brussels, Belgium, Likely Outcomes of 2012 American Elections.

Selected by U.S. Embassies in Sweden, Spain, and Italy to discuss 2016 and 2018 elections to think tanks and universities in area (declined Italy due to teaching responsibilities).

Selected by EEAS to discuss 2018 elections in private session with European Ambassadors.

TEACHING

Introduction to the Policy Process, Spring 2025.

Exhibit 1 – Sean Trende C.V. —

American Democracy and Mass Media, Ohio Wesleyan University, Spring 2018.

Introduction to American Politics, The Ohio State University, Autumns 2018, 2019, 2020, Spring 2018.

Political Participation and Voting Behavior, Springs 2020, 2021, 2022, 2023.

Survey Methodology, Fall 2022, Spring 2024.

PUBLICATIONS

James G. Gimpel, Andrew Reeves, & Sean Trende, “Reconsidering Bellwether Locations in U.S. Presidential Elections,” *Pres. Stud. Q.* (2022) (forthcoming, available online at <http://doi.org/10.1111/psq.12793>).

REAL CLEAR POLITICS COLUMNS

Full archives available at http://www.realclearpolitics.com/authors/sean_trende/

EXHIBIT 16

TO DECLARATION OF RYAN EASON



PRESS RELEASE

Justice Department Sues Governor Gavin Newsom for California's Race-Based Redistricting Plan

Thursday, November 13, 2025

For Immediate Release

Office of Public Affairs

WASHINGTON – The Justice Department announced today that it [filed legal action](#) against Governor Gavin Newsom and Secretary of State Shirley Weber for the State of California's newly adopted redistricting plan enacted with the passage of Proposition 50. The suit alleges that the plan mandates racially gerrymandered congressional districts in violation of the Equal Protection Clause of the Fourteenth Amendment to the U.S. Constitution.

Proposition 50 amends the California Constitution, allowing the legislature to draw a new congressional-district map. Substantial evidence, including that in the legislative record and public statements, indicate that the legislature created a new map in which Latino demographics and racial considerations predominated, in violation of the Equal Protection Clause.

"California's redistricting scheme is a brazen power grab that tramples on civil rights and mocks the democratic process," said Attorney General Pamela Bondi. "Governor Newsom's attempt to entrench one-party rule and silence millions of Californians will not stand."

"Race cannot be used as a proxy to advance political interests, but that is precisely what the California General Assembly did with Prop 50," said Jesus A. Osete, Principal Deputy Assistant

11/20/25, 8:49 PM

Office of Public Affairs | Justice Department Sues Governor Gavin Newsom for California's Race-Based Redistricting Plan | United...

Attorney General for Civil Rights. "Californians were sold an illegal, racially gerrymandered map, but the U.S. Constitution prohibits its use in 2026 and beyond."

"The race-based gerrymandered maps passed by the California legislature are unlawful and unconstitutional," said First Assistant United States Attorney Bill Essayli of the Central District of California. "The U.S. Department of Justice is moving swiftly to prevent these illegal maps from tainting our upcoming elections. California is free to draw congressional maps, but they may not be drawn based on race."

The Department's motion to intervene in *Tangipa et al v Newsom* is pending before the U.S. District Court for the Central District of California.

Assistant Attorney General Harmeet K. Dhillon has been recused from this case. Principal Deputy Assistant Attorney General Jesus A. Osete will represent the Department on this matter.

Updated November 13, 2025

Topic

VOTING AND ELECTIONS

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Press Release Number: 25-1062

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Justice Department Sues Six States for Failure to Provide Voter Registration Rolls

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Today the Justice Department's Civil Rights Division announced the filing of federal lawsuits against six states — [California](#), [Michigan](#), [Minnesota](#), [New York](#), [New Hampshire](#), and...

September 25, 2025

VIDEO

Assistant Attorney General Dhillon Discusses the 60th Anniversary of the Voting Rights Act

August 6, 2025

PRESS RELEASE

Justice Department Files Statement of Interest in Illinois Case Concerning States' Obligations Under the National Voter Registration Act

Today, the Justice Department filed a [Statement of Interest](#) in *Judicial Watch v. Illinois State Board of Elections*, regarding the requirements under the National Voter Registration Act (NVRA) for...

July 8, 2025



Office of Public Affairs

U.S. Department of Justice
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Washington DC 20530



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EXHIBIT 17

TO DECLARATION OF RYAN EASON



Attorney General Pamela Bondi  
@AGPamBondi



Today [@TheJusticeDept](#) sued [@CAgovernor](#) over his brazen Proposition 50 redistricting power grab.

Newsom should be concerned about keeping Californians safe and shutting down Antifa violence, not rigging his state for political gain.



From apnews.com

11:00 AM · Nov 13, 2025 · **4.1M** Views

EXHIBIT 18

TO DECLARATION OF RYAN EASON



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DeMaio Vows to Defeat Gavin Newsom's "Corrupt Scheme to End Fair Elections" in California

© August 14, 2025



DeMaio Urges Voters to Protect the Independent Citizens' Redistricting Process for Non-partisan Election Districts to Preserve Fair Elections

As expected, Gov. Gavin Newsom today called for a Nov. 4 Special Election to amend the state constitution, giving politicians the power to manipulate the lines of their election districts. In response, CA State Assemblymember Carl DeMaio vowed to fight back and lead a campaign to defeat the plan at the ballot box through his Reform California movement.

"California politicians are using Trump as the window dressing to advance a corrupt and dishonest scheme to end fair elections in our state by eliminating the non-partisan Independent Citizens' Redistricting Commission process to draw election districts," DeMaio said.

Active Campaigns



11/29/25, 3:04 PM

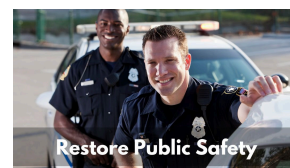
DeMaio Vows to Defeat Gavin Newsom's "Corrupt Scheme to End Fair Elections" in California

"This is a blatant attempt to rig elections by allowing politicians to choose voters rather than letting voters choose politicians – and if this measure passes, the independent Citizens' Redistricting process will be dead forever," DeMaio warned.

DeMaio emphasized that state politicians strongly opposed the citizens' effort advanced by California voters in 2010 that explicitly removed redistricting power from politicians through two voter-approved initiatives. Newsom's proposal would reverse that, handing map-drawing power back to the very politicians voters said they couldn't trust.

"I plan to spend every day fighting Gavin Newsom's assault on democracy through this partisan redistricting scheme – and we believe we have a comprehensive plan to stop him," DeMaio pledged.

DeMaio announced that the 10,000 volunteers he has recruited statewide to collect signatures for the CA Voter ID Initiative will now also be asked to harvest ballots with NO votes against the redistricting plan – at the same time that they are collecting 1 million signatures to qualify Voter ID.



[More Campaigns](#)

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New report reveals that Thanksgiving dinner costs in California have skyrocketed compared to the rest of the country

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DeMaio Vows to Defeat Gavin Newsom's "Corrupt Scheme to End Fair Elections" in California



🕒 November 20, 2025

CA Voter ID Signatures Hit 600k – Final Turn-In Events Scheduled

874,641 Signatures Needed Over 6 Months to Force a Public Vote in 2026 – 17k Volunteers Deployed Statewide



🕒 November 13, 2025

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New report lays the blame for higher costs on California politicians for costly mandates and negligent policies.

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EXHIBIT 19

TO DECLARATION OF RYAN EASON

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No on Prop 50 Campaign Launched to Defeat Newsom's Redistricting Scheme

© August 21, 2025



In yet another blatant power grab, Gov. Gavin Newsom and Sacramento politicians are pushing Proposition 50, a deceptively worded ballot measure that would end fair elections in California—and Carl DeMaio and Reform California have launched a NO on Prop 50 campaign to stop them.

"Prop 50 is a fraudulent scheme that uses a misleading ballot title to trick voters into giving politicians the power to gerrymander and manipulate the lines of election districts for their own benefit," said DeMaio.

"We cannot the dishonest ballot title politicians are using on Prop 50 to fool voters into eliminating fair elections in our state," DeMaio added.

Dismantling Voter-Approved Redistricting Protections

This November 4, Newsom and legislative Democrats have called for a costly \$250 million special election to place Prop 50 before voters. This measure is falsely titled to deceive the public into thinking it *retains* California's Independent Citizens' Redistricting Commission.

Active Campaigns



11/29/25, 3:05 PM

No on Prop 50 Campaign Launched to Defeat Newsom's Redistricting Scheme

In reality, Prop 50 does exactly the opposite—it abolishes the independent commission voters approved in 2010 and gives map-drawing power back to politicians.

"Lying on the ballot is shameful—this is outright voter fraud," DeMaio stated. "Newsom and CA politicians have to lie to get what they want," DeMaio notes.



The Real Motive:

[More Campaigns](#)

If passed, Prop 50 would allow politicians to redraw districts behind closed doors, divide communities to protect partisan politicians, and wipe out transparency in the process.

"This is the very definition of corruption," DeMaio said. "Politicians want to go back to the days where they could carve up districts in smoke-filled rooms and guarantee themselves reelection. That's not democracy—that's dictatorship."

Seven Reasons to Vote NO on Prop 50

DeMaio outlined seven major dangers posed by Prop 50.

1. **Ends Independent Maps:** Let's politicians draw their own safe seats.
2. **Silences voters:** Eliminates public hearing and community input.
3. **Undermines Democracy:** Opens the door to gerrymandering.
4. **Hurts Communities:** Allows maps to be drawn to favor partisan politicians and divide communities.
5. **Sets a Dangerous Precedent:** Weakens constitutional safeguards for fair elections.
6. **Wastes Taxpayer Money:** Costs \$250 million of taxpayer money for an unnecessary special election. Despite California facing painful budget cuts to health care, education, and housing.
7. **Illegal and Unconstitutional:** Violates constitutional provisions banning partisan gerrymandering and legislative interference in redistricting.

New Campaign to Defeat Prop 50

Carl DeMaio has officially launched a statewide campaign to defeat Prop 50. The effort includes voter education, legal review, media outreach, and grassroots mobilization to expose the deception behind the measure.

"This campaign will be fought in the courts, in the media, and at the ballot box," said DeMaio. "We will not let Sacramento politicians get away with this illegal scheme."

DeMaio is calling on Californians to join the fight to defend fair elections.

11/29/25, 3:05 PM

No on Prop 50 Campaign Launched to Defeat Newsom's Redistricting Scheme

"On November 4, vote **NO** on Prop 50," DeMaio urged. "We must send a clear message: California belongs to the people—not the politicians."

CONTRIBUTE:
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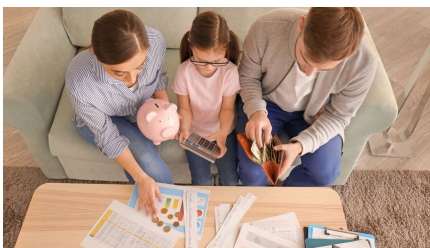
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🕒 November 20, 2025

CA Voter ID Signatures Hit 600k – Final Turn-In Events Scheduled

874,641 Signatures Needed Over 6 Months to Force a Public Vote in 2026 – 17k Volunteers Deployed Statewide



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New report lays the blame for higher costs on California politicians for costly mandates and negligent policies.

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\$500

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\$100

\$50

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EXHIBIT 20

TO DECLARATION OF RYAN EASON

11/29/25, 3:03 PM

Page ID #:5393

CA Special Election this November - Cost \$250 Million



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[Sign the California Voter ID Petition Here >>](#)

CA Special Election this November - Cost \$250 Million

© August 1, 2025



Image Credit: Canva

In the middle of a \$20 billion budget deficit, Gavin Newsom wants to blow \$250 million in taxpayer funds—not to help Californians, but to help democrats gerrymander Republicans off the map.

“Newsom’s trying to destroy California’s independent redistricting system so his party can cling to power—and he’s forcing taxpayers to foot the bill for it,” said Carl DeMaio. It’s corrupt, it’s partisan, and we must stop it.”

Newsom’s Backroom Plot to Kill Fair Elections

Governor Gavin Newsom is threatening to call a Special Election as early as this November to cram through a constitutional amendment that would end California’s non-partisan, independent citizens’ redistricting process—a system voters approved to stop politicians from manipulating district lines to protect themselves.

For years, California has used a non-partisan model led by citizens to keep the redistricting process fair and transparent. Newsom’s plan would destroy that system allowing Democrat politicians to draw their own districts—with the clear

Active Campaigns



11/29/25, 3:03 PM

CA Special Election this November - Cost \$250 Million

intent of eliminating Republican-held seats and cementing one-party rule for years to come.

Newsom has even admitted that his justification is political. He points to redistricting fights in states like Texas and claims California should do the same to gain, more Democrat seats in Congress. But Carl DeMaio isn't buying it.

"I oppose gerrymandering no matter who's doing it or who it benefits," said DeMaio. "Just because someone else is rigging their maps doesn't give Newsom a free pass to rigging ours. That's not leadership—that's hypocrisy."

A \$250 Million Power Grab

This week, DeMaio released a \$250 million cost estimate for the Special Election Newsom is planning—an outrageous figure at a time when California politicians are slashing funds for schools, public safety, and essential services.

DeMaio's estimate factors in:

- The \$200 million cost of the 2021 Recall Election
- 800,000 more registered voters since 2021
- A 19% spike in government salaries and benefits
- 17% increase in mailing and printing costs
- And \$5-10 million in anticipated legal fees from lawsuits challenging the scheme

"California is in a deep budget crisis—and Newsom thinks the solution is to waste \$250 million to help his party cheat," DeMaio said. "Meanwhile, working Californians are being taxed to death, and essential programs are being gutted."

DeMaio is Taking Action

DeMaio is mobilizing legal and grassroots efforts to block the Newsom Redistricting Power Grab. Their campaign will include public education, media exposure, and voter engagement to ensure this attack on democracy is defeated at every step.

"Voters created the Citizens' Redistricting Commission to stop this exact kind of corruption," said DeMaio. "We cannot let Newsom, and his cronies turn back the clock and give politicians the power to rig elections."

The integrity of California's elections is on the line. Carl DeMaio is calling on every concerned citizen to help stop Newsom's corrupt redistricting scheme before it's too late.



More Campaigns

11/29/25, 3:03 PM

CA Special Election this November - Cost \$250 Million

Contribute:
Stop Newsom's
Redistricting
Plan

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Related News



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Newsom's "Turkey Tax" — Thanksgiving Costs 32% More in CA as Prices Fall Nationwide

New report reveals that Thanksgiving dinner costs in California have skyrocketed compared to the rest of the country



🕒 November 20, 2025

CA Voter ID Signatures Hit 600k – Final Turn-In Events Scheduled

874,641 Signatures Needed Over 6 Months to Force a Public Vote in 2026 – 17k Volunteers Deployed Statewide



🕒 November 13, 2025

Living in CA Imposes a \$29,753.16 "Cost-of-Living Penalty" on Typical Middle-Class Family

New report lays the blame for higher costs on California politicians for costly mandates and negligent policies.

11/29/25, 3:03 PM

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CA Special Election this November - Cost \$250 Million

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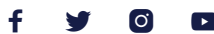
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EXHIBIT 21

TO DECLARATION OF RYAN EASON

11/29/25, 3:09 PM

Page ID #:5399

No On Prop 50 - Protect the Voters FIRST Act



Vote **NO** on **Prop 50**

We Cannot Save Democracy by Burning it Down
in California

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A Threat to California's Landmark Election Reform

For decades, Sacramento politicians drew their own district boundaries behind closed doors with no public oversight — guaranteeing their reelection, denying voters a real choice, and shutting out many women and people of color from elected office.

In 2010, California voters overwhelmingly approved the Voters FIRST Act for Congress — entrusting the independent Citizens Redistricting Commission to draw fair congressional districts.

Now, career politicians want to abolish citizen-drawn maps and put themselves back in charge of redistricting.

Prop 50 creates one of the most extreme partisan gerrymanders in modern American history — creating politician-drawn maps that experts



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Gerrymandering is wrong in all 50 states

– when political parties subvert the will of the electorate for their
own political advantage,

it weakens democracy everywhere.

Join us to help protect democracy.

Vote NO on Gerrymandering and Join the Coalition to Protect the Voters
FIRST Act!



**VOTE NO ON
PROP 50**

Protect independent redistricting



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11/29/25, 3:09 PM

Page ID #:5402

No On Prop 50 - Protect the Voters FIRST Act

TAKE ACTION NOW

Who is Charles Munger, Jr.?

Paid for by No on Prop 50 – Protect Voters First, sponsored by Hold Politicians Accountable. Committee's top funder: Charles Munger, Jr.

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EXHIBIT 22

TO DECLARATION OF RYAN EASON



Christian Martinez ✓
@C_RMartinez



.@GavinNewsom's latest stunt has nothing to do with Californians and everything to do with consolidating radical Democrat power, silencing California voters, and propping up his pathetic 2028 presidential pipe dream.

Newsom's made it clear: he'll shred California's Constitution and trample over democracy – running a cynical, self-serving playbook where Californians are an afterthought and power is the only priority.



From nrcc.org

11:04 AM · Aug 14, 2025 · 25.7K Views



57



152



525



11



Read 57 replies

EXHIBIT 23

TO DECLARATION OF RYAN EASON



Ken Calvert ✓

@TeamCalvert



Prop 50 isn't about saving democracy. It's about pure political power. Democrats are using Trump as an excuse to kill the independent redistricting commission and draw new districts to advance their own political careers. Show them you're not stupid - vote NO.

x.com/StopProp50/sta...

This post is unavailable.

12:24 PM · Oct 17, 2025 · **7,014** Views



33



178



477



4



Read 33 replies

EXHIBIT 24

TO DECLARATION OF RYAN EASON



Rep. Darrell Issa  
@repdarrellissa



My statement tonight:

California is my home. And it's worth fighting for.

I know how many of my friends and constituents feel about tonight's election results and the unprecedented purely partisan campaign that pitted neighbor against neighbor and divided the state as never before.

It was difficult to watch as Gavin Newsom and Sacramento's special interests set about shredding the state constitution, disenfranchising millions of Californians solely because of how they vote, and delivering what they know is an undeserved advantage to Democrats.

But here's something Newsom and his cronies don't know: It won't work. The worst gerrymander in history has a fatal flaw. Voters get to pick their representatives. Not the other way around.

I'm not going anywhere. I'll continue to represent the people of California — regardless of their party or where they live.

I'm not quitting on California. "And neither should anyone else.

9:32 PM · Nov 4, 2025 · **69.5K** Views



511



460



2.6K



49



Read 511 replies

EXHIBIT 25

TO DECLARATION OF RYAN EASON

Unofficial Election Results

State Ballot Measure - Statewide Results



Unofficial Election Results

Results will be certified by December 12, 2025.

(18,399 of 18,399) precincts **partially**

(<http://vote.sos.ca.gov/frequently-asked-questions#faq-reporting>)

reporting as of December 3, 2025, 7:30 a.m. ?

(<http://vote.sos.ca.gov/frequently-asked-questions#faq-reporting>)

Visit the **County Reporting Status**

(<http://vote.sos.ca.gov/returns/status>) page to determine when a county has submitted its latest report.

Vote-by-mail, provisional, and other ballots will continue to be processed and counted after Election Night.

Election results will change throughout the ballot counting canvass period as vote-by-mail ballots, provisional ballots (including conditional voter registration provisional ballots), and other ballots are tallied.

County Results

Other Links

Statewide Map

(<http://vote.sos.ca.gov/contests/maps/ballot-measures>)

		Proposition Title	Yes Votes	%	No Votes	%
Yes	50	Congressional Redistricting	7,452,270	64.4%	4,116,495	35.6%

Related Links

Official Voter Information Guide: Quick Reference Guide [🔗](https://voterguide.sos.ca.gov/quick-reference-guide/index.htm) (<https://voterguide.sos.ca.gov/quick-reference-guide/index.htm>)

Official Voter Information Guide: Proposition 50 [🔗](https://voterguide.sos.ca.gov/proposition/50/) (<https://voterguide.sos.ca.gov/proposition/50/>)

County Results

Statewide (<http://vote.sos.ca.gov/returns/ballot-measures>)

Alameda (<http://vote.sos.ca.gov/returns/ballot-measures/county/alameda>)

Alpine (<http://vote.sos.ca.gov/returns/ballot-measures/county/alpine>)

Amador (<http://vote.sos.ca.gov/returns/ballot-measures/county/amador>)

Butte (<http://vote.sos.ca.gov/returns/ballot-measures/county/butte>)
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Siskiyou (<http://vote.sos.ca.gov/returns/ballot-measures/county/siskiyou>)

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Sonoma (<http://vote.sos.ca.gov/returns/ballot-measures/county/sonoma>)

Stanislaus (<http://vote.sos.ca.gov/returns/ballot-measures/county/stanislaus>)

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Trinity (<http://vote.sos.ca.gov/returns/ballot-measures/county/trinity>)

Tulare (<http://vote.sos.ca.gov/returns/ballot-measures/county/tulare>)

Tuolumne (<http://vote.sos.ca.gov/returns/ballot-measures/county/tuolumne>)

Ventura (<http://vote.sos.ca.gov/returns/ballot-measures/county/ventura>)

Yolo (<http://vote.sos.ca.gov/returns/ballot-measures/county/yolo>)

Yuba (<http://vote.sos.ca.gov/returns/ballot-measures/county/yuba>)

Other Links

State Ballot Measure (<http://vote.sos.ca.gov/returns/ballot-measures>)

Maps (<http://vote.sos.ca.gov/maps>)

Close Contests (<http://vote.sos.ca.gov/returns/close-contests>)

My Voter Status [🔗](https://voterstatus.sos.ca.gov) (<https://voterstatus.sos.ca.gov>)

EXHIBIT 26

TO DECLARATION OF RYAN EASON

11/20/25, 8:57 PM

Exit polls: Election 2025 | CNN Politics



CNN Politics

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2025

Key Races

NJ Governor

VA Races

NYC Mayor

Ballot Measures

Exit Polls

Mayoral Electic

Exit polls: Election 2025

CNN Exit Polls shed light on who came out to vote and what choices they made. The results combine pre-election interviews with those conducted at polling places to represent the full electorate. Results will update through Election Night, with the final numbers weighted to match election results. Learn more about how the surveys were conducted [here](#). CNN Exit Polls are from the Voter Poll conducted by SSRS.

How to read these results: Each vertical column shows how voters in a certain group split their vote. The number at the top of each column shows the size of that group within the electorate.

Location:

California



Contest:

Issue 1



Filter results by demographic:

No Filter



Enter a keyword to search poll questions



Gender

4,326 total respondents

	Male 49%	Female 50%	Identify another way 1%
No	39%	34%	n/a
Yes	61%	66%	n/a

Subgroups indicated with an n/a were interviewed for this exit poll, but the sample size may be too small for estimates

11/20/25, 8:57 PM

Exit polls: Election 2025 | CNN Politics

within those groups to be projectable with confidence to their true values in the population.

Updated 1:01 p.m. ET, Nov. 5

Race

4,326 total respondents

	White 56%	Black 5%	Latino 22%	Asian 11%	Other racial/ethnic groups 5%
No	42%	9%	29%	28%	53%
Yes	58%	91%	71%	72%	47%

Updated 1:01 p.m. ET, Nov. 5

Race

4,326 total respondents

	White voters 56%	Voters of color 44%
No	42%	29%
Yes	58%	71%

Updated 1:01 p.m. ET, Nov. 5

Gender by race

4,326 total respondents

	White men 28%	White women 28%	Black men 2%	Black women 3%	Latino men 11%	Latina women 11%
No	44%	40%	7%	11%	35%	23%
Yes	56%	60%	93%	89%	65%	77%

Updated 1:01 p.m. ET, Nov. 5

Age

11/20/25, 8:57 PM

Exit polls: Election 2025 | CNN Politics

4,326 total respondents

	18-29 12%	30-44 20%	45-64 32%	65 or older 37%
No	20%	31%	38%	42%
Yes	80%	69%	62%	58%

Updated 1:01 p.m. ET, Nov. 5

Age

4,326 total respondents

	18-44 31%	45 or older 69%
No	27%	40%
Yes	73%	60%

Updated 1:01 p.m. ET, Nov. 5

Age

4,326 total respondents

	18-24 6%	25-29 5%	30-39 12%	40-49 16%	50-64 24%	65 or older 37%
No	16%	24%	27%	38%	39%	42%
Yes	84%	76%	73%	62%	61%	58%

Updated 1:01 p.m. ET, Nov. 5

Age by race

4,326 total respondents

	White voters 18-29 4%	White voters 30-44 8%	White voters 45-64 17%	White voters 65 or older 27%	Black voters 18-29 0%
No	26%	39%	44%	43%	n/c

11/20/25, 8:57 PM

Exit polls: Election 2025 | CNN Politics

Yes	74%	61%	56%	57%	n/a
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Subgroups indicated with an n/a were interviewed for this exit poll, but the sample size may be too small for estimates within those groups to be projectable with confidence to their true values in the population.

Updated 1:01 p.m. ET, Nov. 5

Age by gender

4,326 total respondents

	Men 18- 29 6%	Men 30- 44 10%	Men 45- 64 16%	Men 65 or older 17%	Women 18-29 5%	Women 30-44 9%
No	24%	35%	43%	44%	15%	28%
Yes	76%	65%	57%	56%	85%	72%

Subgroups indicated with an n/a were interviewed for this exit poll, but the sample size may be too small for estimates within those groups to be projectable with confidence to their true values in the population.

Updated 1:01 p.m. ET, Nov. 5

Education

4,326 total respondents

	No high school degree 3%	High school graduate 16%	Some college 21%	Associate's degree 11%	Bachelor's degree 30%
No	n/a	47%	39%	42%	33%
Yes	n/a	53%	61%	58%	67%

Subgroups indicated with an n/a were interviewed for this exit poll, but the sample size may be too small for estimates within those groups to be projectable with confidence to their true values in the population.

Updated 1:01 p.m. ET, Nov. 5

Education

4,326 total respondents

11/20/25, 8:57 PM

Exit polls: Election 2025 | CNN Politics

	College graduate 49%	No college degree 51%
No	31%	42%
Yes	69%	58%

Updated 1:01 p.m. ET, Nov. 5

Education by race 4,326 total respondents				
	White voters, college degree 31%	White voters, no degree 25%	Voters of color, college degree 18%	Voters of color, no degree 26%
No	33%	52%	26%	31%
Yes	67%	48%	74%	69%

Updated 1:01 p.m. ET, Nov. 5

Education by gender among White voters 4,326 total respondents					
	White college graduate women 15%	White women no degree 13%	White college graduate men 16%	White men no degree 12%	All other voters 44%
No	30%	51%	36%	55%	29%
Yes	70%	49%	64%	45%	71%

Updated 1:01 p.m. ET, Nov. 5

Education 4,326 total respondents					
	Never attended college 19%	Some college 21%	Associate's degree 11%	Bachelor's degree 30%	Advanced degree 19%

11/20/25, 8:57 PM

Exit polls: Election 2025 | CNN Politics

No	44%	39%	42%	33%	26%
Yes	56%	61%	58%	67%	74%

Updated 1:01 p.m. ET, Nov. 5

Party ID

4,326 total respondents

	Democrat 45%	Republican 23%	Independent 32%
No	4%	87%	43%
Yes	96%	13%	57%

Updated 1:01 p.m. ET, Nov. 5

Party lean

4,326 total respondents

	Democrat/Lean Dem 58%	Republican/Lean Rep 34%	Independent/No lean 8%
No	5%	88%	46%
Yes	95%	12%	54%

Updated 1:01 p.m. ET, Nov. 5

Ideology

4,326 total respondents

	Very liberal 19%	Somewhat liberal 23%	Moderate 30%	Somewhat conservative 17%	Very conservative 10%
No	4%	6%	35%	83%	91%
Yes	96%	94%	65%	17%	9%

Updated 1:01 p.m. ET, Nov. 5

11/20/25, 8:57 PM

Page ID #:5421

Exit polls: Election 2025 | CNN Politics

Ideology

4,326 total respondents

	Liberal 43%	Moderate 30%	Conservative 27%
No	5%	35%	86%
Yes	95%	65%	14%

Updated 1:01 p.m. ET, Nov. 5

Income

4,326 total respondents

	Less than \$30,000 15%	\$30,000-\$49,999 15%	\$50,000-\$99,999 27%
No	29%	39%	36%
Yes	71%	61%	64%

Updated 1:01 p.m. ET, Nov. 5

Income

4,326 total respondents

	Less than \$50,000 30%	\$50,000 or more 70%
No	33%	37%
Yes	67%	63%

Updated 1:01 p.m. ET, Nov. 5

Income

4,326 total respondents

	Less than \$100,000 57%	\$100,000 or more 43%
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11/20/25, 8:57 PM

Exit polls: Election 2025 | CNN Politics

No	35%	38%
Yes	65%	62%

Updated 1:01 p.m. ET, Nov. 5

Income

4,326 total respondents

	Less than \$50,000 30%	\$50,000-\$99,999 27%	\$100,000-\$199,999 28%	\$200,00 or more 15%
No	33%	36%	38%	38%
Yes	67%	64%	62%	62%

Updated 1:01 p.m. ET, Nov. 5

Income

4,326 total respondents

	Less than \$50,000 30%	\$50,000-\$99,999 27%	\$100,000 or more 43%
No	33%	36%	38%
Yes	67%	64%	62%

Updated 1:01 p.m. ET, Nov. 5

Condition of California's economy

4,326 total respondents

	Excellent 5%	Good 33%	Not so good 38%	Poor 23%
No	5%	9%	40%	76%
Yes	95%	91%	60%	24%

Updated 1:01 p.m. ET, Nov. 5

11/20/25, 8:57 PM

Exit polls: Election 2025 | CNN Politics

Condition of California's economy

4,326 total respondents

	Excellent/Good 38%	Not good/Poor 61%
No	9%	54%
Yes	91%	46%

Updated 1:01 p.m. ET, Nov. 5

Family's financial situation

4,326 total respondents

	Getting ahead 11%	Holding steady 59%	Falling behind 30%
No	40%	37%	34%
Yes	60%	63%	66%

Updated 1:01 p.m. ET, Nov. 5

Feeling about the way things are going in U.S.

4,326 total respondents

	Enthusiastic 8%	Satisfied 17%	Dissatisfied 24%	Angry 50%
No	89%	84%	40%	9%
Yes	11%	16%	60%	91%

Updated 1:01 p.m. ET, Nov. 5

Feeling about the way things are going in U.S.

4,326 total respondents

	Enthusiastic/Satisfied 26%	Dissatisfied/Angry 74%
No	85%	19%

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Yes

15%

81%

Updated 1:01 p.m. ET, Nov. 5

Is cost of living in your area:

4,326 total respondents

	Very affordable 1%	Somewhat affordable 15%	Not very affordable 44%	Not at all affordable 40%
No	n/a	24%	33%	44%
Yes	n/a	76%	67%	56%

Subgroups indicated with an n/a were interviewed for this exit poll, but the sample size may be too small for estimates within those groups to be projectable with confidence to their true values in the population.

Updated 1:01 p.m. ET, Nov. 5

Is cost of living in your area:

4,326 total respondents

	Very/Somewhat affordable 16%	Not too/Not at all affordable 84%
No	25%	38%
Yes	75%	62%

Updated 1:01 p.m. ET, Nov. 5

Was one reason for your vote to:

4,326 total respondents

	Support Trump 7%	Oppose Trump 52%	Trump not a factor 40%
No	84%	2%	71%
Yes	16%	98%	29%

Updated 1:01 p.m. ET, Nov. 5

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Opinion of Trump as president

4,326 total respondents

	Strongly approve 23%	Somewhat approve 12%	Somewhat disapprove 6%	Strongly disapprove 59%
No	94%	82%	40%	5%
Yes	6%	18%	60%	95%

Updated 1:01 p.m. ET, Nov. 5

Opinion of Trump as president

4,326 total respondents

	Approve 34%	Disapprove 65%
No	90%	8%
Yes	10%	92%

Updated 1:01 p.m. ET, Nov. 5

Do you consider yourself part of MAGA?

4,326 total respondents

	Yes 18%	No 82%
No	93%	24%
Yes	7%	76%

Updated 1:01 p.m. ET, Nov. 5

MAGA Republican?

4,326 total respondents

	Republican, MAGA 13%	Republican, not MAGA 10%	All other voters 77%
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No	94%	77%	21%
Yes	6%	23%	79%

Updated 1:01 p.m. ET, Nov. 5

MAGA Republican/Lean Republican?

4,326 total respondents

	All other voters 66%	Republican/Lean Rep, not MAGA 17%	Republican/Lean Rep, MAGA 17%
No	9%	81%	95%
Yes	91%	19%	5%

Updated 1:01 p.m. ET, Nov. 5

2024 presidential vote

4,326 total respondents

	Harris 58%	Trump 35%	Another candidate 3%	Did not vote 3%
No	5%	88%	43%	30%
Yes	95%	12%	57%	70%

Updated 1:01 p.m. ET, Nov. 5

View of Democratic Party

4,326 total respondents

	Strongly favorable 17%	Somewhat favorable 33%	Somewhat unfavorable 19%	Strongly unfavorable 30%
No	4%	6%	40%	86%
Yes	96%	94%	60%	14%

Updated 1:01 p.m. ET, Nov. 5

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View of Democratic Party

4,326 total respondents

	Favorable 50%	Unfavorable 49%
No	5%	68%
Yes	95%	32%

Updated 1:01 p.m. ET, Nov. 5

View of Republican Party

4,326 total respondents

	Strongly favorable 15%	Somewhat favorable 19%	Somewhat unfavorable 13%	Strongly unfavorable 52%
No	89%	86%	31%	4%
Yes	11%	14%	69%	96%

Updated 1:01 p.m. ET, Nov. 5

View of Republican Party

4,326 total respondents

	Favorable 35%	Unfavorable 65%
No	87%	9%
Yes	13%	91%

Updated 1:01 p.m. ET, Nov. 5

Favorable opinion of:

4,326 total respondents

	Only Democratic Party 47%	Only Republican Party 31%	Both parties 3%	Neither party 17%

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No	3%	92%	36%	25%
Yes	97%	8%	64%	75%

Updated 1:01 p.m. ET, Nov. 5

Opinion of Gavin Newsom as governor

4,326 total respondents

	Strongly approve 35%	Somewhat approve 21%	Somewhat disapprove 9%	Strongly disapprove 34%
No	2%	6%	36%	90%
Yes	98%	94%	64%	10%

Updated 1:01 p.m. ET, Nov. 5

Opinion of Gavin Newsom as governor

4,326 total respondents

	Approve 56%	Disapprove 43%
No	4%	79%
Yes	96%	21%

Updated 1:01 p.m. ET, Nov. 5

Most important issue facing California

4,326 total respondents

	Immigration 18%	Crime 11%	Economy 46%	Health care 16%	Climate change 8%
No	65%	73%	31%	10%	4%
Yes	35%	27%	69%	90%	96%

Updated 1:01 p.m. ET, Nov. 5

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Trump admin. immigration actions have:

4,326 total respondents

	Gone too far 64%	Not gone far enough 12%	Been about right 24%
No	8%	85%	88%
Yes	92%	15%	12%

Updated 1:01 p.m. ET, Nov. 5

On immigration enforcement, should governor:

4,326 total respondents

	Cooperate with Trump admin. 39%	Not cooperate with Trump admin. 61%
No	84%	5%
Yes	16%	95%

Updated 1:01 p.m. ET, Nov. 5

Is crime where you live:

4,326 total respondents

	A major problem 23%	A minor problem 58%	Not a problem 20%
No	57%	33%	22%
Yes	43%	67%	78%

Updated 1:01 p.m. ET, Nov. 5

Is crime a problem where you live?

4,326 total respondents

	Yes 80%	No 20%
No	40%	60%
Yes	60%	40%

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	40%	22%
Yes	60%	78%

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Who is handling redistricting fairly?

4,326 total respondents

	Only Democrats 29%	Only Republicans 11%	Both parties 7%	Neither party 52%
No	5%	84%	33%	43%
Yes	95%	16%	67%	57%

Updated 1:01 p.m. ET, Nov. 5

Democratic Party handling redistricting fairly?

4,326 total respondents

	Yes 36%	No 64%
No	10%	50%
Yes	90%	50%

Updated 1:01 p.m. ET, Nov. 5

Republican Party handling redistricting fairly?

4,326 total respondents

	Yes 18%	No 81%
No	65%	30%
Yes	35%	70%

Updated 1:01 p.m. ET, Nov. 5

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View of states redistricting in response to other states

4,326 total respondents

	Favor 35%	Oppose 64%
No	12%	49%
Yes	88%	51%

Updated 1:01 p.m. ET, Nov. 5

Congressional districts should generally be drawn by:

4,326 total respondents

	Party in power 8%	Non-partisan commission 92%
No	27%	37%
Yes	73%	63%

Updated 1:01 p.m. ET, Nov. 5

How concerned are you about political violence in U.S.?

4,326 total respondents

	Very concerned 64%	Somewhat concerned 28%	Not too concerned 6%	Not at all concerned 2%
No	38%	34%	28%	n/a
Yes	62%	66%	72%	n/a

Subgroups indicated with an n/a were interviewed for this exit poll, but the sample size may be too small for estimates within those groups to be projectable with confidence to their true values in the population.

Updated 1:01 p.m. ET, Nov. 5

Concerned about level of political violence in U.S.?

4,326 total respondents

	Yes 92%	No 8%
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No	37%	27%
Yes	63%	73%

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Party control of Congress is:

4,326 total respondents

	Very important 69%	Somewhat important 23%	Not too important 5%	Not at all important 2%
No	29%	47%	60%	72%
Yes	71%	53%	40%	28%

Updated 1:01 p.m. ET, Nov. 5

Is it important which party controls Congress?

4,326 total respondents

	Yes 93%	No 7%
No	34%	64%
Yes	66%	36%

Updated 1:01 p.m. ET, Nov. 5

View of sending National Guard into CA cities

4,326 total respondents

	Favor 35%	Oppose 65%
No	88%	8%
Yes	12%	92%

Updated 1:01 p.m. ET, Nov. 5

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Want Newsom to run for president in 2028?

4,326 total respondents

	Yes 46%	No 53%
No	6%	63%
Yes	94%	37%

Updated 1:01 p.m. ET, Nov. 5

Want Harris to run for president in 2028?

4,326 total respondents

	Yes 32%	No 68%
No	11%	48%
Yes	89%	52%

Updated 1:01 p.m. ET, Nov. 5

Reason for voting Yes on Proposition 50?

4,326 total respondents

	Best way to draw lines in CA 17%	Counters GOP changes elsewhere 82%
No	0%	0%
Yes	100%	100%

Updated 1:01 p.m. ET, Nov. 5

Reason for voting No on Proposition 50?

4,326 total respondents

	Not best way to draw lines in CA 65%	To stop Dems from gaining seats 34%
No	100%	100%

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Yes	0%	0%
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Updated 1:01 p.m. ET, Nov. 5

Decided on Proposition 50 vote

4,326 total respondents

	In last few days n/a	In last week 3%	In October 28%	Before October 16%	Knew all along 53%
No	n/a	28%	33%	30%	40%
Yes	n/a	72%	67%	70%	60%

Subgroups indicated with an n/a were interviewed for this exit poll, but the sample size may be too small for estimates within those groups to be projectable with confidence to their true values in the population.

Updated 1:01 p.m. ET, Nov. 5

Decided on Proposition 50 vote

4,326 total respondents

	In last week 3%	Before that 97%
No	28%	36%
Yes	72%	64%

Updated 1:01 p.m. ET, Nov. 5

Decided on Proposition 50 vote

4,326 total respondents

	In last month 31%	Before that 69%
No	33%	38%
Yes	67%	62%

Updated 1:01 p.m. ET, Nov. 5

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Area type

4,326 total respondents

	Urban 35%	Suburban 61%	Rural 4%
No	30%	39%	42%
Yes	70%	61%	58%

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EXHIBIT 27

TO DECLARATION OF RYAN EASON



User Name: Ryan.Eason

Date and Time: Wednesday, December 3, 2025 1:45 PM EST

Job Number: 269702728

Document (1)

1. [Strickland v. Weber](#)

Client/Matter: -None-

Search Terms:

Search Type: Natural Language

Narrowed by:

Content Type

Narrowed by
-None-

No *Shepard's* Signal™
As of: December 3, 2025 6:45 PM Z

Strickland v. Weber

Supreme Court of California
August 20, 2025, Opinion Filed
S292490

Reporter

2025 Cal. LEXIS 5421 *; 2025 LX 388009

TONY STRICKLAND, as State Senator, etc. et al.,
Petitioners, v. SHIRLEY N. WEBER, as Secretary of
State, etc. et al., Respondents.

Notice: DECISION WITHOUT PUBLISHED OPINION

Judges: [*1] Corrigan, J.

Opinion

The petition for writ of mandate and application for stay are denied. Petitioners have failed to meet their burden of establishing a basis for relief at this time under [California Constitution article IV, section 8](#).

Corrigan, J., was absent and did not participate.

End of Document

EXHIBIT 28

TO DECLARATION OF RYAN EASON

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As of: December 3, 2025 6:51 PM Z

Sanchez v. Weber

Supreme Court of California

August 27, 2025, Opinion Filed

S292592

Reporter

2025 Cal. LEXIS 5694 *; 2025 LX 341702

KATHRYN SANCHEZ, as State Assembly Member, etc.
et al., Petitioners, v. SHIRLEY N. WEBER, as Secretary
of State, etc., Respondent; LEGISLATURE OF THE
STATE OF CALIFORNIA, Real Party in Interest.

Opinion

[*1] The petition for writ of mandate and application for stay are denied.

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EXHIBIT 29

TO DECLARATION OF RYAN EASON

No *Shepard's* Signal™

As of: December 3, 2025 7:04 PM Z

Jackson v. Weber

United States District Court for the Northern District of Texas, Amarillo Division

October 23, 2025, Decided; October 23, 2025, Filed

2:25-CV-197-Z

Reporter

2025 U.S. Dist. LEXIS 208742 *; 2025 LX 496769; 2025 WL 2986057

REPRESENTATIVE RONNY JACKSON, Plaintiff, v.
SHIRLEY N. WEBER, et al., Defendants.**Core Terms**elect, redress, modify, causation, concrete, cognizable,
republican, visibility, media, voter, seat, private right**Counsel:** [*1] For Ronny Jackson, Plaintiff: Edward A Paltzik, LEAD ATTORNEY, Taylor Dykema PLLC, Houston, TX; Chris D Parker, Farris Parker & Hubbard PC, Amarillo, TX; Daniel Z Epstein, PRO HAC VICE, America First Legal, Washington, DC.

For Shirley N Weber, California Secretary of State, Gavin Newsom, Governor of California, Defendants: Jennifer E Rosenberg, LEAD ATTORNEY, PRO HAC VICE, California Attorney General's Office, Los Angeles, CA; Anya Binsacca, Iram Hasan, PRO HAC VICE, California Attorney General's Office, San Francisco, CA; Artin DerOhanian, CA Attorney General, Los Angeles, CA; David Green, PRO HAC VICE, Office of the Attorney General, Department of Justice, Sacramento, CA.

Judges: MATTHEW J. KACSMARYK, UNITED STATES DISTRICT JUDGE.**Opinion by:** MATTHEW J. KACSMARYK**Opinion****MEMORANDUM OPINION AND ORDER**

Before the Court are two motions: Defendants Shirley Weber and Gavin Newsom's Motion to Dismiss Plaintiffs Complaint ("Defendants' Motion") (ECF No. 32), filed September 30, 2025, and Plaintiff Representative Ronny Jackson's Motion for Temporary Restraining Order and Preliminary Injunction ("Plaintiffs Motion")

(ECF No. 4), filed September 4, 2025. Plaintiff responded to Defendants' Motion on October 5, 2025. ECF No. [*2] 35. Defendants filed an untimely Reply on October 20, 2025.¹ ECF No. 36. The Motions are now ripe. Having considered the briefing, Motions, and relevant law, Defendants' Motion is **GRANTED**. Plaintiffs Motion is **DENIED as MOOT**.

BACKGROUND

On August 21, 2025, Defendant Newsom signed a California state bill known as the Election Rigging Response Act ("ERRA"). ECF No. 33 at 14. Pursuant to the ERRA, the California electorate will soon vote on [Proposition 50](#), a proposed amendment to the California Constitution. *Id.* If [Proposition 50](#) passes, California will use "a new congressional district map for the 2026, 2028, and 2030 congressional elections." *Id.* Plaintiff claims the ERRA and [Proposition 50](#) are designed to "engineer a Democratic majority in Congress"; Defendants argue that California only passed the ERRA after Texas and other "Republican-led states" approved similar redistricting measures. ECF Nos. 5 at 8; 33 at 13.

In early November, California voters will be asked to approve [Proposition 50](#) through a statewide special election. See ECF No. 33 at 14-15 (noting that the election is slated for November 4, 2025, and that early voting is "already underway"). Remarkably, the vote on [Proposition 50](#) comes just fifteen years after California voters overwhelmingly [*3] approved Proposition 20, giving the power to draw congressional districts "to an independent commission known as the California

¹ See *N.D. TEX. R. 7.1(f)* (requiring replies to be filed "within 14 days from the date the response is filed"). Defendants filed their Reply fifteen days after Plaintiff filed his Response. Accordingly, the Court does not consider Defendants' Reply in ruling on the Motions.

Citizens Redistricting Commission." *Proposition 50*, CALIFORNIA LEGISLATIVE ANALYST'S OFFICE, 2 (2025), <https://lao.ca.gov/ballot/2025/prop50-110425.pdf> [<https://perma.cc/MMA8-38KF>]. This nonpartisan commission currently consists of "14 members: 5 Democratic members, 5 Republican members, and 4 members who are not registered with either of those political parties." *Id.*

Plaintiff filed this suit on August 29, 2025, challenging the ERRA and *Proposition 50* under California state law and two clauses of the U.S. Constitution: the Elections Clause² and the Guarantee Clause.³ See ECF No. 1 at 1; ECF No. 5 at 22-23. Specifically, he contends the ERRA "is a plainly unconstitutional and retaliatory piece of legislation targeted against Texas, its citizens, and its congressional delegation." *Id.* at 2. Plaintiff named Weber and Newsom as defendants because, as Secretary of State and Governor of California, they are "charged with enforcing the ERRA" and have "relentlessly championed and promoted" it. *Id.*

Defendants moved to dismiss the Complaint under four provisions of *Federal Rule of Civil Procedure 12(b)*: *Rule 12(b)(1)*, subject-matter jurisdiction; *Rule 12(b)(2)*, personal jurisdiction; *Rule 12(b)(3)*, improper venue; and *Rule 12(b)(6)*, failure [*4] to state a claim. See ECF No. 33. For the reasons that follow, the Court addresses only Defendants' *Rule 12(b)(1)* subject-matter jurisdiction argument.

LEGAL STANDARD

Federal Rule of Civil Procedure 12(b)(1) allows defendants to seek dismissal of an action for "lack of subject-matter jurisdiction." *Fed. R. Civ. P. 12(b)(1)*. "Federal courts are courts of limited jurisdiction," possessing 'only that power authorized by Constitution

²The Elections Clause provides: "The Times, Places and Manner of holding Elections for Senators and Representatives, shall be prescribed in each State by the Legislature thereof; but the Congress may at any time by Law make or alter such Regulations, except as to the Places of chusing Senators." *U.S. Const. art. I, § 4, cl. 1*.

³The Guarantee Clause provides: "The United States shall guarantee to every State in this Union a Republican Form of Government, and shall protect each of them against Invasion; and on Application of the Legislature, or of the Executive (when the Legislature cannot be convened) against domestic Violence." *U.S. Const. art. IV, § 4*.

and statute." *Gunn v. Minton*, 568 U.S. 251, 256, 133 S. Ct. 1059, 185 L. Ed. 2d 72 (2013) (quoting *Kokkonen v. Guardian Life Ins. of Am.*, 511 U.S. 375, 377, 114 S. Ct. 1673, 128 L. Ed. 2d 391 (1994)). The plaintiff "at all times bears the burden of demonstrating that subject matter jurisdiction exists." *Santerre v. Agip Petroleum Co.*, 45 F. Supp. 2d 558, 565 (S.D. Tex. 1999) (citing *Paterson v. Weinberger*, 644 F.2d 521, 523 (5th Cir. 1981)). This means plaintiffs must make "clear, distinct, and precise affirmative jurisdictional allegations" in pleadings, or else federal courts may not assert jurisdiction. *SXSW, L.L.C. v. Fed. Ins. Co.*, 83 F.4th 405, 407 (5th Cir. 2023) (quoting *Getty Oil Corp. v. Ins. Co. of N. Am.*, 841 F.2d 1254, 1259 (5th Cir. 1988)). This is because federal courts "presume that a cause lies outside their limited jurisdiction." *Kokkonen*, 511 U.S. at 377 (citation modified). Courts must consider jurisdictional challenges "before addressing any attack on the merits." *In re FEMA Trailer Formaldehyde Prods. Liab. Litig.*, 668 F.3d 281, 286 (5th Cir. 2012); see also *Ramming v. U.S.*, 281 F.3d 158, 161 (5th Cir. 2001) ("When a *Rule 12(b)(1)* motion is filed in conjunction with other *Rule 12* motions, the court should consider the *Rule 12(b)(1)* jurisdictional attack before addressing any attack on the merits.").

ANALYSIS

The Court "begins—and ends—with standing." *Murthy v. Missouri*, 603 U.S. 43, 56, 144 S. Ct. 1972, 219 L. Ed. 2d 604 (2024) (citation modified). Because Plaintiff does not have standing, the Court lacks jurisdiction [*5] to reach the merits of this dispute.

I. STANDING

Article III of the Constitution limits the federal "judicial Power" to "Cases" and "Controversies." *U.S. Const. art. III, § 2*. "This is a 'bedrock requirement.'" *Raines v. Byrd*, 521 U.S. 811, 818, 117 S. Ct. 2312, 138 L. Ed. 2d 849 (1997) (quoting *Valley Forge Christian Coll. v. Ams. United for Separation of Church and State, Inc.*, 454 U.S. 464, 471, 102 S. Ct. 752, 70 L. Ed. 2d 700 (1982)). "No principle is more fundamental to the judiciary's proper role in our system of government than the constitutional limitation of federal-court jurisdiction to actual cases or controversies." *Id.* (quoting *Simon v. E. Ky. Welfare Rts. Org.*, 426 U.S. 26, 37, 96 S. Ct. 1917, 48 L. Ed. 2d 450 (1976)). 'One element of the case-or-controversy requirement' is that plaintiffs 'must establish that they have standing to sue.'" *Clapper v. Amnesty Int'l*

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USA, 568 U.S. 398, 408, 133 S. Ct. 1138, 185 L. Ed. 2d 264 (2013) (quoting Raines, 521 U.S. at 818). The standing inquiry is about whether the plaintiff is the right person to bring the lawsuit. See Lujan v. Defs. of Wildlife, 504 U.S. 555, 560 n.1, 112 S. Ct. 2130, 119 L. Ed. 2d 351 (1992); see also Acheson Hotels, LLC v. Laufer, 601 U.S. 1, 12, 144 S. Ct. 18, 217 L. Ed. 2d 155 (2023) (Thomas, J., concurring in the judgment) ("Standing asks, 'What's it to you?'" (quoting Antonin Scalia, *The Doctrine of Standing as an Essential Element of the Separation of Powers*, 17 SUFFOLK U. L. REV. 881, 882 (1983) (citation modified))); William Baude & Samuel L. Bray, Proper Parties, Proper Relief, 137 Harv. L. Rev. 153, 161 (2023) ("Doctrines like standing operate to ensure that the federal courts act as courts. Requiring proper parties ensures that [a case] is a judicially cognizable dispute, and requiring proper relief ensures that it is a judicially resolvable dispute.").

To have standing, "[t]he plaintiff must have (1) suffered an injury in fact, (2) that is fairly traceable to the challenged conduct [*6] of the defendant, and (3) that is likely to be redressed by a favorable judicial decision." La Union Del Pueblo Entero v. Abbott, 151 F.4th 273, 285 (5th Cir. 2025) (quoting Spokeo, Inc. v. Robins, 578 U.S. 330, 338, 136 S. Ct. 1540, 194 L. Ed. 2d 635 (2016)). "An injury in fact is 'an invasion of a legally protected interest which is (a) concrete and particularized; and (b) actual or imminent, not conjectural or hypothetical.'" *Id.* (quoting Lujan, 504 U.S. at 560 (citation modified)). This is the "[f]irst and foremost" of standing's three elements." Spokeo, 578 U.S. at 338-39 (quoting Steel Co. v. Citizens for Better Env't, 523 U.S. 83, 103, 118 S. Ct. 1003, 140 L. Ed. 2d 210 (1998)). "The second and third requirements, causation and redressability, are usually 'flip sides of the same coin.'" Diamond Alt. Energy, LLC v. Env't Prot. Agency, 606 U.S. , 145 S. Ct. 2121, 2133, 222 L. Ed. 2d 370 (2025) (quoting FDA v. All. for Hippocratic Med., 602 U.S. 367, 379, 144 S. Ct. 1540, 219 L. Ed. 2d 121 (2024)); see also Murthy, 603 U.S. at 97 (Auto, J., dissenting) ("If a defendant's action causes an injury, enjoining the action or awarding damages for the action will typically redress that injury." (citation modified)). "Causation requires the plaintiff to show 'that the injury was likely caused by the defendant,' and redressability requires the plaintiff to demonstrate 'that the injury would likely be redressed by judicial relief.'" *Id.* (quoting Trans Union LLC v. Ramirez, 594 U.S. 413, 423, 141 S. Ct. 2190, 210 L. Ed. 2d 568 (2021)). Far from being "an ingenious academic exercise in the conceivable," the standing inquiry requires the plaintiff to make "a factual showing of perceptible harm." Lujan, 504 U.S. at 566

(quoting United States v. Students Challenging Regul. Agency Procs. (SCRAP), 412 U.S. 669, 688, 93 S. Ct. 2405, 37 L. Ed. 2d 254 (1973)).

A. Injury-in-Fact

As in Spokeo, this case "primarily concerns injury in fact." 578 U.S. at 338. Plaintiff argues [*7] he "suffers and will suffer concrete and particularized injury" because "enforcement of the ERRA would violate [his] rights and the structural constitutional principles that protect all citizens." ECF No. 35 at 20. Among the purported rights Plaintiff points to are "his current legislative powers as chair of two subcommittees and personal access to a larger staff of advisors," his "influence over the congressional majority," and "opportunities to enhance his media visibility." ECF No. 5 at 18. He contends all of these "would be lost" if he "becomes a minority member of Congress." *Id.*

Plaintiff leans heavily on Powell v. McCormack, 395 U.S. 486, 89 S. Ct. 1944, 23 L. Ed. 2d 491 (1969). There, longtime Congressman Adam Clayton Powell won reelection to New York's 18th Congressional District. *Id.* at 489. Before he could be sworn in for the 90th Congress, the House of Representatives passed a resolution specifically barring Powell from taking his seat. *Id.* at 490. Powell then sued the Speaker of the House and several other defendants, seeking injunctive relief and a declaratory judgment that his exclusion was unconstitutional. *Id.* at 493-94. The Supreme Court held that Powell's suit "presented a case or controversy within the meaning of Article III" and that federal courts therefore had subject-matter jurisdiction [*8] over his claims. *Id.* at 496, 512-13 (citation modified). Plaintiff argues that "like Congressman Adam Clayton Powell," he will be "personally deprived of his current legislative powers as chair of two subcommittees and personal access to a larger staff of advisors" if California voters approve Proposition 50. ECF No. 5 at 18.

Plaintiff also attempts to distinguish Raines v. Byrd. See ECF No. 5 at 17. In Raines, four representatives and two senators who voted against the Line Item Veto Act filed suit in the District Court for the District of Columbia, arguing that the Act violated the Constitution's Presentment Clause. *Id.* at 814, 816. They alleged that the Act injured them "directly and concretely . . . in their official capacities" in three ways:

The Act . . . (a) alter[s] the legal and practical effect of all votes they may cast on bills containing such separately vetoable items, (b) divest[s] the

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[appellees] of their constitutional role in the repeal of legislation, and (c) alter[s] the constitutional balance of powers between the Legislative and Executive Branches, both with respect to measures containing separately vetoable items and with respect to other matters coming before Congress.

Id. at 816. The Supreme Court rejected the contention that any of these injuries could [*9] be direct and concrete, holding instead that the six "individual members of Congress" did not "have a sufficient personal stake in this dispute and ha[d] not alleged a sufficiently concrete injury to have established Article III standing." Id. at 830 (internal quotation marks removed).

The Raines Court's characterization of Powell is instructive. Powell was distinguishable, the Court wrote, for two reasons. First, because the Raines plaintiffs had not been targeted for "specially unfavorable treatment as opposed to other Members of their respective bodies." Raines, 521 U.S. at 821. Instead, their claim was only that "the Act causes a type of institutional injury (the diminution of legislative power), which necessarily damages all Members of Congress and both Houses of Congress equally." Id. Because they had not been "singled out," as Congressman Powell had been, their claimed injury was not sufficiently personal. Id. at 820-21. And second, the Raines plaintiffs did not argue that they had "been deprived of something to which they personally are entitled—such as their seats as Members of Congress after their constituents had elected them." Id. at 821 (emphasis in original). "Rather," the Court noted, the plaintiffs' "claim of standing [was] based on a loss of political power, not [*10] loss of any private right, which would make the injury more concrete." Id. To the extent they were injured at all, the injury was to each "Member's seat" in Congress, not to each plaintiff in his "private capacity." Id. In other words, even if the Raines plaintiffs had been "singled out for specially unfavorable treatment," their claimed injury—dilution of their political power and influence—was something they had no private right to in the first place. Accordingly, they lacked standing to challenge the Act.

Raines makes clear that Plaintiffs suit is not judicially cognizable. His essential claim is that California's redistricting proposal could "cause[] a type of institutional injury"—namely, the potential "diminution" of his party's representation in Congress. Raines, 521 U.S. at 821. But if this occurs at all, such an outcome would "necessarily damage[] all" members of his party equally, not just Plaintiff. Id. Resisting this language in Raines, Plaintiff contends that like Congressman Powell, but

"[u]nlike the appellees in Raines," he "has 'been singled out for specially unfavorable treatment as opposed to other Members of [Congress]." ECF No. 5 at 17 (quoting Raines, 521 U.S. at 821 (emphasis added)). He writes that a "future Democrat-controlled [*11] House will likely subject" him to "political probes" and that this risk does not "affect all members of Congress equally." Id. But he fails to say why. He offers no evidence for the idea that a Democrat-controlled House is likely to subject any of their Republican colleagues to political probes—a far cry from Powell, where Congressman Powell had standing because the House had created a special "Select Committee to determine Powell's eligibility" and had specifically "excluded" him from taking his seat in the 90th Congress. Powell, 395 U.S. at 490, 510. And he doesn't seriously argue that he is more likely than his Republican colleagues to be the target of a such a probe, other than to note his "significant political support of President Trump." ECF No. 5 at 17. Plaintiff is hardly unique among Republican congressmen in that respect, however. Thus, his argument that he is uniquely likely to suffer retribution at the hands of a Democratic majority falls flat.

Plaintiff further insists that unlike the Raines plaintiffs, he does have "a personal stake in the outcome of this dispute" because he stands to lose individual "influence" and "opportunities to enhance his media visibility" if the House turns blue. ECF No. 5 at 18. Setting [*12] aside the fact that "influence" and "media visibility" are likely not judicially cognizable, any influence and media visibility Plaintiff possesses are not his by private right; they are byproducts of the fact that he is the current U.S. Representative for Texas's 13th congressional district. Any influence and media visibility Plaintiff enjoys belong not to him, but to his office. Stated differently: If Plaintiff "were to retire tomorrow, he would no longer have a claim; the claim would be possessed by his successor instead." Raines, 521 U.S. at 821. His claim thus runs with his seat, which he holds "as trustee for his constituents, not as a prerogative of personal power." Id. (citing THE FEDERALIST No. 62, at 378 (J. Madison) (C. Rossiter ed. 1961) ("It is a misfortune incident to republican government, though in a less degree than to other governments, that those who administer it may forget their obligations to their constituents and prove unfaithful to their important trust.")). It follows that Plaintiffs "claim of standing is based on a loss of political power, not loss of any private right, which would make the injury more concrete." Raines, 521 U.S. at 821; see also Jackson Mun. Airport Auth. v. Harkins, No. 21-60312, 2023 U.S. App. LEXIS 22554, 2023 WL 5522213, at *10 (5th Cir.

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[Aug. 25, 2023](#)), *reh'g en banc granted, opinion vacated, 78 F.4th 844 (5th Cir. 2023)*, and on *reh'g en banc, appeal dismissed as moot, 98 F.4th 144 (5th Cir. 2024)* (Duncan, J., concurring in [*13] part and dissenting in part) ("[Raines](#) teaches that individual lawmakers can't sue to vindicate a loss of political power but only a loss of a private right." (citation modified)). Accordingly, Plaintiff has failed to show that he will suffer a legally cognizable injury-in-fact.

B. Causation

Even if Plaintiffs asserted injury—the "dilut[ion]" of "his influence as a Texas Congressman"—were judicially cognizable, it is too attenuated from California's passage of the ERRA to establish causation. ECF No. 5 at 15; see also *id.* at 10 ("Plaintiff and other Texas representatives would be relegated to the minority on their committees, which entails reduced staff and resources available to serve their constituents" (citation modified)).

Plaintiff writes that if this Court does not enjoin California's upcoming special election, California's new legislative districts "*will cause* the U.S. House of Representatives to shift from its Republican majority to a Democrat majority by the term beginning in 2027." ECF No. 5 at 10 (emphasis added). More accurately, California's approval of [Proposition 50](#) *could* or may cause such a result. That's because Plaintiffs claims depend on all of the following occurring: California [*14] voters approving [Proposition 50](#) in November 2025; California voters turning out for Democrats in overwhelming numbers in November 2026; that overwhelming turnout resulting in Californians electing more Democrats to the U.S. House than they already do;⁴ and voters nationwide electing precisely the right number of Democrats, such that the entire U.S. House turns blue because of the seats California Democrats may flip in the 2026 midterms. If all of that happens, then Plaintiff *might* lose perks such as additional staff members, media visibility, and political influence. This is far too speculative to show causation. See, e.g., [Clapper, 568 U.S. at 414](#) (no causation where the plaintiffs' claim rested on a "speculative chain of

possibilities"); [Summers v. Earth Island Inst., 555 U.S. 488, 499, 129 S. Ct. 1142, 173 L. Ed. 2d 1 \(2009\)](#) ("[S]peculation does not suffice."); [Whitmore v. Arkansas, 495 U.S. 149, 157, 110 S. Ct. 1717, 109 L. Ed. 2d 135 \(1990\)](#) ("Petitioner's alleged injury is too speculative to invoke the jurisdiction of an Art. III court."); [Allen v. Wright, 468 U.S. 737, 759, 104 S. Ct. 3315, 82 L. Ed. 2d 556 \(1984\)](#) (no standing where the "links in the chain of causation between the challenged Government conduct and the asserted injury" were "far too weak"); [Murthy, 603 U.S. at 57](#) (finding no standing because of the "one-step-removed, anticipatory nature" of the plaintiffs' alleged injuries).

C. Redressability

Causation and [*15] redressability "are usually 'flip sides of the same coin.'" [Diamond Alt. Energy, 145 S. Ct. at 2133](#) (quoting [All. for Hippocratic Med., 602 U.S. at 379](#)). That's true here: If causation is satisfied, so is redressability. But causation isn't satisfied. Plaintiff failed to show that California's approval of the ERRA will likely cause him to suffer a legally cognizable injury. It follows that enjoining California's upcoming special election would not redress any injury Plaintiff may suffer. See ECF No. 5 at 8 ("Plaintiff asks this Court to preliminarily enjoin Defendants from placing [Proposition 50](#) on the ballot and otherwise implementing the ERRA."). Accordingly, Plaintiff lacks standing to challenge the ERRA and Proposition 50.

CONCLUSION

For the foregoing reasons, Defendants' Motion to Dismiss is **GRANTED**. Plaintiff's Complaint and Motion for Temporary Restraining Order and Preliminary Injunction are **DISMISSED without prejudice**.

SO ORDERED.

October 23, 2025

/s/ Matthew J. Kacsmarik

MATTHEW J. KACSMARYK

UNITED STATES DISTRICT JUDGE

JUDGMENT

The Court **GRANTED** Defendants' Motion to Dismiss on

⁴ Of California's fifty-two elected members of the U.S. House of Representatives, only nine are Republicans. *Directory of Representatives*, UNITED STATES HOUSE OF REPRESENTATIVES, <https://www.house.gov/representatives> [<https://perma.cc/H2M4-ADSS>].

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all of Plaintiff's claims. This case is therefore
DISMISSED without prejudice. Judgment is rendered
accordingly.

SO ORDERED.

October 23, 2025

/s/ Matthew J. Kacsmarik

MATTHEW J. KACSMARYK

UNITED STATES DISTRICT JUDGE

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EXHIBIT 30

TO DECLARATION OF RYAN EASON

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

REPRESENTATIVE RONNY JACKSON,
et al.,

Plaintiffs,

v.

2:25-CV-236-Z

SHIRLEY N. WEBER, *et al.*,

Defendants.

ORDER

Before the Court are three motions, all filed October 30, 2025: (1) Plaintiffs' Motion for Preliminary Injunction (ECF No. 6); (2) Plaintiffs' Motion for Leave to Exceed Page Limits (ECF No. 7); and (3) Plaintiffs' Motion to Convene a Three Judge Panel (ECF No. 8). After reviewing the briefing and relevant law, and for the reasons stated below, Plaintiffs' Motions are all **DENIED**. Further, Plaintiffs' claims are *sua sponte* **DISMISSED without prejudice** for lack of standing.

BACKGROUND

Plaintiffs United States Representative Ronny Jackson¹ and Representative Darrell Issa² seek a preliminary injunction to prevent the enforcement of California's Election

¹ Jackson represents Texas's 13th Congressional District in the U.S. House of Representatives and currently serves as Chairman of two House subcommittees: the Subcommittee on Oversight and Investigations of the House Permanent Select Committee on Intelligence, and the Subcommittee on Intelligence and Special Operations of the House Armed Services Committee. *See* ECF No. 6 at 11, 36.

² Issa represents California's 48th Congressional District in the U.S. House of Representatives and currently serves as Vice Chair of the Committee on Foreign Affairs. He also serves as Chairman of the Subcommittee on Intellectual Property, Artificial Intelligence, and the Internet on the Committee on Judiciary. ECF No. 1 at 3.

Rigging Response Act (the “ERRA”). ECF No. 6 at 7. On November 4, 2025, pursuant to the ERRA, California will conduct a statewide special election concerning Proposition 50—a “legislatively referred constitutional amendment” to the state’s constitution. *Id.* Plaintiff contends that the “California Constitution, not the Legislature, is tasked with adjusting the boundaries of congressional, Senate, Assembly, and State Board of Equalization districts once every decade, in the year following the national census.” *Id.* Thus, Proposition 50 would “temporarily override the Commission’s authority regarding congressional districts.” *Id.* Accordingly, Plaintiff argues that the ERRA (1) violates 42 U.S.C. Section 1983 and the Fourteenth Amendment by “depriving Plaintiff Darrell Issa of his vote being counted equally after redistricting, consistent with equal protection”; (2) violates the Elections Clause “by usurping power that the California Legislature does not lawfully possess under its own state constitution”; and (3) violates the Guarantee Clause by “sabotaging fundamental principles of republican government.” *Id.* Plaintiff asks this Court to preliminarily enjoin Defendants from “placing Proposition 50 on the ballot and otherwise implementing the ERRA.” *Id.* at 8.

This case follows shortly on the heels of a nearly identical case and request for preliminary injunctive relief. There, Representative Ronny Jackson also sued Defendants Shirley N. Weber and Gavin Newsom in their official capacities, raising nearly—if not exactly—identical challenges to the ERRA. *See Jackson v. Weber*, No. 2:25-CV-197, 2025 WL 2986057, at *5 (N.D. Tex. Oct. 23, 2025) (“Plaintiff asks this Court to enjoin Defendants from placing Proposition 50 on the ballot and otherwise implementing the ERRA.” (internal marks omitted)). This Court denied Plaintiff Jackson’s motion for a temporary restraining order and preliminary injunction and ultimately dismissed the action, as Plaintiff did not have standing to challenge a California redistricting law as a United States Congressman. *Id.* (“Plaintiff lacks standing to challenge the ERRA and Proposition 50.”). Now, Representative Jackson

returns and joins Darrell Issa, the representative for California's 48th Congressional District, in an attempt to renew his earlier challenge.

LEGAL STANDARD

Federal courts have an equitable power to issue preliminary injunctions under Federal Rule of Civil Procedure 65. A preliminary injunction is an extraordinary remedy requiring the movant to unequivocally show it is entitled to the relief. *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 22 (2008). "Its purpose 'is merely to preserve the relative positions of the parties until a trial on the merits can be held.'" *Starbucks Corp. v. McKinney*, 602 U.S. 339, 346 (2024) (quoting *Univ. of Tex. v. Camenisch*, 451 U.S. 390, 395 (1981)). To obtain one, the movant must show four factors:

(1) a substantial likelihood of success on the merits, (2) a substantial threat of irreparable injury if the injunction is not issued, (3) that the threatened injury if the injunction is denied outweighs any harm that will result if the injunction is granted, and (4) that the grant of an injunction will not disserve the public interest.

Id. The first factor is "the most important." *Mock v. Garland*, 75 F.4th 563, 587 n.50 (5th Cir. 2023). But no factor has a "fixed quantitative value." *Id.* at 587. On the contrary, "a sliding scale is utilized, which takes into account the intensity of each in a given calculus." *Id.* However, "[a] preliminary injunction is an extraordinary and drastic remedy; it is never awarded as of right." *Munaf v. Green*, 553 U.S. 674, 689 (2008) (internal citations and quotations omitted). The "decision to grant or deny [relief] lies within the sound discretion of the trial court." *White v. Carlucci*, 862 F.2d 1209, 1211 (5th Cir. 1989).

ANALYSIS

I. Standing

Before turning to the question of whether a preliminary injunction is warranted in the instant case, the Court begins by addressing the threshold issue of standing. Article III of the Constitution limits the federal "judicial Power" to "Cases" and "Controversies." U.S.

CONST. art. III, § 2. “One element of the case-or-controversy requirement is that [plaintiffs], based on their complaint, must establish that they have standing to sue.” *Raines v. Byrd*, 521 U.S. 811, 818 (1997). Like many other jurisdictional requirements, this standing requirement cannot be waived. *See Lewis v. Casey*, 518 U.S. 343, 349 n.1 (1996). Thus, it must be addressed at the outset of the case.

A plaintiff must therefore establish standing before a court may grant a preliminary injunction. *See Speech First, Inc. v. Fenves*, 979 F.3d 319, 329 (5th Cir. 2020). To have standing, “[t]he plaintiff must have (1) suffered an injury in fact, (2) that is fairly traceable to the challenged conduct of the defendant, and (3) that is likely to be redressed by a favorable judicial decision.” *La Union Del Pueblo Entero v. Abbott*, 151 F.4th 273, 285 (5th Cir. 2025) (quoting *Spokeo, Inc. v. Robins*, 578 U.S. 330, 338 (2016)). “An injury in fact is ‘an invasion of a legally protected interest which is (a) concrete and particularized; and (b) actual or imminent, not conjectural or hypothetical.’” *Id.* (quoting *Lujan v. Defs. of Wildlife*, 504 U.S. 555, 560 (1992) (citation modified)). This is the “[f]irst and foremost” of standing’s three elements.” *Spokeo*, 578 U.S. at 338–89 (quoting *Steel Co. v. Citizens for Better Env’t*, 523 U.S. 83, 103 (1998)). “The second and third requirements, causation and redressability, are usually ‘flip sides of the same coin.’” *Diamond Alt. Energy, LLC v. Env’t Prot. Agency*, 606 U.S. ---, 145 S. Ct. 2121, 2133 (2025) (quoting *FDA v. All. for Hippocratic Med.*, 602 U.S. 367, 379 (2024)); *see also Murthy v. Missouri*, 603 U.S. 48, 97 (2024) (Alito, J., dissenting) (“If a defendant’s action causes an injury, enjoining the action or awarding damages for the action will typically redress that injury.” (citation modified)). “Causation requires the plaintiff to show ‘that the injury was likely caused by the defendant,’ and redressability requires the plaintiff to demonstrate ‘that the injury would likely be redressed by judicial relief.’” *Id.* (quoting *TransUnion LLC v. Ramirez*, 594 U.S. 418, 423 (2021)). Far from being “an

ingenious academic exercise in the conceivable,” the standing inquiry requires the plaintiff to make “a factual showing of perceptible harm.” *Lujan*, 504 U.S. at 566 (quoting *United States v. Students Challenging Regul. Agency Procs. (SCRAP)*, 412 U.S. 669, 688 (1973)).

A. Injury-in-Fact

Plaintiffs allege “dual” injuries as legislators and voters. ECF No. 1 at 3. First, they claim they will each suffer harm in their representational capacities. *Id.* at 2. They assert an injury “as individual Members of Congress whose ability to represent their constituents will be directly and immediately impaired.” *Id.* But Plaintiffs do not rely solely on their status as legislators. They further contend they will suffer injury as individuals “whose own votes will be diluted by California’s unconstitutional redistricting scheme.” *Id.* Thus, Plaintiffs assert standing first as legislators, second as voters. The Court addresses each argument in turn.

1. Legislator Standing

The Supreme Court has recognized few circumstances in which legislators may sue in their representational capacity. In *Powell v. McCormack*, the Court allowed a congressman to sue the Speaker of the House and others after they passed a resolution specifically barring him from taking his seat. 395 U.S. 486, 489 (1969). And in *Coleman v. Miller*, the Supreme Court found state legislators had standing to sue when they alleged a Lieutenant Governor’s action ratifying an amendment deprived their vote against ratification of its effect. 307 U.S. 433, 36–37 (1939). But the Court significantly narrowed legislator standing in *Raines v. Byrd*. 521 U.S. at 821. There, the Supreme Court clarified its earlier decisions, limiting *Powell*’s holding to cases where a legislator receives “specially unfavorable treatment” relative to other members of Congress. *Id.* *Raines* also characterized *Coleman* as being limited to cases in which legislators’ votes are “deprived of all validity.” *Id.* at 822. Post-*Raines*, legislators may not sue in their representative capacity when the asserted harm amounts only to “a loss

of political power, not loss of any private right, which would make the injury more concrete.” *Id.* at 821. Nor can they sue for a loss of voting power unless the challenged event renders their vote completely ineffective. *Id.* at 822.

Here, Plaintiffs essentially claim they will lose “political power,” not any “private right.” *Id.* Plaintiff Jackson argues that if “Democrats take control of the House in January 2027, [he] will immediately and automatically lose” his chairmanship positions on two subcommittees, as well as the resources attending those positions and a House majority seat. ECF No. 1 at 13. These are trappings of “political power,” not private entitlements. Nor do the anticipated losses deprive Plaintiff of his vote as a Member of Congress. Under *Raines*, these are not Article III injuries. *See* 521 U.S. at 821–22.

The Court previously addressed Representative Jackson’s standing to challenge the California election in its Order dismissing his prior action. *See generally Jackson*, 2025 WL 2986057. There, the Court held *Raines v. Byrd* “makes clear that Plaintiff’s suit is not judicially cognizable.” *Id.* at *4. Now, as then, this Court holds Representative Jackson does not have standing to bring this suit in his capacity as a legislator. Adding Plaintiff Representative Darrell Issa does not change this outcome.

Plaintiff Issa alleges that “[i]f Democrats take control of the House due to AB 604’s implementation, Plaintiff Issa will lose” his “seniority advantages in committee proceedings,” as well as suffer a reduced staff allocation, a weaker “[a]bility to shape committee agendas,” and less “[p]riority access to witnesses, oversight materials, and legislative opportunities.” Just as the injuries alleged by Plaintiff Jackson, these are articles of “political power,” not “private right[s].” *Raines*, 521 U.S. at 821. Because he has alleged no loss of a personal entitlement, nor a complete deprivation of his vote’s validity, Plaintiff Issa has not pled a cognizable injury in his representational capacity. *See id.* at 821–22.

2. Voter Standing

Plaintiffs also assert anticipated injuries as voters. At the outset, this Court notes Plaintiff Jackson is not a voter in any California district. *See* ECF No. 1 at 2. Rather, he “represents Texas’s 13th Congressional District.” *Id.* As a voter, then, Plaintiff Jackson will suffer no harm except that which every other voter in the United States shares equally. In other words, Plaintiff Jackson would hold a “generalized grievance,” in no way particular to him. *See United States v. Richardson*, 418 U.S. 166, 176, 180 (1974); *Lujan*, 504 U.S. at 575. Plaintiff Jackson’s generalized grievances are not Article III injuries. *Id.*

Plaintiff Issa, however, does vote in California. ECF No. 1 at 2. As a California voter, the state’s redistricting would immediately affect him. Courts have recognized cognizable injuries flowing from certain dilutions of an individual’s vote. *See Reynolds v. Sims*, 377 U.S. 533, 558 (1964). When population deviations of ten percent or more occur, redistricting presumptively violates the equal protection principle of “one person one vote.” *See id.*; *Moore v. Itawamba Cnty.*, 431 F.3d 257 (5th Cir. 2005). But deviations below that level are often permitted, as the “plaintiff must prove that the redistricting process was tainted by arbitrariness or discrimination.” *Moore*, 431 F.3d at 258.

Here, Plaintiffs pay lip-service to the “one person one vote,” rule but allege no facts supporting a violation thereof. *See* ECF No. 1 at 6. Instead, they barely assert the redistricting will use “stale” data and result in “unequal distribution of people across district lines,” even though Plaintiffs admit “AB 604’s districts deviate from [the 2020 Census data] ideal by no more than one person.” *Id.* at 9–10. Without more, Plaintiff Issa has not alleged an illegal dilution of his vote. In other words, he has not alleged an injury-in-fact.

Courts have also recognized cognizable injuries flowing from racially classified or motivated redistricting. *See generally, e.g., Miller v. Johnson*, 515 U.S. 900 (1995); *Shaw v.*

Reno, 509 U.S. 630 (1993). Instead of racial motivations, here Plaintiffs complain of political motivations. Plaintiff Issa argues his “vote will be manipulated for partisan advantage.” ECF No. 1 at 17. This is a political gerrymandering claim—asserting not that Plaintiff Issa’s vote will hold less quantitative weight, but that the political effects will favor one party. Indeed, “[p]artisan gerrymandering is nothing new. Nor is frustration with it.” *Rucho v. Common Cause*, 588 U.S. 684, 696 (2019).

Even if Plaintiffs present valid frustrations, having one’s district politically gerrymandered does not constitute a justiciable injury. *Id.* at 707. “Partisan gerrymandering invariably sounds in a desire for proportional representation.” *Id.* at 704. But judicial precedents “clearly foreclose any claim that the Constitution requires proportional representation or that legislatures in reapportioning must draw district lines to come as near as possible to allocating seats to the contending parties in proportion to what their anticipated statewide vote will be.” *Id.* at 704–05 (internal quotations omitted). Because the “Framers were aware of electoral districting problems” and yet “settled on . . . assigning the issue to the state legislatures, expressly checked and balanced by the Federal Congress,” any holding “that legislators cannot take partisan interests into account when drawing district lines would essentially countermand [their] decision to entrust districting to political entities.” *Id.* at 699, 701. In summary, the Founders and the Supreme Court understood something akin to gerrymandering would emerge as an inevitable, political “spoil of war” beyond the reach of the Judiciary.

Even disregarding the Founders’ intentions, creating workable standards for adjudicating such disputes would involve “questions that are political, not legal,” and therefore “beyond the competence of the federal courts.” *Id.* at 707. Simply put, political gerrymandering disputes present questions beyond this Court’s jurisdiction.

Plaintiff Issa's claims that his vote is politically diluted cannot, therefore, give rise to a cognizable injury. And to the extent Plaintiffs rely on a broader injury, extending "to the statewide harm to their interest in their collective representation in the legislature, and in influencing the legislature's overall composition and policymaking," this also fails. *Gill v. Whitford*, 585 U.S. 48, 50 (2018) (internal quotations omitted). The Supreme Court's "cases to date have not found that this presents an individual and personal injury of the kind required for Article III standing." *Id.* at 68.

For the foregoing reasons, Plaintiffs have alleged no cognizable injury-in-fact supporting their standing to sue.

B. Causation

Just as before, Plaintiffs' asserted injuries are too attenuated from California's passage of the ERRA to establish causation. Plaintiffs write that if this Court does not enjoin California's upcoming special election, California's new legislative districts "*will* cause the U.S. House of Representatives to shift from its Republican majority to a Democrat majority by the term beginning in 2027." ECF No. 6 at 5 (emphasis added). More accurately, California's approval of Proposition 50 *could or may* cause such a result. As this Court has previously stated, "Plaintiffs claims depend on all of the following occurring: California voters approving Proposition 50 in November 2025; California voters turning out for Democrats in overwhelming numbers in November 2026; that overwhelming turnout resulting in Californians electing more Democrats to the U.S. House than they already do; and voters nationwide electing precisely the right number of Democrats, such that the entire U.S. House turns blue because of the seats California Democrats may flip in the 2026 midterms." *Jackson*, 2025 WL 2986057, at *5.

This is not a “manufactured litany of hypotheticals.” ECF No. 6 at 17. Rather, the Court merely takes Plaintiffs’ arguments to their logical conclusions, demonstrating a situation that is far too speculative to show causation. Plaintiffs’ own hypothetical—asking the Court to consider California imposing tariffs on Texas businesses—actually underscores why causation is lacking. There, the causal link between the state’s action and the plaintiffs’ injury is clear and concrete: tariffs directly increase the cost of doing business for the affected entities. By contrast, Plaintiffs’ alleged injuries depend on a speculative chain of events involving independent actors, unpredictable voter behavior, and uncertain political outcomes. Unlike tariffs, the purported “retaliatory measures” here merely assert a generalized grievance about how elections are administered. Such attenuated and conjectural claims fall far short of establishing causation sufficient for standing. *See, e.g., Clapper*, 568 U.S. at 414 (no causation where the plaintiffs’ claim rested on a “speculative chain of possibilities”); *Summers v. Earth Island Inst.*, 555 U.S. 488, 499 (2009) (“[S]peculation does not suffice.”); *Whitmore v. Arkansas*, 495 U.S. 149, 157 (1990) (“Petitioner’s alleged injury is too speculative to invoke the jurisdiction of an Art. III court.”); *Allen v. Wright*, 468 U.S. 737, 759 (1984) (no standing where the “links in the chain of causation between the challenged Government conduct and the asserted injury” were “far too weak”); *Murthy*, 603 U.S. at 57 (finding no standing because of the “one-step-removed, anticipatory nature” of the plaintiffs’ alleged injuries).

C. Redressability

Causation and redressability are “flip sides of the same coin.” *Diamond Alt. Energy*, 145 S. Ct. at 2133 (quoting *All. for Hippocratic Med.*, 602 U.S. at 379). Thus, if causation is satisfied, so is redressability. But causation is not satisfied. Plaintiffs failed to show that California’s approval of the ERRRA will likely cause them to suffer a legally cognizable injury.

It follows that enjoining California's upcoming special election would not redress any injury Plaintiffs may suffer.

Moreover, the Supreme Court recently rejected a voter-challenge to a redistricting effort in *Gill v. Whitford*, 585 U.S. 48 (2018). Citing redressability concerns, the Court noted that even in racial gerrymandering cases, plaintiffs "cannot sue to invalidate the whole State's legislative districting map; such complaints must proceed 'district by district.' *Id.* (quoting *Ala. Black Caucus v. Alabama*, 575 U.S. 254, 262 (2015)). Just as in that case, Representative Issa's anticipated injury is the political dilution of his vote. *See id.* at 67 ("Here, the plaintiff's partisan gerrymandering claims turn on allegations that their votes have been diluted."); ECF No. 1 at 17 (asserting Issa's "vote will be diluted" and "manipulated for partisan advantage"). Representative Issa is a citizen of a single district. Any dilution of his individual vote occurs within that district. So, even if his claim is justiciable, enjoining a statewide election likely exceeds the redress of his injury.

An injury as an individual voter does not warrant enjoining a statewide election. And, to the extent Plaintiffs rely on a broader injury, extending "to the statewide harm to their interest in their collective representation in the legislature, and in influencing the legislature's overall composition and policymaking," this also fails. *Gill*, 585 U.S. at 68. The Supreme Court's "cases to date have not found that this presents an individual and personal injury of the kind required for Article III standing." *Id.* Therefore, that broader harm could not support redressability because it is not justiciable in the first place.

II. Additional Procedural Concerns

It is worth noting that even if Plaintiffs *did* have standing—they do not—and the Court proceeded to analyze Plaintiffs' likelihood of success on the merits, this lawsuit would not survive a venue challenge. 28 U.S.C. Section 1391 governs "the venue of all civil actions"

in district courts. 28 U.S.C. § 1391(a)(1). Venue is proper if one of three conditions is met. First, if the civil action is brought in “a judicial district in which any defendant resides, if all defendants are residents of the State in which the district is located.” *Id.* § 1391(b)(1). Second, if Plaintiff brings suit in “a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred, or a substantial part of property that is the subject of the action is situated.” *Id.* § 1391(b)(2). Third, the action can proceed in “any judicial district in which any defendant is subject to the court’s personal jurisdiction with respect to such action,” but only if “there is no district in which an action may otherwise be brought as provided in this section.” *Id.* § 1391(b)(3).

Here, Plaintiffs state both Defendants are citizens of California. ECF No. 1 at 3. Therefore, no defendant resides in this judicial district, and venue is not proper under Section 1391(b)(1). Consider also the facts of this case. The challenged election is a California election. The ERRA is a California state bill which “the California Legislature passed and Defendant Newsom signed into law.” *Id.* at 5. Proposition 50 will be approved or declined by “California voters.” *Id.* at 8. Any nonspeculative effects of that action will likely occur in California. The relevant facts of this case, then, bear little to no relationship to the Northern District of Texas. California’s reference to Texas’s redistricting as a political motivator does not constitute “a substantial part of the events or omissions” in this case. 28 U.S.C. § 1391(b)(2); *see* ECF No. 1 at 6. Therefore, Plaintiffs have not shown that venue is proper under Section 1391(b)(2). And, for the same reasons previously stated, Plaintiff could satisfy the venue requirements in California under either Section 1391(b)(1) or 1391(b)(2). Since there exists another district in which Plaintiff can bring this action, venue is not proper under Section 1391(b)(3).

III. Request for a Three-Judge Panel

In addition to their Motion for Preliminary Injunctive Relief, Plaintiffs request the Court to convene a three-judge district court panel pursuant to 28 U.S.C. Section 2284(a) to “hear and determine this action.” ECF No. 8 at 1.

28 U.S.C. Section 2284 provides that “[a] district court of three judges shall be convened when . . . an action is filed challenging the constitutionality of the apportionment of congressional districts or the apportionment of any statewide legislative body.” 28 U.S.C. § 2284(a). Section 2284 continues, stating that “[u]pon the filing of a request for three judges, the judge to whom the request is presented shall, *unless he determines that three judges are not required*, immediately notify the chief judge of the circuit, who shall designate two other judges, at least one of whom shall be a circuit judge.” 28 U.S.C. § 2284(b)(1) (emphasis added).

Although Plaintiffs “challenge[] the constitutionality of California’s apportionment of congressional districts on multiple grounds,” ECF No. 8 at 2, a single district court judge may determine that “three judges are not required” if the party seeking relief lacks standing. To be sure, the Supreme Court has held that a “three-judge court is not required where the district court itself lacks jurisdiction [over] the complaint or the complaint is not justiciable in the federal courts.” *Shapiro v. McManus*, 577 U.S. 39, 44–45 (2015) (quoting *Gonzalez v. Automatic Emp. Credit Union*, 419 U.S. 90, 100 (1974)). And because a case is not justiciable in federal courts when the plaintiff lacks standing, the absence of standing is a “ground upon which a single judge [may] decline[] to convene a three-judge court.” *See Gonzalez*, 419 U.S. at 100; *see also Bone Shirt v. Hazeltine*, 444 F. Supp. 2d 992 (D.S.D. 2005) (“[A] court has jurisdiction to dispose of the matter without convening a three-judge district court.”); *Giles v. Ashcroft*, 193 F. Supp.2d 258, 262 (D.D.C. 2002) (“An individual district court judge may consider threshold jurisdictional challenges before convening a three-judge panel.”); *Sharrow*

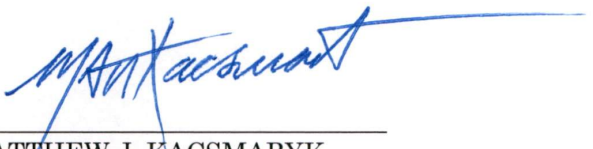
v. Fish, 501 F. Supp. 202, 205 (S.D.N.Y. 1980) (“[H]aving determined that plaintiff lacks standing and thus presents no substantial claim, the Court finds that the convening of a three-judge court is not warranted”). Just so here. Plaintiffs lack standing and, thus, convening a three-judge court is neither necessary nor mandatory.

CONCLUSION

For the foregoing reasons, Plaintiffs’ Motions (ECF Nos. 6, 7, 8) are all **DENIED**. Because Plaintiffs do not have standing to sue, this Court lacks subject-matter jurisdiction and must also dismiss. *See* FED. R. CIV. P. 12(h)(3). Accordingly, it is further **ORDERED** that Plaintiffs’ claims are *sua sponte* **DISMISSED without prejudice** for lack of standing.

SO ORDERED.

October 31, 2025



MATTHEW J. KACSMARYK
UNITED STATES DISTRICT JUDGE

EXHIBIT 31

TO DECLARATION OF RYAN EASON

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
CIVIL MINUTES—GENERAL

Case No. **SACV 25-01988-KK-Ex**

Date: November 4, 2025

Title: ***Steve Hilton et al. v. Shirley Weber et al.***

Present: The Honorable **KENLY KIYA KATO, UNITED STATES DISTRICT JUDGE**

Twyla Freeman

Not Reported

Deputy Clerk

Court Reporter

Attorney(s) Present for Plaintiff(s):

Attorney(s) Present for Defendant(s):

None Present

None Present

Proceedings: (In Chambers) Order (1) DENYING Plaintiff's Motion for Preliminary Injunction [Dkt. 17], (2) DENYING Plaintiff's Request for the Appointment of a Three Judge Panel [Dkt. 36], and (3) DISMISSING Plaintiff's Complaint With Leave to Amend

I.
INTRODUCTION

On September 4, 2025, plaintiff Steve Hilton ("Plaintiff") filed a Complaint against defendant California Secretary of State Shirley Weber ("Secretary of State Weber"), defendant Governor Gavin Newsom ("Governor Newsom"), and real party in interest the Legislature of California ("California Legislature") (collectively, "Defendants"). ECF Docket No. ("Dkt.") 1, Complaint ("Compl."). On October 3, 2025, Plaintiff filed the instant Motion for Preliminary Injunction ("Motion"). Dkt. 17-1, Motion ("Mot."). On October 17, 2025, Plaintiff filed the instant Request for the Appointment of a Three-Judge Panel ("Request"). Dkt. 36, Request ("Req.").

The Court finds this matter appropriate for resolution without oral argument. *See* Fed. R. Civ. P. 78(b); C.D. Cal. L.R. 7-15. For the reasons set forth below, Plaintiff's Motion and Request are **DENIED**, and Plaintiff's Complaint is **DISMISSED** with leave to amend.

II.
BACKGROUND

On August 21, 2025, the California Legislature approved Assembly Constitution Amendment No. 8 ("ACA 8"). ACA 8, 2025-2026 Leg., Reg. Sess. (Cal. 2025). ACA 8 proposes amending the California Constitution to temporarily replace the current congressional district maps in California for

the 2026, 2028, and 2030 congressional elections. See id. The same day, Governor Newsom signed into law Assembly Bill No. 604 (“AB 604”) and Senate Bill No. 280 (“SB 280”). See Assem. Bill No. 604, 2025-2026 Reg. Sess. (Cal. Aug. 21, 2025); Sen. Bill No. 280, 2025-2026 Reg. Sess. (Cal. Aug. 21, 2025). AB 604 sets forth the temporary district maps that would be implemented for congressional elections in California until 2030 if ACA 8 is adopted. See Assem. Bill No. 604. SB 280 sets a special election for November 4, 2025, in which California voters will decide whether to adopt ACA 8, designated as Proposition 50 (“Prop 50”). See Sen. Bill No. 280.

On September 4, 2025, Plaintiff, a registered voter in San Mateo County, California, and candidate for the 2026 California gubernatorial election, filed the operative Complaint challenging the constitutionality of Prop 50.¹ Compl. ¶ 1. In the Complaint, Plaintiff alleges Defendants, in undertaking a “hyper-partisan gerrymandering project[,] . . . act[ed] ‘under color of state law’ to deprive Plaintiff of rights, privileges, or immunities secured by the U.S. Constitution.” Id. ¶ 14. The Complaint raises the following two causes of action:

1. **Cause of Action One:** Violation of the Equal Protection Clause Based on Unequal Congressional Districts; and
2. **Cause of Action Two:** Violation of the Equal Protection Clause Based on Legislature v. Deukmejian, 34 Cal. 3d 658 (1983).

Id. ¶¶ 11-22.

On October 3, 2025, Plaintiff filed the Motion. Mot. Plaintiff moves for preliminary injunction, alleging Prop 50 would create congressional districts with unequal populations in violation of the Equal Protection Clause’s “one person, one vote” principle by failing to account for population changes since the last decennial census. Id. at 19-23. Plaintiff seeks a preliminary injunction either (1) enjoining Secretary of State Weber “to suspend all activity in processing this election and postpone this election until she can produce clear and convincing evidence that these maps are relatively equal in population or if unequal, that the discrepancy serves a legitimate governmental purpose,” or, (2) if Prop 50 passes, enjoining “implementation of the new maps until the state can produce clear and convincing evidence that these maps are relatively equal in population or if unequal, that the discrepancy serves a legitimate governmental purpose.” Id. at 28. Plaintiff also requests a three-judge panel under 28 U.S.C. § 2284 (“Section 2284”). Id. at 8. In support of the Motion, Plaintiff submits the Declaration of Chandra Sharma. Dkt. 17-2 (“Sharma Decl.”).

On October 17, 2025, Plaintiff filed the Request, reasserting his request that the Court initiate the process for convening a three-judge panel pursuant to Section 2284. Req. at 2-3.

On October 20, 2025, the Court ordered the parties to file supplemental briefing addressing (1) whether Plaintiff has standing, (2) whether the claims are ripe for adjudication, and (3) whether Plaintiff’s claims raise a federal question for jurisdictional purposes under Goosby v. Osser, 409 U.S. 512 (1973). Dkt. 37. On the same day, real party in interest the California Legislature filed an Opposition to the Motion, dkt. 38, and defendants Secretary of State Weber and Governor Newsom filed an Opposition to the Motion, dkt. 39. In support of its Opposition, the California Legislature

¹ The Court notes Plaintiff chose to file his suit in the Central District of California rather than his home forum of the Northern District of California.

includes the Declaration of John W. Connelly, dkt. 38-1 (“Connelly Decl.”), and a Supplemental Request for Judicial Notice, dkt. 38-2 (“Supp. RJN”).² In support of their Opposition, defendants Secretary of State Weber and Governor Newsom submit the Declaration of Jana Lean, dkt. 39-1.

On October 24, 2025, the parties filed their respective supplemental briefings addressing the Court’s October 20, 2025 Order. Dkt. 41, Plaintiff’s Supplemental Briefing (“Pl.’s Supp. Br.”); Dkt. 42, Defendants Secretary of State Weber and Governor Newsom’s Supplemental Brief; Dkt. 43, Real Party in Interest Legislature of the State of California’s Supplemental Brief (“Legis.’s Supp. Br.”).

On October 27, 2025, Plaintiff filed a Reply. Dkt. 44, Reply.

This matter, thus, stands submitted.

III. **LEGAL STANDARD**

Federal courts are courts of “limited jurisdiction” which “possess only that power authorized by Constitution and statute.” Kokkonen v. Guardian Life Ins. Co. of Am., 511 U.S. 375, 377 (1994). Under Federal Rule of Civil Procedure 12(h)(3), “[i]f the court determines at any time that it lacks subject-matter jurisdiction, the court must dismiss the action.” Fed. R. Civ. P. 12(h)(3).

Article III of the U.S. Constitution limits federal courts’ subject matter jurisdiction to “actual cases or controversies.” Clapper v. Amnesty Int’l USA, 568 U.S. 398, 408 (2013) (citation modified) (quoting DaimlerChrysler Corp. v. Cuno, 547 U.S. 332, 341 (2006)). One facet of this “case-or-controversy requirement” is that a plaintiff “must establish that they have standing to sue.” Id. (citation modified) (quoting Raines v. Byrd, 521 U.S. 811, 818 (1997)). “The plaintiff ‘bears the burden of establishing standing as of the time [s]he brought th[e] lawsuit and maintaining it thereafter.’” Murthy v. Missouri, 603 U.S. 43, 58 (2024) (quoting Carney v. Adams, 592 U.S. 53, 59 (2020)).

Each element of standing “must be supported . . . with the manner and degree of evidence required at the successive stages of the litigation.” Lujan v. Defs. of Wildlife, 504 U.S. 555, 561 (1992). At the preliminary injunction stage, “the plaintiff must make a ‘clear showing’ that she is ‘likely’ to establish each element of standing.” Murthy, 603 U.S. at 58 (citing Winter v. Nat. Res. Def. Council, Inc., 555 U.S. 7, 22 (2008)). Furthermore, the plaintiff must “demonstrate standing for each claim that they press and for each form of relief that they seek.” Am. Encore v. Fontes, 152 F.4th

² A court may take judicial notice of documents extrinsic to the complaint if no party contests their authenticity and the complaint “necessarily relies” upon the documents, Parrino v. FHP, Inc., 146 F.3d 699, 705-06 (9th Cir. 1998), superseded by statute on other grounds as recognized in Abrego Abrego v. Dow Chem. Co., 443 F.3d 676, 681 (9th Cir. 2006), or if the documents are matters of public record, Lee v. City of Los Angeles, 250 F.3d 668, 688-89 (9th Cir. 2001). Here, the California Legislature requests the Court take judicial notice of the Official Voter Information Guide for the November 4, 2025 California Statewide Special Election, see Supp. RJN, Ex. A, and the AB 604 Districts Atlas, see Supp. RJN, Ex. B. Because Plaintiff does not dispute the authenticity of the documents and the documents are either necessarily relied upon by the Complaint or are matters of public record, the Supplemental Request for Judicial Notice is **GRANTED**.

1097, 1110 (9th Cir. 2025) (citation modified) (quoting TransUnion LLC v. Ramirez, 594 U.S. 413, 431 (2021)).

IV. DISCUSSION

A. THIS COURT DOES NOT HAVE JURISDICTION OVER PLAINTIFF'S CLAIMS BECAUSE PLAINTIFF HAS NOT ESTABLISHED ARTICLE III STANDING

1. Applicable Law

The “irreducible constitutional minimum” of Article III standing consists of: (1) injury in fact, (2) causation, and (3) redressability. Spokeo, Inc. v. Robins, 578 U.S. 330, 338 (2016) (quoting Lujan, 504 U.S. at 560). An injury in fact is “an invasion of a legally protected interest which is (a) concrete and particularized, and (b) actual or imminent, not conjectural or hypothetical.” Lujan, 504 U.S. at 560 (citation modified).

First, “[t]o be ‘concrete,’ the injury ‘must actually exist’ – an abstract, theoretical concern will not do.” Pierce v. Ducey, 965 F.3d 1085, 1089 (9th Cir. 2020) (quoting Spokeo, Inc., 578 U.S. at 340). Second, “[f]or an injury to be ‘particularized,’ it ‘must affect the plaintiff in a personal and individual way.’” Spokeo, Inc., 578 U.S. at 339 (quoting Lujan, 504 U.S. at 560 n.1). “[A] suit alleging only generalized grievances fails for lack of standing.” Sisley v. U.S. Drug Enf't Admin., 11 F.4th 1029, 1034 (9th Cir. 2021) (citation modified). A generalized grievance is “characterized by its abstract and indefinite nature – for example, harm to the common concern for obedience to law.” Ecological Rts. Found. v. Pac. Gas & Elec. Co., 874 F.3d 1083, 1093 (9th Cir. 2017) (citation modified). Third, an injury is imminent “if the threatened injury is certainly impending, or there is a substantial risk that the harm will occur.” In re Zappos.com, Inc., 888 F.3d 1020, 1024 (9th Cir. 2018) (citation modified). Allegations of merely “possible future injury” are insufficient. Clapper, 568 U.S. at 409 (citation modified) (quoting Whitmore v. Arkansas, 495 U.S. 149, 158 (1990)).

2. Analysis

As an initial matter, it appears none of Plaintiff's claimed injuries are imminent because it is speculative whether California voters will, in fact, approve Prop 50. While Plaintiff maintains “there is a better than even chance” Prop 50 will pass, Plaintiff offers no evidence to support this conclusory assertion. Pl.'s Supp. Br. at 7.³ Furthermore, Plaintiff's lack of imminent injury is underscored by the conditional nature of his requested relief – an injunction preventing the implementation of the new congressional district maps “if the measure is passed,” Mot. at 28 (emphasis added) – and his statement that he will dismiss his claims “[i]f the voters reject Prop[] 50 at the polls,” Pl.'s Supp. Br. at 13 (emphasis added). Hence, Plaintiff's allegations of injury are

³ In his Supplemental Briefing, Plaintiff urges the Court to “acknowledge” an October 2025 poll which purportedly demonstrates a majority of likely voters support Prop 50. Pl.'s Supp. Br. at 13. This does not show Prop 50's passage is imminent, and, in any event, the Court declines to speculate on the outcome of the November 4, 2025 special election. The Court further notes the official results of the election might not be known until 38 days after the election, the statutory deadline for the Secretary of State to certify the results under state law. See Cal. Elec. Code § 15501(b).

“necessarily conjectural.” Clapper, 568 U.S. at 412; see also, e.g., Serv. Emps. Int’l Union, Local 721 v. Cnty. of Riverside, No. EDCV-09-00561-VAP-JTLx, 2011 WL 1599610, at *13 (C.D. Cal. Apr. 27, 2011) (finding a plaintiff failed to allege a concrete and particularized injury where the injury rested on “contingent future events” (quoting Bova v. City of Medford, 564 F.3d 1093, 1096 (9th Cir. 2009))).

Moreover, even if Plaintiff demonstrated imminence, none of his asserted injuries are sufficient to confer Article III standing. Here, Plaintiff asserts two categories of injuries. According to Plaintiff’s primary theory of injury, the “unequal congressional districts” created by Prop 50 will “deny Plaintiff, and everyone else in the state, the right to an equal vote in congressional elections.” Mot. at 19. Alternatively, Plaintiff claims, for the first time in his Supplemental Briefing and the Reply, Prop 50 will result in his “forced displacement” from California’s 16th Congressional District (“CD 16”) to California’s 15th Congressional District (“CD 15”), thereby inflicting “other personal injuries.” Pl.’s Supp. Br. at 7; see also Reply at 4-5. As discussed below, neither theory is sufficient to confer Article III standing.

First, Plaintiff’s “unequal congressional districts” injury is not sufficiently particularized to support Article III standing. To the extent Plaintiff’s alleged harm is the dilution of his vote, “that injury is district specific.” Gill v. Whitford, 585 U.S. 48, 66 (2018). Therefore, Plaintiff “cannot sue to invalidate the whole State’s legislative districting map;” rather, he may, at most, seek relief for his individual district. Id. at 66-67 (citing Ala. Legis. Black Caucus v. Alabama, 575 U.S. 254, 262 (2015)). Plaintiff nonetheless seeks to assert statewide injury and seeks statewide relief. Specifically, Plaintiff alleges Prop 50 “will dilute every California[n]’s voting power,” and, thus, Prop 50’s implementation must be “immediately” enjoined across all of California’s congressional districts. Mot. at 26, 28 (emphasis added); see also id. at 21 (alleging Defendants are “intentionally disadvantaging political opponents and diluting [the] voting power of Californians who reside in every district across the State” (emphasis added)); id. at 6 (asserting Prop 50 “abridges the equal protection rights of [Plaintiff] and all California residents” (emphasis added)). These allegations amount to nothing more than a “generalized grievance against governmental conduct of which he . . . does not approve,” Gill, 585 U.S. at 66 (citation modified). Hence, Plaintiff’s “unequal congressional district” injury is insufficient to establish an injury in fact for the purposes of standing. See, e.g., id. at 69-72 (holding plaintiffs who asserted statewide harms from partisan gerrymandering failed to allege a particularized injury); Wash. Election Integrity Coal. United v. Hall, 634 F. Supp. 3d 977, 983-84 (W.D. Wash. 2022) (finding plaintiffs’ “general allegations of election irregularities that affected the votes of all ‘qualified electors’” were insufficient to establish standing); Bowyer v. Ducey, 506 F. Supp. 3d 699, 712-13 (D. Ariz. 2020) (concluding plaintiffs failed to allege a particularized and redressable vote dilution injury); Donald J. Trump for President, Inc. v. Cegavske, 488 F. Supp. 3d 993, 1000 (D. Nev. 2020) (finding plaintiffs’ allegations of vote dilution were “impermissibly generalized”).

Moreover, even assuming Plaintiff’s “unequal congressional districts” injury is particularized, Plaintiff does not make a clear showing of an individual vote dilution injury. “Vote dilution in the legal sense occurs only when disproportionate weight is given to some votes over others within the same electoral unit.” Election Integrity Project Cal., Inc. v. Weber, 113 F.4th 1072, 1087 (9th Cir. 2024) (citing Short v. Brown, 893 F.3d 671, 676 (9th Cir. 2018)). Thus, a vote dilution injury under the Equal Protection Clause occurs when a district is overpopulated relative to other districts in the state, resulting in the “undervaluation of the votes of those living there.” Reynolds v. Sims, 377 U.S. 533, 563 (1964). While Plaintiff contends Prop 50 will “severely dilute[]” his vote, he does not set forth facts or allegations showing his district would be overpopulated relative to others in California.

Rather, he simply alleges his district “will likely be unequal in population to other districts” under Prop 50. Mot. at 24; see also Sharma Decl. at 3 (broadly asserting “serious questions as to whether the Proposition 50 congressional maps are drawn with ‘precise statistical equality’”). Hence, Plaintiff’s bare assertions of speculative harm without any specific facts of individual vote dilution are insufficient to establish an injury in fact. See Murthy, 603 U.S. at 67 n.7 (holding plaintiffs failed to carry their burden of setting forth “specific facts” establishing a likelihood of standing); see also Mussi v. Fontes, No. CV-24-01310-PHX-DWL, 2024 WL 4988589, at *6 (D. Ariz. Dec. 5, 2024) (explaining vote dilution “requires a point of comparison” between districts to be a basis for standing).

Second, Plaintiff has not made a clear showing of his alleged “forced displacement” injury. Plaintiff contends his “displacement” from CD 16 to CD 15 will (1) force him to “move from a known member to an unknown member of Congress,” (2) “limit[] his opportunities to run for office in his familiar neighborhoods,” and (3) harm him as a taxpayer “by the State expending public funds on improper districts.” Pl.’s Supp. Br. at 7; see also Reply at 4-5. As an initial matter, it is disputed whether Prop 50, if passed, would in fact “displace” Plaintiff from CD 16 to CD 15.⁴ See, e.g., Murthy, 603 U.S. at 64-65 (holding a plaintiff failed to satisfy the burden at the preliminary injunction stage of showing the alleged injury was “likely traceable” to the challenged action). Nonetheless, even accepting Plaintiff’s allegations as true, Plaintiff “must do more than simply allege a nonobvious harm”; he “must explain how the elements essential to standing are met.” Va. House of Delegates v. Bethune-Hill, 587 U.S. 658, 663 (2019) (citing Wittman v. Personhuballah, 578 U.S. 539, 543-46 (2016)); see also Perry v. Newsom, 18 F.4th 622, 634 (9th Cir. 2021) (holding plaintiffs failed to establish standing where “the record [was] devoid of the ‘factual showing of perceptible harm’” (quoting Lujan, 504 U.S. at 566)). Here, Plaintiff fails to offer even a cursory analysis of whether and how his alleged “forced displacement” injury satisfies the concreteness, particularization, and imminence requirements for an injury in fact. For example, Plaintiff cites to no authority recognizing this injury as legally cognizable for the purposes of standing. See, e.g., Drake v. Obama, 664 F.3d 774, 782 (9th Cir. 2011) (“A taxpayer must demonstrate a nexus between the challenged spending and the constitutional right in order to establish taxpayer standing.” (citing Hein v. Freedom From Religion Found., Inc., 551 U.S. 587, 605 (2007))). Moreover, Plaintiff does not explain why his “forced displacement” injury – which, like his “unequal congressional districts” injury, is district specific – confers standing for the sweeping statewide injunctive relief he seeks. See Cuno, 547 U.S. at 353 (“The remedy must of course be limited to the inadequacy that produced the injury in fact

⁴ Real party in interest the California Legislature contends Plaintiff’s allegations of “forced displacement” are unlikely to be true “because the boundaries of proposed CD 15 are the same as the boundaries of the present District 15.” Legis.’s Supp. Br. at 7; see also Connelly Decl. ¶ 4. When evaluating a factual challenge to the court’s subject matter jurisdiction, the court “need not presume the truthfulness of the plaintiffs’ allegations,” White v. Lee, 227 F.3d 1214, 1242 (9th Cir. 2000), and may consider evidence outside the pleadings, see Leite v. Crane Co., 749 F.3d 1117, 1121-22 (9th Cir. 2014). Because the issue of Plaintiff’s alleged displacement is not “intertwined with the merits” of his Equal Protection claims, the Court need not accept the truth of Plaintiff’s “forced displacement” allegations. Bowen v. Energizer Holdings, Inc., 118 F.4th 1134, 1143 (9th Cir. 2024) (quoting Leite, 749 F.3d at 1122). Accordingly, in light of the evidence provided by the California Legislature, Plaintiff fails to show his “forced displacement” is “likely traceable” to Prop 50 for the purposes of satisfying the causation requirement of standing at the preliminary injunction stage. Murthy, 603 U.S. at 66.

...” (citation modified) (quoting Lewis v. Casey, 518 U.S. 343, 357 (1996))). Without more, Plaintiff’s conclusory “forced displacement” injury is insufficient to establish an injury in fact.

* * * * *

Accordingly, Plaintiff has failed to establish an injury in fact to support Article III standing, and this Court, therefore, lacks jurisdiction to hear Plaintiff’s claims. See Lujan, 504 U.S. at 561 (holding a plaintiff must establish standing to invoke federal jurisdiction).

B. THE COURT MAY DISMISS PLAINTIFF’S CLAIMS WITHOUT A THREE-JUDGE PANEL

1. Applicable Law

Under 28 U.S.C. § 2284 (“Section 2284”), “[a] district court of three judges shall be convened . . . when an action is filed challenging the constitutionality of the apportionment of congressional districts or the apportionment of any statewide legislative body.” 28 U.S.C. § 2284(a). However, “[a] three-judge court is not required where the district court itself lacks jurisdiction of the complaint or the complaint is not justiciable in the federal courts.” Shapiro v. McManus, 577 U.S. 39, 44-45 (2015) (quoting Gonzalez v. Automatic Emps. Credit Union, 419 U.S. 90, 100 (1974)). Hence, a district court may properly deny a request for a three-judge panel where “the district court lack[s] jurisdiction to hear [the p]laintiffs’ claims under Article III.” Citizens for Fair Representation v. Padilla, 815 F. App’x 120, 124 (9th Cir. 2020).

2. Analysis

Here, the Court finds it lacks jurisdiction to hear Plaintiff’s claims under Article III. Accordingly, the Court may dismiss Plaintiff’s claims for lack of jurisdiction without convening a three-judge panel under Section 2284. See, e.g., Padilla, 815 F. App’x at 124 (affirming a district court’s denial of a request for a three-judge panel where the plaintiffs lacked standing); Garcia v. 2011 Legis. Reapportionment Comm’n, 559 F. App’x 128, 135 (3d Cir. 2014) (same).

V. CONCLUSION

For the reasons set forth above, Plaintiff’s Motion and Request are **DENIED** because this Court lacks jurisdiction over Plaintiff’s claims. “If the court determines at any time that it lacks subject-matter jurisdiction, the court must dismiss the action.” Fed. R. Civ. P. 12(h)(3). Accordingly, Plaintiff’s Complaint is **DISMISSED** with leave to amend.

No later than fourteen (14) days from this order, Plaintiff shall file a First Amended Complaint. If Plaintiff chooses to file an amended complaint, Plaintiff shall lodge as an exhibit a redlined version of the amended pleading indicating all additions and deletions of material. **Plaintiff is expressly warned that failure to timely file a First Amended Complaint may result in sanctions including dismissal for failure to prosecute and comply with Court orders.** See Fed. R. Civ. P. 41(b).

IT IS SO ORDERED.

EXHIBIT 32

TO DECLARATION OF RYAN EASON



PRESS RELEASE

Legislative Democrats Announce Plan Empowering Voters To Protect California

AUGUST 19, 2025

SACRAMENTO—Today, Democrats in the California State Legislature announced new legislation to call a special election in November, empowering voters to protect our state’s economy and democracy, and fighting back against reckless attacks by Trump and Republicans.

The legislation includes a state constitutional amendment to set a special election on November 4. It also makes public, for all voters to see and review, new proposed Congressional maps for California.

Voters will have the final say on the maps when they cast their ballots.

The proposed maps are now publicly available on the [Senate and Assembly Elections Committee websites](#).

Californians also can provide input on the map [via a public portal](#) on the same website, which already has received more than 3,000 public comments since its launch on Wednesday.

Our Democratic Approach Empowers Voters, Protects People and Communities, and Promotes Transparency

Republican redistricting efforts in Texas and other states are dividing communities, undermining voter freedom — and their maps are drawn in secret without letting the people decide.

In California, lawmakers in the Assembly and Senate pushed for key provisions in the legislation to ensure fidelity to independent commissions,



Commission. The Legislature's plan makes sure the Commission maintains its full scope of work and authority after the 2030 Census and beyond, redrawing California's Congressional, state legislative and Board of Equalization lines every 10 years.

- **California only acts if Republicans try to rig the vote.** The legislation includes a trigger to ensure that maps will take effect only if other states effectuate partisan gerrymanders. Several Republican-controlled states, most notably Texas, are considering gerrymanders aimed to benefit their party. Unlike California, none are submitting those plans for voter approval.
- **Every state in the country should have independent redistricting.** The bills include provisions to express California's policy to support nonpartisan, independent redistricting nationwide and would call on Congress to initiate a federal constitutional amendment to require nonpartisan, independent redistricting nationwide.
- **Protecting communities of color and historically marginalized voters.** The new map makes no changes to historic Black districts in Oakland and the Los Angeles area, and retains and expands Voting Rights Act districts that empower Latino voters to elect their candidates of choices.
- **Keeping cities and communities together.** The proposed Congressional map keeps more cities whole within a single district than the most recent map enacted by the commission.

What Senate President Pro Tem Mike McGuire Says

"This is about more than drawing lines on a map, it's about drawing a line in the sand to stop Texas and Trump from rigging the election. This is about protecting the people of the Golden State, our Democracy, and making sure voters have a say. Access to health care matters. Reproductive rights and Planned Parenthood matters. Making life more affordable matters. So does keeping tariffs from killing California jobs. These are the stakes, this is what we will be voting on this week in the Legislature, and what the people of California will vote on in November."

What Assembly Speaker Robert Rivas Says



in the nation. voters will see the maps and have the final say. The stakes couldn't be higher, but I'm confident we'll defeat this assault on our democracy and end Trump's attacks on California."

Overview of the Legislation

The Legislature will consider three bills in order to call and facilitate the special election:

- A constitutional amendment which authorizes the replacement of the existing Congressional map
- A statute which contains the new proposed Congressional map for voter approval
- A statute to call the special election, appropriate funding for election administration, and make conforming changes to election calendars.

How Trump and Republicans Continue to Harm California's Families, Workers and Businesses

- Trump's tariffs are making family essentials and basic household items more expensive.
- Trump's budget slashes billions of dollars in funding for social services, threatening access to health care and food for millions of Californians.
- Trump's immigration raids are damaging California's economy as they terrorize our communities.
- Trump is arbitrarily and capriciously cutting off grant funding for California's research universities, along with K-12 funds, punishing California students and stalling resources for afterschool programs and teacher training.
- Trump and the federal government are playing politics with California's requests for relief following the devastating January fires in Los Angeles.

Timeline of Anticipated Legislative Action

Monday, August 18: Legislation into print in Assembly and Senate



legislation

Thursday, August 21: Anticipated floor votes in both Assembly and Senate

En español

###

Mike McGuire is President pro Tempore of the California Senate. He represents the North Coast of California, which stretches from the Golden Gate Bridge to the Oregon border, including Del Norte, Trinity, Humboldt, Lake, Mendocino, Sonoma, and Marin Counties. Website of Senate Leader McGuire: <https://sd02.senate.ca.gov/>

EXHIBIT 33

TO DECLARATION OF RYAN EASON



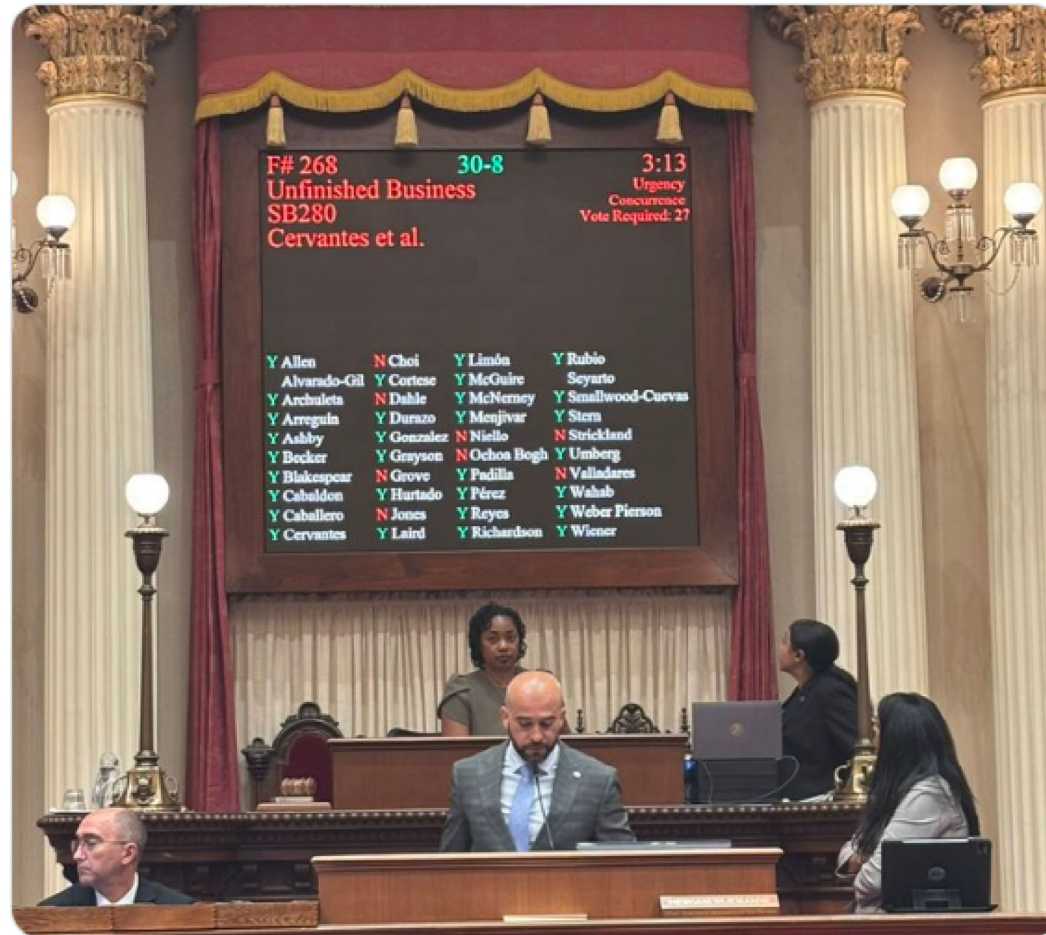
Mike McGuire ✓
@ilike_mike

...

We just passed the Election Rigging Response Act, to give California voters the choice to fight back against Donald Trump's gerrymandering.

We won't let him rig the 2026 election.

Not on our watch.



4:28 PM · Aug 21, 2025 · 1,013 Views

EXHIBIT 34

TO DECLARATION OF RYAN EASON



EXHIBIT 35

TO DECLARATION OF RYAN EASON



David Tangipa
@DavidTangipa

...

Prop 50 cost \$300M, I warned we didn't have the money, & they cut my mic. Partisan gain mattered more than Californians, & now we'll pay the price

When cuts come, remember: "what about Texas" mattered more than you. Other states have surpluses. California has deficits.



7:06 PM · Nov 19, 2025 · 17.6K Views

EXHIBIT 36

TO DECLARATION OF RYAN EASON

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Prop 50 and Voter ID Rallies This Weekend!

BAKERSFIELD, FRESNO, & MERCED — Saturday, October 18

We are hitting the road this Saturday for a **Statewide Voter ID Signature Drive & No on Prop 50” Rally Tour**, with stops in **Bakersfield, Fresno, and Merced**.

The events will feature **Assemblymembers Carl DeMaio and David Tangipa**, who will rally voters to take a stand for election integrity and against Prop 50, a misleading measure that threatens accountability and transparency in California elections.

You will have the opportunity to **sign the petition to put Voter ID on the ballot**, drop off your ballot for **No on 50**, and connect with fellow Californians who are ready to restore confidence in our elections.

Event Schedule – Saturday, October 18:

- **Bakersfield Rally – 10am to 11am**

PLAINTIFFS_000008

CA647

Exhibit 36 to Eason Declaration

- **Fresno Rally** – 3pm to 4pm
- **Merced Rally** – 6pm to 7pm

RSVP at VoterIDEvents.org

Central California is leading the fight for fairness and transparency. We're saying no to Prop 50 and yes to secure elections.

Attendees are encouraged to RSVP for event details and updates.

Join us this Saturday and be part of the movement to **protect election integrity, reject Prop 50, and get Voter ID on the ballot!**

RSVP HERE



CA VOTER ID
SIGNATURE DRIVE

NO ON 50
RALLIES

Saturday, Oct. 18
Bakersfield, Fresno, & Merced
With CA State Reps Carl DeMaio & David Tangipa

RSVP & More Info:
VoterIDEvents.org

Reform California is leading the fight to qualify and pass the Voter ID Initiative on the 2026 ballot. At this free event, you'll learn exactly how you can help make sure every vote cast in California is legal and secure.

For secure elections,
David Tangipa

###

David Tangipa is the current Assemblyman for the 8th Assembly District. Learn more about his campaign at <https://www.daviddtangipaforassembly.com>.

Follow David[Join Team Tangipa](#)

Checks mailable to:
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Tangipa Sues Newsom Over Unconstitutional Prop 50 Maps

FOR IMMEDIATE RELEASE

November 5th, 2025

Contact: info@davidtangipaforassembly.com

Clovis, CA — Today Assemblyman Tangipa, along with the California Republican Party and Dhillon Law Group, filed a Federal Lawsuit challenging Prop 50. The lawsuit was filed in response to Prop 50 maps adding additional Voting Rights Act (VRA) districts, which violates both the U.S. Constitution and established Supreme Court precedent governing the VRA.

Tangipa's lawsuit contends that California failed to meet the Supreme Court test required to justify the creation of VRA districts. According to the suit:

1. **The state does not have a majority population controlling the electorate**, meaning no single minority group meets the legal threshold to necessitate a VRA district.
2. **Analysis concluded there was no remedy needed for a disadvantaged voting bloc**, data show that voters from protected classes are already electing

PLAINTIFFS_000012

CA651

Exhibit 36 to Eason Declaration

candidates of their choice under existing conditions.

3. **California cannot satisfy the Supreme Court's test for VRA districts**, the state's justification for imposing new district boundaries under Proposition 50 fails to meet constitutional standards.

"The people of California deserve fair maps drawn by law, not by politics," said Tangipa. "Prop 50 is an unconstitutional power grab that manipulates congressional boundaries for partisan gain under the false pretense of protecting voting rights. The data and the law are clear, California does not meet the requirements to justify VRA districts, and the maps must be struck down. It's time we end our toxic relationship with Gavin Newsom."

Tangipa emphasized that his challenge seeks to restore integrity and transparency to the redistricting process and ensure that every Californian's vote counts equally, regardless of race, region, or party.

WATCH THE FULL PRESS CONFERENCE

###

David Tangipa is the current Assemblyman for the 8th Assembly District. Learn more about his campaign at <https://www.davidtangipaforassembly.com>.

Follow David

Join Team Tangipa





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US Justice Dept. Joins Our Lawsuit Versus Newsom

FOR IMMEDIATE RELEASE

November 13th, 2025

Contact: info@davidtangipaforassembly.com

DOJ JOINS LAWSUIT VS. NEWSOM

The U.S. Department of Justice has now joined my lawsuit to stop California from using its new congressional map. This is what fighting for California looks like and *we need your help*.

Newsom and the Legislature broke the law. They pushed through a map that hurts communities, protects themselves, and shows just how deeply the culture of backroom deals runs in Sacramento. They thought no one would call them out.

Well, we did. And now **the Federal Government is backing us up**.

This isn't about politics — it's about doing what's right. It's about stopping powerful people from rigging the system in their favor and making sure Californians actually get the

PLAINTIFFS_000015

CA654

Exhibit 36 to Eason Declaration

representation they deserve.

I said it earlier, and I'll say it again:

"Sacramento's political class has gotten too used to doing whatever they want, whenever they want, and this time, they got caught. I'm not afraid to take them on, and clearly, neither is the Department of Justice."

We're just getting started.

JOIN ME - let's keep shining a light on Sacramento and make sure the rules apply to everyone.

JOIN THE FIGHT

Your foundational support helps keep the fight going.

###

David Tangipa is the current Assemblyman for the 8th Assembly District. Learn more about his campaign at <https://www.davidtangipaforassembly.com>.

Follow David

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EXHIBIT 37

TO DECLARATION OF RYAN EASON

CONGRESS.GOV

Representative Lucille Roybal-Allard (1941 -)

In Congress 1993 - 2023



Image courtesy of the Member

[Read biography](#)

Party Democratic

House California, District 40 113th-117th (2013-2023)

California, District 34 108th-112th (2003-2013)

California, District 33 103rd-107th (1993-2003)

Member Activity by Lucille Roybal-Allard

[Download Results](#)

1-100 of 6,368



1

of 64



BILL

1. [H.R.9578](#) — 117th Congress (2021-2022)

To provide that Donald J. Trump is ineligible to again hold the Office of President of the United States or to hold any office, civil or military, under the United States.

Sponsor: [Cicilline, David N. \[Rep.-D-RI-1\]](#) (Introduced 12/15/2022) **Cosponsors:** (41)

Committees: House - Judiciary

Latest Action: House - 12/15/2022 Referred to the House Committee on the Judiciary. ([All Actions](#))

Tracker: **Introduced**

BILL

2. [H.R.9497](#) — 117th Congress (2021-2022)

International Violence Against Women Act of 2022

Sponsor: [Schakowsky, Janice D. \[Rep.-D-IL-9\]](#) (Introduced 12/12/2022) **Cosponsors:** (114)

Committees: House - Foreign Affairs

Latest Action: House - 12/12/2022 Referred to the House Committee on Foreign Affairs. ([All Actions](#))

Tracker: **Introduced**

EXHIBIT 38

TO DECLARATION OF RYAN EASON

11/21/25, 1:15 PM

2020 California 40th Congressional District Results: Lucille Roybal-Allard vs. C. Antonio Delgado - The New York Times

The New York Times

<https://www.nytimes.com/interactive/2020/11/03/us/elections/results-california-house-district-40.html>

These are past election results. See the latest:

2024 Presidential Election Results

Live Coverage

2020 President Senate House Exit Polls State Results~

Claudia Tenney, Republican, wins New York's 22nd Congressional District ›

California Election Results: 40th Congressional District

Calif. Statewide Results ›

Updated Dec. 5, 2020

100% REPORTED 

Candidate	Party	Votes	Pct.
Lucille Roybal-Allard*	Dem.	135,572	72.7%
C. Antonio Delgado	Rep.	50,809	27.3
Total reported		186,381	

* Incumbent

Vote reporting is effectively complete in California.

Dem.	Rep.
------	------

186,381 votes reported

See results for all races in California ›

Results by county

11/21/25, 1:15 PM

2020 California 40th Congressional District Results: Lucille Roybal-Allard vs. C. Antonio Delgado - The New York Times

Dem. 50 60 70% Rep. 50 60 70%

Vote share Size of lead

Note: Absentee vote data may not be available in some places.

Absentee votes by candidate

Some states and counties will report candidate vote totals for mail-in ballots, but some places may not report comprehensive vote type data.

Candidate	Votes	Pct.
Roybal-Allard	79,534	75.1%
Delgado	26,375	24.9
Total reported	105,909	

100% of counties (1 of 1) have reported absentee votes. Data for absentee votes may not be available in some places.

[See absentee ballots returned in each state >](#)

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Latest updates



Maggie Astor Jan. 7, 2021

Vice President Mike Pence affirms Joseph R. Biden Jr. and Kamala Harris as the next president and vice president.

[See all updates v](#)

11/21/25, 1:15 PM

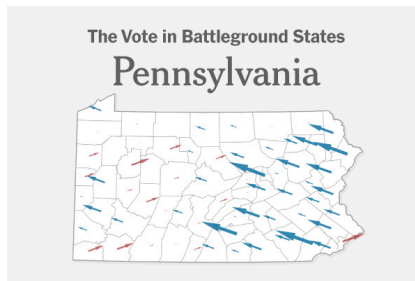
2020 California 40th Congressional District Results: Lucille Roybal-Allard vs. C. Antonio Delgado - The New York Times

Read our analysis of the vote



Tight Georgia Race Comes Down to Metro Atlanta

Nov. 4, 2020



How Biden Flipped Pennsylvania

Nov. 7, 2020



Phoenix's Blue Wave Pushes Arizona Toward Biden

Nov. 9, 2020

Source: Election results from National Election Pool/Edison Research

By Michael Andre, Aliza Aufrichtig, Gray Beltran, Matthew Bloch, Larry Buchanan, Andrew Chavez, Nate Cohn, Matthew Conlen, Annie Daniel, Asmaa Elkeurti, Andrew Fischer, Josh Holder, Will Houp, Jonathan Huang, Josh Katz, Aaron Krolik, Jasmine C. Lee, Rebecca Lieberman, Ilana Marcus, Jaymin Patel, Charlie Smart, Ben Smithgall, Umi Syam, Rumsey Taylor, Miles Watkins and Isaac White

Additional data collection by Alice Park, Rachel Shorey, Thu Trinh and Quoc Trung Bui

Candidate photo research and production by Earl Wilson, Alana Celii, Lalena Fisher, Yuriria Avila, Amanda Cordero, Laura Kaltman, Andrew Rodriguez, Alex Garces, Chris Kahley, Andy Chen, Chris O'Brien, Jim DeMaria, Dave Braun and Jessica White

Reporting contributed by Alicia Parlapiano

2020 Election Results

Alabama ›	Hawaii ›
Alaska ›	Idaho ›
Arizona ›	Illinois ›
Arkansas ›	Indiana ›
California ›	Iowa ›
Colorado ›	Kansas ›
Connecticut ›	Kentucky ›
Delaware ›	Louisiana ›
D.C. ›	Maine ›
Florida ›	Maryland ›
Georgia ›	Massachusetts ›

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2020 California 40th Congressional District Results: Lucille Roybal-Allard vs. C. Antonio Delgado - The New York Times

Michigan ›	Oregon ›
Minnesota ›	Pennsylvania ›
Mississippi ›	Rhode Island ›
Missouri ›	South Carolina ›
Montana ›	South Dakota ›
Nebraska ›	Tennessee ›
Nevada ›	Texas ›
New Hampshire ›	Utah ›
New Jersey ›	Vermont ›
New Mexico ›	Virginia ›
New York ›	Washington ›
North Carolina ›	West Virginia ›
North Dakota ›	Wisconsin ›
Ohio ›	Wyoming ›
Oklahoma ›	

Past Election Results

2020 Primaries	2018	2016	2014	2012	2010	2008
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EXHIBIT 39

TO DECLARATION OF RYAN EASON

STATE OF CALIFORNIA

CITIZENS REDISTRICTING COMMISSION

FINAL REPORT ON 2011 REDISTRICTING

APPENDIX 3

AUGUST 15, 2011

Assembly Districts

Table 1: Total 2011 PL94 Population and Deviation from Ideal			
District	Population	Deviation	% Deviation
01	466,514	840	0.18%
02	463,404	-2,270	-0.49%
03	468,983	3,309	0.71%
04	466,385	711	0.15%
05	463,049	-2,625	-0.56%
06	468,939	3,265	0.70%
07	464,310	-1,364	-0.29%
08	463,773	-1,901	-0.41%
09	468,512	2,838	0.61%
10	465,830	156	0.03%
11	466,986	1,312	0.28%
12	461,766	-3,908	-0.84%
13	461,772	-3,902	-0.84%
14	466,848	1,174	0.25%
15	469,144	3,470	0.75%
16	465,945	271	0.06%
17	467,501	1,827	0.39%
18	469,665	3,991	0.86%
19	467,767	2,093	0.45%
20	461,362	-4,312	-0.93%
21	461,301	-4,373	-0.94%
22	462,734	-2,940	-0.63%
23	468,185	2,511	0.54%
24	464,599	-1,075	-0.23%
25	461,206	-4,468	-0.96%
26	470,166	4,492	0.96%
27	464,103	-1,571	-0.34%
28	466,090	416	0.09%
29	465,870	196	0.04%
30	465,431	-243	-0.05%
31	468,265	2,591	0.56%
32	466,850	1,176	0.25%
33	469,288	3,614	0.78%
34	466,780	1,106	0.24%
35	467,334	1,660	0.36%
36	463,038	-2,636	-0.57%
37	466,200	526	0.11%
38	469,883	4,209	0.90%
39	466,422	748	0.16%
40	462,470	-3,204	-0.69%
41	462,507	-3,167	-0.68%
42	462,952	-2,722	-0.58%
43	468,406	2,732	0.59%
44	462,271	-3,403	-0.73%
45	467,766	2,092	0.45%
46	464,441	-1,233	-0.26%
47	470,257	4,583	0.98%
48	461,346	-4,328	-0.93%
49	462,545	-3,129	-0.67%
50	470,048	4,374	0.94%
51	465,643	-31	-0.01%
52	465,678	4	0.00%
53	463,916	-1,758	-0.38%
54	466,445	771	0.17%
55	461,696	-3,978	-0.85%
56	465,302	-372	-0.08%
57	465,845	171	0.04%
58	468,258	2,584	0.55%
59	465,168	-506	-0.11%
60	470,287	4,613	0.99%
61	470,325	4,651	1.00%
62	466,713	1,039	0.22%
63	461,153	-4,521	-0.97%
64	466,400	726	0.16%
65	461,510	-4,164	-0.89%
66	467,745	2,071	0.44%
67	462,769	-2,905	-0.62%
68	463,053	-2,621	-0.56%
69	465,317	-357	-0.08%
70	468,514	2,840	0.61%
71	462,584	-3,090	-0.66%
72	469,933	4,259	0.91%
73	461,101	-4,573	-0.98%
74	470,248	4,574	0.98%
75	465,548	-126	-0.03%
76	468,627	2,953	0.63%
77	464,066	-1,608	-0.35%
78	461,885	-3,789	-0.81%
79	466,416	742	0.16%
80	464,602	-1,072	-0.23%

Table 2: Total Population - U.S. Census Bureau 2010 PL94, Table 2. DOJ Tabulation																
District	Latino	%Latino	White	%White	Black	%Black	American Indian	%American Indian	Asian	%Asian	Hawaiian or Pacific Islander	%Hawaiian or Pacific Islander	Other	%Other	Remainder of Multiracial	%Remainder of Multiracial
01	45,755	9.81%	383,028	82.10%	7,267	1.56%	16,850	3.61%	9,878	2.12%	1,143	0.25%	1,131	0.24%	1,462	0.31%
02	83,221	17.96%	331,193	71.47%	7,241	1.56%	21,685	4.68%	15,078	3.25%	1,580	0.34%	1,412	0.30%	1,994	0.43%
03	104,106	22.20%	304,880	65.01%	9,782	2.09%	13,484	2.88%	31,540	6.73%	1,521	0.32%	1,013	0.22%	2,657	0.57%
04	136,468	29.26%	269,521	57.79%	9,668	2.07%	6,615	1.42%	39,160	8.40%	1,588	0.34%	1,074	0.23%	2,291	0.49%
05	119,597	25.83%	310,034	66.95%	9,383	2.03%	11,382	2.46%	9,015	1.95%	876	0.19%	1,622	0.35%	1,140	0.25%
06	56,147	11.97%	349,239	74.47%	11,766	2.51%	5,525	1.18%	40,836	8.71%	1,564	0.33%	1,519	0.32%	2,343	0.50%
07	125,025	26.93%	201,083	43.31%	51,437	11.08%	5,853	1.26%	68,054	14.66%	4,931	1.06%	1,510	0.33%	6,417	1.38%
08	82,008	17.68%	283,788	61.19%	39,330	8.48%	6,526	1.41%	42,387	9.14%	3,381	0.73%	1,292	0.28%	5,061	1.09%
09	123,354	26.33%	161,217	34.41%	59,589	12.72%	3,960	0.85%	103,990	22.20%	6,775	1.45%	1,272	0.27%	8,355	1.78%
10	96,684	20.76%	319,892	68.67%	11,854	2.54%	4,407	0.95%	27,628	5.93%	1,445	0.31%	1,837	0.39%	2,083	0.45%
11	128,667	27.55%	205,935	44.10%	61,750	13.22%	4,731	1.01%	53,194	11.39%	4,071	0.87%	1,985	0.43%	6,653	1.42%
12	158,732	34.37%	245,730	53.22%	14,232	3.08%	5,660	1.23%	29,965	6.49%	3,051	0.66%	1,353	0.29%	3,043	0.66%
13	188,407	40.80%	128,690	27.87%	45,501	9.85%	4,056	0.88%	85,385	18.49%	3,031	0.66%	1,101	0.24%	5,601	1.21%
14	118,643	25.41%	209,388	44.85%	48,411	10.37%	3,999	0.86%	75,894	16.26%	3,543	0.76%	1,446	0.31%	5,524	1.18%
15	101,844	21.71%	184,842	39.40%	76,527	16.31%	2,471	0.53%	93,304	19.89%	1,698	0.36%	2,712	0.58%	5,746	1.22%
16	51,027	10.95%	300,247	64.44%	12,626	2.71%	2,486	0.53%	93,668	20.10%	1,597	0.34%	1,479	0.32%	2,815	0.60%
17	88,153	18.86%	193,034	41.29%	38,299	8.19%	2,641	0.56%	136,498	29.20%	2,774	0.59%	1,746	0.37%	4,356	0.93%
18	123,520	26.30%	112,555	23.96%	109,540	23.32%	2,650	0.56%	110,364	23.50%	3,267	0.70%	1,536	0.33%	6,233	1.33%
19	64,773	13.85%	164,386	35.14%	15,911	3.40%	1,518	0.32%	213,178	45.57%	2,032	0.43%	2,077	0.44%	3,892	0.83%
20	132,729	28.77%	119,145	25.82%	39,893	8.65%	2,594	0.56%	151,132	32.76%	7,699	1.67%	1,275	0.28%	6,895	1.49%
21	250,267	54.25%	154,820	33.56%	16,504	3.58%	4,600	1.00%	29,517	6.40%	2,026	0.44%	1,030	0.22%	2,537	0.55%
22	108,082	23.36%	222,130	48.00%	9,726	2.10%	1,926	0.42%	108,287	23.40%	6,535	1.41%	2,262	0.49%	3,786	0.82%
23	150,717	32.19%	227,547	48.60%	25,715	5.49%	6,350	1.36%	52,775	11.27%	1,070	0.23%	1,313	0.28%	2,698	0.58%
24	93,169	20.05%	220,209	47.40%	13,982	3.01%	1,831	0.39%	126,506	27.23%	4,372	0.94%	1,533	0.33%	2,997	0.65%
25	90,698	19.67%	111,647	24.21%	14,228	3.08%	1,817	0.39%	234,001	50.74%	2,909	0.63%	1,106	0.24%	4,800	1.04%
26	271,214	57.68%	165,433	35.19%	6,568	1.40%	8,206	1.75%	16,032	3.41%	639	0.14%	989	0.21%	1,085	0.23%
27	214,793	46.28%	72,963	15.72%	14,817	3.19%	1,893	0.41%	153,370	33.05%	2,076	0.45%	1,060	0.23%	3,131	0.67%
28	81,146	17.41%	234,920	50.40%	11,449	2.46%	2,443	0.52%	130,352	27.97%	1,771	0.38%	1,261	0.27%	2,748	0.59%
29	109,390	23.48%	283,572	60.87%	12,505	2.68%	4,329	0.93%	48,819	10.48%	2,499	0.54%	1,423	0.31%	3,333	0.72%
30	308,573	66.30%	116,593	25.05%	8,566	1.84%	2,852	0.61%	24,995	5.37%	1,143	0.25%	951	0.20%	1,758	0.38%
31	319,087	68.14%	80,923	17.28%	22,355	4.77%	3,558	0.76%	39,074	8.34%	440	0.09%	1,030	0.22%	1,798	0.38%
32	321,599	68.89%	91,037	19.50%	30,162	6.46%	4,095	0.88%	16,474	3.53%	570	0.12%	1,526	0.33%	1,387	0.30%
33	182,457	38.88%	213,491	45.49%	46,085	9.82%	6,643	1.42%	14,405	3.07%	2,130	0.45%	1,218	0.26%	2,859	0.61%
34	153,442	32.87%	252,295	54.05%	24,566	5.26%	7,385	1.58%	25,154	5.39%	929	0.20%	1,093	0.23%	1,916	0.41%
35	166,897	35.71%	260,199	55.68%	11,210	2.40%	4,915	1.05%	19,852	4.25%	1,162	0.25%	1,382	0.30%	1,717	0.37%
36	192,630	41.60%	174,418	37.67%	65,344	14.11%	4,062	0.88%	20,599	4.45%	1,073	0.23%	1,643	0.35%	3,269	0.71%
37	176,729	37.91%	250,974	53.83%	7,191	1.54%	4,096	0.88%	23,711	5.09%	911	0.20%	1,113	0.24%	1,475	0.32%
38	121,098	25.77%	261,365	55.62%	16,698	3.55%	2,747	0.58%	62,993	13.41%	938	0.20%	1,536	0.33%	2,508	0.53%
39	319,378	68.47%	94,720	20.31%	15,413	3.30%	1,645	0.35%	31,919	6.84%	606	0.13%	1,341	0.29%	1,400	0.30%
40	195,818	42.34%	164,499	35.57%	51,256	11.08%	3,025	0.65%	41,374	8.95%	1,734	0.37%	1,284	0.28%	3,480	0.75%
41	142,128	30.73%	213,246	46.11%	39,249	8.49%	2,322	0.50%	60,124	13.00%	824	0.18%	1,545	0.33%	3,069	0.66%
42	138,499	29.92%	275,719	59.56%	19,889	4.30%	6,591	1.42%	17,949	3.88%	1,401	0.30%	930	0.20%	1,974	0.43%
43	109,246	23.32%	261,917	55.92%	10,395	2.22%	1,509	0.32%	80,742	17.24%	1,109	0.24%	1,540	0.33%	1,948	0.42%
44	196,680	42.55%	209,419	45.30%	9,574	2.07%	2,305	0.50%	40,160	8.69%	1,262	0.27%	981	0.21%	1,890	0.41%

District	Latino	%Latino	White	%White	Black	%Black	American Indian	%American Indian	Asian	%Asian	Hawaiian or Pacific Islander	%Hawaiian or Pacific Islander	Other	%Other	Remainder of Multiracial	%Remainder of Multiracial
45	142,111	30.38%	233,237	49.86%	20,876	4.46%	1,624	0.35%	64,727	13.84%	965	0.21%	1,691	0.36%	2,535	0.54%
46	206,152	44.39%	185,661	39.98%	21,768	4.69%	1,473	0.32%	44,238	9.52%	809	0.17%	1,955	0.42%	2,385	0.51%
47	323,240	68.74%	67,146	14.28%	51,233	10.89%	1,923	0.41%	21,807	4.64%	1,492	0.32%	1,036	0.22%	2,380	0.51%
48	295,431	64.04%	89,487	19.40%	12,272	2.66%	1,610	0.35%	59,312	12.86%	648	0.14%	934	0.20%	1,652	0.36%
49	150,179	32.47%	57,828	12.50%	3,977	0.86%	867	0.19%	246,830	53.36%	327	0.07%	621	0.13%	1,916	0.41%
50	56,412	12.00%	334,905	71.25%	19,494	4.15%	1,892	0.40%	52,074	11.08%	843	0.18%	2,047	0.44%	2,381	0.51%
51	333,382	71.60%	50,780	10.91%	10,869	2.33%	1,285	0.28%	66,498	14.28%	319	0.07%	1,083	0.23%	1,427	0.31%
52	317,014	68.08%	80,206	17.22%	27,898	5.99%	1,779	0.38%	34,563	7.42%	1,149	0.25%	1,211	0.26%	1,858	0.40%
53	316,956	68.32%	33,557	7.23%	24,240	5.23%	1,019	0.22%	84,670	18.25%	333	0.07%	1,445	0.31%	1,696	0.37%
54	142,279	30.50%	137,372	29.45%	117,562	25.20%	1,332	0.29%	59,386	12.73%	791	0.17%	2,750	0.59%	4,973	1.07%
55	138,473	29.99%	157,188	34.05%	12,390	2.68%	1,702	0.37%	147,350	31.91%	821	0.18%	1,135	0.25%	2,637	0.57%
56	334,077	71.80%	101,991	21.92%	14,590	3.14%	3,678	0.79%	8,913	1.92%	439	0.09%	788	0.17%	826	0.18%
57	315,559	67.74%	84,674	18.18%	7,694	1.65%	1,743	0.37%	53,070	11.39%	882	0.19%	911	0.20%	1,312	0.28%
58	314,499	67.16%	61,587	13.15%	21,340	4.56%	1,471	0.31%	65,154	13.91%	1,344	0.29%	992	0.21%	1,871	0.40%
59	348,882	75.00%	12,117	2.60%	90,139	19.38%	602	0.13%	9,547	2.05%	199	0.04%	1,663	0.36%	2,019	0.43%
60	246,979	52.52%	148,705	31.62%	25,984	5.53%	2,888	0.61%	40,423	8.60%	1,863	0.40%	1,138	0.24%	2,307	0.49%
61	245,865	52.28%	121,367	25.80%	60,295	12.82%	2,573	0.55%	33,410	7.10%	2,143	0.46%	1,218	0.26%	3,454	0.73%
62	201,743	43.23%	106,582	22.84%	117,871	25.26%	1,577	0.34%	30,343	6.50%	2,581	0.55%	2,033	0.44%	3,983	0.85%
63	342,188	74.20%	51,322	11.13%	34,207	7.42%	1,322	0.29%	26,324	5.71%	3,049	0.66%	965	0.21%	1,776	0.39%
64	290,292	62.24%	15,407	3.30%	119,601	25.64%	1,035	0.22%	31,151	6.68%	4,698	1.01%	1,095	0.23%	3,121	0.67%
65	179,292	38.85%	143,098	31.01%	14,103	3.06%	2,175	0.47%	116,608	25.27%	2,503	0.54%	1,107	0.24%	2,624	0.57%
66	98,308	21.02%	216,689	46.33%	22,656	4.84%	2,020	0.43%	120,339	25.73%	2,439	0.52%	1,834	0.39%	3,460	0.74%
67	160,485	34.68%	235,308	50.85%	24,298	5.25%	4,144	0.90%	32,666	7.06%	1,951	0.42%	1,044	0.23%	2,873	0.62%
68	129,991	28.07%	225,160	48.63%	8,262	1.78%	2,089	0.45%	92,582	19.99%	1,414	0.31%	1,255	0.27%	2,300	0.50%
69	354,291	76.14%	56,501	12.14%	6,805	1.46%	1,246	0.27%	43,100	9.26%	1,523	0.33%	757	0.16%	1,094	0.24%
70	181,339	38.71%	164,526	35.12%	50,743	10.83%	2,775	0.59%	59,972	12.80%	3,660	0.78%	1,445	0.31%	4,054	0.87%
71	111,306	24.06%	295,774	63.94%	21,705	4.69%	7,000	1.51%	20,135	4.35%	2,883	0.62%	1,169	0.25%	2,612	0.56%
72	120,622	25.67%	181,741	38.67%	5,382	1.15%	2,362	0.50%	154,204	32.81%	2,495	0.53%	958	0.20%	2,169	0.46%
73	83,226	18.05%	318,088	68.98%	6,688	1.45%	2,572	0.56%	46,264	10.03%	1,141	0.25%	1,218	0.26%	1,904	0.41%
74	72,603	15.44%	296,992	63.16%	6,324	1.34%	2,311	0.49%	86,798	18.46%	1,614	0.34%	1,412	0.30%	2,194	0.47%
75	164,999	35.44%	239,885	51.53%	12,675	2.72%	5,888	1.26%	36,928	7.93%	1,769	0.38%	1,053	0.23%	2,351	0.50%
76	137,466	29.33%	271,293	57.89%	16,400	3.50%	3,414	0.73%	31,610	6.75%	4,008	0.86%	1,320	0.28%	3,116	0.66%
77	57,875	12.47%	266,976	57.53%	14,214	3.06%	2,434	0.52%	115,511	24.89%	2,118	0.46%	1,455	0.31%	3,483	0.75%
78	85,217	18.45%	298,542	64.64%	20,859	4.52%	3,270	0.71%	47,554	10.30%	1,711	0.37%	1,875	0.41%	2,857	0.62%
79	157,807	33.83%	156,129	33.47%	51,168	10.97%	2,691	0.58%	88,428	18.96%	3,818	0.82%	1,228	0.26%	5,147	1.10%
80	314,582	67.71%	66,549	14.32%	30,022	6.46%	1,787	0.38%	45,632	9.82%	2,180	0.47%	937	0.20%	2,913	0.63%

District	Total VAP	% VAP*	Latino VAP	%Latino VAP	White VAP	%White VAP	Black VAP	%Black VAP	American Indian VAP	%American Indian VAP	Asian VAP	%Asian VAP	Hawaiian or Pacific Islander VAP	%Hawaiian or Pacific Islander VAP	Other VAP	%Other VAP	Remainder of Multiracial VAP	%Remainder of Multiracial VAP
01	370,850	79.49%	30,310	8.17%	313,391	84.51%	5,414	1.46%	12,206	3.29%	6,991	1.89%	804	0.22%	904	0.24%	830	0.22%
02	365,635	78.90%	53,606	14.66%	277,603	75.92%	5,225	1.43%	15,160	4.15%	10,623	2.91%	1,154	0.32%	1,065	0.29%	1,199	0.33%
03	352,351	75.13%	64,465	18.30%	246,629	70.00%	6,386	1.81%	9,644	2.74%	21,883	6.21%	1,044	0.30%	727	0.21%	1,573	0.45%
04	362,572	77.74%	89,543	24.70%	225,582	62.22%	7,033	1.94%	5,026	1.39%	31,839	8.78%	1,195	0.33%	813	0.22%	1,541	0.43%
05	360,835	77.93%	77,084	21.36%	258,122	71.53%	7,543	2.09%	8,612	2.39%	6,754	1.87%	644	0.18%	1,365	0.38%	711	0.20%
06	350,612	74.77%	36,120	10.30%	269,935	76.99%	8,858	2.53%	4,015	1.15%	28,139	8.03%	1,111	0.32%	1,113	0.32%	1,321	0.38%
07	346,100	74.54%	81,020	23.41%	166,294	48.05%	35,757	10.33%	4,630	1.34%	49,975	14.44%	3,463	1.00%	1,049	0.30%	3,912	1.13%
08	352,594	76.03%	51,954	14.73%	231,075	65.54%	26,433	7.50%	5,018	1.42%	31,735	9.00%	2,445	0.69%	911	0.26%	3,023	0.86%
09	334,848	71.47%	75,875	22.66%	130,270	38.90%	40,329	12.04%	2,996	0.89%	74,600	22.28%	4,843	1.45%	832	0.25%	5,103	1.52%
10	364,547	78.26%	64,431	17.67%	263,593	72.31%	8,858	2.43%	3,459	0.95%	20,437	5.61%	1,100	0.30%	1,329	0.36%	1,340	0.37%
11	341,465	73.12%	81,787	23.95%	165,515	48.47%	43,353	12.70%	3,621	1.06%	39,238	11.49%	2,899	0.85%	1,505	0.44%	3,547	1.04%
12	334,915	72.53%	98,639	29.45%	195,297	58.31%	9,773	2.92%	4,381	1.31%	21,754	6.50%	2,277	0.68%	908	0.27%	1,886	0.56%
13	322,471	69.83%	117,211	36.35%	105,101	32.59%	30,492	9.46%	3,065	0.95%	60,596	18.79%	2,127	0.66%	721	0.22%	3,158	0.98%
14	358,199	76.73%	78,163	21.82%	175,739	49.06%	34,882	9.74%	3,150	0.88%	59,470	16.60%	2,539	0.71%	977	0.27%	3,279	0.92%
15	377,085	80.38%	70,077	18.58%	161,096	42.72%	59,646	15.82%	2,044	0.54%	77,082	20.44%	1,360	0.36%	1,936	0.51%	3,844	1.02%
16	350,379	75.20%	34,525	9.85%	236,496	67.50%	9,474	2.70%	1,902	0.54%	64,188	18.32%	1,197	0.34%	936	0.27%	1,661	0.47%
17	408,761	87.44%	70,268	17.19%	180,156	44.07%	31,416	7.69%	2,437	0.60%	117,774	28.81%	1,993	0.49%	1,402	0.34%	3,315	0.81%
18	365,624	77.85%	83,448	22.82%	99,119	27.11%	84,819	23.20%	2,208	0.60%	88,566	24.22%	2,331	0.64%	1,093	0.30%	4,040	1.10%
19	393,307	84.08%	50,284	12.78%	146,050	37.13%	13,348	3.39%	1,321	0.34%	176,465	44.87%	1,594	0.41%	1,519	0.39%	2,726	0.69%
20	348,027	75.43%	89,046	25.59%	102,616	29.49%	28,474	8.18%	2,015	0.58%	114,847	33.00%	5,629	1.62%	846	0.24%	4,554	1.31%
21	318,196	68.98%	154,234	48.47%	124,725	39.20%	11,387	3.58%	3,602	1.13%	20,536	6.45%	1,474	0.46%	686	0.22%	1,552	0.49%
22	361,226	78.06%	76,071	21.06%	184,167	50.98%	7,521	2.08%	1,522	0.42%	83,202	23.03%	4,748	1.31%	1,500	0.42%	2,495	0.69%
23	342,822	73.22%	96,235	28.07%	184,653	53.86%	16,728	4.88%	4,685	1.37%	37,215	10.86%	751	0.22%	911	0.27%	1,644	0.48%
24	358,101	77.08%	63,185	17.64%	180,887	50.51%	10,991	3.07%	1,447	0.40%	95,584	26.69%	3,043	0.85%	947	0.26%	2,017	0.56%
25	354,708	76.91%	62,077	17.50%	96,609	27.24%	10,465	2.95%	1,408	0.40%	177,971	50.17%	2,167	0.61%	783	0.22%	3,228	0.91%
26	320,827	68.24%	164,124	51.16%	133,168	41.51%	4,336	1.35%	5,969	1.86%	11,452	3.57%	454	0.14%	632	0.20%	692	0.22%
27	343,687	74.05%	144,126	41.94%	64,185	18.68%	11,627	3.38%	1,523	0.44%	117,720	34.25%	1,575	0.46%	744	0.22%	2,187	0.64%
28	354,635	76.09%	54,436	15.35%	192,536	54.29%	8,521	2.40%	1,904	0.54%	93,391	26.33%	1,329	0.37%	783	0.22%	1,735	0.49%
29	368,889	79.18%	73,339	19.88%	239,832	65.01%	9,336	2.53%	3,565	0.97%	37,804	10.25%	1,884	0.51%	1,018	0.28%	2,111	0.57%
30	325,922	70.03%	199,460	61.20%	95,794	29.39%	6,888	2.11%	2,200	0.68%	19,005	5.83%	855	0.26%	622	0.19%	1,098	0.34%
31	314,850	67.24%	200,692	63.74%	67,744	21.52%	15,856	5.04%	2,685	0.85%	25,814	8.20%	330	0.10%	660	0.21%	1,069	0.34%
32	315,978	67.68%	201,093	63.64%	74,121	23.46%	23,152	7.33%	2,989	0.95%	12,160	3.85%	423	0.13%	1,236	0.39%	804	0.25%
33	329,415	70.19%	111,155	33.74%	169,243	51.38%	29,425	8.93%	5,062	1.54%	10,773	3.27%	1,385	0.42%	799	0.24%	1,573	0.48%
34	335,721	71.92%	95,842	28.55%	197,539	58.84%	16,157	4.81%	5,485	1.63%	18,197	5.42%	636	0.19%	722	0.22%	1,143	0.34%
35	359,077	76.84%	107,896	30.05%	219,516	61.13%	8,917	2.48%	3,968	1.11%	15,722	4.38%	866	0.24%	1,089	0.30%	1,103	0.31%
36	323,398	69.84%	120,338	37.21%	138,646	42.87%	42,146	13.03%	3,139	0.97%	15,358	4.75%	776	0.24%	1,075	0.33%	1,920	0.59%
37	367,474	78.82%	121,331	33.02%	215,218	58.57%	5,634	1.53%	3,319	0.90%	19,367	5.27%	725	0.20%	832	0.23%	1,048	0.29%
38	351,818	74.87%	81,584	23.19%	206,331	58.65%	12,331	3.50%	2,086	0.59%	46,205	13.13%	665	0.19%	1,007	0.29%	1,609	0.46%
39	343,345	73.61%	219,110	63.82%	82,039	23.89%	12,082	3.52%	1,357	0.40%	26,391	7.69%	496	0.14%	885	0.26%	985	0.29%
40	333,685	72.15%	124,961	37.45%	135,126	40.50%	35,658	10.69%	2,372	0.71%	31,477	9.43%	1,168	0.35%	816	0.24%	2,107	0.63%

District	Total VAP	% VAP*	Latino VAP	%Latino VAP	White VAP	%White VAP	Black VAP	%Black VAP	American Indian VAP	%American Indian VAP	Asian VAP	%Asian VAP	Hawaiian or Pacific Islander VAP	%Hawaiian or Pacific Islander VAP	Other VAP	%Other VAP	Remainder of Multiracial VAP	%Remainder of Multiracial VAP
41	363,586	78.61%	98,798	27.17%	180,065	49.52%	30,516	8.39%	1,861	0.51%	48,530	13.35%	605	0.17%	1,056	0.29%	2,155	0.59%
42	358,808	77.50%	87,893	24.50%	236,038	65.78%	13,617	3.80%	4,984	1.39%	13,522	3.77%	980	0.27%	615	0.17%	1,159	0.32%
43	381,417	81.43%	81,297	21.31%	221,903	58.18%	8,586	2.25%	1,288	0.34%	64,890	17.01%	958	0.25%	1,076	0.28%	1,419	0.37%
44	338,873	73.31%	129,292	38.15%	168,057	49.59%	7,083	2.09%	1,783	0.53%	29,944	8.84%	930	0.27%	585	0.17%	1,199	0.35%
45	364,331	77.89%	98,779	27.11%	193,752	53.18%	15,677	4.30%	1,315	0.36%	51,201	14.05%	777	0.21%	1,071	0.29%	1,759	0.48%
46	358,293	77.14%	141,349	39.45%	158,809	44.32%	17,163	4.79%	1,248	0.35%	36,184	10.10%	646	0.18%	1,218	0.34%	1,676	0.47%
47	316,046	67.21%	203,883	64.51%	54,972	17.39%	35,914	11.36%	1,528	0.48%	16,656	5.27%	953	0.30%	645	0.20%	1,495	0.47%
48	337,378	73.13%	199,892	59.25%	76,464	22.66%	9,430	2.80%	1,294	0.38%	48,042	14.24%	518	0.15%	611	0.18%	1,127	0.33%
49	362,747	78.42%	106,829	29.45%	50,423	13.90%	3,111	0.86%	685	0.19%	199,669	55.04%	279	0.08%	363	0.10%	1,388	0.38%
50	400,330	85.17%	44,967	11.23%	289,035	72.20%	16,726	4.18%	1,642	0.41%	43,775	10.93%	756	0.19%	1,560	0.39%	1,869	0.47%
51	348,231	74.78%	233,855	67.16%	45,761	13.14%	9,200	2.64%	1,042	0.30%	56,327	16.18%	285	0.08%	693	0.20%	1,068	0.31%
52	329,263	70.71%	207,699	63.08%	68,018	20.66%	21,558	6.55%	1,438	0.44%	27,697	8.41%	818	0.25%	834	0.25%	1,201	0.36%
53	354,298	76.37%	224,267	63.30%	30,620	8.64%	21,343	6.02%	898	0.25%	74,525	21.03%	290	0.08%	943	0.27%	1,412	0.40%
54	375,241	80.45%	101,520	27.05%	119,519	31.85%	94,390	25.15%	1,114	0.30%	52,257	13.93%	685	0.18%	2,026	0.54%	3,730	0.99%
55	351,337	76.10%	94,384	26.86%	128,295	36.52%	9,476	2.70%	1,329	0.38%	114,702	32.65%	609	0.17%	737	0.21%	1,805	0.51%
56	328,306	70.56%	216,930	66.08%	88,733	27.03%	11,644	3.55%	2,691	0.82%	6,871	2.09%	351	0.11%	559	0.17%	527	0.16%
57	344,852	74.03%	217,904	63.19%	73,313	21.26%	5,906	1.71%	1,418	0.41%	44,150	12.80%	648	0.19%	591	0.17%	922	0.27%
58	341,855	73.01%	216,254	63.26%	53,544	15.66%	15,406	4.51%	1,215	0.36%	52,582	15.38%	972	0.28%	694	0.20%	1,188	0.35%
59	319,044	68.59%	228,124	71.50%	10,880	3.41%	67,640	21.20%	456	0.14%	9,202	2.88%	160	0.05%	1,113	0.35%	1,469	0.46%
60	329,885	70.15%	156,673	47.49%	118,631	35.96%	18,916	5.73%	2,177	0.66%	30,097	9.12%	1,305	0.40%	734	0.22%	1,352	0.41%
61	329,301	70.02%	154,134	46.81%	99,934	30.35%	41,624	12.64%	2,019	0.61%	27,266	8.28%	1,427	0.43%	833	0.25%	2,064	0.63%
62	355,015	76.07%	137,789	38.81%	93,927	26.46%	90,750	25.56%	1,359	0.38%	25,131	7.08%	1,821	0.51%	1,463	0.41%	2,775	0.78%
63	319,486	69.28%	226,451	70.88%	43,191	13.52%	24,471	7.66%	1,077	0.34%	20,628	6.46%	2,041	0.64%	587	0.18%	1,040	0.33%
64	319,811	68.57%	185,679	58.06%	13,482	4.22%	88,381	27.64%	829	0.26%	25,458	7.96%	3,271	1.02%	718	0.22%	1,993	0.62%
65	345,653	74.90%	117,326	33.94%	121,769	35.23%	10,385	3.00%	1,750	0.51%	90,160	26.08%	1,785	0.52%	736	0.21%	1,742	0.50%
66	365,069	78.05%	67,868	18.59%	179,993	49.30%	16,691	4.57%	1,610	0.44%	93,661	25.66%	1,799	0.49%	1,242	0.34%	2,205	0.60%
67	328,809	71.05%	99,320	30.21%	183,444	55.79%	16,387	4.98%	3,027	0.92%	23,224	7.06%	1,262	0.38%	657	0.20%	1,488	0.45%
68	348,844	75.34%	86,274	24.73%	182,460	52.30%	6,078	1.74%	1,645	0.47%	69,024	19.79%	1,049	0.30%	804	0.23%	1,510	0.43%
69	324,581	69.75%	230,895	71.14%	49,871	15.36%	5,382	1.66%	1,001	0.31%	35,072	10.81%	1,089	0.34%	501	0.15%	770	0.24%
70	359,249	76.68%	120,791	33.62%	144,133	40.12%	38,031	10.59%	2,343	0.65%	47,750	13.29%	2,627	0.73%	1,019	0.28%	2,555	0.71%
71	350,857	75.85%	71,946	20.51%	239,724	68.33%	14,822	4.22%	5,160	1.47%	15,026	4.28%	2,006	0.57%	804	0.23%	1,369	0.39%
72	361,195	76.86%	79,920	22.13%	152,605	42.25%	3,907	1.08%	1,855	0.51%	119,081	32.97%	1,757	0.49%	671	0.19%	1,399	0.39%
73	346,400	75.12%	55,047	15.89%	248,123	71.63%	4,654	1.34%	1,946	0.56%	33,836	9.77%	819	0.24%	792	0.23%	1,183	0.34%
74	382,309	81.30%	51,189	13.39%	251,820	65.87%	4,855	1.27%	1,906	0.50%	68,815	18.00%	1,218	0.32%	986	0.26%	1,520	0.40%
75	339,242	72.87%	104,586	30.83%	191,566	56.47%	8,679	2.56%	4,178	1.23%	27,029	7.97%	1,240	0.37%	672	0.20%	1,292	0.38%
76	355,819	75.93%	89,760	25.23%	222,375	62.50%	11,826	3.32%	2,660	0.75%	23,660	6.65%	2,884	0.81%	857	0.24%	1,797	0.51%
77	351,336	75.71%	38,440	10.94%	211,504	60.20%	9,866	2.81%	1,828	0.52%	85,224	24.26%	1,555	0.44%	952	0.27%	1,967	0.56%
78	399,987	86.60%	64,971	16.24%	268,182	67.05%	17,343	4.34%	2,849	0.71%	41,647	10.41%	1,389	0.35%	1,512	0.38%	2,094	0.52%
79	351,301	75.32%	104,302	29.69%	133,553	38.02%	36,362	10.35%	2,136	0.61%	68,296	19.44%	2,928	0.83%	838	0.24%	2,886	0.82%
80	335,580	72.23%	211,077	62.90%	59,612	17.76%	22,872	6.82%	1,508	0.45%	36,344	10.83%	1,717	0.51%	683	0.20%	1,767	0.53%

*Denominator is total population

District	Total CVAP	Latino CVAP	% Latino CVAP	White CVAP	% White CVAP	Black CVAP	% Black CVAP	Asian CVAP	% Asian CVAP	American Indian CVAP	%American Indian CVAP	Other CVAP	% Other CVAP
01	350,597	19,959	5.69%	306,663	87.47%	6,145	1.75%	5,363	1.53%	6,322	1.80%	12,467	3.56%
02	325,642	27,767	8.53%	269,491	82.76%	4,734	1.45%	7,027	2.16%	9,856	3.03%	16,623	5.10%
03	311,791	35,176	11.28%	244,216	78.33%	5,832	1.87%	14,750	4.73%	3,730	1.20%	11,817	3.79%
04	305,905	47,071	15.39%	223,290	72.99%	6,753	2.21%	21,720	7.10%	2,598	0.85%	7,071	2.31%
05	318,961	42,211	13.23%	253,268	79.40%	8,304	2.60%	5,460	1.71%	4,482	1.41%	9,718	3.05%
06	314,615	25,392	8.07%	256,506	81.53%	8,689	2.76%	18,441	5.86%	2,040	0.65%	5,587	1.78%
07	286,401	48,343	16.88%	162,945	56.89%	32,734	11.43%	33,312	11.63%	2,905	1.01%	9,067	3.17%
08	310,070	30,742	9.91%	227,744	73.45%	22,934	7.40%	21,078	6.80%	2,757	0.89%	7,572	2.44%
09	268,791	43,174	16.06%	130,447	48.53%	36,366	13.53%	51,041	18.99%	2,098	0.78%	7,763	2.89%
10	307,078	25,185	8.20%	253,579	82.58%	8,051	2.62%	14,912	4.86%	1,542	0.50%	5,351	1.74%
11	285,055	46,034	16.15%	165,116	57.92%	39,122	13.72%	26,995	9.47%	1,851	0.65%	7,788	2.73%
12	282,351	59,452	21.06%	193,259	68.45%	8,196	2.90%	14,080	4.99%	2,455	0.87%	7,364	2.61%
13	246,110	64,899	26.37%	107,115	43.52%	27,749	11.28%	39,801	16.17%	1,795	0.73%	6,546	2.66%
14	300,358	39,078	13.01%	176,421	58.74%	32,571	10.84%	44,408	14.79%	1,468	0.49%	7,880	2.62%
15	310,951	35,604	11.45%	158,682	51.03%	55,396	17.82%	55,603	17.88%	777	0.25%	5,666	1.82%
16	297,090	21,921	7.38%	226,196	76.14%	7,770	2.62%	37,098	12.49%	735	0.25%	4,105	1.38%
17	329,004	40,468	12.30%	175,296	53.28%	30,931	9.40%	76,838	23.35%	1,069	0.32%	5,471	1.66%
18	281,791	36,077	12.80%	96,152	34.12%	84,806	30.10%	57,723	20.48%	1,221	0.43%	7,033	2.50%
19	337,218	33,854	10.04%	147,802	43.83%	14,682	4.35%	135,610	40.21%	799	0.24%	5,270	1.56%
20	266,963	49,288	18.46%	107,997	40.45%	24,888	9.32%	76,808	28.77%	1,259	0.47%	7,982	2.99%
21	236,734	83,355	35.21%	125,077	52.83%	10,592	4.47%	12,580	5.31%	1,879	0.79%	5,130	2.17%
22	289,604	38,297	13.22%	178,610	61.67%	7,577	2.62%	59,214	20.45%	733	0.25%	5,906	2.04%
23	296,648	70,967	23.92%	182,261	61.44%	14,860	5.01%	22,514	7.59%	2,085	0.70%	6,046	2.04%
24	262,885	27,319	10.39%	170,750	64.95%	12,328	4.69%	48,170	18.32%	1,337	0.51%	4,318	1.64%
25	256,391	41,523	16.20%	97,725	38.12%	9,854	3.84%	102,918	40.14%	951	0.37%	4,371	1.70%
26	241,074	88,558	36.73%	134,575	55.82%	4,244	1.76%	7,293	3.03%	3,481	1.44%	6,404	2.66%
27	240,288	78,152	32.52%	63,544	26.44%	10,863	4.52%	83,445	34.73%	967	0.40%	4,284	1.78%
28	293,328	32,204	10.98%	194,755	66.39%	6,969	2.38%	56,261	19.18%	790	0.27%	3,139	1.07%
29	321,431	40,919	12.73%	237,241	73.81%	9,148	2.85%	26,685	8.30%	1,266	0.39%	7,438	2.31%
30	219,999	96,843	44.02%	98,387	44.72%	6,816	3.10%	14,759	6.71%	1,200	0.55%	3,194	1.45%
31	211,837	107,631	50.81%	70,404	33.23%	15,248	7.20%	14,822	7.00%	1,572	0.74%	3,732	1.76%
32	209,937	97,125	46.26%	77,536	36.93%	22,637	10.78%	8,494	4.05%	1,983	0.94%	4,145	1.97%
33	265,680	67,178	25.29%	160,086	60.26%	24,915	9.38%	6,807	2.56%	2,943	1.11%	6,694	2.52%
34	277,228	59,061	21.30%	187,589	67.67%	14,305	5.16%	9,814	3.54%	2,334	0.84%	6,459	2.33%
35	295,361	52,780	17.87%	217,304	73.57%	8,504	2.88%	11,268	3.81%	2,269	0.77%	5,505	1.86%
36	247,869	68,304	27.56%	131,357	52.99%	33,847	13.66%	9,328	3.76%	1,513	0.61%	5,033	2.03%
37	307,080	70,309	22.90%	212,350	69.15%	5,545	1.81%	13,459	4.38%	1,713	0.56%	5,417	1.76%
38	296,536	49,547	16.71%	199,963	67.43%	12,031	4.06%	30,031	10.13%	833	0.28%	4,964	1.67%
39	227,273	118,193	52.00%	76,242	33.55%	11,853	5.22%	18,411	8.10%	849	0.37%	2,574	1.13%
40	277,508	83,296	30.02%	139,401	50.23%	31,625	11.40%	18,502	6.67%	1,360	0.49%	4,684	1.69%
41	324,531	75,829	23.37%	181,668	55.98%	31,039	9.56%	32,181	9.92%	885	0.27%	3,814	1.18%
42	315,589	55,087	17.46%	234,393	74.27%	10,532	3.34%	8,723	2.76%	3,015	0.96%	6,854	2.17%
43	295,412	52,510	17.78%	191,124	64.70%	9,822	3.32%	39,472	13.36%	797	0.27%	2,484	0.84%
44	261,592	64,977	24.84%	164,552	62.90%	7,015	2.68%	21,492	8.22%	778	0.30%	3,556	1.36%

District	Total CVAP	Latino CVAP	% Latino CVAP	White CVAP	% White CVAP	Black CVAP	% Black CVAP	Asian CVAP	% Asian CVAP	American Indian CVAP	%American Indian CVAP	Other CVAP	% Other CVAP
45	280,628	50,012	17.82%	184,384	65.70%	12,831	4.57%	30,943	11.03%	469	0.17%	2,458	0.88%
46	247,706	60,565	24.45%	146,327	59.07%	15,229	6.15%	22,235	8.98%	604	0.24%	3,350	1.35%
47	218,085	114,101	52.32%	55,853	25.61%	34,036	15.61%	10,383	4.76%	817	0.37%	3,712	1.70%
48	255,184	131,258	51.44%	81,225	31.83%	10,090	3.95%	30,674	12.02%	595	0.23%	1,937	0.76%
49	275,312	76,470	27.78%	55,065	20.00%	2,679	0.97%	137,899	50.09%	1,147	0.42%	3,199	1.16%
50	348,226	28,679	8.24%	271,489	77.96%	17,614	5.06%	26,606	7.64%	922	0.26%	3,838	1.10%
51	229,008	136,324	59.53%	43,325	18.92%	9,680	4.23%	36,808	16.07%	982	0.43%	2,871	1.25%
52	247,395	125,095	50.56%	77,008	31.13%	23,814	9.63%	16,466	6.66%	1,549	0.63%	5,012	2.03%
53	164,102	82,951	50.55%	25,193	15.35%	20,075	12.23%	33,484	20.40%	951	0.58%	2,399	1.46%
54	294,720	51,228	17.38%	111,110	37.70%	96,067	32.60%	32,521	11.03%	837	0.28%	3,794	1.29%
55	287,325	65,344	22.74%	133,590	46.49%	10,275	3.58%	75,070	26.13%	1,052	0.37%	3,046	1.06%
56	227,204	114,469	50.38%	92,402	40.67%	11,992	5.28%	4,680	2.06%	2,216	0.98%	3,661	1.61%
57	268,696	153,098	56.98%	75,760	28.20%	4,863	1.81%	31,879	11.86%	1,111	0.41%	3,096	1.15%
58	249,379	139,902	56.10%	54,967	22.04%	14,221	5.70%	38,056	15.26%	898	0.36%	2,233	0.90%
59	168,548	84,278	50.00%	10,837	6.43%	67,405	39.99%	4,230	2.51%	539	0.32%	1,798	1.07%
60	243,511	86,835	35.66%	116,109	47.68%	17,680	7.26%	18,555	7.62%	1,361	0.56%	4,332	1.78%
61	232,803	80,463	34.56%	97,431	41.85%	35,312	15.17%	14,961	6.43%	1,289	0.55%	4,636	1.99%
62	270,569	71,340	26.37%	90,536	33.46%	88,657	32.77%	16,537	6.11%	846	0.31%	3,499	1.29%
63	206,962	119,710	57.84%	45,170	21.83%	23,709	11.46%	14,178	6.85%	903	0.44%	4,195	2.03%
64	212,983	85,023	39.92%	13,871	6.51%	90,850	42.66%	17,770	8.34%	569	0.27%	5,469	2.57%
65	254,368	58,413	22.96%	124,266	48.85%	10,234	4.02%	56,614	22.26%	1,507	0.59%	4,841	1.90%
66	303,141	47,703	15.74%	174,164	57.45%	14,774	4.87%	61,423	20.26%	646	0.21%	5,077	1.67%
67	252,809	58,503	23.14%	162,940	64.45%	12,217	4.83%	14,043	5.55%	1,508	0.60%	5,106	2.02%
68	283,274	47,809	16.88%	180,968	63.88%	6,076	2.14%	45,183	15.95%	1,254	0.44%	3,238	1.14%
69	172,928	90,953	52.60%	53,183	30.75%	4,746	2.74%	21,818	12.62%	606	0.35%	2,228	1.29%
70	282,096	66,137	23.44%	142,051	50.36%	33,986	12.05%	33,196	11.77%	1,232	0.44%	6,726	2.38%
71	299,471	44,627	14.90%	224,011	74.80%	13,288	4.44%	10,654	3.56%	2,737	0.91%	6,891	2.30%
72	296,747	45,433	15.31%	159,384	53.71%	3,767	1.27%	83,396	28.10%	1,287	0.43%	4,767	1.61%
73	304,043	31,281	10.29%	241,982	79.59%	5,189	1.71%	22,311	7.34%	950	0.31%	3,280	1.08%
74	326,040	31,223	9.58%	242,608	74.41%	4,578	1.40%	43,805	13.44%	826	0.25%	3,826	1.17%
75	257,429	46,799	18.18%	179,301	69.65%	7,673	2.98%	17,105	6.64%	3,091	1.20%	6,551	2.54%
76	294,133	49,479	16.82%	212,079	72.10%	10,484	3.56%	16,137	5.49%	1,394	0.47%	5,954	2.02%
77	310,211	29,091	9.38%	212,515	68.51%	8,804	2.84%	55,026	17.74%	918	0.30%	4,775	1.54%
78	352,199	42,445	12.05%	264,876	75.21%	14,484	4.11%	25,642	7.28%	1,204	0.34%	4,752	1.35%
79	283,225	62,084	21.92%	133,319	47.07%	34,102	12.04%	46,632	16.46%	1,038	0.37%	7,088	2.50%
80	227,429	115,454	50.76%	62,208	27.35%	21,478	9.44%	24,416	10.74%	992	0.44%	3,873	1.70%

Senate Districts

Table 1: Total 2011 PL94 Population and Deviation from Ideal			
District	Population	Deviation	% Deviation
01	935,336	3,987	0.43%
02	928,077	-3,272	-0.35%
03	928,167	-3,182	-0.34%
04	937,962	6,613	0.71%
05	939,163	7,814	0.84%
06	936,301	4,952	0.53%
07	924,708	-6,641	-0.71%
08	929,712	-1,637	-0.18%
09	940,601	9,252	0.99%
10	923,707	-7,642	-0.82%
11	930,853	-496	-0.05%
12	933,222	1,873	0.20%
13	927,480	-3,869	-0.42%
14	935,376	4,027	0.43%
15	928,584	-2,765	-0.30%
16	922,123	-9,226	-0.99%
17	931,341	-8	0.00%
18	928,725	-2,624	-0.28%
19	928,850	-2,499	-0.27%
20	935,935	4,586	0.49%
21	930,282	-1,067	-0.11%
22	929,298	-2,051	-0.22%
23	933,807	2,458	0.26%
24	933,510	2,161	0.23%
25	926,935	-4,414	-0.47%
26	927,757	-3,592	-0.39%
27	935,656	4,307	0.46%
28	930,072	-1,277	-0.14%
29	925,494	-5,855	-0.63%
30	922,496	-8,853	-0.95%
31	940,612	9,263	0.99%
32	933,406	2,057	0.22%
33	926,972	-4,377	-0.47%
34	927,893	-3,456	-0.37%
35	934,615	3,266	0.35%
36	938,083	6,734	0.72%
37	937,986	6,637	0.71%
38	929,760	-1,589	-0.17%
39	928,044	-3,305	-0.35%
40	935,055	3,706	0.40%

Table 2: Total Population - U.S. Census Bureau 2010 PL94, Table 2. DOJ Tabulation																
District	Latino	%Latino	White	%White	Black	%Black	American Indian	%American Indian	Asian	%Asian	Hawaiian or Pacific Islander	%Hawaiian or Pacific Islander	Other	%Other	Remainder of Multiracial	%Remainder of Multiracial
01	100,370	10.73%	742,721	79.41%	17,178	1.84%	23,601	2.52%	42,928	4.59%	2,503	0.27%	2,564	0.27%	3,471	0.37%
02	181,288	19.53%	649,081	69.94%	19,522	2.10%	28,033	3.02%	39,851	4.29%	2,959	0.32%	3,208	0.35%	4,135	0.45%
03	231,855	24.98%	478,177	51.52%	74,348	8.01%	9,325	1.00%	115,854	12.48%	5,978	0.64%	2,983	0.32%	9,647	1.04%
04	185,091	19.73%	618,299	65.92%	35,440	3.78%	20,454	2.18%	65,516	6.98%	4,304	0.46%	2,254	0.24%	6,604	0.70%
05	354,745	37.77%	377,356	40.18%	61,488	6.55%	9,894	1.05%	117,993	12.56%	6,208	0.66%	2,472	0.26%	9,007	0.96%
06	231,979	24.78%	361,967	38.66%	122,831	13.12%	10,031	1.07%	178,668	19.08%	12,198	1.30%	2,925	0.31%	15,702	1.68%
07	193,725	20.95%	505,367	54.65%	56,801	6.14%	6,410	0.69%	147,184	15.92%	4,822	0.52%	3,003	0.32%	7,396	0.80%
08	262,321	28.22%	520,638	56.00%	37,794	4.07%	18,029	1.94%	81,060	8.72%	2,540	0.27%	2,624	0.28%	4,706	0.51%
09	225,192	23.94%	299,285	31.82%	186,351	19.81%	5,177	0.55%	203,324	21.62%	4,956	0.53%	4,242	0.45%	12,074	1.28%
10	224,711	24.33%	234,751	25.41%	55,199	5.98%	4,449	0.48%	379,834	41.12%	10,663	1.15%	2,419	0.26%	11,681	1.26%
11	151,485	16.27%	356,535	38.30%	54,089	5.81%	4,148	0.45%	347,908	37.38%	4,736	0.51%	3,789	0.41%	8,163	0.88%
12	601,740	64.48%	239,613	25.68%	28,006	3.00%	7,494	0.80%	47,821	5.12%	2,536	0.27%	2,375	0.25%	3,637	0.39%
13	202,617	21.85%	441,218	47.57%	23,800	2.57%	3,749	0.40%	234,472	25.28%	10,972	1.18%	3,819	0.41%	6,833	0.74%
14	665,570	71.16%	167,194	17.87%	44,403	4.75%	7,758	0.83%	44,346	4.74%	998	0.11%	2,397	0.26%	2,710	0.29%
15	278,959	30.04%	318,301	34.28%	25,471	2.74%	4,331	0.47%	289,487	31.18%	3,773	0.41%	2,347	0.25%	5,915	0.64%
16	329,395	35.72%	479,910	52.04%	47,283	5.13%	15,953	1.73%	40,691	4.41%	2,637	0.29%	2,132	0.23%	4,122	0.45%
17	288,246	30.95%	526,158	56.49%	21,705	2.33%	8,824	0.95%	75,067	8.06%	3,614	0.39%	2,766	0.30%	4,961	0.53%
18	524,993	56.53%	269,822	29.05%	39,264	4.23%	2,981	0.32%	82,918	8.93%	1,401	0.15%	3,280	0.35%	4,066	0.44%
19	448,444	48.28%	391,894	42.19%	19,170	2.06%	7,088	0.76%	54,369	5.85%	2,379	0.26%	2,016	0.22%	3,490	0.38%
20	640,254	68.41%	147,352	15.74%	79,131	8.45%	3,702	0.40%	56,370	6.02%	2,641	0.28%	2,247	0.24%	4,238	0.45%
21	378,900	40.73%	372,015	39.99%	109,134	11.73%	7,537	0.81%	50,913	5.47%	2,700	0.29%	3,068	0.33%	6,015	0.65%
22	496,617	53.44%	113,016	12.16%	14,525	1.56%	2,319	0.25%	297,132	31.97%	934	0.10%	1,469	0.16%	3,286	0.35%
23	354,432	37.96%	424,954	45.51%	72,555	7.77%	10,292	1.10%	60,454	6.47%	3,237	0.35%	2,259	0.24%	5,624	0.60%
24	622,849	66.72%	111,828	11.98%	29,054	3.11%	2,293	0.25%	160,813	17.23%	793	0.08%	2,632	0.28%	3,248	0.35%
25	240,708	25.97%	483,809	52.19%	47,881	5.17%	3,947	0.43%	140,794	15.19%	1,890	0.20%	3,044	0.33%	4,862	0.52%
26	126,358	13.62%	601,837	64.87%	36,715	3.96%	3,921	0.42%	147,042	15.85%	2,389	0.26%	3,947	0.43%	5,548	0.60%
27	232,461	24.84%	544,291	58.17%	28,369	3.03%	4,416	0.47%	116,675	12.47%	1,826	0.20%	3,034	0.32%	4,584	0.49%
28	379,913	40.85%	442,979	47.63%	36,831	3.96%	7,831	0.84%	53,808	5.79%	2,574	0.28%	1,988	0.21%	4,148	0.45%
29	338,824	36.61%	293,659	31.73%	25,387	2.74%	3,781	0.41%	253,449	27.39%	3,141	0.34%	2,218	0.24%	5,035	0.54%
30	461,587	50.04%	129,621	14.05%	257,407	27.90%	2,220	0.24%	58,157	6.30%	998	0.11%	4,661	0.51%	7,845	0.85%
31	492,844	52.40%	270,072	28.71%	86,279	9.17%	5,461	0.58%	73,833	7.85%	4,006	0.43%	2,356	0.25%	5,761	0.61%
32	568,638	60.92%	178,913	19.17%	34,647	3.71%	3,596	0.39%	138,692	14.86%	3,026	0.32%	2,014	0.22%	3,880	0.42%
33	648,693	69.98%	120,539	13.00%	82,212	8.87%	3,008	0.32%	60,349	6.51%	5,413	0.58%	2,193	0.24%	4,565	0.49%
34	434,685	46.85%	269,045	29.00%	13,031	1.40%	3,737	0.40%	198,207	21.36%	4,042	0.44%	1,749	0.19%	3,397	0.37%
35	495,096	52.97%	106,677	11.41%	199,211	21.31%	2,868	0.31%	111,717	11.95%	8,756	0.94%	2,937	0.31%	7,353	0.79%
36	222,803	23.75%	595,051	63.43%	23,219	2.48%	6,047	0.64%	78,172	8.33%	5,183	0.55%	2,559	0.27%	5,049	0.54%
37	203,289	21.67%	525,297	56.00%	14,634	1.56%	4,440	0.47%	180,104	19.20%	3,035	0.32%	2,679	0.29%	4,508	0.48%
38	253,111	27.22%	544,135	58.52%	34,605	3.72%	11,321	1.22%	74,599	8.02%	4,581	0.49%	2,361	0.25%	5,047	0.54%
39	156,622	16.88%	549,634	59.22%	47,119	5.08%	5,991	0.65%	154,034	16.60%	4,311	0.46%	3,407	0.37%	6,926	0.75%
40	582,309	62.28%	153,242	16.39%	67,969	7.27%	5,354	0.57%	112,848	12.07%	4,965	0.53%	1,823	0.19%	6,545	0.70%

Table 3: Total Voting Age Population - U.S. Census Bureau 2010 PL94, Table 4. DOJ Tabulation																		
District	Total VAP	% VAP*	Latino VAP	%Latino VAP	White VAP	%White VAP	Black VAP	%Black VAP	American Indian VAP	%American Indian VAP	Asian VAP	%Asian VAP	Hawaiian or Pacific Islander VAP	%Hawaiian or Pacific Islander VAP	Other VAP	%Other VAP	Remainder of Multiracial VAP	%Remainder of Multiracial VAP
01	728,887	77.93%	65,764	9.02%	597,012	81.91%	13,070	1.79%	17,190	2.36%	30,094	4.13%	1,768	0.24%	1,972	0.27%	2,017	0.28%
02	729,486	78.60%	118,286	16.21%	540,592	74.11%	14,463	1.98%	19,989	2.74%	28,999	3.98%	2,202	0.30%	2,381	0.33%	2,574	0.35%
03	716,049	77.15%	152,346	21.28%	398,472	55.65%	54,776	7.65%	7,330	1.02%	90,798	12.68%	4,422	0.62%	2,304	0.32%	5,601	0.78%
04	702,185	74.86%	114,932	16.37%	494,284	70.39%	23,313	3.32%	14,826	2.11%	46,437	6.61%	3,018	0.43%	1,546	0.22%	3,829	0.55%
05	670,015	71.34%	220,614	32.93%	304,822	45.49%	41,577	6.21%	7,605	1.14%	84,010	12.54%	4,497	0.67%	1,643	0.25%	5,247	0.78%
06	692,040	73.91%	148,447	21.45%	301,225	43.53%	84,026	12.14%	7,876	1.14%	130,108	18.80%	8,701	1.26%	2,024	0.29%	9,633	1.39%
07	687,634	74.36%	126,553	18.40%	402,664	58.56%	39,219	5.70%	4,900	0.71%	104,687	15.22%	3,419	0.50%	1,909	0.28%	4,283	0.62%
08	694,800	74.73%	166,925	24.02%	425,504	61.24%	25,258	3.64%	13,454	1.94%	57,031	8.21%	1,839	0.26%	1,912	0.28%	2,877	0.41%
09	743,998	79.10%	153,376	20.62%	261,801	35.19%	144,573	19.43%	4,293	0.58%	165,309	22.22%	3,680	0.49%	3,025	0.41%	7,941	1.07%
10	704,066	76.22%	152,169	21.61%	202,581	28.77%	39,763	5.65%	3,454	0.49%	288,843	41.02%	7,827	1.11%	1,658	0.24%	7,771	1.10%
11	798,616	85.79%	119,525	14.97%	325,420	40.75%	44,674	5.59%	3,747	0.47%	292,846	36.67%	3,533	0.44%	2,890	0.36%	5,981	0.75%
12	641,932	68.79%	379,610	59.14%	194,603	30.32%	21,480	3.35%	5,788	0.90%	34,580	5.39%	1,867	0.29%	1,752	0.27%	2,252	0.35%
13	719,549	77.58%	140,230	19.49%	364,092	50.60%	18,583	2.58%	2,969	0.41%	178,810	24.85%	7,840	1.09%	2,478	0.34%	4,547	0.63%
14	623,635	66.67%	413,286	66.27%	136,753	21.93%	32,986	5.29%	5,737	0.92%	30,756	4.93%	731	0.12%	1,783	0.29%	1,603	0.26%
15	698,809	75.26%	187,530	26.84%	264,974	37.92%	19,554	2.80%	3,422	0.49%	215,000	30.77%	2,863	0.41%	1,544	0.22%	3,922	0.56%
16	662,419	71.84%	204,178	30.82%	380,322	57.41%	31,022	4.68%	11,922	1.80%	29,379	4.44%	1,849	0.28%	1,392	0.21%	2,355	0.36%
17	724,678	77.81%	190,445	26.28%	444,083	61.28%	16,619	2.29%	7,181	0.99%	58,398	8.06%	2,700	0.37%	2,076	0.29%	3,176	0.44%
18	699,815	75.35%	360,423	51.50%	231,798	33.12%	31,075	4.44%	2,480	0.35%	67,933	9.71%	1,123	0.16%	2,103	0.30%	2,880	0.41%
19	697,445	75.09%	296,329	42.49%	332,348	47.65%	14,623	2.10%	5,699	0.82%	42,941	6.16%	1,806	0.26%	1,409	0.20%	2,290	0.33%
20	645,309	68.95%	411,582	63.78%	122,990	19.06%	57,472	8.91%	2,966	0.46%	44,353	6.87%	1,771	0.27%	1,479	0.23%	2,696	0.42%
21	649,719	69.84%	235,918	36.31%	292,372	45.00%	71,197	10.96%	5,848	0.90%	37,053	5.70%	1,798	0.28%	2,013	0.31%	3,520	0.54%
22	698,855	75.20%	341,756	48.90%	98,879	14.15%	11,250	1.61%	1,861	0.27%	241,099	34.50%	772	0.11%	919	0.13%	2,319	0.33%
23	681,524	72.98%	223,675	32.82%	347,882	51.04%	49,836	7.31%	7,657	1.12%	45,529	6.68%	2,175	0.32%	1,450	0.21%	3,320	0.49%
24	710,984	76.16%	440,168	61.91%	100,593	14.15%	24,782	3.49%	1,908	0.27%	138,605	19.49%	691	0.10%	1,680	0.24%	2,557	0.36%
25	735,320	79.33%	170,003	23.12%	406,049	55.22%	37,257	5.07%	3,210	0.44%	111,800	15.20%	1,524	0.21%	2,088	0.28%	3,389	0.46%
26	778,734	83.94%	96,867	12.44%	519,679	66.73%	30,247	3.88%	3,337	0.43%	119,557	15.35%	1,962	0.25%	2,992	0.38%	4,093	0.53%
27	717,882	76.72%	159,365	22.20%	439,268	61.19%	20,643	2.88%	3,391	0.47%	88,890	12.38%	1,416	0.20%	1,855	0.26%	3,054	0.43%
28	677,516	72.85%	239,271	35.32%	362,695	53.53%	25,868	3.82%	5,785	0.85%	38,609	5.70%	1,717	0.25%	1,291	0.19%	2,280	0.34%
29	695,503	75.15%	225,064	32.36%	244,642	35.17%	19,135	2.75%	3,006	0.43%	196,527	28.26%	2,249	0.32%	1,463	0.21%	3,417	0.49%
30	686,822	74.45%	311,231	45.31%	112,308	16.35%	200,222	29.15%	1,828	0.27%	51,288	7.47%	838	0.12%	3,281	0.48%	5,826	0.85%
31	659,186	70.08%	310,807	47.15%	218,565	33.16%	60,540	9.18%	4,196	0.64%	57,363	8.70%	2,732	0.41%	1,567	0.24%	3,416	0.52%
32	692,591	74.20%	391,526	56.53%	154,228	22.27%	25,014	3.61%	2,933	0.42%	112,840	16.29%	2,164	0.31%	1,373	0.20%	2,513	0.36%
33	652,106	70.35%	427,870	65.61%	105,516	16.18%	60,618	9.30%	2,512	0.39%	47,672	7.31%	3,719	0.57%	1,406	0.22%	2,793	0.43%
34	688,872	74.24%	285,768	41.48%	228,862	33.22%	9,973	1.45%	2,987	0.43%	154,925	22.49%	2,883	0.42%	1,205	0.17%	2,269	0.33%
35	676,116	72.34%	326,380	48.27%	92,541	13.69%	150,644	22.28%	2,366	0.35%	91,249	13.50%	6,158	0.91%	2,019	0.30%	4,759	0.70%
36	708,785	75.56%	146,255	20.63%	475,185	67.04%	16,562	2.34%	4,662	0.66%	57,732	8.15%	3,729	0.53%	1,669	0.24%	2,991	0.42%
37	734,844	78.34%	137,962	18.77%	436,852	59.45%	10,969	1.49%	3,579	0.49%	138,372	18.83%	2,274	0.31%	1,795	0.24%	3,041	0.41%
38	696,724	74.94%	162,351	23.30%	440,039	63.16%	23,719	3.40%	8,294	1.19%	54,641	7.84%	3,313	0.48%	1,583	0.23%	2,784	0.40%
39	764,337	82.36%	114,156	14.94%	476,060	62.28%	35,885	4.69%	4,991	0.65%	122,878	16.08%	3,353	0.44%	2,549	0.33%	4,465	0.58%
40	671,129	71.77%	388,556	57.90%	131,303	19.56%	50,852	7.58%	4,110	0.61%	87,514	13.04%	3,785	0.56%	1,271	0.19%	3,738	0.56%

*Denominator is total population

Table 4: Total Citizen Voting Age Population - Statewide Database, 2005 - 2009 American Community Survey 5 yr estimates													
District	Total CVAP	Latino CVAP	% Latino CVAP	White CVAP	% White CVAP	Black CVAP	% Black CVAP	Asian CVAP	% Asian CVAP	American Indian CVAP	% American Indian CVAP	Other CVAP	% Other CVAP
01	672,832	43,386	6.45%	575,841	85.58%	13,448	2.00%	21,626	3.21%	8,578	1.27%	18,531	2.75%
02	635,914	53,578	8.43%	525,442	82.63%	13,327	2.10%	20,388	3.21%	12,122	1.91%	23,179	3.64%
03	612,229	83,170	13.58%	395,557	64.61%	51,833	8.47%	66,402	10.85%	3,781	0.62%	15,267	2.49%
04	622,033	65,324	10.50%	484,710	77.92%	21,662	3.48%	31,290	5.03%	6,307	1.01%	19,047	3.06%
05	541,374	126,875	23.44%	308,480	56.98%	37,201	6.87%	55,519	10.26%	3,897	0.72%	13,299	2.46%
06	565,628	88,731	15.69%	298,462	52.77%	74,745	13.21%	86,355	15.27%	5,105	0.90%	17,335	3.06%
07	569,011	68,701	12.07%	390,810	68.68%	33,715	5.93%	65,393	11.49%	2,312	0.41%	10,392	1.83%
08	606,375	114,240	18.84%	417,945	68.93%	22,535	3.72%	34,677	5.72%	7,542	1.24%	16,978	2.80%
09	595,108	72,221	12.14%	256,455	43.09%	140,393	23.59%	113,201	19.02%	2,034	0.34%	12,838	2.16%
10	524,928	89,703	17.09%	210,385	40.08%	35,477	6.76%	177,244	33.77%	2,254	0.43%	12,119	2.31%
11	663,732	73,499	11.07%	322,364	48.57%	45,493	6.85%	211,795	31.91%	1,839	0.28%	10,581	1.59%
12	438,286	188,080	42.91%	197,424	45.04%	21,123	4.82%	22,815	5.21%	3,663	0.84%	8,844	2.02%
13	553,079	66,332	11.99%	349,061	63.11%	19,908	3.60%	107,415	19.42%	2,092	0.38%	10,363	1.87%
14	410,500	207,394	50.52%	143,864	35.05%	32,392	7.89%	19,360	4.72%	3,391	0.83%	7,490	1.82%
15	539,225	107,927	20.02%	266,228	49.37%	16,888	3.13%	140,686	26.09%	1,761	0.33%	7,496	1.39%
16	564,836	126,292	22.36%	376,558	66.67%	29,509	5.22%	17,395	3.08%	5,937	1.05%	15,082	2.67%
17	615,065	104,945	17.06%	437,338	71.10%	16,513	2.68%	43,642	7.10%	3,124	0.51%	12,627	2.05%
18	471,813	179,485	38.04%	214,629	45.49%	28,550	6.05%	43,493	9.22%	1,365	0.29%	5,656	1.20%
19	536,288	150,912	28.14%	330,038	61.54%	14,817	2.76%	30,741	5.73%	3,035	0.57%	9,780	1.82%
20	465,480	239,196	51.39%	132,861	28.54%	57,850	12.43%	26,849	5.77%	2,366	0.51%	8,724	1.87%
21	507,189	138,366	27.28%	277,557	54.72%	58,030	11.44%	23,064	4.55%	3,149	0.62%	10,172	2.01%
22	515,067	227,268	44.12%	108,995	21.16%	10,701	2.08%	163,105	31.67%	1,775	0.34%	4,998	0.97%
23	563,579	142,736	25.33%	340,225	60.37%	41,897	7.43%	27,573	4.89%	4,153	0.74%	11,148	1.98%
24	408,806	210,974	51.61%	91,041	22.27%	26,017	6.36%	75,497	18.47%	1,855	0.45%	5,277	1.29%
25	625,479	127,297	20.35%	381,105	60.93%	38,717	6.19%	72,096	11.53%	1,767	0.28%	6,264	1.00%
26	669,916	69,527	10.38%	487,046	72.70%	29,944	4.47%	75,873	11.33%	1,810	0.27%	7,526	1.12%
27	587,906	84,385	14.35%	422,982	71.95%	18,101	3.08%	56,758	9.65%	1,124	0.19%	5,680	0.97%
28	529,628	133,548	25.22%	339,946	64.19%	22,761	4.30%	23,544	4.45%	3,700	0.70%	9,829	1.86%
29	532,640	126,174	23.69%	253,097	47.52%	19,385	3.64%	126,586	23.77%	2,242	0.42%	7,398	1.39%
30	465,763	125,666	26.98%	103,495	22.22%	200,805	43.11%	29,958	6.43%	1,574	0.34%	5,839	1.25%
31	476,314	167,298	35.12%	213,540	44.83%	52,992	11.13%	33,516	7.04%	2,650	0.56%	8,968	1.88%
32	535,094	269,284	50.32%	156,301	29.21%	23,049	4.31%	79,970	14.95%	2,218	0.41%	6,490	1.21%
33	414,477	209,667	50.59%	106,506	25.70%	56,414	13.61%	33,480	8.08%	1,689	0.41%	8,410	2.03%
34	491,287	129,343	26.33%	238,431	48.53%	9,906	2.02%	105,917	21.56%	2,088	0.43%	7,690	1.57%
35	481,429	166,321	34.55%	94,664	19.66%	148,641	30.87%	60,634	12.59%	1,338	0.28%	11,169	2.32%
36	603,622	81,583	13.52%	458,309	75.93%	15,725	2.61%	38,707	6.41%	2,369	0.39%	9,298	1.54%
37	613,024	79,683	13.00%	425,907	69.48%	10,677	1.74%	89,633	14.62%	2,080	0.34%	7,124	1.16%
38	559,186	83,342	14.90%	411,073	73.51%	20,376	3.64%	32,439	5.80%	4,609	0.82%	11,956	2.14%
39	685,425	79,483	11.60%	482,996	70.47%	31,682	4.62%	80,287	11.71%	2,509	0.37%	10,977	1.60%
40	466,879	214,302	45.90%	132,918	28.47%	48,582	10.41%	61,124	13.09%	2,935	0.63%	9,953	2.13%

Board of Equalization Districts

Table 1: Total 2011 PL94 Population and Deviation from Ideal			
District	Population	Deviation	% Deviation
01	9,355,321	41,832	0.45%
02	9,220,357	-93,132	-1.00%
03	9,289,203	-24,286	-0.26%
04	9,389,075	75,586	0.81%

Table 2: Total Population - U.S. Census Bureau 2010 PL94, Table 2. DOJ Tabulation																
District	Latino	%Latino	White	%White	Black	%Black	American Indian	%American Indian	Asian	%Asian	Hawaiian or Pacific Islander	%Hawaiian or Pacific Islander	Other	%Other	Remainder of Multiracial	%Remainder of Multiracial
01	3,663,439	39.16%	4,097,000	43.79%	568,287	6.07%	120,834	1.29%	781,622	8.35%	37,613	0.40%	26,265	0.28%	60,261	0.64%
02	2,411,799	26.16%	4,153,967	45.05%	534,841	5.80%	83,355	0.90%	1,876,565	20.35%	54,952	0.60%	30,533	0.33%	74,345	0.81%
03	4,289,721	46.18%	2,730,991	29.40%	757,522	8.15%	33,344	0.36%	1,371,995	14.77%	27,914	0.30%	28,230	0.30%	49,486	0.53%
04	3,648,760	38.86%	3,974,295	42.33%	449,408	4.79%	64,278	0.68%	1,137,271	12.11%	40,139	0.43%	23,232	0.25%	51,692	0.55%

Table 3: Total Voting Age Population - U.S. Census Bureau 2010 PL94, Table 4. DOJ Tabulation																		
District	Total VAP	% VAP*	Latino VAP	%Latino VAP	White VAP	%White VAP	Black VAP	%Black VAP	American Indian VAP	%American Indian VAP	Asian VAP	%Asian VAP	Hawaiian or Pacific Islander VAP	%Hawaiian or Pacific Islander VAP	Other VAP	%Other VAP	Remainder of Multiracial VAP	%Remainder of Multiracial VAP
01	6,772,228	72.39%	2,327,843	34.37%	3,310,807	48.89%	393,099	5.80%	90,564	1.34%	568,635	8.40%	26,778	0.40%	18,167	0.27%	36,335	0.54%
02	7,154,381	77.59%	1,622,871	22.68%	3,493,508	48.83%	405,788	5.67%	64,121	0.90%	1,458,008	20.38%	40,371	0.56%	21,611	0.30%	48,103	0.67%
03	7,054,820	75.95%	2,935,600	41.61%	2,319,855	32.88%	583,055	8.26%	27,222	0.39%	1,114,847	15.80%	20,700	0.29%	19,258	0.27%	34,283	0.49%
04	6,977,487	74.31%	2,371,185	33.98%	3,285,688	47.09%	321,397	4.61%	49,382	0.71%	873,965	12.53%	28,859	0.41%	15,713	0.23%	31,298	0.45%

*Denominator is total population

Table 4: Total Citizen Voting Age Population - Statewide Database, 2005 - 2009 American Community Survey 5 yr estimates													
District	Total CVAP	Latino CVAP	% Latino CVAP	White CVAP	% White CVAP	Black CVAP	% Black CVAP	Asian CVAP	% Asian CVAP	American Indian CVAP	%American Indian CVAP	Other CVAP	% Other CVAP
01	5,443,123	1,326,714	24.37%	3,258,117	59.86%	359,838	6.61%	365,797	6.72%	48,240	0.89%	132,657	2.44%
02	5,772,499	852,581	14.77%	3,441,030	59.61%	386,338	6.69%	968,313	16.77%	35,021	0.61%	124,237	2.15%
03	5,249,827	1,644,607	31.33%	2,235,546	42.58%	574,881	10.95%	724,891	13.81%	16,964	0.32%	69,902	1.33%
04	5,470,997	1,292,336	23.62%	3,225,893	58.96%	290,724	5.31%	567,046	10.36%	29,914	0.55%	94,998	1.74%

Congressional Districts

Table 1: Total 2011 PL94 Population and Deviation from Ideal			
District	Population	Deviation	% Deviation
01	702,905	0	0.00%
02	702,905	0	0.00%
03	702,906	1	0.00%
04	702,906	1	0.00%
05	702,905	0	0.00%
06	702,905	0	0.00%
07	702,904	-1	0.00%
08	702,905	0	0.00%
09	702,904	-1	0.00%
10	702,905	0	0.00%
11	702,906	1	0.00%
12	702,905	0	0.00%
13	702,906	1	0.00%
14	702,905	0	0.00%
15	702,904	-1	0.00%
16	702,904	-1	0.00%
17	702,904	-1	0.00%
18	702,906	1	0.00%
19	702,904	-1	0.00%
20	702,906	1	0.00%
21	702,904	-1	0.00%
22	702,905	0	0.00%
23	702,904	-1	0.00%
24	702,904	-1	0.00%
25	702,904	-1	0.00%
26	702,905	0	0.00%
27	702,905	0	0.00%
28	702,904	-1	0.00%
29	702,905	0	0.00%
30	702,904	-1	0.00%
31	702,905	0	0.00%
32	702,905	0	0.00%
33	702,904	-1	0.00%
34	702,904	-1	0.00%
35	702,905	0	0.00%
36	702,905	0	0.00%
37	702,904	-1	0.00%
38	702,905	0	0.00%
39	702,905	0	0.00%
40	702,904	-1	0.00%
41	702,904	-1	0.00%
42	702,906	1	0.00%
43	702,904	-1	0.00%
44	702,904	-1	0.00%
45	702,906	1	0.00%
46	702,906	1	0.00%
47	702,905	0	0.00%
48	702,906	1	0.00%
49	702,906	1	0.00%
50	702,905	0	0.00%
51	702,906	1	0.00%
52	702,904	-1	0.00%
53	702,904	-1	0.00%

Table 2: Total Population - U.S. Census Bureau 2010 PL94, Table 2. DOJ Tabulation																
District	Latino	%Latino	White	%White	Black	%Black	American Indian	%American Indian	Asian	%Asian	Hawaiian or Pacific Islander	%Hawaiian or Pacific Islander	Other	%Other	Remainder of Multiracial	%Remainder of Multiracial
01	84,261	11.99%	555,872	79.08%	11,790	1.68%	24,686	3.51%	20,307	2.89%	1,810	0.26%	1,634	0.23%	2,545	0.36%
02	116,969	16.64%	511,716	72.80%	13,663	1.94%	22,574	3.21%	30,557	4.35%	1,870	0.27%	2,659	0.38%	2,897	0.41%
03	195,247	27.78%	357,493	50.86%	45,864	6.52%	12,040	1.71%	78,729	11.20%	4,158	0.59%	2,308	0.33%	7,067	1.01%
04	86,868	12.36%	549,759	78.21%	10,499	1.49%	14,759	2.10%	34,721	4.94%	1,931	0.27%	1,843	0.26%	2,526	0.36%
05	180,559	25.69%	370,810	52.75%	49,132	6.99%	8,852	1.26%	81,280	11.56%	4,116	0.59%	1,938	0.28%	6,218	0.88%
06	189,445	26.95%	273,251	38.87%	95,746	13.62%	8,084	1.15%	113,314	16.12%	9,348	1.33%	2,259	0.32%	11,458	1.63%
07	113,339	16.12%	401,755	57.16%	57,331	8.16%	8,129	1.16%	105,951	15.07%	5,676	0.81%	2,246	0.32%	8,477	1.21%
08	248,397	35.34%	352,775	50.19%	57,090	8.12%	11,717	1.67%	24,111	3.43%	3,056	0.43%	1,701	0.24%	4,058	0.58%
09	261,187	37.16%	259,295	36.89%	61,873	8.80%	6,753	0.96%	101,012	14.37%	3,871	0.55%	1,718	0.24%	7,195	1.02%
10	281,702	40.08%	326,037	46.38%	25,909	3.69%	8,215	1.17%	48,988	6.97%	4,952	0.70%	1,974	0.28%	5,128	0.73%
11	179,637	25.56%	341,787	48.62%	66,013	9.39%	4,266	0.61%	98,625	14.03%	3,603	0.51%	2,835	0.40%	6,140	0.87%
12	103,175	14.68%	309,243	43.99%	44,038	6.27%	3,502	0.50%	231,181	32.89%	3,241	0.46%	2,689	0.38%	5,836	0.83%
13	146,515	20.84%	240,440	34.21%	140,008	19.92%	3,910	0.56%	156,562	22.27%	3,794	0.54%	2,825	0.40%	8,852	1.26%
14	170,583	24.27%	259,672	36.94%	24,760	3.52%	2,569	0.37%	225,380	32.06%	10,205	1.45%	3,328	0.47%	6,408	0.91%
15	164,454	23.40%	263,398	37.47%	48,648	6.92%	4,101	0.58%	203,212	28.91%	8,628	1.23%	1,987	0.28%	8,476	1.21%
16	407,741	58.01%	176,462	25.10%	43,109	6.13%	6,740	0.96%	62,067	8.83%	1,312	0.19%	1,991	0.28%	3,482	0.50%
17	122,760	17.46%	188,447	26.81%	18,497	2.63%	2,688	0.38%	358,165	50.96%	3,880	0.55%	1,828	0.26%	6,639	0.94%
18	120,187	17.10%	407,159	57.93%	15,464	2.20%	3,839	0.55%	146,986	20.91%	3,149	0.45%	2,258	0.32%	3,864	0.55%
19	291,334	41.45%	189,550	26.97%	21,685	3.09%	3,582	0.51%	187,408	26.66%	3,096	0.44%	1,699	0.24%	4,550	0.65%
20	356,042	50.65%	275,545	39.20%	16,110	2.29%	5,228	0.74%	41,651	5.93%	2,748	0.39%	1,727	0.25%	3,855	0.55%
21	498,785	70.96%	135,780	19.32%	32,814	4.67%	5,499	0.78%	25,429	3.62%	693	0.10%	2,043	0.29%	1,861	0.26%
22	314,576	44.75%	297,874	42.38%	22,035	3.13%	7,632	1.09%	54,851	7.80%	1,236	0.18%	1,858	0.26%	2,843	0.40%
23	249,720	35.53%	355,557	50.58%	44,725	6.36%	11,675	1.66%	34,575	4.92%	1,593	0.23%	1,818	0.26%	3,241	0.46%
24	239,701	34.10%	401,497	57.12%	14,650	2.08%	6,747	0.96%	34,168	4.86%	1,587	0.23%	2,014	0.29%	2,540	0.36%
25	248,258	35.32%	322,132	45.83%	59,994	8.54%	4,818	0.69%	59,975	8.53%	1,410	0.20%	2,227	0.32%	4,090	0.58%
26	303,859	43.23%	324,211	46.12%	13,527	1.92%	4,636	0.66%	50,806	7.23%	1,762	0.25%	1,507	0.21%	2,597	0.37%
27	188,973	26.88%	205,406	29.22%	33,212	4.72%	2,189	0.31%	266,698	37.94%	702	0.10%	1,687	0.24%	4,038	0.57%
28	180,638	25.70%	388,580	55.28%	18,364	2.61%	2,547	0.36%	105,638	15.03%	1,497	0.21%	2,551	0.36%	3,089	0.44%
29	482,916	68.70%	129,457	18.42%	27,088	3.85%	2,050	0.29%	55,438	7.89%	1,039	0.15%	2,326	0.33%	2,591	0.37%
30	189,850	27.01%	375,093	53.36%	32,731	4.66%	2,635	0.37%	94,518	13.45%	1,349	0.19%	2,692	0.38%	4,036	0.57%
31	347,521	49.44%	208,507	29.66%	80,735	11.49%	3,959	0.56%	52,968	7.54%	2,588	0.37%	1,921	0.27%	4,706	0.67%
32	440,161	62.62%	127,300	18.11%	19,175	2.73%	2,466	0.35%	108,780	15.48%	1,013	0.14%	1,413	0.20%	2,597	0.37%
33	78,795	11.21%	481,592	68.51%	22,183	3.16%	2,970	0.42%	109,109	15.52%	1,729	0.25%	2,786	0.40%	3,740	0.53%
34	459,919	65.43%	64,930	9.24%	31,974	4.55%	1,885	0.27%	139,011	19.78%	560	0.08%	1,965	0.28%	2,660	0.38%
35	488,108	69.44%	111,877	15.92%	48,846	6.95%	2,716	0.39%	44,995	6.40%	1,783	0.25%	1,669	0.24%	2,911	0.41%
36	327,837	46.64%	311,816	44.36%	27,845	3.96%	7,656	1.09%	22,807	3.24%	1,383	0.20%	1,323	0.19%	2,238	0.32%
37	271,183	38.58%	170,692	24.28%	176,118	25.06%	1,901	0.27%	71,093	10.11%	1,058	0.15%	4,147	0.59%	6,712	0.95%
38	430,350	61.22%	132,978	18.92%	26,596	3.78%	2,738	0.39%	103,373	14.71%	2,358	0.34%	1,470	0.21%	3,042	0.43%
39	229,151	32.60%	240,000	34.14%	17,432	2.48%	2,728	0.39%	206,547	29.38%	1,607	0.23%	1,661	0.24%	3,779	0.54%

District	Latino	%Latino	White	%White	Black	%Black	American Indian	%American Indian	Asian	%Asian	Hawaiian or Pacific Islander	%Hawaiian or Pacific Islander	Other	%Other	Remainder of Multiracial	%Remainder of Multiracial
40	607,911	86.49%	37,646	5.36%	36,199	5.15%	1,296	0.18%	16,118	2.29%	977	0.14%	1,413	0.20%	1,344	0.19%
41	392,952	55.90%	183,311	26.08%	70,741	10.06%	4,250	0.60%	42,620	6.06%	3,019	0.43%	1,713	0.24%	4,298	0.61%
42	254,414	36.19%	327,780	46.63%	39,141	5.57%	5,461	0.78%	67,055	9.54%	2,915	0.41%	1,734	0.25%	4,406	0.63%
43	323,366	46.00%	106,007	15.08%	168,263	23.94%	2,103	0.30%	90,329	12.85%	4,052	0.58%	2,806	0.40%	5,978	0.85%
44	480,835	68.41%	50,395	7.17%	119,232	16.96%	1,843	0.26%	38,885	5.53%	6,444	0.92%	1,564	0.22%	3,706	0.53%
45	129,327	18.40%	390,115	55.50%	12,219	1.74%	2,871	0.41%	160,723	22.87%	1,872	0.27%	2,108	0.30%	3,671	0.52%
46	467,888	66.56%	129,534	18.43%	13,263	1.89%	2,403	0.34%	83,358	11.86%	3,017	0.43%	1,278	0.18%	2,165	0.31%
47	239,935	34.13%	239,422	34.06%	54,077	7.69%	3,820	0.54%	153,048	21.77%	5,431	0.77%	1,861	0.26%	5,311	0.76%
48	139,894	19.90%	411,598	58.56%	8,314	1.18%	3,871	0.55%	131,541	18.71%	2,792	0.40%	1,792	0.25%	3,104	0.44%
49	181,238	25.78%	432,469	61.53%	19,091	2.72%	4,898	0.70%	54,828	7.80%	4,546	0.65%	1,933	0.28%	3,903	0.56%
50	210,438	29.94%	412,173	58.64%	19,387	2.76%	10,036	1.43%	42,718	6.08%	3,142	0.45%	1,645	0.23%	3,366	0.48%
51	481,150	68.45%	101,181	14.39%	50,023	7.12%	4,374	0.62%	57,816	8.23%	3,044	0.43%	1,326	0.19%	3,992	0.57%
52	90,424	12.86%	436,159	62.05%	23,519	3.35%	4,206	0.60%	138,187	19.66%	2,986	0.42%	2,558	0.36%	4,865	0.69%
53	223,244	31.76%	302,718	43.07%	59,316	8.44%	4,698	0.67%	99,241	14.12%	4,990	0.71%	2,004	0.29%	6,693	0.95%

Table 3: Total Voting Age Population - U.S. Census Bureau 2010 PL94, Table 4. DOJ Tabulation																		
District	Total VAP	% VAP*	Latino VAP	%Latino VAP	White VAP	%White VAP	Black VAP	%Black VAP	American Indian VAP	%American Indian VAP	Asian VAP	%Asian VAP	Hawaiian or Pacific Islander VAP	%Hawaiian or Pacific Islander VAP	Other VAP	%Other VAP	Remainder of Multiracial VAP	%Remainder of Multiracial VAP
01	554,136	78.84%	54,690	9.87%	455,291	82.16%	8,390	1.51%	17,799	3.21%	13,961	2.52%	1,280	0.23%	1,270	0.23%	1,455	0.26%
02	555,305	79.00%	78,229	14.09%	423,500	76.26%	10,378	1.87%	15,919	2.87%	22,050	3.97%	1,395	0.25%	2,001	0.36%	1,833	0.33%
03	526,206	74.86%	124,246	23.61%	290,101	55.13%	33,561	6.38%	8,906	1.69%	60,493	11.50%	2,994	0.57%	1,836	0.35%	4,069	0.77%
04	544,601	77.48%	56,598	10.39%	441,207	81.01%	7,449	1.37%	10,983	2.02%	24,205	4.44%	1,356	0.25%	1,349	0.25%	1,454	0.27%
05	544,581	77.48%	117,326	21.54%	313,874	57.64%	35,544	6.53%	6,866	1.26%	62,846	11.54%	3,059	0.56%	1,347	0.25%	3,719	0.68%
06	521,275	74.16%	121,466	23.30%	228,050	43.75%	66,153	12.69%	6,413	1.23%	83,909	16.10%	6,625	1.27%	1,541	0.30%	7,118	1.37%
07	525,190	74.72%	71,905	13.69%	321,672	61.25%	39,051	7.44%	6,129	1.17%	75,694	14.41%	4,104	0.78%	1,637	0.31%	4,998	0.95%
08	503,201	71.59%	152,327	30.27%	281,907	56.02%	36,663	7.29%	8,897	1.77%	18,012	3.58%	2,035	0.40%	1,127	0.22%	2,233	0.44%
09	497,569	70.79%	162,458	32.65%	209,099	42.02%	41,032	8.25%	5,160	1.04%	71,999	14.47%	2,732	0.55%	1,091	0.22%	3,998	0.80%
10	500,233	71.17%	174,471	34.88%	259,025	51.78%	17,563	3.51%	6,284	1.26%	34,897	6.98%	3,602	0.72%	1,310	0.26%	3,081	0.62%
11	536,433	76.32%	118,386	22.07%	281,284	52.44%	48,745	9.09%	3,377	0.63%	76,261	14.22%	2,601	0.48%	1,942	0.36%	3,837	0.72%
12	612,806	87.18%	82,849	13.52%	283,774	46.31%	36,257	5.92%	3,193	0.52%	197,801	32.28%	2,403	0.39%	2,089	0.34%	4,440	0.72%
13	562,583	80.04%	101,130	17.98%	210,181	37.36%	109,391	19.44%	3,264	0.58%	127,943	22.74%	2,770	0.49%	2,029	0.36%	5,875	1.04%
14	553,819	78.79%	121,113	21.87%	218,117	39.38%	19,964	3.60%	2,080	0.38%	178,725	32.27%	7,287	1.32%	2,295	0.41%	4,238	0.77%
15	525,207	74.72%	110,291	21.00%	214,655	40.87%	35,162	6.69%	3,159	0.60%	148,873	28.35%	6,319	1.20%	1,288	0.25%	5,460	1.04%
16	478,367	68.06%	252,816	52.85%	144,627	30.23%	29,791	6.23%	5,125	1.07%	41,448	8.66%	982	0.21%	1,494	0.31%	2,084	0.44%
17	537,484	76.47%	84,099	15.65%	161,266	30.00%	13,626	2.54%	2,023	0.38%	267,863	49.84%	2,900	0.54%	1,244	0.23%	4,463	0.83%
18	542,924	77.24%	81,886	15.08%	331,434	61.05%	11,746	2.16%	3,084	0.57%	108,574	20.00%	2,327	0.43%	1,388	0.26%	2,485	0.46%
19	522,778	74.37%	194,438	37.19%	158,975	30.41%	16,571	3.17%	2,840	0.54%	143,387	27.43%	2,334	0.45%	1,183	0.23%	3,050	0.58%
20	523,748	74.51%	232,460	44.38%	235,163	44.90%	12,709	2.43%	4,222	0.81%	33,431	6.38%	2,097	0.40%	1,190	0.23%	2,476	0.47%
21	475,172	67.60%	312,899	65.85%	110,672	23.29%	25,457	5.36%	4,062	0.85%	18,881	3.97%	525	0.11%	1,564	0.33%	1,112	0.23%
22	498,009	70.85%	195,842	39.32%	239,381	48.07%	14,624	2.94%	5,658	1.14%	38,653	7.76%	904	0.18%	1,214	0.24%	1,733	0.35%
23	504,348	71.75%	155,817	30.89%	280,565	55.63%	29,755	5.90%	8,687	1.72%	25,232	5.00%	1,069	0.21%	1,258	0.25%	1,965	0.39%
24	552,445	78.59%	160,250	29.01%	342,507	62.00%	11,766	2.13%	5,528	1.00%	27,869	5.04%	1,227	0.22%	1,571	0.28%	1,727	0.31%
25	502,838	71.54%	158,296	31.48%	253,135	50.34%	39,471	7.85%	3,691	0.73%	43,345	8.62%	1,010	0.20%	1,402	0.28%	2,488	0.49%
26	520,503	74.05%	200,425	38.51%	264,485	50.81%	10,017	1.92%	3,591	0.69%	38,057	7.31%	1,307	0.25%	961	0.18%	1,660	0.32%
27	557,804	79.36%	135,362	24.27%	174,702	31.32%	26,219	4.70%	1,745	0.31%	215,216	38.58%	562	0.10%	1,113	0.20%	2,885	0.52%
28	583,658	83.04%	135,586	23.23%	337,884	57.89%	15,751	2.70%	2,241	0.38%	86,646	14.85%	1,315	0.23%	1,860	0.32%	2,375	0.41%
29	513,305	73.03%	329,109	64.12%	111,696	21.76%	21,172	4.12%	1,692	0.33%	45,561	8.88%	833	0.16%	1,393	0.27%	1,849	0.36%
30	558,009	79.39%	133,675	23.96%	316,247	56.67%	25,077	4.49%	2,173	0.39%	75,183	13.47%	1,086	0.19%	1,797	0.32%	2,771	0.50%
31	500,159	71.16%	221,898	44.37%	171,951	34.38%	56,743	11.34%	3,154	0.63%	40,541	8.11%	1,713	0.34%	1,212	0.24%	2,947	0.59%
32	517,437	73.61%	299,251	57.83%	109,230	21.11%	14,851	2.87%	1,964	0.38%	88,608	17.12%	815	0.16%	925	0.18%	1,793	0.35%
33	573,186	81.55%	58,794	10.26%	402,740	70.26%	17,345	3.03%	2,445	0.43%	85,881	14.98%	1,364	0.24%	2,016	0.35%	2,601	0.45%
34	538,000	76.54%	325,479	60.50%	58,830	10.93%	27,940	5.19%	1,585	0.29%	120,278	22.36%	489	0.09%	1,278	0.24%	2,121	0.39%
35	487,557	69.36%	315,589	64.73%	93,858	19.25%	36,160	7.42%	2,162	0.44%	35,612	7.30%	1,220	0.25%	1,114	0.23%	1,842	0.38%
36	523,662	74.50%	206,503	39.43%	271,746	51.89%	19,371	3.70%	5,611	1.07%	17,227	3.29%	965	0.18%	891	0.17%	1,348	0.26%
37	551,006	78.39%	189,837	34.45%	148,626	26.97%	139,559	25.33%	1,581	0.29%	62,470	11.34%	914	0.17%	2,990	0.54%	5,029	0.91%
38	521,736	74.23%	297,592	57.04%	114,463	21.94%	19,361	3.71%	2,247	0.43%	83,419	15.99%	1,678	0.32%	1,013	0.19%	1,963	0.38%
39	535,665	76.21%	155,041	28.94%	198,859	37.12%	13,166	2.46%	2,164	0.40%	161,541	30.16%	1,171	0.22%	1,097	0.20%	2,626	0.49%
40	477,900	67.99%	402,986	84.32%	31,663	6.63%	26,392	5.52%	1,029	0.22%	13,372	2.80%	694	0.15%	904	0.19%	860	0.18%

District	Total VAP	% VAP*	Latino VAP	%Latino VAP	White VAP	%White VAP	Black VAP	%Black VAP	American Indian VAP	%American Indian VAP	Asian VAP	%Asian VAP	Hawaiian or Pacific Islander VAP	%Hawaiian or Pacific Islander VAP	Other VAP	%Other VAP	Remainder of Multiracial VAP	%Remainder of Multiracial VAP
41	491,667	69.95%	246,863	50.21%	151,810	30.88%	49,316	10.03%	3,275	0.67%	34,569	7.03%	2,071	0.42%	1,170	0.24%	2,593	0.53%
42	498,150	70.87%	160,000	32.12%	253,289	50.85%	27,346	5.49%	4,045	0.81%	48,129	9.66%	1,916	0.38%	1,086	0.22%	2,339	0.47%
43	519,520	73.91%	216,184	41.61%	91,826	17.68%	127,097	24.46%	1,725	0.33%	73,875	14.22%	2,889	0.56%	1,906	0.37%	4,018	0.77%
44	487,384	69.34%	314,285	64.48%	43,980	9.02%	88,429	18.14%	1,500	0.31%	31,418	6.45%	4,450	0.91%	1,011	0.21%	2,311	0.47%
45	539,594	76.77%	87,339	16.19%	314,198	58.23%	8,894	1.65%	2,262	0.42%	121,700	22.55%	1,392	0.26%	1,385	0.26%	2,424	0.45%
46	500,972	71.27%	304,979	60.88%	112,591	22.47%	10,203	2.04%	1,930	0.39%	66,819	13.34%	2,119	0.42%	843	0.17%	1,488	0.30%
47	533,611	75.92%	158,045	29.62%	205,532	38.52%	40,033	7.50%	3,181	0.60%	118,361	22.18%	3,862	0.72%	1,281	0.24%	3,316	0.62%
48	554,357	78.87%	95,048	17.15%	342,461	61.78%	6,219	1.12%	3,066	0.55%	102,226	18.44%	2,048	0.37%	1,233	0.22%	2,056	0.37%
49	533,629	75.92%	118,699	22.24%	349,805	65.55%	13,718	2.57%	3,773	0.71%	40,825	7.65%	3,258	0.61%	1,274	0.24%	2,277	0.43%
50	522,239	74.30%	134,085	25.68%	331,118	63.40%	13,157	2.52%	7,222	1.38%	31,532	6.04%	2,203	0.42%	1,070	0.20%	1,852	0.35%
51	503,465	71.63%	321,713	63.90%	88,611	17.60%	38,433	7.63%	3,372	0.67%	45,630	9.06%	2,324	0.46%	947	0.19%	2,435	0.48%
52	564,937	80.37%	64,892	11.49%	365,144	64.63%	17,687	3.13%	3,379	0.60%	106,711	18.89%	2,254	0.40%	1,877	0.33%	2,993	0.53%
53	548,546	78.04%	151,952	27.70%	263,051	47.95%	42,864	7.81%	3,826	0.70%	77,696	14.16%	3,859	0.70%	1,442	0.26%	3,856	0.70%

*Denominator is total population

Table 4: Total Citizen Voting Age Population - Statewide Database, 2005 - 2009 American Community Survey 5 yr estimates													
District	Total CVAP	Latino CVAP	% Latino CVAP	White CVAP	% White CVAP	Black CVAP	% Black CVAP	Asian CVAP	% Asian CVAP	American Indian CVAP	%American Indian CVAP	Other CVAP	% Other CVAP
01	521,232	34,957	6.71%	448,444	86.04%	8,850	1.70%	10,078	1.93%	8,265	1.59%	18,903	3.63%
02	492,860	37,570	7.62%	411,140	83.42%	9,233	1.87%	16,417	3.33%	9,809	1.99%	18,500	3.75%
03	451,387	70,133	15.54%	291,155	64.50%	32,920	7.29%	42,932	9.51%	4,622	1.02%	14,247	3.16%
04	500,865	37,081	7.40%	425,556	84.96%	7,409	1.48%	17,710	3.54%	5,339	1.07%	13,109	2.62%
05	458,239	55,410	12.09%	311,389	67.95%	32,516	7.10%	46,965	10.25%	3,764	0.82%	11,959	2.61%
06	427,809	70,250	16.42%	225,856	52.79%	59,983	14.02%	57,578	13.46%	3,969	0.93%	14,142	3.31%
07	448,198	46,077	10.28%	310,222	69.22%	34,006	7.59%	47,704	10.64%	3,453	0.77%	10,189	2.27%
08	421,592	92,485	21.94%	274,266	65.05%	31,402	7.45%	11,745	2.79%	5,757	1.37%	11,694	2.77%
09	392,571	89,245	22.73%	211,156	53.79%	36,571	9.32%	46,296	11.79%	2,810	0.72%	9,303	2.37%
10	407,021	100,933	24.80%	255,974	62.89%	15,573	3.83%	23,781	5.84%	3,480	0.85%	10,760	2.64%
11	454,694	56,082	12.33%	284,720	62.62%	46,918	10.32%	59,056	12.99%	1,375	0.30%	7,918	1.74%
12	516,166	50,066	9.70%	278,635	53.98%	36,642	7.10%	142,928	27.69%	1,508	0.29%	7,895	1.53%
13	446,704	47,457	10.62%	200,670	44.92%	106,181	23.77%	82,855	18.55%	1,499	0.34%	9,541	2.14%
14	441,583	65,716	14.88%	216,005	48.92%	21,967	4.97%	128,167	29.02%	1,229	0.28%	9,728	2.20%
15	403,231	62,580	15.52%	208,203	51.63%	30,056	7.45%	92,158	22.85%	1,780	0.44%	10,234	2.54%
16	342,593	139,539	40.73%	145,826	42.57%	28,334	8.27%	22,361	6.53%	2,730	0.80%	6,533	1.91%
17	376,660	51,089	13.56%	160,800	42.69%	13,125	3.48%	145,669	38.67%	1,468	0.39%	5,977	1.59%
18	447,162	42,052	9.40%	323,586	72.36%	10,034	2.24%	66,290	14.82%	1,486	0.33%	5,200	1.16%
19	395,403	113,340	28.66%	159,099	40.24%	14,644	3.70%	102,286	25.87%	1,389	0.35%	6,034	1.53%
20	390,272	109,164	27.97%	234,893	60.19%	13,262	3.40%	24,042	6.16%	2,032	0.52%	8,911	2.28%
21	312,511	153,955	49.26%	114,765	36.72%	24,483	7.83%	13,066	4.18%	2,879	0.92%	6,242	2.00%
22	407,528	121,493	29.81%	239,618	58.80%	13,859	3.40%	25,175	6.18%	2,402	0.59%	7,383	1.81%
23	413,491	94,181	22.78%	269,641	65.21%	25,756	6.23%	14,001	3.39%	4,024	0.97%	9,912	2.40%
24	459,061	81,581	17.77%	338,799	73.80%	11,263	2.45%	19,086	4.16%	3,185	0.69%	8,332	1.82%
25	401,163	90,323	22.52%	242,150	60.36%	32,613	8.13%	28,591	7.13%	1,709	0.43%	7,486	1.87%
26	410,946	107,807	26.23%	259,490	63.14%	9,857	2.40%	27,524	6.70%	1,610	0.39%	6,268	1.53%
27	460,799	104,812	22.75%	177,838	38.59%	26,969	5.85%	145,478	31.57%	1,588	0.34%	5,702	1.24%
28	454,892	82,665	18.17%	295,479	64.96%	17,327	3.81%	54,661	12.02%	1,394	0.31%	4,760	1.05%
29	311,328	157,982	50.74%	100,762	32.37%	19,720	6.33%	29,021	9.32%	1,016	0.33%	3,843	1.23%
30	449,491	73,708	16.40%	302,368	67.27%	21,946	4.88%	47,035	10.46%	754	0.17%	4,434	0.99%
31	400,775	142,085	35.45%	177,530	44.30%	51,603	12.88%	23,769	5.93%	1,475	0.37%	5,788	1.44%
32	391,380	196,525	50.21%	117,505	30.02%	15,974	4.08%	58,444	14.93%	965	0.25%	2,932	0.75%
33	500,923	44,688	8.92%	381,318	76.12%	16,533	3.30%	52,991	10.58%	1,050	0.21%	5,393	1.08%
34	297,590	149,637	50.28%	54,045	18.16%	26,737	8.98%	62,616	21.04%	1,740	0.58%	4,555	1.53%
35	354,446	184,111	51.94%	104,029	29.35%	37,213	10.50%	21,826	6.16%	2,019	0.57%	7,267	2.05%
36	408,634	112,242	27.47%	262,225	64.17%	15,955	3.90%	10,503	2.57%	3,494	0.86%	7,709	1.89%
37	412,771	85,922	20.82%	140,469	34.03%	142,504	34.52%	38,685	9.37%	1,177	0.29%	5,191	1.26%
38	412,417	212,231	51.46%	116,090	28.15%	18,260	4.43%	60,213	14.60%	1,949	0.47%	5,623	1.36%

District	Total CVAP	Latino CVAP	% Latino CVAP	White CVAP	% White CVAP	Black CVAP	% Black CVAP	Asian CVAP	% Asian CVAP	American Indian CVAP	%American Indian CVAP	Other CVAP	% Other CVAP
39	427,211	98,101	22.96%	203,842	47.71%	14,136	3.31%	105,613	24.72%	1,959	0.46%	5,519	1.29%
40	261,568	192,215	73.49%	33,160	12.68%	24,446	9.35%	9,473	3.62%	744	0.28%	2,274	0.87%
41	349,104	128,230	36.73%	151,005	43.26%	42,491	12.17%	20,526	5.88%	2,079	0.60%	6,852	1.96%
42	388,752	97,041	24.96%	231,245	59.48%	23,542	6.06%	29,359	7.55%	2,242	0.58%	7,565	1.95%
43	377,417	108,393	28.72%	91,323	24.20%	123,640	32.76%	48,091	12.74%	1,083	0.29%	5,970	1.58%
44	327,915	160,867	49.06%	46,049	14.04%	91,382	27.87%	21,738	6.63%	1,151	0.35%	7,879	2.40%
45	452,817	53,607	11.84%	310,754	68.63%	8,907	1.97%	74,450	16.44%	1,676	0.37%	5,099	1.13%
46	300,844	126,541	42.06%	116,930	38.87%	9,225	3.07%	43,703	14.53%	1,230	0.41%	4,445	1.48%
47	414,977	83,247	20.06%	207,701	50.05%	35,539	8.56%	79,783	19.23%	1,828	0.44%	8,707	2.10%
48	480,997	55,369	11.51%	337,532	70.17%	6,308	1.31%	75,052	15.60%	1,552	0.32%	6,736	1.40%
49	439,772	63,460	14.43%	330,317	75.11%	12,108	2.75%	26,547	6.04%	1,871	0.43%	7,340	1.67%
50	417,572	65,872	15.78%	310,537	74.37%	11,565	2.77%	19,796	4.74%	4,485	1.07%	9,802	2.35%
51	338,919	172,827	50.99%	92,389	27.26%	36,643	10.81%	30,463	8.99%	2,514	0.74%	6,597	1.95%
52	502,718	47,431	9.43%	365,010	72.61%	14,627	2.91%	68,394	13.60%	1,472	0.29%	7,256	1.44%
53	459,475	95,863	20.86%	261,076	56.82%	39,024	8.49%	53,356	11.61%	2,059	0.45%	10,156	2.21%