

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

CUBANOS PA'LANTE, *et al.*,

Plaintiffs,

v.

FLORIDA HOUSE OF
REPRESENTATIVES, *et al.*,

Defendants.

Case No. 1:24-cv-21983-JB

Hon. Britt C. Grant

Hon. Rodolfo A. Ruiz II

Hon. Judge Jacqueline Becerra

Expert Report of Dr. Carolyn B. Abbott, Ph.D.

March 21, 2025

CONFIDENTIAL

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I. QUALIFICATIONS

1. I am an assistant professor of political science at Baruch College, City University of New York, where I teach a number of courses in American politics and research methods. These include classes about political representation, state and local elections, and quantitative analysis. Prior to joining the faculty at Baruch, I taught at St. John's University in Queens, New York and completed a postdoctoral fellowship at The Ohio State University. I received a Ph.D. in politics and social policy from Princeton University in 2016.

2. I have worked as an expert witness or consultant in which I was asked to analyze and evaluate election and other political data and statistical methods in *Serrato v. Town of Mount Pleasant*, Case No. 55442/2024 (Supreme Court of the State of New York County of Westchester) and *GRACE, Inc., et al. v. City of Miami*, Case No. 1:22-cv-24066-KMM (U.S. District Court for the Southern District of Florida).

3. Both my research and teaching focuses on various aspects of American politics and public policy, particularly at the state and local level. This work includes research on American elections, including publications in top peer-reviewed journals on local elections, minority representation, voting rights, and voting behavior. Further details about my professional qualifications and experience are listed in the copy of my curriculum vitae attached.

4. The analysis and opinions provided in this report are consistent with my education and training in political science and quantitative analysis. I am being compensated for my work on this report at an hourly rate of \$475 per hour. No part of my compensation depends on the outcome of this case or on the nature of the opinions that I provide.

II. ASSIGNMENT

5. I have been asked by Plaintiffs’ counsel in this case to examine whether, and the extent to which, race explains the shape and boundaries of certain Hispanic-majority congressional and State House districts in South Florida, including congressional district 26 and State House districts 112–116 and 118–119 (“challenged districts”).

6. I have also been asked to examine whether, and the extent to which, the configurations of Florida congressional districts 26–28 and State House districts 110–116 and 118–119 are consistent or inconsistent with drawing them to perform for the “Hispanic candidate of choice.” Counsel instructed me, for purposes of this analysis, to assume that the “Hispanic candidate of choice” is likely to prevail when a district leans Republican.

7. I have been instructed to examine “counterfactual” alternative maps drawn by another expert. These alternative maps were provided to me by counsel. These alternative maps were drawn without reference to racial or political data.

8. I have also been instructed to assume that no districts in Florida’s enacted redistricting plans were drawn with the intent to favor or disfavor any political or any incumbent.

III. SUMMARY OF OPINIONS

9. Based on my examination of Census and state redistricting data, I conclude that counties, cities, and precincts that have been split across congressional and State House districts are substantively different from one another in terms of Hispanic voting-age population (VAP). Congressional district 26 and State House districts 112-116 and 118-119 – and especially districts 113, 115, and 118 – contain portions of counties, cities, and precincts that have greater concentrations of Hispanic

residents compared to the portions contained in neighboring districts. Additionally, precincts along district borders that have not been split are also more Hispanic in these districts than those that they are contiguous with on the other side of the boundary. Overall, I conclude that the boundary of these congressional and State House districts have been drawn in a manner that significantly concentrates Hispanic population within the districts, resulting in clear and substantial racial disparities between these districts and their neighboring areas. Florida's 2022 congressional and State House maps are consistent with the idea that race played a significant role in shaping the state legislature's redistricting decisions in drawing these studied districts.

10. As for the second assignment, based on my examination of state elections data and instructed assumption, I conclude that the districts were likely drawn in such a way as to elect as many Republicans – the assumed “Hispanic candidate of choice” – as possible, and that these districts' configurations are consistent with drawing them to perform for the “Hispanic candidate of choice”. The districts examined contain greater concentrations of Republican voters compared to other portions of Miami-Dade County and other areas immediately surrounding the districts. These challenged and protected districts voted more heavily for the Republican candidate in three recent statewide elections prior to redistricting (2020 presidential election; 2018 gubernatorial election; 2016 presidential election) compared to surrounding areas that were contiguous with the other side of the district boundary. Compared to alternative maps provided by Plaintiffs' counsel, the enacted maps contained more districts in the contested portion of South Florida that were Republican, and reflect overall configurations that optimize Republican chances in the challenged and protected districts. Overall, I conclude that the boundaries of congressional districts 26 and 27 and of State House districts 110-116 and 118-119 have been drawn in a manner that “cracks and packs” Democratic voters within and

across these districts relative to surrounding areas and creates boundaries in such a way as to maximize the number of Republican victories, consistent with the idea that they were done so in order to perform for the assumed “Hispanic candidate of choice.”

IV. SOURCES AND METHODOLOGY

11. In preparing this report, I have relied on my personal knowledge gathered through my years of researching, studying, and publishing. I also utilize the standard methodology that political scientists use when investigating precinct and census data. To assess the likelihood of nonrandom districting decisions, I examined patterns in the distribution of racial groups across multiple geographic levels, ranging from broader areas like counties to more granular units such as voting district (VTD) splits.

12. The 2020 Census provided data on VAP by race at the block level that could then be aggregated up to the precinct, city, and county level (and splits thereof). I downloaded U.S. Congressional district shapefiles and block assignments to congressional districts from the Florida Senate’s website.¹ Population, demographic, voter registration, voter turnout, and election results data were downloaded from the Florida Redistricting 2022 website.² Block assignments to precincts and to State House districts were provided to me by counsel. County and city shapefiles were downloaded from National Historical GIS.³ Block assignments for alternative congressional and State House districts were provided to me by counsel. Additionally, I consulted 2020 and 2016 presidential and 2018 gubernatorial election results and maps using DRA2020, and include images of several of those maps in this report.⁴ DRA2020 election results are sourced from the University of Florida’s Voting and

¹ <https://www.flsenate.gov/Session/Redistricting/MapsAndStats>.

² <https://www.floridaredistricting.gov/pages/resources>.

³ <https://www.nhgis.org/>.

⁴ <https://davesredistricting.org/>.

Election Science Team (VEST).⁵ Dr. Cory McCartan provided me with three maps visualizing Hispanic VAP data with district borders overlaid: figures 1, 2, and 4.

13. Counsel instructed me to assume that congressional districts 26, 27, and 28, and State House districts 110, 111, 112, 113, 114, 115, 116, 118, and 119 were drawn as protected districts for Hispanic voters under Section 2 of the Voting Rights Act and/or Tier One of the Florida Constitution's Fair Districts Amendments. For brevity, I refer to these as the Hispanic protected districts. Counsel also instructed me, for purposes of this analysis, to assume that the "Hispanic candidate of choice" is likely to prevail when a district leans Republican.

14. Counsel instructed me to assume that the following adjacent congressional and State House districts were drawn as protected districts for Black voters: Congressional districts 20 and 24 and State House districts 102, 108, 109, and 117. For brevity, I refer to these as Black protected districts.

15. Counsel also instructed me to assume that Plaintiffs' alternative plans were drawn without regard to race.

V. THE 2022 ENACTED CONGRESSIONAL MAP

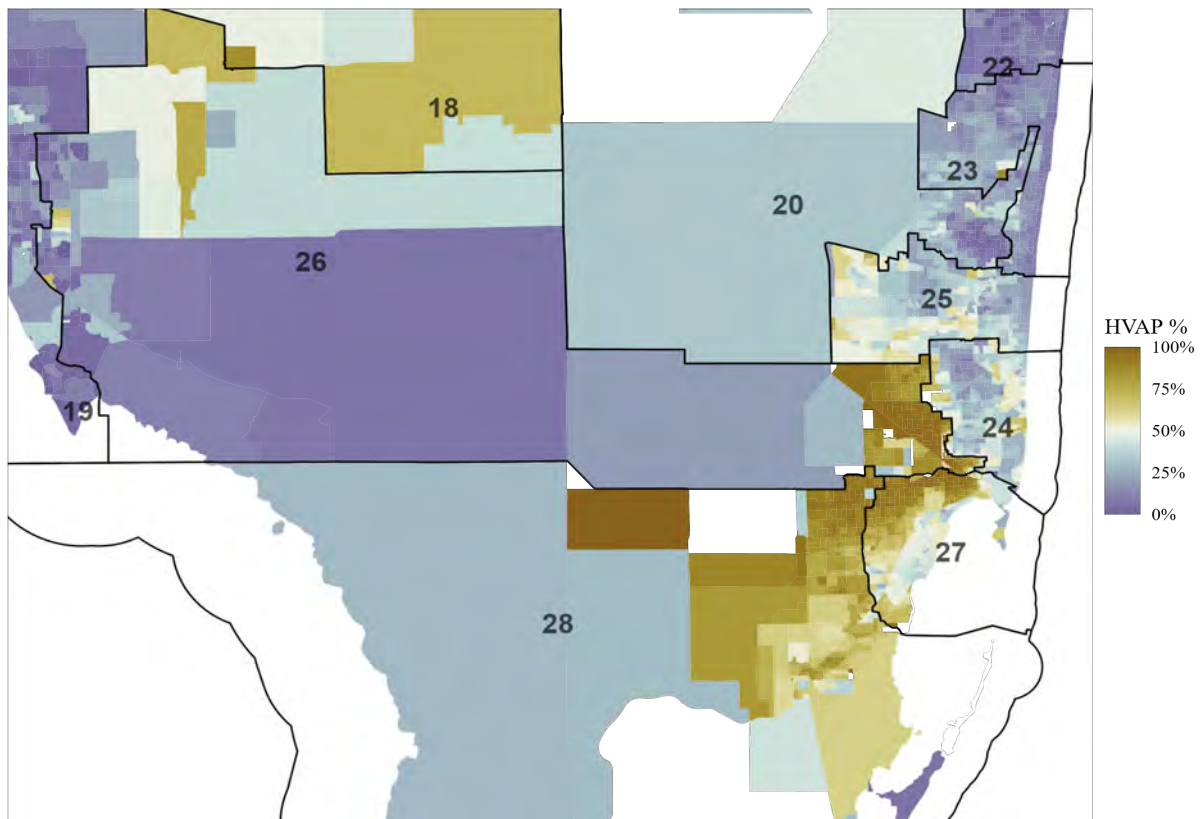
16. This report is concerned with both the U.S. congressional district map and the State House district map that was adopted by Florida in 2022. In particular, I focus on districts in South Florida which are challenged (congressional district 26 and State House districts 112–116 and 118–119), with additional analysis of other Hispanic protected districts (congressional districts 27 and 28, and State House districts 110 and 111), as well as districts that share borders with those districts. I begin with an examination of the congressional district map.

⁵ <https://davesredistricting.org/maps#aboutdata>; <https://election.lab.ufl.edu/precinct-data/>.

17. Table 1 depicts the VAP by race in district 26 and its seven bordering districts (including the two other Hispanic protected districts). In these eight congressional districts in South Florida, the overall Hispanic VAP is 45.6%, the White VAP is 32.9%, and the Black VAP is 18.9%. As Table 1 shows, Hispanic VAP in seven of the eight districts was either far below this regional average (districts 18, 19, 20, and 24) or far above it (districts 26, 27, and 28). Only district 25 comes close to matching the region's average Hispanic VAP composition.

Table 1: District Racial Compositions in South Florida

District	Hispanic VAP	White VAP	Black VAP
26	73.2%	19.7%	6.9%
27	74.2%	16.9%	7.1%
28	73.4%	15.2%	10.3%
18	23.7%	59.8%	13.2%
19	16.2%	74.1%	6.1%
20	23.0%	23.5%	50.1%
24	38.5%	18.2%	42.2%
25	42.3%	34.4%	17.5%

Figure 1: Enacted Congressional Districts and Hispanic VAP of VTDs and Split VTDs

18. The three Hispanic protected districts have a remarkably uniform Hispanic VAP, varying by only a single percentage point. One might expect such a uniform Hispanic VAP to reflect a uniformly Hispanic sub-region in which the three districts are located. But examining the distribution of Hispanic populations *within*

the Hispanic protected districts suggests that this district-level uniformity is not merely a function of the demographics of the region. As illustrated by Figure 1, the three districts are drawn in areas with great variation in their demographics. The three districts each contain areas with greater than 90% Hispanic VAP and with less than 25% Hispanic VAP. Yet, the overall Hispanic VAP of each district differs by just one percentage point, suggesting they each were drawn to achieve a uniformly high Hispanic population.

19. This pattern is further supported by comparing the enacted plan with Plaintiffs' alternative maps. For example, the Hispanic VAP of congressional districts 26, 27, and 28 range from 65.0% to 91.1% in Plaintiffs' maps A, C1, C2, and D; and from 64.0% to 89.5% in Plaintiffs' map B1. (B2, which is more like the enacted plan in districts 27 and 28, has more similar demographics.) These are both spreads of over 25 percentage points. The enacted districts' demographics, therefore, cannot be explained by the natural demography of the region.

Table 2: District Racial Compositions for Districts 19, 24, 26, 27, and 28 in Plaintiffs' Maps

District	Hispanic VAP	White VAP	Black VAP
Plaintiffs' Maps A, C1, C2, and D			
19	23.3	66.9	6.8
24	40.3	17.3	40.2
26	91.1%	5.3%	3.4%
27	66.7%	17.6%	14.6%
28	65.0%	20.1%	13.3%
Plaintiffs' Map B1			
19	23.3	66.9	6.8
24	44.5	16.7	36.7
26	89.5%	5.3%	5.1%
27	64.0%	18.4%	16.6%
28	65.0%	20.1%	13.3%
Plaintiffs' Map B2			
19	23.3	66.9	6.8
24	44.7	16.8	36.3
26	71.6%	11.1%	17.5%
27	74.2%	16.9%	7.1%
28	73.1%	15.3%	10.5%

20. Furthermore, in the alternative maps, districts adjacent to the districts 26, 27, and 28 in the alternative maps that now encompass some population from the Hispanic-protected districts in the enacted map show an increased Hispanic VAP compared to the enacted plan. District 19's Hispanic VAP increases by over 43%, from 16.2% to 23.3% in every alternative plan. District 24's Hispanic VAP increases in every alternative plan, and does so by as much as six percentage points, going from 38.5% to 44.5% and 44.7% in maps B1 and B2, respectively. Together, the overall configurations and racial makeups of the enacted and alternative districts suggest that districts 26, 27, and 28 were drawn to both balance the Hispanic population at a uniformly high level, and to concentrate most of the region's Hispanic residents into those three districts, with a resultant reduction in the Hispanic concentrations of adjacent districts.

21. To further interrogate the large deviations from average regional Hispanic VAP in the enacted districts, I examine the racial composition of portions of majority-Hispanic district 26 and the remaining non-Hispanic-protected districts that are adjacent to one another. The next two sections document the manner in which counties and municipalities have been split across South Florida congressional districts. Subsection 4.3 discusses individual precincts and portions of precincts on either side of the borders of district 26 and non-Hispanic-protected districts.

A. COUNTIES

22. Two counties are split across multiple congressional districts within district 26. Both of these counties' splits are more Hispanic in the portions that are included in district 26.

- **Collier County (18/19/26)** is split across three congressional districts: 18, 19, and the majority-Hispanic 26. The portion contained in district 26 has a VAP that is 31.8% Hispanic while the portion in district 18 and 19 is 13.7% Hispanic. The total VAP in district 26's portion of Collier County is 171,564 while the other section contains 141,558 VAP.
- **Miami-Dade County (24/26/27/28)** is split across four congressional districts: non-Hispanic-protected 24 and Hispanic-protected 26, 27, and 28. The portion in district 26 has 88.9% Hispanic VAP with 451,934 total VAP while non-Hispanic-protected district 24 contains 552,177 total VAP, of whom 39.3% are Hispanic. The portions of the county in the other two Hispanic-protected districts 27 and 28 are 74.2% Hispanic VAP with 636,002 total VAP and 80.2% Hispanic VAP with 538,514 total VAP, respectively.

B. MUNICIPALITIES AND CENSUS-DESIGNATED PLACES (CDPs)

23. Five different municipalities and CDPs (together referred here colloquially as cities) are split across two or more congressional districts within the greater South Florida region.⁶ All of these cities, with the exception of Immokalee, are split so that areas with greater Hispanic concentration are contained within Hispanic-protected congressional districts.

- **Immokalee (18/26):** The district 26 portion of Immokalee contains 13,169 total VAP, 70.3% of whom are Hispanic. The district 18 portion contains 3,309 total VAP, 84.6% of whom are Hispanic.
- **Miami (24/26/27):** The district 24 portion of Miami contains 69,609 total VAP, 39.6% of whom are Hispanic. The district 26 portion contains 53,878 total VAP, 79.6% of whom are Hispanic. Finally, district 27 contains 245,174 total VAP, 78.2% of whom are Hispanic.
- **Brownsville (24/26):** The district 24 portion of Brownsville has a total VAP of 10,539, 43.6% of whom are Hispanic while the district 26 portion contains 1,914 total VAP, 63.7% of whom are Hispanic.
- **Gladeview (24/26):** The district 24 portion of Gladeview has a total VAP of 10,573, 37.7% of whom are Hispanic, while the district 26 portion contains 266 total VAP, 92.5% of whom are Hispanic.

⁶ Municipalities and CDPs are convenient, officially-defined units of geographic analysis smaller than a county but larger than a precinct, and are thus useful to conduct the geographic analysis in this report. Additionally, incorporated municipalities have a legal status under the Florida Constitution's redistricting standards.

- **West Little River (24/26):** Finally, West Little River's split into district 24 has a total VAP of 15,535, 40.4% of whom are Hispanic, while the portion contained in district 26 has a total VAP of 11,877, 83.3% of whom are Hispanic.

C. PRECINCTS ALONG THE BORDER OF DISTRICT 26

24. Both whole precincts and portions of precincts in district 26 that are separated by a district boundary look significantly different. Collier County VTD 121 for example, is split between districts 18 and 26. The portion in district 18 has a much lower Hispanic VAP (48.7%) than the portion contained in the majority-Hispanic district 26 (70.3%). On the northern border with district 24, Miami-Dade County VTD 518 (contained wholly within district 24) contains 48.1% Hispanic VAP despite being contiguous with Miami-Dade County VTD 535 in district 26 that contains 76.5% Hispanic VAP. Table 3 and Table 4 summarize the disparities among split precincts and whole precincts, respectively, as they relate to district 26.

Table 3: Hispanic Voting-Age Population in District 26 Precincts Split Across Different Congressional Districts

VTD	District 26 Split	Other District Split
Collier 121	70.3%	48.7% (18)
Collier 134	70.2%	84.6% (18)
Collier 070	23.3%	23.4% (19)
Collier 071	67.5%	67.1% (19)
Collier 079	11.6%	7.7% (19)
Collier 092	88.2%	10.6% (19)
Collier 002	12.7%	6.3% (19)
Collier 012	9.7%	11.5% (19)
Miami-Dade 533.0	33.6%	24.8% (24)
Miami-Dade 538	56.5%	53.4% (24)
Miami-Dade 522	67.7%	40.4% (24)
Miami-Dade 282	52.6%	47.8% (24)
Miami-Dade 249	60.4%	30.8% (24)

Note: District number contained in parentheses in “Other District Split” column. Split precincts with portions containing total VAP under 100 are excluded. Rows highlighted in yellow indicate split precincts with greater Hispanic VAP in district 26 relative to the bordering, non-majority-Hispanic district.

25. As Table 3 shows, nearly every precinct that is split between district 26 and a nonmajority-Hispanic district contains a higher percentage of Hispanic VAP in the district 26 split relative to the split that is not contained in district 26. In other words, the portions of split precincts in district 26 are disproportionately Hispanic relative to the portions not in district 26.

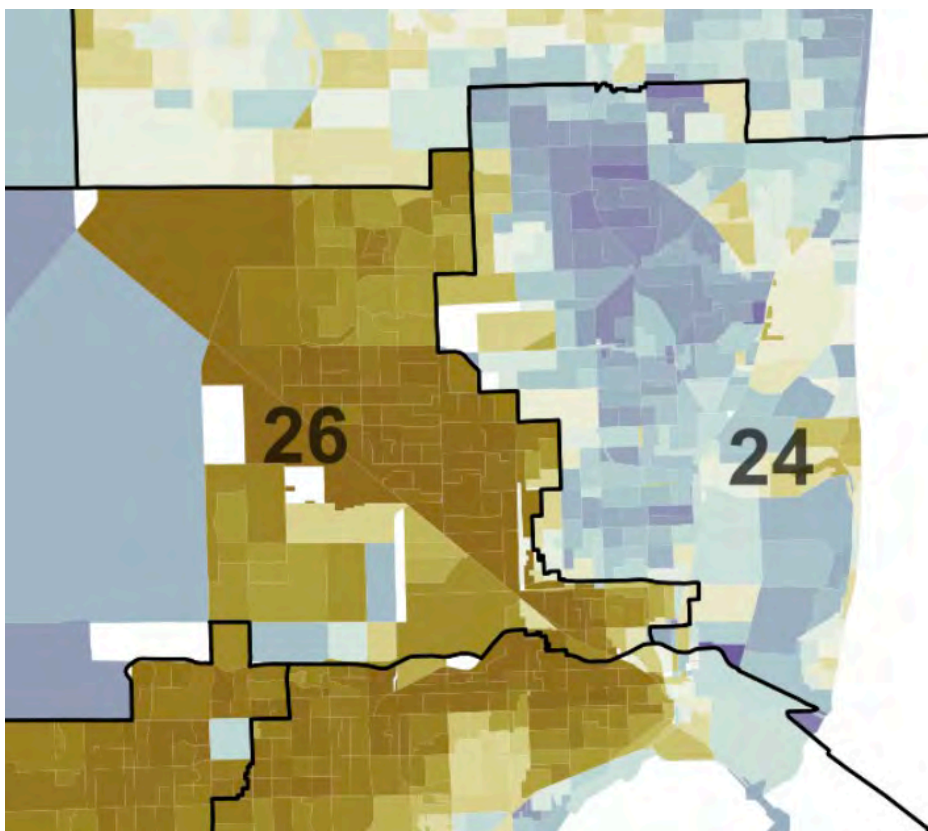
Table 4: Hispanic Voting-Age Population in District 26 Precincts and Neighbors Across District Boundaries

District 26 VTD	Neighboring VTD
Collier 120, 48.5%	Broward 19, 20.1% (19)
Collier 120, 48.5%	Broward 25, 5.6% (19)
Collier 118, 26.7%	Broward 25, 5.6% (19)
Collier 62, 17.6%	Broward 25, 5.6% (19)
Collier 139, 10.0%	Broward 25, 5.6% (19)
Collier 057, 5.1%	Broward 24, 20.8% (19)
Collier 057, 5.1%	Collier 142, 2.8% (19)
Collier 058, 3.1%	Collier 030, 6.7% (19)
Collier 059, 5.3%	Collier 030, 6.7% (19)
Collier 064, 13.6%	Collier 038, 37.8% (19)
Collier 068, 4.1%	Collier 065, 19.8% (19)
Collier 078, 10.7%	Collier 095, 1.7% (19)
Collier 003, 4.8%	Collier 010, 22.6% (19)
Miami-Dade 599, 42.3%	Miami-Dade 518, 48.1% (24)
Miami-Dade 535, 76.5%	Miami-Dade 518, 48.1% (24)
Miami-Dade 248.0, 82.8%	Miami-Dade 248.1, 53.4% (24)
Miami-Dade 248.0, 82.8%	Miami-Dade 245, 47.3% (24)
Miami-Dade 246, 91.2%	Miami-Dade 245, 47.3% (24)
Miami-Dade 246, 91.2%	Miami-Dade 241, 51.5% (24)
Miami-Dade 314, 91.5%	Miami-Dade 241, 51.5% (24)
Miami-Dade 314, 91.5%	Miami-Dade 236, 45.8% (24)
Miami-Dade 306, 80.5%	Miami-Dade 233, 70.1% (24)
Miami-Dade 231, 83.8%	Miami-Dade 233, 70.1% (24)
Miami-Dade 232, 77.4%	Miami-Dade 233, 70.1% (24)
Miami-Dade 232, 77.4%	Miami-Dade 274, 66.4% (24)
Miami-Dade 232, 77.4%	Miami-Dade 229, 68.5% (24)
Miami-Dade 230, 76.5%	Miami-Dade 229, 68.5% (24)
Miami-Dade 272, 84.6%	Miami-Dade 291, 65.1% (24)
Miami-Dade 201, 89.3%	Miami-Dade 202, 69.5% (24)
Miami-Dade 201, 89.3%	Miami-Dade 267, 58.8% (24)
Miami-Dade 201, 89.3%	Broward W021, 57.1% (25)
Miami-Dade 350, 71.8%	Broward W021, 57.1% (25)
Miami-Dade 303, 81.6%	Broward W020, 55.8% (25)
Miami-Dade 364, 88.8%	Broward 22, 56.3% (25)
Miami-Dade 365, 84.2%	Broward 22, 56.3% (25)
Miami-Dade 365, 84.2%	Broward W021, 57.1% (25)
Miami-Dade 365, 84.2%	Broward 6, 48.9% (25)
Miami-Dade 369.0, 95.1%	Broward W014, 58.0% (25)
Miami-Dade 369.0, 95.1%	Broward W017, 51.4% (25)
Miami-Dade 369.0, 95.1%	Broward W016, 50.5% (25)
Miami-Dade 369.0, 95.1%	Broward W015, 48.8% (25)
Collier 122, 40.1%	Hendry 8, 41.5% (18)
Collier 122, 40.1%	Hendry 25, 70.8% (18)

Note: VTD number followed by Hispanic VAP percentage in each cell. District number contained in parentheses in “Neighboring VTD” column. VTDs containing total VAP under 100 are excluded, as are split VTDs. Rows highlighted in yellow indicate district 26 precincts with greater Hispanic VAP relative to9 bordering precincts in non-majority-Hispanic districts.

26. These patterns of racial division are starkly visible in a map of district 26’s boundary in Miami-Dade County, Figure 2.

Figure 2: District 26 Boundary in Miami-Dade County and Hispanic VAP of VTDs and Split VTDs



D. PROBABILITY ANALYSIS OF ALL NEIGHBORING PRECINCT SEGMENTS

27. Another way to assess the extent to which racial patterns explain the boundary district 26 shares with non-Hispanic-protected districts is through a probability analysis of all the neighboring precinct pairs studied above. (District 26’s boundary with the two other Hispanic protected districts is examined above.)

Focusing on Hispanic voting age population (reflected in Tables 3 and 4), there are a total of 56 precinct pairs reflecting segments of neighboring precincts and precinct splits. 44 of the 56 neighboring pairs (78.6%) have a higher HVAP inside the district 26 side of the boundary.

28. A probability analysis can determine the likelihood that the precincts on one side of the district boundary line are consistently more Hispanic than on the other side. For example, if a map was drawn completely blind to race, a district boundary line would have an equal 50% chance of seeing higher or lower Hispanic concentrations on either side of the boundary. Unless Hispanic concentrations were a factor in drawing the boundary, a boundary should randomly have some precincts that are more Hispanic and some that are less Hispanic on either side of the line.

29. But in the case of the district grouping studied here, only 12 of 56 precinct pairs had a higher Hispanic concentration on the exterior side of the boundary. The statistical probability that at most 21.4% (12 of 56) would have a lower HVAP on one side is 1 in 95,801 or a 0.001% chance.

E. WHETHER DISTRICTS WERE DRAWN TO PERFORM FOR THE “HISPANIC CANDIDATE OF CHOICE”

30. I next examine whether the configurations of the three Hispanic-protected congressional districts 26, 27, and 28 are consistent with drawing them to perform for the “Hispanic candidate of choice,” with the assumption that the “Hispanic candidate of choice” is likely to prevail when a district leans Republican. Table 5 depicts the breakdown of voteshare across the Hispanic-protected congressional districts in the three most recent statewide elections before redistricting (the 2020 and 2016 presidential race and the 2018 gubernatorial race). The Republican candidate won a plurality or majority in the 2020 election in all three districts, and

all districts can be characterized as Republican-leaning or at least competitive, overall.

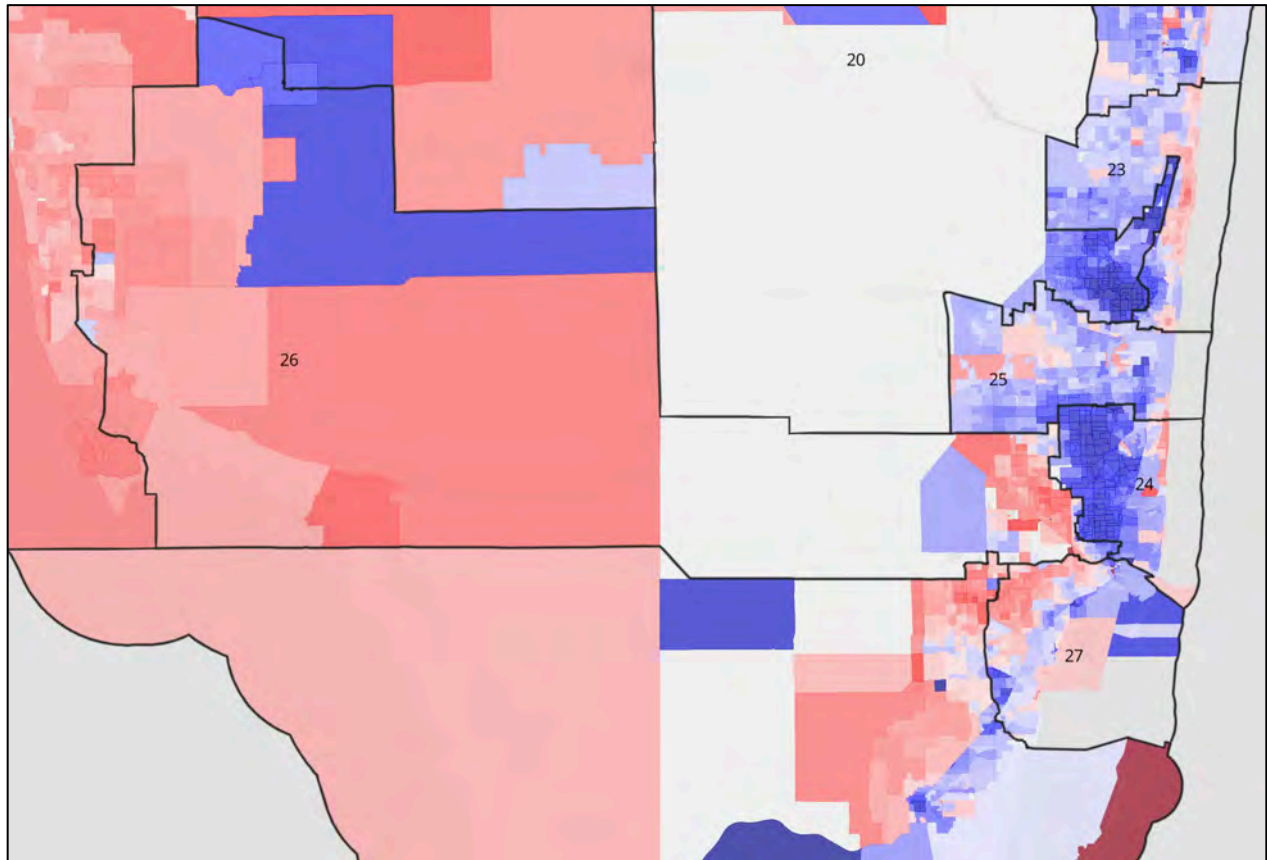
Table 5: Republican Voteshare in Congressional Districts 26, 27, and 28

District	President 2020	Governor 2018	President 2016
26	58.6%	54.1%	46.6%
27	49.8%	36.2%	39.6%
28	52.9%	46.3%	40.5%

31. Figure 3 shows the precinct (VTD) results for the 2020 election. Patterns are visible suggesting the Hispanic-protected districts were drawn to optimize the election of the “Hispanic candidate of choice.” District 26 includes Republican precincts in Miami-Dade County, but avoids heavily Democratic areas assigned to district 24 with near-surgical precision. District 26 additionally includes mostly Republican areas of Collier County, in addition to more Democratic (but sparsely populated) areas around Immokalee. Districts 27 and 28 both include more Democratic areas closer to the coast in Miami-Dade County, but group those areas together with heavily Republican precincts further north and west.

32. Overall, Trump won 26.3% in 2020, 17.9% in 2016, and DeSantis won 18.8% in 2018 in the district 24 portion of Miami-Dade County. The district 26 portion of the county, on the other hand, went 57.5%, 40.8%, and 49.7% for the Republican candidate in each of those elections. In the district 27 portion of the county, the Republican candidate won 49.8%, 39.6%, and 45.7% in each of the elections, and won 52.8%, 38.6%, and 45.4% in the district 28 portion of the county.

Figure 3: Enacted Congressional Districts and 2020 Presidential Election Results by Precinct



33. A pattern of favoring the “Hispanic candidate of choice” is confirmed by comparing the enacted plan to Plaintiffs’ alternatives. As with a comparison focused on racial demographics, comparing the election results reveals that the partisan composition of the Hispanic-protected districts is not merely a function of the region’s natural political geography. Most significantly, the range in Republican voteshare in the three districts increases markedly in the alternative plans, from an 8.8-point spread in the enacted plan to 20.6 or 22.0 under the 2020 presidential result. (The range in B2, which again has a similar configuration to the enacted districts 27 and 28, has a tighter range.) This comparison provides further support for the idea that the protected-Hispanic districts were drawn to have a uniformly concentrated

Hispanic population and would uniformly perform for the “Hispanic candidate of choice” in elections.⁷

Table 6: Republican Voteshare in Districts 19, 24, 26, 27 and 28 in Plaintiffs’ Maps

District	President 2020	Governor 2018	President 2016
Plaintiffs’ Maps A and D			
19	60.6%	62.6%	59.9%
24	28.3%	20.9%	20.4%
26	61.8%	55.6%	46.0%
27	41.2%	36.2%	31.1%
28	47.3%	41.0%	36.8%
Plaintiffs’ Maps C1 and C2			
19	60.4%	62.4%	59.8%
24	28.3%	20.9%	20.4%
26	61.8%	55.6%	46.0%
27	41.2%	36.2%	31.1%
28	47.3%	41.0%	36.8%
Plaintiffs’ Map B1			
19	60.6%	62.6%	59.9%
24	30.9%	23.0%	22.2%
26	61.0%	54.9%	45.6%
27	39.0%	33.8%	29.3%
28	47.3%	41.0%	36.8%
Plaintiffs’ Map B2			
19	60.6%	62.6%	59.9%
24	31.0%	23.2%	22.3%
26	44.6%	36.2%	31.1%
27	49.8%	45.8%	39.7%
28	52.8%	46.2%	40.4%

⁷ As in Table 2 above, Table 6 includes districts 19 and 24 from Plaintiffs’ alternative maps because those districts encompass some population from the Hispanic-protected districts in the enacted map.

VI. THE 2022 ENACTED STATE HOUSE MAP

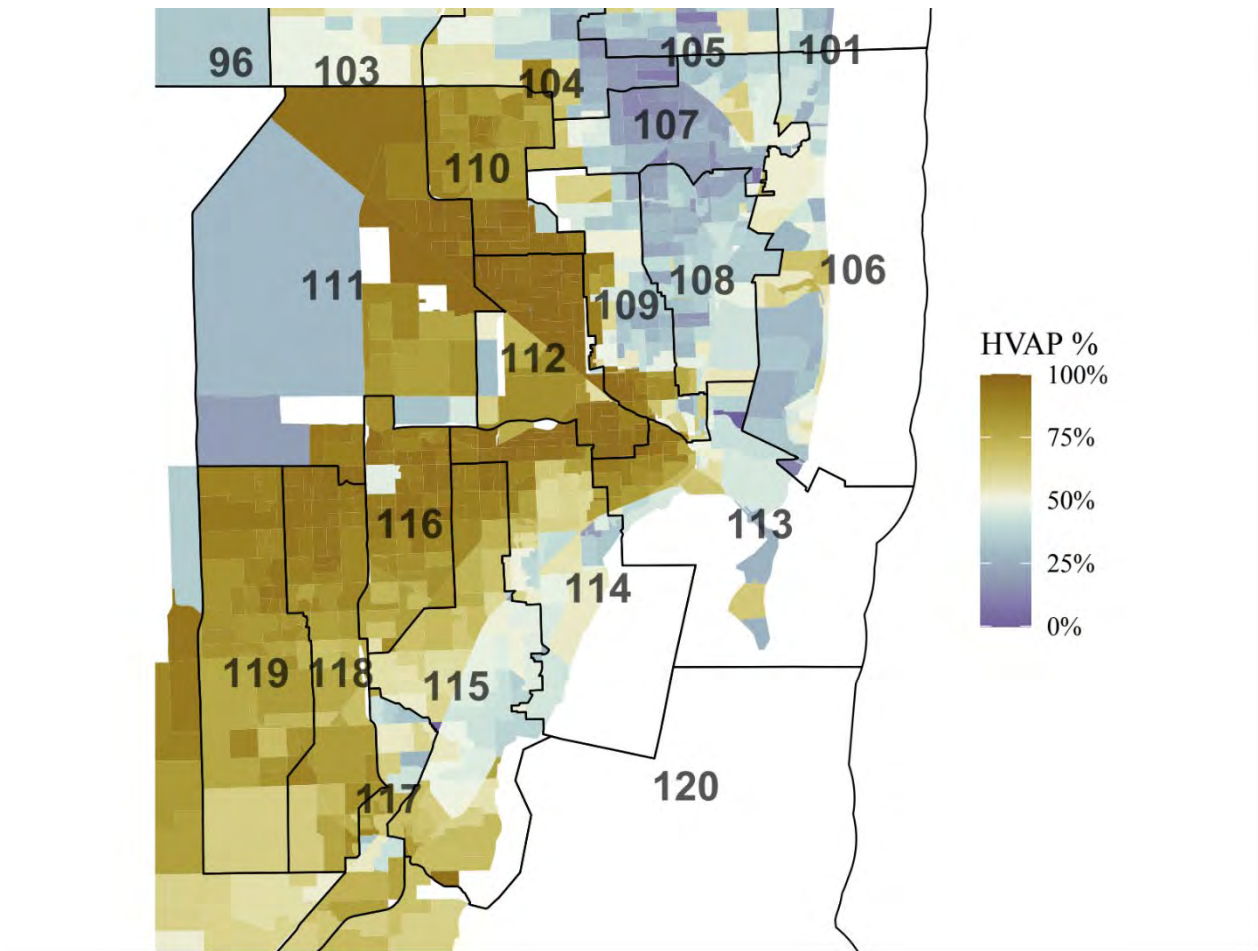
34. I now turn to an examination of the 2022 enacted State House map.

35. Table 7 depicts the VAP by race in State House districts 110-116 and 118-119 (“Hispanic protected districts” including “challenged districts”) and the districts that border them. In these seventeen state house districts, the overall Hispanic VAP is 69.3%, the white VAP is 11.8%, and the Black VAP is 17.6%. As Table 7 shows, Hispanic VAP in these seventeen districts ranges from 35.4% (108) to 94.0% (112).

Table 7: State House District Racial Compositions in South Florida

District	Hispanic VAP	White VAP	Black VAP
103	51.6%	25.4%	14.4%
104	45.3%	10.9%	41.2%
106	46.8%	43.5%	4.8%
107	36.2%	12.4%	50.4%
108	35.4%	13.6%	50.7%
109	58.4%	4.9%	40.1%
110	88.9%	5.4%	6.5%
111	90.1%	5.4%	3.2%
112	94.0%	4.1%	3.6%
113	71.9%	20.8%	4.5%
114	74.5%	18.2%	5.8%
115	65.9%	23.8%	6.8%
116	87.4%	8.2%	3.3%
117	65.1%	6.6%	28.9%
118	85.7%	7.7%	5.6%
119	85.2%	7.5%	5.4%
120	44.9%	41.6%	11.6%

Figure 4: Enacted State House Districts and Hispanic VAP of Precincts



36. As with the congressional districts, examining the distribution of Hispanic populations *within* the Hispanic protected districts suggests that their Hispanic populations are not merely a function of the demographics of the region. As illustrated by Figure 4, the districts (particularly challenged districts 113, 114, 115, 118, and 119) are drawn in an area with great demographic variation. Despite this variation, adjacent Hispanic-protected districts exhibit similar Hispanic VAP, including 113 and 114 (2.6 percentage point difference); and 116, 118, and 119 (2.2 percentage point difference). All challenged districts have a Hispanic VAP above 65%; all but one are above 70%. The region’s demographic patterns are such that more highly-concentrated Hispanic areas are located in a “boomerang” shape stretching from the northern end of district 119 (Tamiami) eastward to the border of districts

112 and 113 (Little Havana), and northwest to Hialeah and Hialeah Gardens. Areas on the periphery of this boomerang are less Hispanic. All of the challenged and protected Hispanic districts are arrayed so as to “dip into” this boomerang, while also including some portions of the periphery, meaning no district is entirely located in the less-Hispanic periphery.

37. As with the congressional districts, a comparison with Plaintiffs’ alternative plans reveals that the demographic realities of the region do not dictate the challenged districts’ racial composition. Every alternative plan exhibits more variation in the districts’ Hispanic shares, with a range from the lowest to highest Hispanic VAP of 37.4 percentage points in certain plans (C2 and C3), compared to 28.1 in the enacted plan. The adjacent districts whose Hispanic shares are remarkably similar in the enacted plan show much more variation in Plaintiffs’ maps, suggesting that those districts were drawn to balance the Hispanic population at a uniformly high level. For example, districts 113 and 114 have a Hispanic VAP range of over 26 points in B, C1, C2, and C3, up from 2.6 points in the enacted plan. Districts 116, 118, and 119 have a range of at least 11.3 points in every alternative plan, up from 2.2 points in the enacted plan.

Table 8: Hispanic VAP for Challenged State House Districts in Enacted and Plaintiffs’ Maps

Plan	112	113	114	115	116	118	119
Enacted	94.0%	71.9%	74.5%	65.9%	87.4%	85.7%	85.2%
A1	94.5%	76.7%	68.6%	63.6%	89.9%	91.2%	79.8%
A2	94.5%	73.0%	72.4%	63.6%	89.9%	91.1%	79.8%
B	94.5%	58.2%	93.3%	63.7%	84.9%	91.1%	79.8%
C1	96.4%	59.8%	91.5%	64.1%	84.3%	91.2%	79.8%
C2	96.4%	67.5%	94.4%	59.0%	79.3%	91.2%	79.8%
C3	96.4%	67.5%	93.2%	59.0%	79.7%	91.2%	79.8%
C4	96.4%	72.8%	79.3%	62.6%	83.7%	91.0%	79.7%

38. I further study these districts by examining the racial composition of portions of Hispanic-protected State House districts 112-116 and 118-119 and the remaining non-Hispanic-protected districts that are adjacent. The next two sections document the manner in which counties and municipalities have been split across these South Florida State House districts. Subsections 5.3-5.9 discusses the role of race in individual precincts and portions of precincts on either side of the borders of challenged districts and non-protected districts.

A. COUNTIES

39. All Hispanic-protected State House districts examined in this report are contained within the borders of Miami-Dade County.

B. MUNICIPALITIES AND CDPs

- **Miami (108/109/112/113/114):** The portion of Miami that encompasses Hispanic-protected districts (State House districts 112, 113, and 114) contains 246,881 total VAP, 78.9% of whom are Hispanic. The non-Hispanic-protected districts (108 and 109) that compose the rest of Miami contain 122,319 VAP, 55.5% of whom are Hispanic.
- **Goulds (117/118):** The portion of Goulds that encompasses Hispanic-protected district 118 contains 3,302 total VAP, 80.9% of whom are Hispanic. The non-Hispanic-protected district 117 that encompasses the rest of Goulds contain 5,190 VAP, 42.2% of whom are Hispanic.
- **South Miami Heights (117/118):** The portion of South Miami Heights that encompasses Hispanic-protected district 118 contains 16,371 total VAP, 80.6% of whom are Hispanic. The non-Hispanic-protected district 117 that encompasses the rest of South Miami Heights contain 13,166 VAP, 75.9% of whom are Hispanic.

- **Unincorporated area northeast of Everglades National Park (119/120):** There is a large unincorporated portion of Miami-Dade County northeast of the Everglades National Park that is primarily composed of State House district 120 but also reaches into district 119, comprising about a quarter of the district and precludes the cities or portions of cities of Kendall West, The Hammocks, Country Walk, and Richmond West. The district 119 portion of this unincorporated area contains 36,336 total VAP, 88.0% of whom are Hispanic. The district 120 portion of this unincorporated area, on the other hand, contains 145,013 total VAP, 44.9% of whom are Hispanic.

C. PRECINCTS ALONG THE BORDER OF DISTRICT 112

40. District 112 only shares one border with one non-Hispanic-protected district (district 109). District 109 is majority-Hispanic with 58.4% Hispanic VAP but is considerably less Hispanic than 112 at 94.0% Hispanic VAP. Precincts separated by the boundary between the two districts do not look significantly different from one another, the findings of which are reported in Table 9.

**Table 9: Hispanic Voting-Age Population in State House District 112
Precincts and Neighbors Across District Boundaries**

District 112 VTD	District 109 VTD
Miami-Dade 379, 96.8%	Miami-Dade 246, 91.2%
Miami-Dade 337, 94.6%	Miami-Dade 278, 91.0%
Miami-Dade 285, 96.5%	Miami-Dade 284, 96.2%
Miami-Dade 545, 90.0%	Miami-Dade 526*, 94.3%
Miami-Dade 545, 90.0%	Miami-Dade 592, 90.8%

Note: VTD number followed by Hispanic VAP percentage in each cell. VTDs containing total VAP under 100 are excluded. Rows highlighted in yellow indicate district 112 precincts with greater Hispanic VAP relative to district 109. *Represents a portion of this VTD that has been split across districts.

D. PRECINCTS ALONG THE BORDER OF DISTRICT 113

41. District 113 shares a border with three non-Hispanic-protected districts - 106, 108, and 109 (district 113 also shares a border with district 120, but the portion of 120 that is adjacent to 113 is virtually unpopulated). Districts 106 and 108 are considerably less Hispanic (46.8% and 35.4%, respectively) than both district 113 (71.9%) and district 109 (58.4%). Generally, as reported in Table 10, precincts in district 113 do look significantly different from contiguous precincts that are separated by one of the district boundaries. However, most district 113 precincts are more Hispanic than their neighbors in districts 106 (especially), 108, and 109.

E. PRECINCTS ALONG THE BORDER OF DISTRICT 114

42. State House district 114 borders only one non-Hispanic-protected district, district 120, but along an area in which there is no substantial population.

Table 10: Hispanic Voting-Age Population in District 113 Precincts and Neighbors Across District Boundaries

District 113 VTD	Neighboring VTD
Miami-Dade 582*, 44.8%	Miami-Dade 047*, 11.8% (106)
Miami-Dade 983, 41.8%	Miami-Dade 048, 32.7% (106)
Miami-Dade 983, 41.8%	Miami-Dade 038, 34.0% (106)
Miami-Dade 659.0, 37.0%	Miami-Dade 030, 26.2% (106)
Miami-Dade 538*, 55.2%	Miami-Dade 030, 26.2% (106)
Miami-Dade 538*, 55.2%	Miami-Dade 538*, 55.0% (108)
Miami-Dade 544, 42.8%	Miami-Dade 534.0, 64.3% (109)
Miami-Dade 983, 41.8%	Miami-Dade 982.0, 36.6% (109)
Miami-Dade 983, 41.8%	Miami-Dade 984.0*, 48.3% (109)
Miami-Dade 984.0*, 50.4%	Miami-Dade 984.0*, 48.3% (109)
Miami-Dade 984.0*, 50.4%	Miami-Dade 984.1, 61.4% (109)
Miami-Dade 566, 78.4%	Miami-Dade 656.0*, 68.3% (109)
Miami-Dade 543, 93.3%	Miami-Dade 656.1, 88.2% (109)
Miami-Dade 543, 93.3%	Miami-Dade 530, 52.1% (109)

Note: VTD number followed by Hispanic VAP percentage in each cell. District number contained in parentheses in “Neighboring VTD” column. VTDs containing total VAP under 100 are excluded. Rows highlighted in yellow indicate district 113 precincts with greater Hispanic VAP relative to bordering precincts in non-protected districts. *Represents a portion of this VTD that has been split across districts.

F. PRECINCTS ALONG THE BORDER OF DISTRICT 115

43. District 115 shares a border with non-Hispanic-protected districts 117 and 120. District 115 and 117 have virtually the same Hispanic VAP (65.9% versus 65.1%) while district 120 is non-majority Hispanic (44.9% Hispanic VAP).

Nevertheless, as reported in Table 11, precincts in district 115 generally contain greater percentages of Hispanic VAP compared to adjacent districts.

Table 11: Hispanic Voting-Age Population in District 115 Precincts and Neighbors Across District Boundaries

District 115 VTD	Neighboring VTD
Miami-Dade 756*, 57.7%	Miami-Dade 791*, 77.8% (117)
Miami-Dade 804, 53.2%	Miami-Dade 803, 32.0% (117)
Miami-Dade 840, 61.0%	Miami-Dade 803, 32.0% (117)
Miami-Dade 811, 54.5%	Miami-Dade 842*, 54.8% (117)
Miami-Dade 819, 49.4%	Miami-Dade 818, 27.6% (117)
Miami-Dade 819, 49.4%	Miami-Dade 826, 43.0% (117)
Miami-Dade 825, 69.0%	Miami-Dade 826, 43.0% (117)
Miami-Dade 825, 69.0%	Miami-Dade 851, 74.6% (117)
Miami-Dade 825, 69.0%	Miami-Dade 827.1, 65.5% (117)
Miami-Dade 825, 69.0%	Miami-Dade 834, 67.4% (117)
Miami-Dade 825, 69.0%	Miami-Dade 856, 42.1% (117)
Miami-Dade 833*, 90.9%	Miami-Dade 856, 42.1% (117)
Miami-Dade 833*, 90.9%	Miami-Dade 167*, 68.2% (120)
Miami-Dade 932, 70.1%	Miami-Dade 167*, 68.2% (120)

Note: VTD number followed by Hispanic VAP percentage in each cell. District number contained in parentheses in “Neighboring VTD” column. VTDs containing total VAP under 100 are excluded. Rows highlighted in yellow indicate district 115 precincts with greater Hispanic VAP relative to bordering precincts in non-protected districts. *Represents a portion of this VTD that has been split across districts.

G. PRECINCTS ALONG THE BORDER OF DISTRICT 116

44. State House district 116 does not share a border with a non-Hispanic-protected district.

H. PRECINCTS ALONG THE BORDER OF DISTRICT 118

45. Like district 115, district 118 shares a border with non-protected districts 117 and 120. District 118 is considerably more Hispanic than both districts 117 and 120. This fact is reflected in the precinct analysis reported in Table 12 in which 118 precincts contain greater percentages of Hispanic VAP compared to adjacent precincts in neighboring districts.

I. PRECINCTS ALONG THE BORDER OF DISTRICT 119

46. District 119 shares one border with a non-protected district (district 120). District 120 is considerably less Hispanic than 119 at 44.9% and 85.2% Hispanic VAP, respectively. While precincts in the middle of the districts that are adjacent to one another look somewhat similar to one another, those in the northern and southern sections do not; precincts contained in district 119 are more Hispanic than those neighboring in district 120. These findings are reported in Table 13.

Table 12: Hispanic Voting-Age Population in District 118 Precincts and Neighbors Across District Boundaries

District 118 VTD	Neighboring VTD
Miami-Dade 814 69.0%	Miami-Dade 791*, 77.8% (117)
Miami-Dade 814 69.0%	Miami-Dade 801*, 42.5% (117)
Miami-Dade 841*, 80.6%	Miami-Dade 813*, 53.9% (117)
Miami-Dade 815*, 85.7%	Miami-Dade 816, 63.7% (117)
Miami-Dade 838*, 82.9%	Miami-Dade 826, 43.0% (117)
Miami-Dade 838*, 82.9%	Miami-Dade 851, 74.6% (117)
Miami-Dade 838*, 82.9%	Miami-Dade 829.0*, 75.8% (117)
Miami-Dade 846, 84.9%	Miami-Dade 829.0*, 75.8% (117)
Miami-Dade 829.0*, 77.6%	Miami-Dade 829.0*, 75.8% (117)
Miami-Dade 829.1*, 64.6%	Miami-Dade 829.1*, 81.3% (117)
Miami-Dade 829.1*, 64.6%	Miami-Dade 830*, 74.3% (117)
Miami-Dade 830*, 75.1%	Miami-Dade 830*, 74.3% (117)
Miami-Dade 830*, 75.1%	Miami-Dade 831, 87.8% (117)
Miami-Dade 967*, 88.0%	Miami-Dade 967*, 32.3% (117)
Miami-Dade 966*, 69.9%	Miami-Dade 966*, 43.2% (117)
Miami-Dade 960*, 85.4%	Miami-Dade 960*, 57.3% (117)
Miami-Dade 969*, 77.7%	Miami-Dade 969*, 52.9% (120)
Miami-Dade 848*, 64.5%	Miami-Dade 969*, 52.9% (120)
Miami-Dade 848*, 64.5%	Miami-Dade 848*, 63.4% (120)

Note: VTD number followed by Hispanic VAP percentage in each cell. District number contained in parentheses in “Neighboring VTD” column. VTDs containing total VAP under 100 are excluded. Rows highlighted in yellow indicate district 118 precincts with greater Hispanic VAP relative to bordering precincts in non-protected districts. *Represents a portion of this VTD that has been split across districts.

**Table 13: Hispanic Voting-Age Population in State House District 119
Precincts and Neighbors Across District Boundaries**

District 119 VTD	District 120 VTD
Miami-Dade 469, 89.9%	Miami-Dade 796.0, 35.2%
Miami-Dade 461, 93.4%	Miami-Dade 796.0, 35.2%
Miami-Dade 798, 89.8%	Miami-Dade 796.0, 35.2%
Miami-Dade 797, 84.0%	Miami-Dade 796.0, 35.2%
Miami-Dade 694, 84.2%	Miami-Dade 796.0, 35.2%
Miami-Dade 694, 84.2%	Miami-Dade 796.1, 94.3%
Miami-Dade 762, 79.3%	Miami-Dade 796.1, 94.3%
Miami-Dade 759, 76.6%	Miami-Dade 790, 92.6%
Miami-Dade 787.0, 77.0%	Miami-Dade 790, 92.6%
Miami-Dade 787.0, 77.0%	Miami-Dade 789, 89.8%
Miami-Dade 787.0, 77.0%	Miami-Dade 979, 81.7%
Miami-Dade 848*, 63.5%	Miami-Dade 789, 89.8%
Miami-Dade 848*, 63.5%	Miami-Dade 853, 79.3%
Miami-Dade 848*, 63.5%	Miami-Dade 941, 62.3%
Miami-Dade 848*, 63.5%	Miami-Dade 900, 57.8%

Note: VTD number followed by Hispanic VAP percentage in each cell. VTDs containing total VAP under 100 are excluded. Rows highlighted in yellow indicate district 119 precincts with greater Hispanic VAP relative to district 120. *Represents a portion of this VTD that has been split across districts.

J. PROBABILITY ANALYSIS OF ALL NEIGHBORING PRECINCT SEGMENTS

47. There are a total of 67 precinct pairs reflecting segments of neighboring precincts. 45 of the 67 neighboring pairs (67.2%) have a higher HVAP inside the challenged-district side of the boundary.

48. The statistical probability that at most 32.8% (22 of 67) would have a lower HVAP on one side is 1 in 297 or a 0.34% chance.

VII. WHETHER THE 2022 ENACTED STATE HOUSE DISTRICTS WERE DRAWN TO PERFORM FOR THE “HISPANIC CANDIDATE OF CHOICE”

49. I next examine whether the configurations of the Hispanic-protected State House districts, including the challenged districts, are consistent with drawing them to perform for the “Hispanic candidate of choice,” with the assumption that the “Hispanic candidate of choice” is likely to prevail when a district leans Republican. Table 14 depicts the breakdown of voteshare across the Hispanic-protected State House districts in the three most recent statewide elections before redistricting (the 2020 and 2016 presidential race and the 2018 gubernatorial race). The Republican candidate won a majority in the 2020 election in all but two districts, and all districts except district 113 can be characterized as Republican-leaning or at least competitive, overall.

Table 14: Republican Voteshare in South Florida State House Districts

District	President 2020	President 2016	Governor 2018
110	59.9%	44.8%	53.2%
111	57.4%	38.6%	48.7%
112	64.0%	47.5%	57.5%
113	43.7%	33.5%	39.5%
114	49.4%	40.0%	46.6%
115	50.5%	42.4%	47.3%
116	59.5%	46.0%	54.7%
118	57.9%	43.5%	51.3%
119	53.9%	38.6%	46.2%

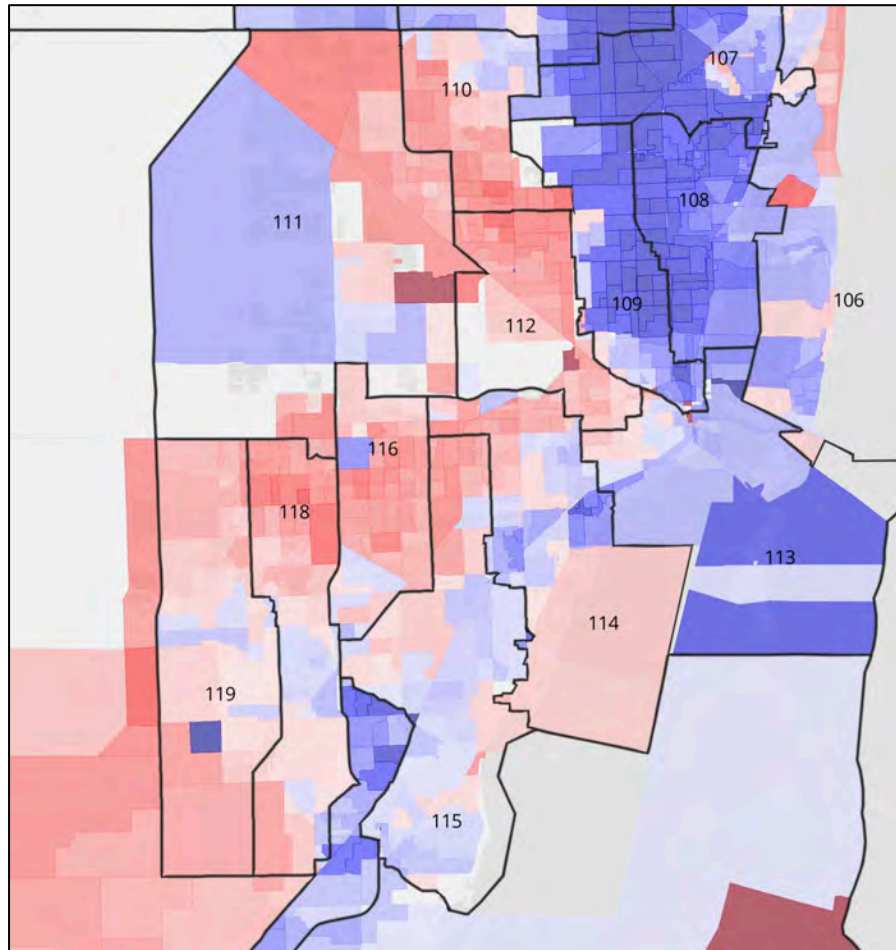
50. Figure 5 shows the precinct (VTD) results for the 2020 election. As in the congressional map, patterns are visible suggesting the Hispanic-protected districts were drawn to optimize the election of the “Hispanic candidate of choice.” Within the area covered by the Hispanic-protected districts, more heavily Republican areas are arrayed in a similar “boomerang” shape as the one discussed above. Areas on the

periphery of this boomerang are less Republican. As is true for racial patterns, all the challenged and protected-Hispanic districts are arrayed so as to “dip into” this boomerang, while also including some portions of the periphery, meaning no district is entirely located in the less-Republican periphery.

51. On a more granular level, a considerable swath of Democratic voters exists in the southern and/or middle portions of districts 114, 115, 116, 118, and 119. These districts appear to be drawn in such a way as to distribute these Democratic voters across all five districts in order to maintain all of these districts as Republican-leaning. The decision to draw all five districts as long north-south rectangles, rather than more compact shapes, results in this discrepancy – one that becomes strikingly clear when comparing these districts to those in the alternative maps.

52. Further, the external borders of districts 111, 110, 112, 115, and 118 avoid heavily Democratic areas assigned to adjacent districts.

Figure 5: Enacted State House Districts and 2020 Presidential Election Results by Precinct



53. A pattern of favoring the “Hispanic candidate of choice” is confirmed by comparing the enacted plan to Plaintiffs’ alternatives in Table 15. As with a comparison focused on racial demographics, comparing the election results reveals that the partisan composition of the Hispanic-protected districts is not merely a function of the region’s natural political geography. As with the congressional plans, the range in Republican voteshare in the Hispanic-protected State House districts increases in the alternative plans, from a 20.3-point spread in the enacted plan to as much as 26.9 points under the 2020 presidential result. This comparison provides further support for the idea that the protected-Hispanic districts were drawn to have

a uniformly concentrated Hispanic population and, with the exception of district 113, would uniformly perform for the “Hispanic candidate of choice” in elections in as many Hispanic-protected districts as possible.

Table 15: 2020 President Republican Voteshare for Hispanic-Protected State House Districts in Enacted and Plaintiffs’ Maps

Plan	110	111	112	113	114	115	116	118	119
Enacted	59.9%	57.4%	64.0%	43.7%	49.4%	50.5%	59.5%	57.9%	53.9%
A1	59.9%	57.4%	65.2%	45.8%	47.5%	47.6%	62.2%	61.8%	50.0%
A2	59.9%	57.4%	65.2%	44.3%	48.8%	47.6%	62.2%	61.8%	49.9%
B	58.6%	55.5%	66.4%	41.4%	56.8%	47.7%	60.7%	61.8%	49.9%
C1	58.3%	53.8%	68.2%	41.3%	55.8%	48.1%	60.8%	61.9%	49.9%
C2	58.3%	54.5%	68.2%	41.7%	60.6%	45.8%	57.8%	61.9%	49.9%
C3	58.3%	54.8%	68.2%	41.7%	60.0%	45.9%	57.8%	61.9%	49.9%
C4	58.3%	54.5%	68.2%	44.2%	51.0%	47.8%	60.5%	61.7%	49.9%

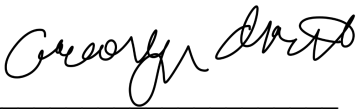
VIII. CONCLUSION

54. Based on my analysis, congressional district 26 and State House districts 112, 113, 114, 115, 116, 118, and 119 in South Florida encompass areas with significantly higher concentrations of Hispanic residents and voters compared to neighboring districts. This pattern is observable in the way counties, cities, and precincts are divided, as well as in the makeup of precincts that remain undivided along district boundaries. At every geographic level of analysis, it is evident that areas with higher Hispanic concentrations are included in these districts, while areas with lower Hispanic concentrations are excluded from them. The evidence clearly demonstrates substantial disparities in the distribution of Hispanic populations across district lines, and is consistent with the claim that mapmaking was driven by racial considerations. Additionally, the distribution of demographics within the Hispanic-protected districts suggests an effort to optimize and balance the Hispanic population of all these districts at a uniformly high level. These conclusions are

further supported by the strong evidence that these districts were created in such a way as to perform for the “Hispanic candidate of choice”.

55. My work in this matter is ongoing, and I reserve the right to supplement this analysis in the future.

56. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed this 21st day of March, 2025.

A handwritten signature in black ink, appearing to read "Carolyn B. Abott", written over a horizontal line.

Carolyn B. Abott, Ph.D.

Dated: March 21, 2025

APPENDIX A

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EDUCATION

Ph.D., Politics and Social Policy, Princeton University, 2016
Dissertation: *The Politics of Public Sector Pensions*
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RESEARCH AND TEACHING INTERESTS

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PUBLICATIONS

Abott, Carolyn. The Politics of Public Pensions: Parties, State Governments, and
Unions, Columbia University Press, *in press*.
Rauscher, Emily, Greer Mellon, Susanna Loeb, and Carolyn Abott. When Money Matters
Most: Unpacking the Effectiveness of School Spending, conditionally accepted at *Sociology
of Education*.
Abott, Carolyn, Matthew Incantalupo and Akheil Singla. Informing Voters about Public
Finance: Evidence from a Survey Experiment, *Public Finance Journal*, forthcoming.

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Abbott, Carolyn. (2010). Federal Reserve System. *Encyclopedia of United States Political History, Vol. 7: 1976-present*. Ed. Rick Valelly. Washington, DC: CQ Press.

AVAILABLE WORKING PAPERS

“Voter Responsiveness to Measures of Local Government Financial Health” (with Matthew Incantalupo and Akheil Singla) Revised and resubmitted to *Urban Affairs Review*.

“The Impact of Local Electoral Rules on Government Spending: Evidence from School Districts in California” (with Pengju Zhang) Under review.

“The Bankruptcy of Special Districts in the United States: An Exploratory Analysis” (with Pengju Zhang and Jinah Yoo) Under review.

“The Political Consequences of Local Financial Emergencies” (with Matthew Incantalupo and Akheil Singla)

“Fiscal Federalism and Local Public Good Provision: Examining the Politics and Impact of the State and Local Tax Deduction (SALT) Cap” (with Rahul Pathak)

“A Distaste for Deficits: Voter Opinion and Balanced Budget Laws in the U.S. States”

RESEARCH IN PROGRESS

“Decoding the Role of Parent-Teacher Associations in New York City School Budgets”

“Analyzing the Impact of Community Boards on Local Governance in New York City”

INVITED TALKS, PRESENTATIONS, AND WORKSHOPS

“Decoding the Role of Parent-Teacher Associations in New York City School Budgets”

Public Finance and Budgeting Northeastern Workshop, Howard J. Samuels State and City Policy Center, Baruch College - CUNY, 2025.

“The Politics of Public Pensions”

Keynote Speaker at the 10th Annual Political Science Reception, Baruch College - CUNY, 2025.

“Informing Voters about Public Finance: Evidence from a Survey Experiment”

Government Finance Officers Association Webinar, 2025.

“Analyzing the Impact of Community Boards on Local Governance in New York City”

Faculty Research Symposium, Baruch College - CUNY, 2025.

“The 2024 Election and the State of American Politics,” moderator

Baruch College and The Graduate Center - CUNY, 2024.

“Analyzing the Impact of Community Boards on Local Governance in New York City”

Eugene M. Lang New Faculty Fellows Luncheon, Baruch College - CUNY, 2024.

“Fiscal Federalism and Local Public Good Provision: Examining the Politics and Impact of the

State and Local Tax Deduction (SALT) Cap”

Public Financial Management Northeastern Workshop, School of Public Affairs and Administration, Rutgers, The State University of New Jersey-Newark, 2024.

“Fiscal Federalism and Local Public Good Provision: Examining the Politics and Impact of the State and Local Tax Deduction (SALT) Cap”

Research in Progress Faculty Seminar, Marxe School of Public and International Affairs, Baruch College - CUNY, 2024.

“Voter Responsiveness to Measures of Local Fiscal Performance”

Spring Public Finance Conference, School of Public Policy, University of Maryland, 2023.

“Voter Responsiveness to Measures of Local Fiscal Performance”

Political Science Research Colloquium, Baruch College - CUNY, 2023.

“Fiscal Federalism and Local Public Good Provision: Examining the Politics and Impact of the State and Local Tax Deduction (SALT) Cap”

Annual Faculty Research Symposium, Baruch College - CUNY, 2023.

“A Distaste for Deficits: Voter Opinion and Balanced Budget Laws in the U.S. States”

Research in Progress Faculty Seminar, Marxe School of Public and International Affairs, Baruch College - CUNY, 2021.

Roundtable on Capital Assets Reporting Standards

Governmental Accounting Standards Board (GASB), 2021.

“A Distaste for Deficits: Voter Opinion and Balanced Budget Laws in the U.S. States”
Public Finance Consortium, School of Public & Environmental Affairs, Indiana University, 2021.

“Service Solvency and Quality of Life After Municipal Bankruptcy”
Local Political Economy Symposium, Bedrosian Center at Sol Price School of Public Policy, University of Southern California, 2021.

“Municipal Bankruptcy as Policy: Local Fiscal Stress and the Decision to File”‡
Public Financial Management Northeastern Workshop, School of Public Affairs and Administration, Rutgers, The State University of New Jersey-Newark, 2020.

“Municipal Bankruptcy as Policy: Local Fiscal Stress and the Decision to File”
Fiscal Policy Series, Federal Reserve Bank of New York, 2019.

“At-Large Elections and Minority Representation in Local Government”
Department of Government and Politics Fall Graduate Colloquium, St. John’s University, 2018.

“The Differential Impact of Single-Member and At-Large Voting Districts on Local Democracy:
New Tests and Evidence”

Yale Center for the Study of American Politics Annual Conference, Yale University, 2017.

‡Canceled due to COVID-19 pandemic.

CONFERENCE PRESENTATIONS

Annual Meeting of the American Political Science Association: 2016, 2017, 2022, 2024.

Annual State Politics and Policy Conference: 2015, 2020.‡

Annual Meeting of the Southern Political Science Association: 2015, 2016, 2019, 2020,*, 2021, 2024.

Urban Affairs Association Conference: 2019.†

Annual Conference of the American Society for Public Administration: 2024.†

Public Management Research Conference: 2017,† 2023.†

World Social Science Association Annual Conference: 2023.†

Annual Conference of the Association for Budgeting and Financial Management: 2016, 2018,† 2022,† 2023.†

Brookings Municipal Finance Conference: 2020.

Annual State Politics and Policy Conference: 2015, 2020.‡

Annual Conference of the Association for Education Finance and Policy: 2019.†

Annual Conference of the Association for Public Policy Analysis & Management: 2018, 2019.† Annual Meeting of the Midwest Political Science Association: 2015, 2017.

‡Canceled due to COVID-19 pandemic; *Canceled due to earthquake; †Paper presented by coauthor.

GRANTS, AWARDS, & FELLOWSHIPS

GovFi Prize for Best Paper in *Public Finance Journal* (with Matthew Incantalupo and Akheil Singla), Government Finance Officers Association, 2025 (\$8,000)

Samuels Center Faculty Fellowship, Marxe School of Public and International Affairs, Baruch College, 2024 (\$5,000)

Eugene M. Lang Junior Faculty Research Fellowship Award, Baruch College, 2024 (\$8,000)

Cycle 55 PSC-CUNY Traditional B Research Award, City University of New York, 2024 (\$6,000)

GovFi Research Award (with Matthew Incantalupo and Akheil Singla), Government Finance Officers Association, 2024 (\$1,000)

Artinian Award, Southern Political Science Association, 2024 (\$500)

Faculty Fellowship Publication Program, City University of New York, 2024

Cycle 54 PSC-CUNY Traditional B Research Award, City University of New York, 2023 (\$6,000) Faculty Innovation Seed Grant (with Rahul Pathak), Provost's Office, Baruch College, 2022 (\$12,000)

Cycle 53 PSC-CUNY Traditional B Research Award, City University of New York, 2022 (\$6,000)

Travel Grant, APSA Annual Meeting, 2017

Prestage-Cook Travel Award, Southern Political Science Association, 2016

Grant, Graduate Student Travel, Center for the Study of Democratic Politics, Princeton, 2015

Grant, Dean's Fund for Scholarly Travel, Princeton, 2015

Grant (with Nolan McCarty), The Social and Economic Effects of the Great Recession, Russell Sage Foundation, 2012 (\$114,921)

Graduate School Centennial Fellowship in the Humanities and Social Sciences, Department of Politics, Princeton, 2010 - 2015

Honorable Mention, National Science Foundation Graduate Research Fellowships Program, 2010

TEACHING EXPERIENCE

Graduate level

Carolyn B. Abbott

A6

Public Policy
Research Methodology and Quantitative Analysis
State and Local Government and Administration
Public Budgeting and Finance

Undergraduate level

Public Policy
The Politics of Inequality in the U.S.
Introduction to Public Administration
Research Methods for Political Science and Public Administration
Introduction to American Government

PROFESSIONAL SERVICE

Organizer, Public Finance and Budgeting Northeastern Workshop, 2025
Referee, PSC-CUNY Awards, Economic and Political Science Panel, 2024-present
Member, Baruch Political Science Student Awards Committee - 2022, 2024-present
Chair, Baruch Political Science Department Colloquium - 2022-present
Member, Committee to Design the Baruch Public Service Capstone Seminar - 2023
Member, Baruch Political Science Search Committee in Comparative Politics - 2021
Co-chair, SJU Government & Politics Committee to Redesign the Public Administration Major- 2019-2021
Member, SJU Government & Politics Graduate Education Policy Committee - 2018-2021
Member, SJU Government & Politics Undergraduate Education Policy Committee - 2018-2021
Referee, *American Journal of Political Science*, *American Political Science Review*, *Economics & Politics*, *Economics Letters*, *European Journal of Political Science*, *Journal of Politics*, *Journal of Public Administration Research and Theory*, *Journal of Race, Ethnicity, & Politics*, *National Tax Journal*, *Political Analysis*, *Political Behavior*, *Politics & Policy*, *Public Budgeting & Finance*, *Public Finance & Management*, *Russell Sage Foundation*, *Sage Publications*, *Urban Affairs Review*

EXPERT WITNESS AND/OR CONSULTANT SERVICE

Serrato v. Town of Mount Pleasant. Case No. 55442/2024 (Supreme Court of the State of New York County of Westchester)
GRACE, Inc., et al. v. City of Miami. Case No. 1:22-cv-24066-KMM (U.S. District Court for the Southern District of Florida)