

Cubanos Pa'lante v. Florida House of Representatives

Case No. 1:24-cv-21983

Direct Examination of Carolyn Abott

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

January 2026

Dr. Carolyn Abbott: Qualifications



Dr. Carolyn Abbott



Education

- Princeton University, M.A. in Politics & Ph.D. in Politics & Social Policy
- Swarthmore College, B.A. in Economics & Political Science (High Honors)

Work Experience

- 2021-Present: Baruch College - CUNY, Assistant Professor
- 2018-2021: St. John's University, Assistant Professor
- 2016-2018: The Ohio State University, Postdoctoral Research Fellow

Research & Writing

- Author of one book (*Politics of Public Pensions*, 2025), seven peer-reviewed journal articles, and other publications cited by over 200 other authors
- Published in American Journal of Political Science, Journal of Political Institutions and Political Economy, Journal of Public Economics, Urban Affairs Review, and Public Administration Review

Summary of Expert Opinions

1

Congressional District 26 divides the region along racial lines

2

State House Districts 115, 118, & 119 each stretch into a high-HVAP band in Miami-Dade County

Summary of Expert Opinions

1

Congressional District 26 divides the region along racial lines

- Uniform concentration of Hispanic VAP among Congressional District 26 & neighboring “protected” districts
- Not explained by regional demographics
- Explained by systematic distribution of Hispanic VAP in Congressional District 26

Uniform Concentration of Hispanic VAP in “Protected” Districts

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%



Opening Rep., Table 1

Uniform Concentration of Hispanic VAP in “Protected” Districts

District	Hispanic VAP	White VAP	Black VAP
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%
26	73.2%	19.7%	6.9%
27	74.2%	16.9%	7.1%
28	73.4%	15.2%	10.3%

P167 (Opening Rep., Table 1)

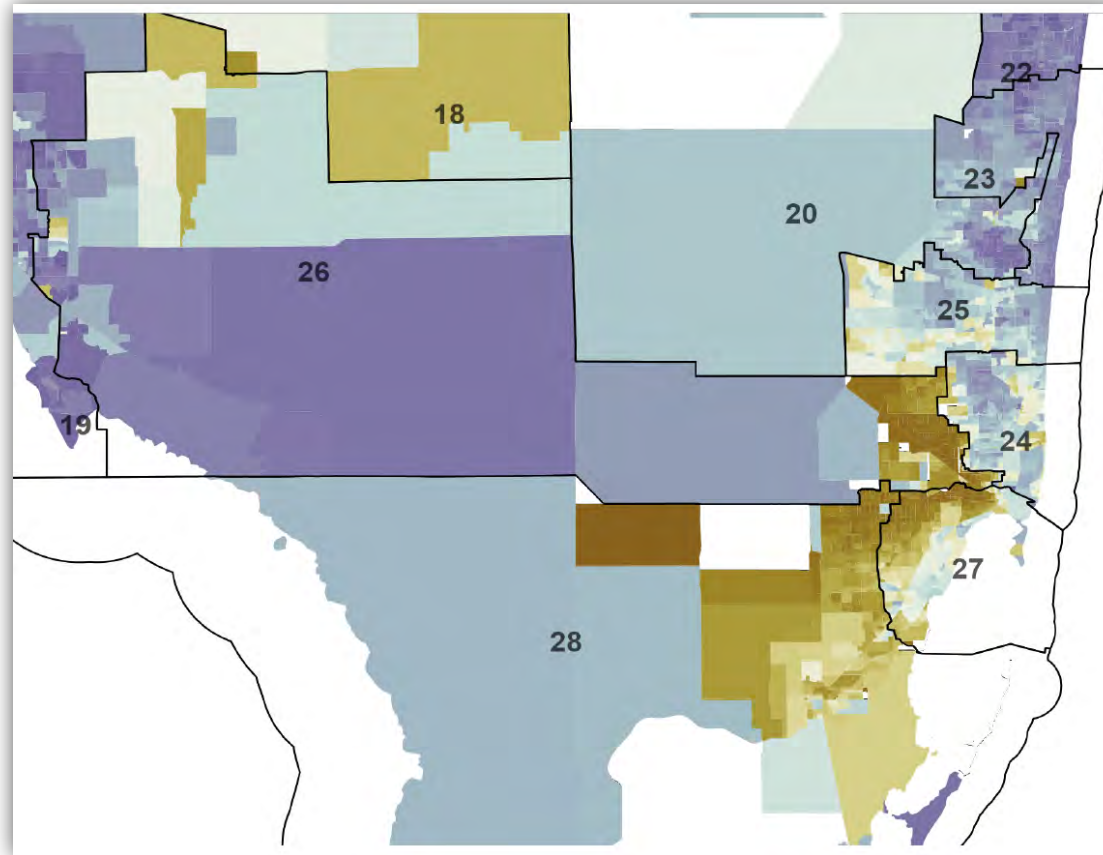
Investigation of Uniform HVAP Percentages in “Protected” Districts

1. Overall **regional demographics**
2. HVAP comparison between portions of **split counties** inside and outside CD 26
3. HVAP comparison between portions of **split cities and CDPs** inside and outside CD 26
4. HVAP comparison between **VTDs split or located along border** inside and outside CD 26

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Regional Demographics Do Not Explain Uniform Concentration of Hispanic Voters in “Protected” Districts



Opening Rep., Fig. 1

Regional Demographics Do Not Explain Uniform Concentration of Hispanic Voters in “Protected” Districts

Table C.1:

Different Combinations of Counties and Districts and Voting Age Population by Race

Region	WVAP	HVAP	BVAP
Enacted 26 and Adjacent Districts (18, 19, 20, 24, 25, 27, 28)	32.9%	45.6%	18.9%
Counties Including Enacted 26 (Miami-Dade, Collier)	19.9%	64.1%	14.9%
Counties Including Enacted 26 and Adjacent Counties (Miami-Dade, Collier, Lee, Hendry, Broward, Monroe)	32.4%	46.6%	18.1%
Districts Including Portions of Those Six Counties (17, 18, 19, 20, 23, 24, 25, 26, 27, 28)	40.4%	39.5%	16.9%

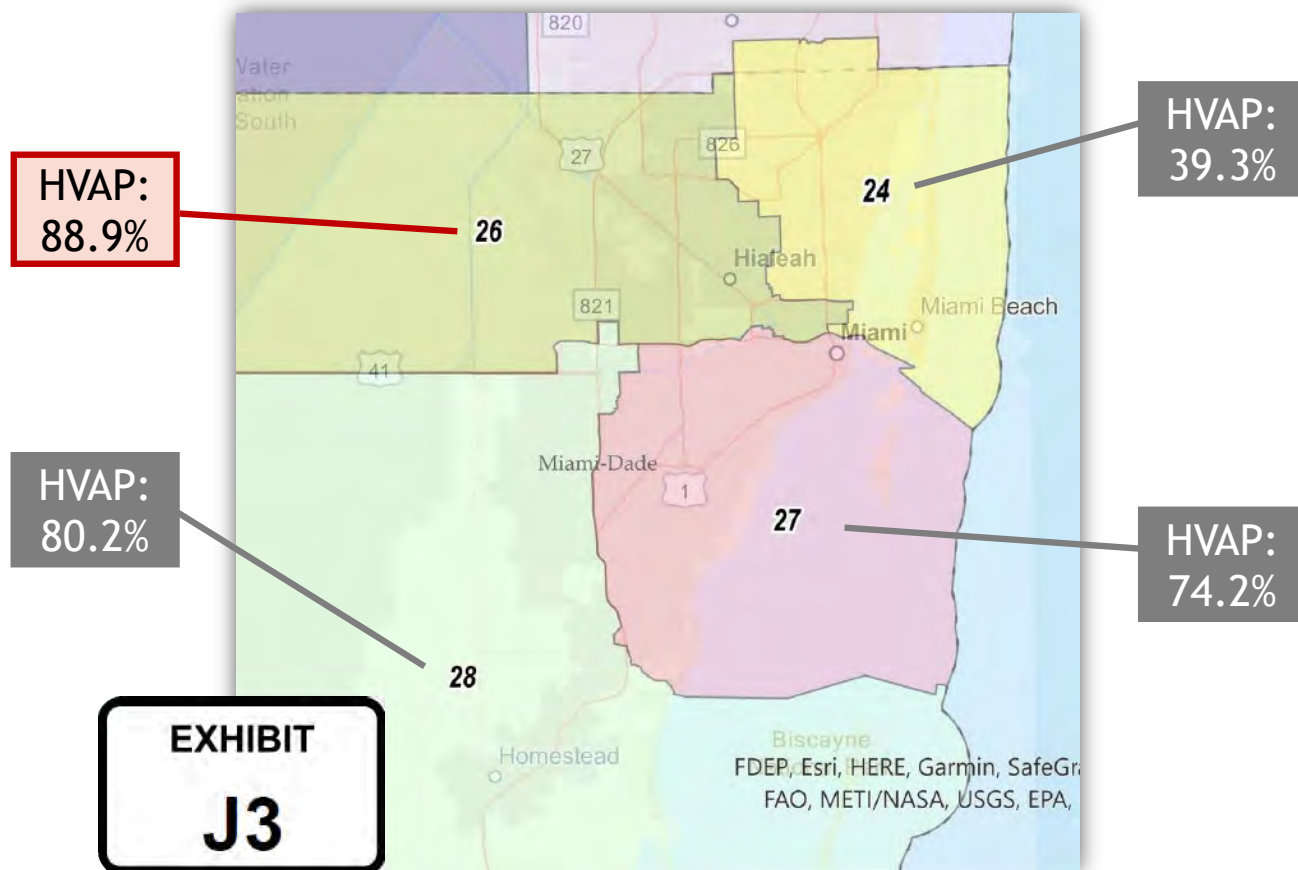


Rebuttal Rep., Table C.1

Investigation of Uniform HVAP Percentages in “Protected” Districts

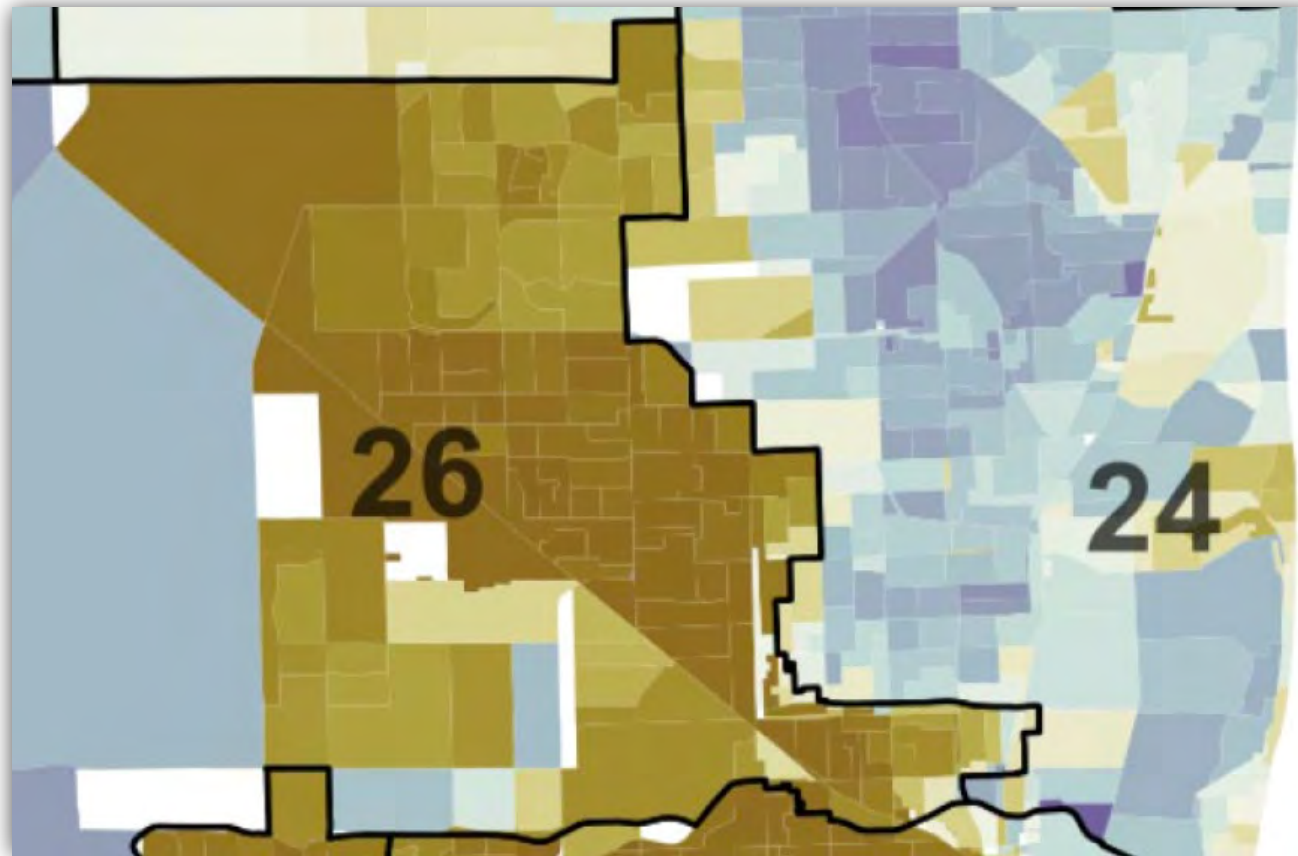
1. Overall regional demographics
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Hispanic Voters Distributed in CD 26: Miami-Dade County



Opening Rep., p. 11

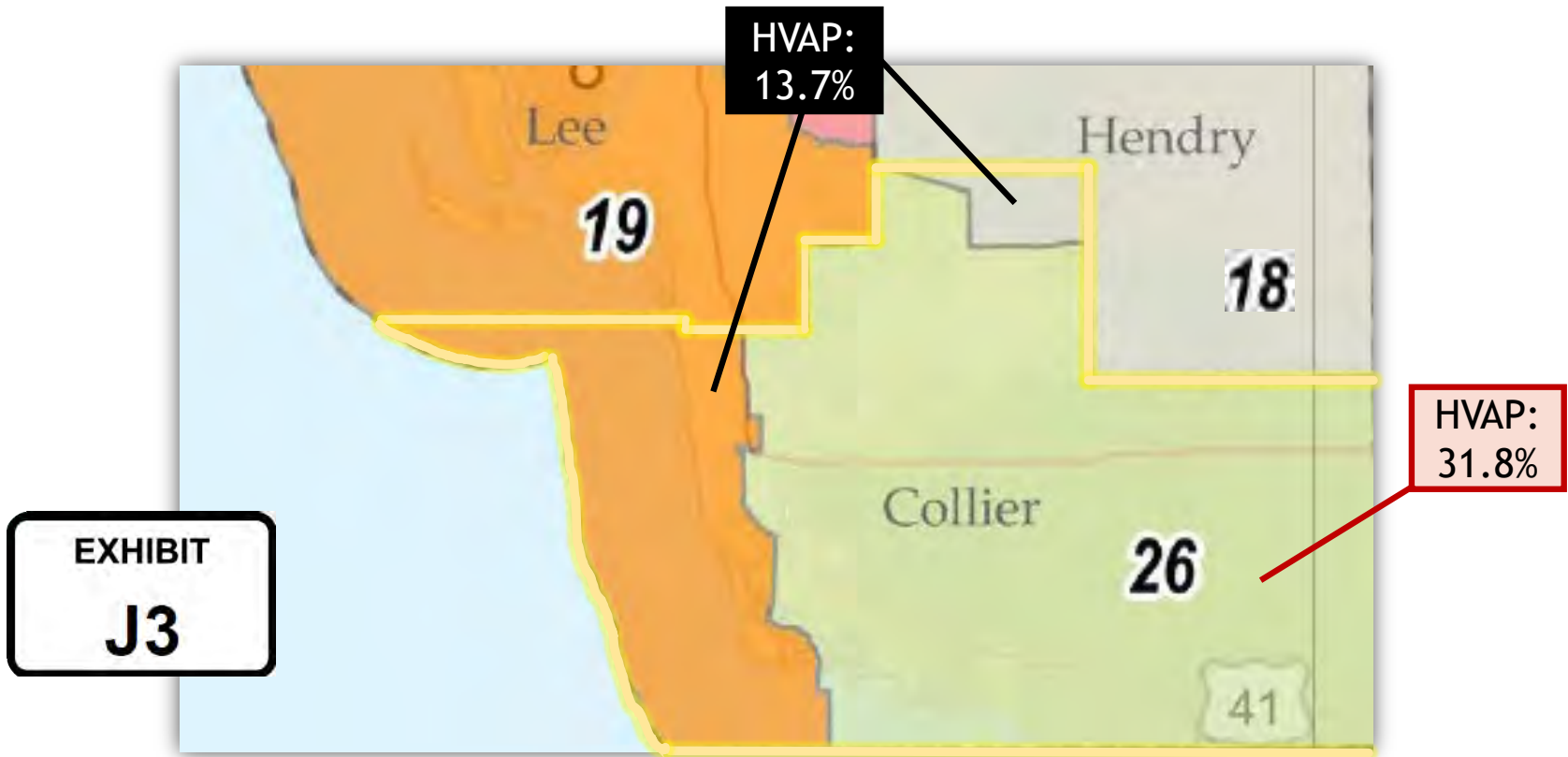
Hispanic Voters Distributed in CD 26: Miami-Dade County



PLAINTIFFS' TRIAL
EXHIBIT
P224
1:24-cv-21983-JB

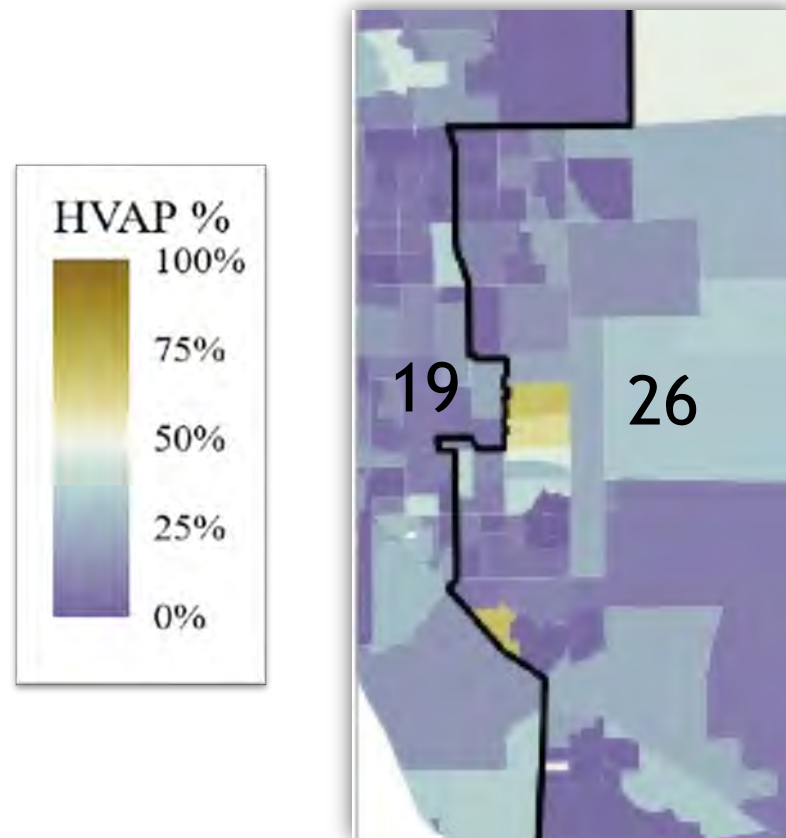
Opening Rep., Fig. 2

Hispanic Voters Distributed in CD 26: Collier County



Opening Rep., p. 11

Hispanic Voters Distributed in CD 26: CD 19 Border



Opening Rep., Fig. 1

Investigation of Uniform HVAP Percentages in “Protected” Districts

1. Overall regional demographics
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Hispanic Voters Distributed in CD 26: CDP / City Splits

Census Designated Place (CDP) / City	HVAP % - CD 26	Total VAP	HVAP % - Other District(s)	Total VAP
Miami (24/25/26)	79.6%	53,878	39.6%	69,609
Brownsville (24/26)	63.7%	1,914	43.6%	10,538
Gladeview (24/26)	92.5%	266	37.7%	10,573
West Little River (24/26)	83.3%	11,877	40.4%	15,535
Immokalee (18/26)	70.3%	13,169	84.6%	3,309

Opening Rep., p. 12

Investigation of Uniform HVAP Percentages in “Protected” Districts

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Hispanic Voters Distributed in CD 26: VTD Split Analysis

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

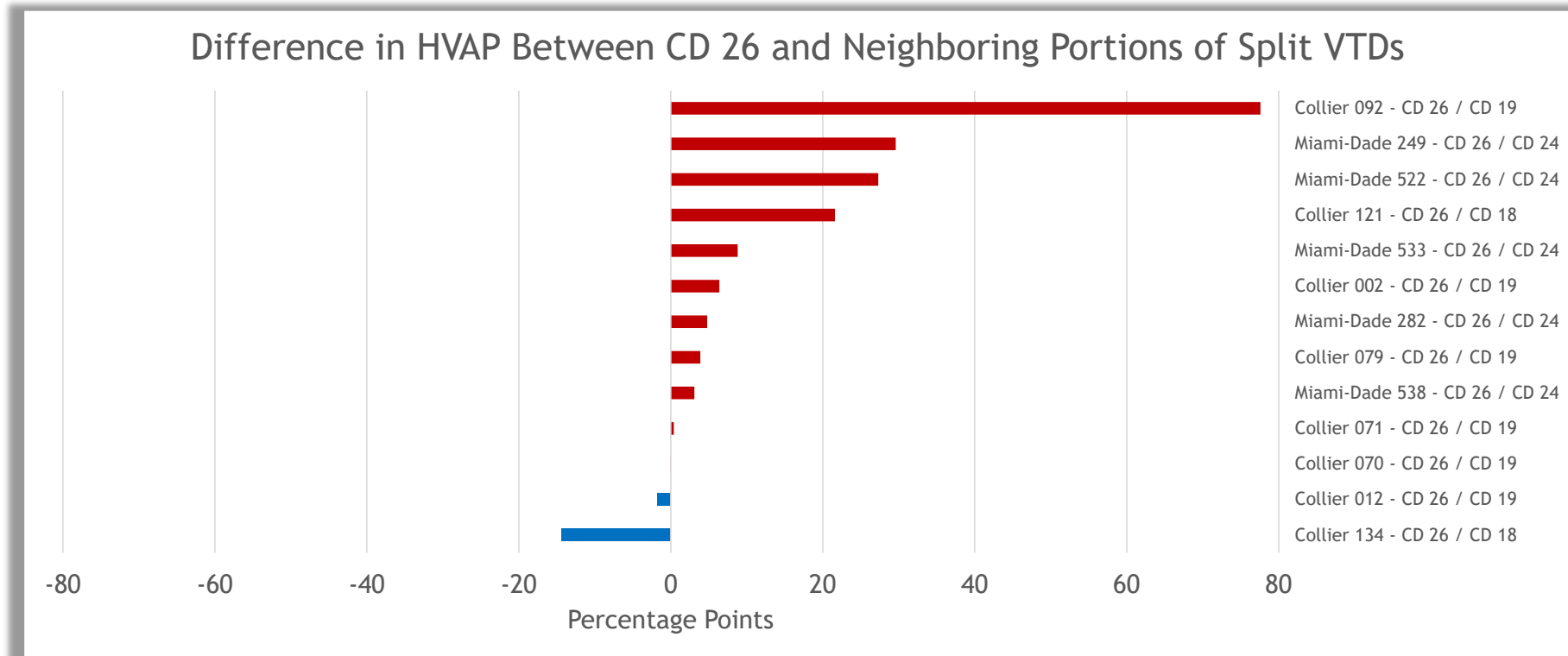
VTD	District 26 Split	Other District Split
Collier 121	70.3%	48.7% (18)
Collier 134	70.2%	84.6% (18)
Collier 070	23.3%	23.4% (19)
Collier 071	67.5%	67.1% (19)
Collier 079	11.6%	7.7% (19)
Collier 092	88.2%	10.6% (19)
Collier 002	12.7%	6.3% (19)
Collier 012	9.7%	11.5% (19)
Miami-Dade 533.0	33.6%	24.8% (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.



Opening Rep., Table 3

Hispanic Voters Distributed in CD 26: VTD Split Analysis



P170 (Opening Rep., Table 3)

Hispanic Voters Distributed in CD 26: VTD Neighbor Analysis

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

District 26 VTD	Neighboring VTD
Collier 120, 48.5%	Lee 19, 20.1% (19)
Collier 120, 48.5%	Lee 25, 5.6% (19)
Collier 118, 26.7%	Lee 25, 5.6% (19)
Collier 62, 17.6%	Lee 25, 5.6% (19)
Collier 139, 10.0%	Lee 25, 5.6% (19)
Collier 057, 5.1%	Lee 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, 90.5%	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)

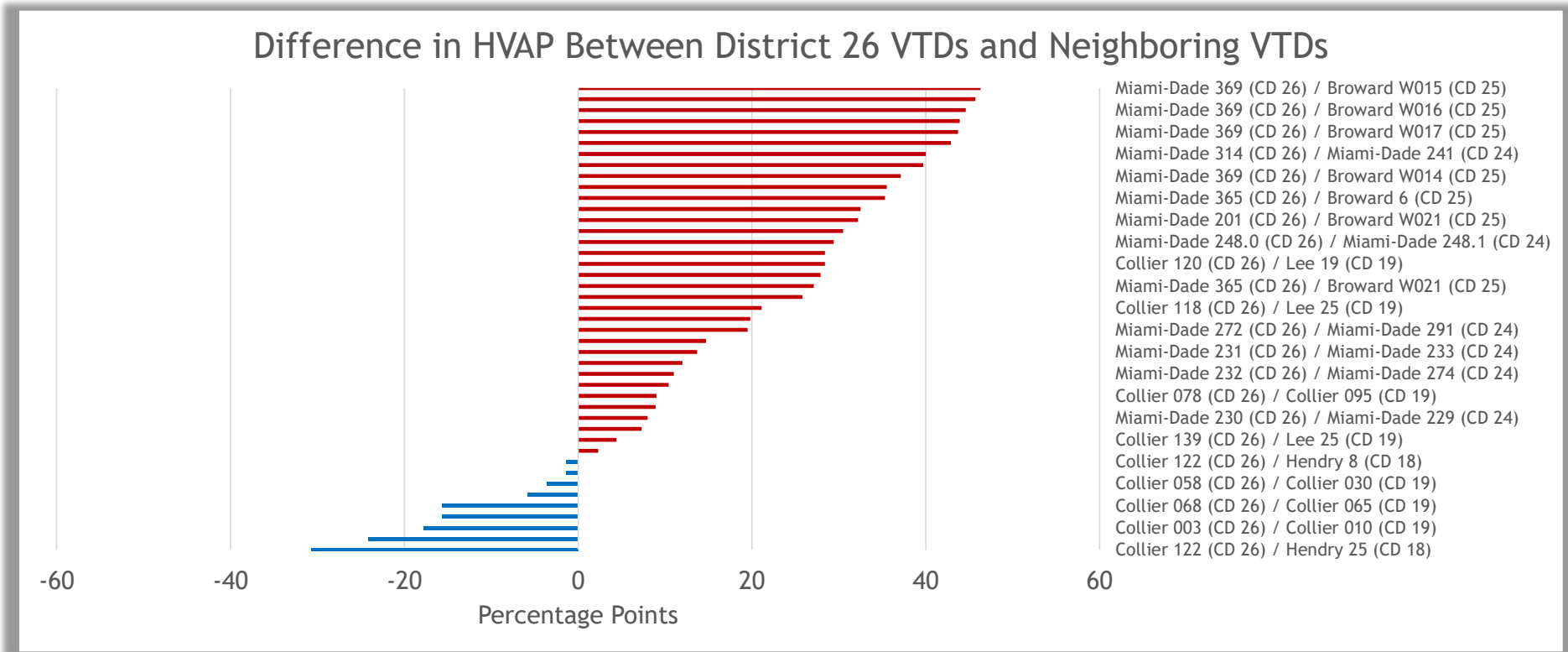
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Collier 064, 13.6%	Collier 038, 37.8% (19)



Errata, Corrected Table 4

Hispanic Voters Distributed in CD 26: VTD Neighbor Analysis



P171 (Errata, Corrected Table 4)

Alternative Explanations Do Not Explain Boundaries of CD 26

Political boundaries?

- Boundaries of CD 26 repeatedly split city/counties along racial lines

Geographic boundaries?

- Map could be drawn in *many* ways tracking “geographic boundaries,” with or without considering race



Dkt. No. 181 (Order Granting Judicial Notice of State Roads)

Alternative Map Configurations Exhibit More Variation in HVAP

Table C.2:

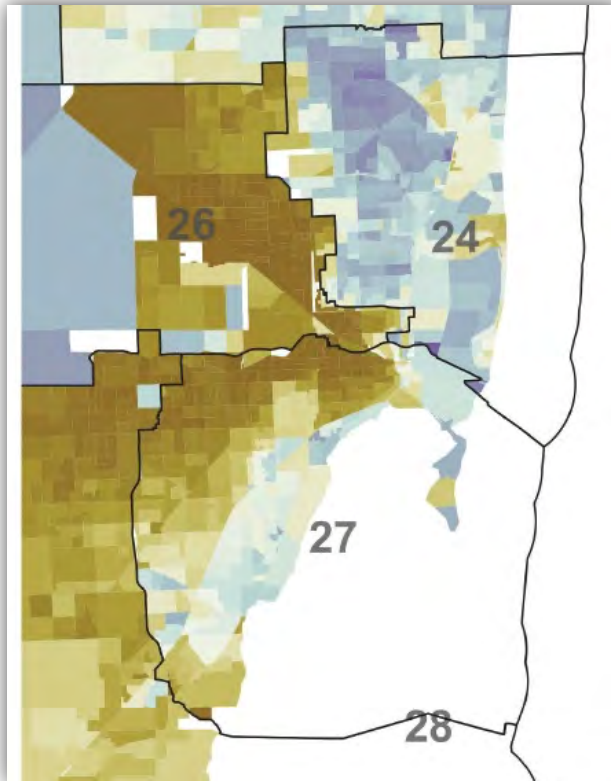
District Racial Compositions in South Florida in Enacted Map and Plaintiffs' Maps

District	Enacted HVAP	A	B1	B2	C1	C2	D
26	73.2%	91.08%	89.48%	71.56%	91.08%	91.08%	91.08%
27	74.2%	66.74%	64%	74.17%	66.74%	66.74%	66.74%
28	73.4%	64.97%	64.97%	73.12%	64.97%	64.97%	64.97%
18	23.7%	22.92%	21.69%	21.69%	19.66%	20.37%	22.81%
19	16.2%	23.33%	23.28%	23.28%	23.31%	23.31%	23.28%
20	23.0%	23.61%	23.45%	23.61%	24.28%	24.28%	24.28%
24	38.5%	40.32%	44.50%	44.70%	40.32%	40.32%	40.32%
25	42.3%	33.26%	33.56%	33.26%	33.51%	33.51%	33.51%
17	11.5%	12.71%	12.74%	12.74%	16.08%	15.33%	12.76%
23	20.5%	17.79%	17.95%	17.79%	14.98%	14.98%	14.98%

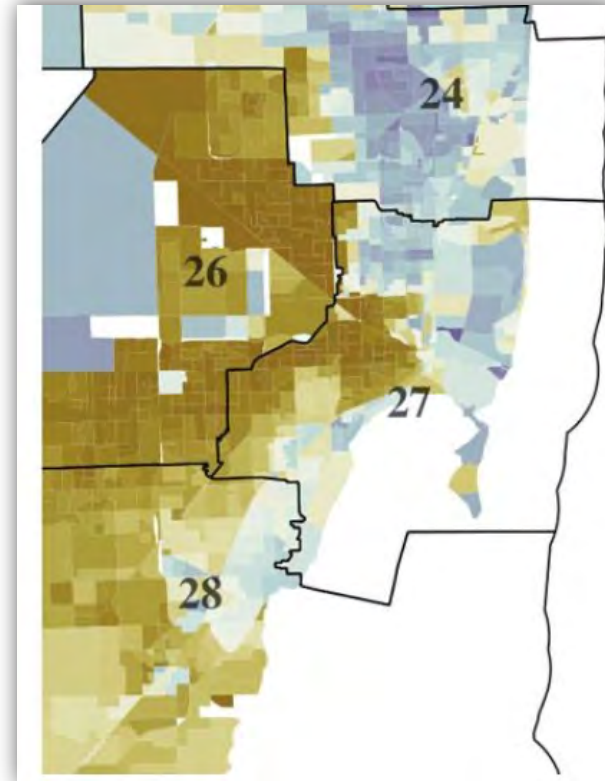


Rebuttal Rep., Table C.2

Alternative Map Configurations Exhibit More Variation in HVAP



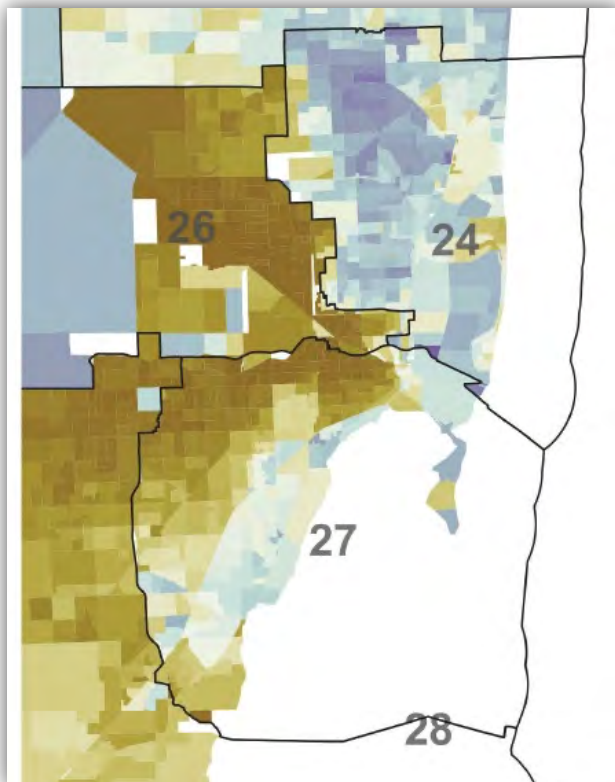
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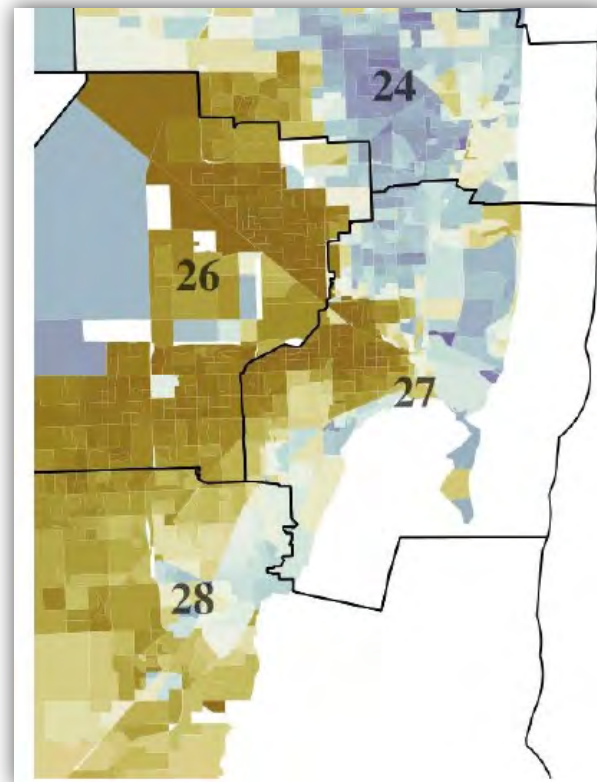
A, C1, C2, D

P224; HVAP2

Alternative Map Configurations Exhibit More Variation in HVAP



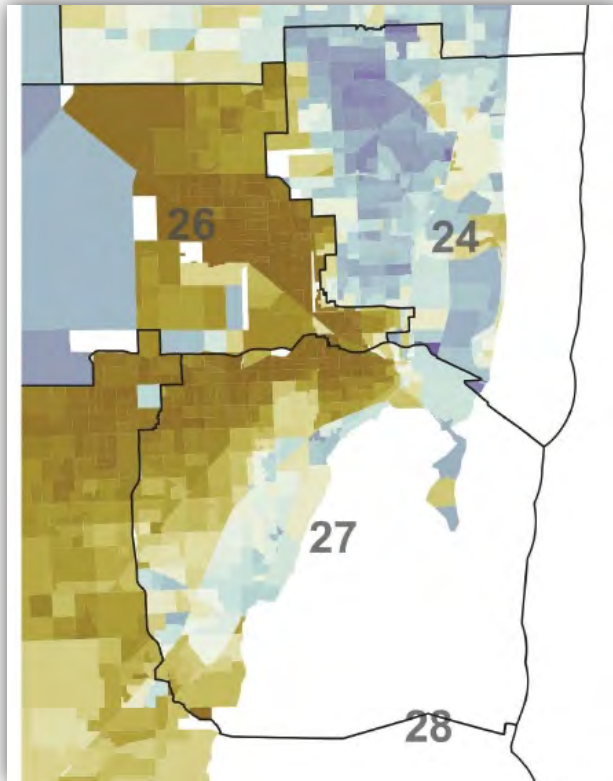
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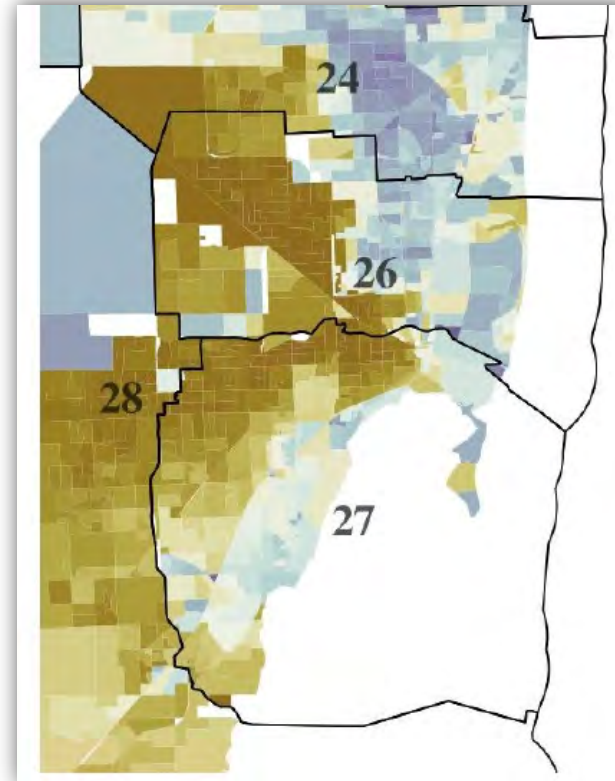
B1

P224; HVAP2

Alternative Map Configurations Exhibit More Variation in HVAP



Enacted



B2

P224; HVAP2

Summary of Expert Opinions

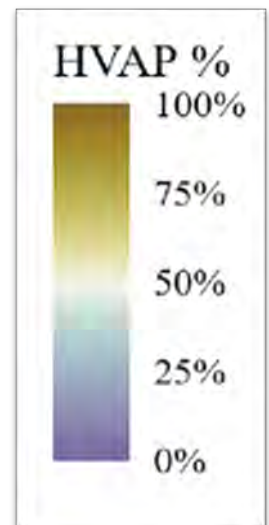
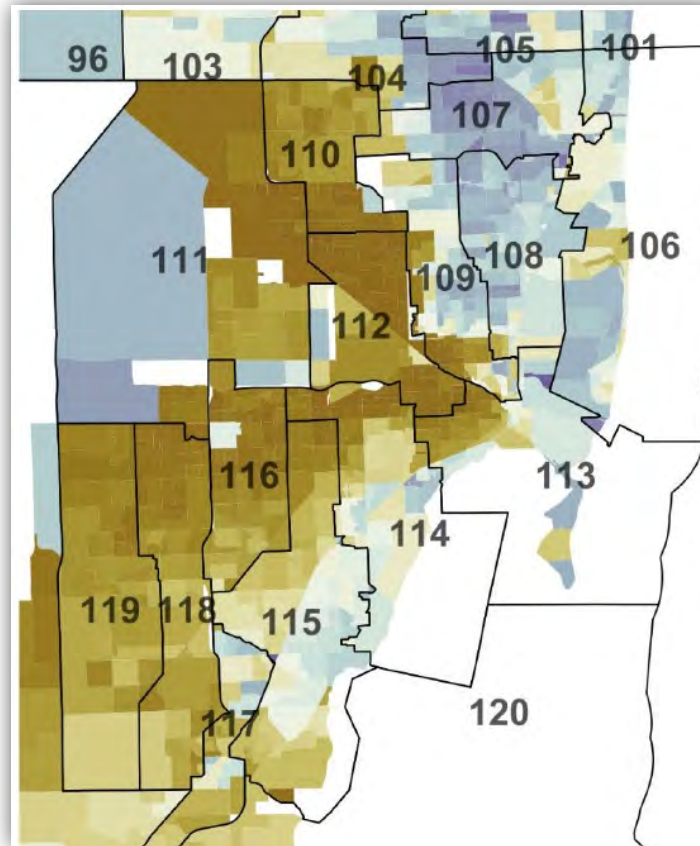
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Congressional District 26 divides the region along racial lines

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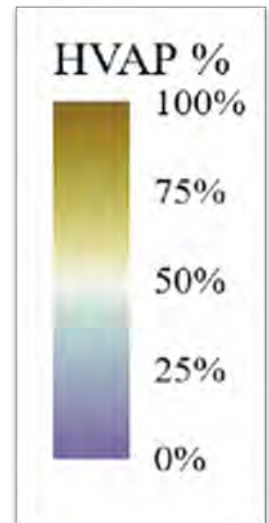
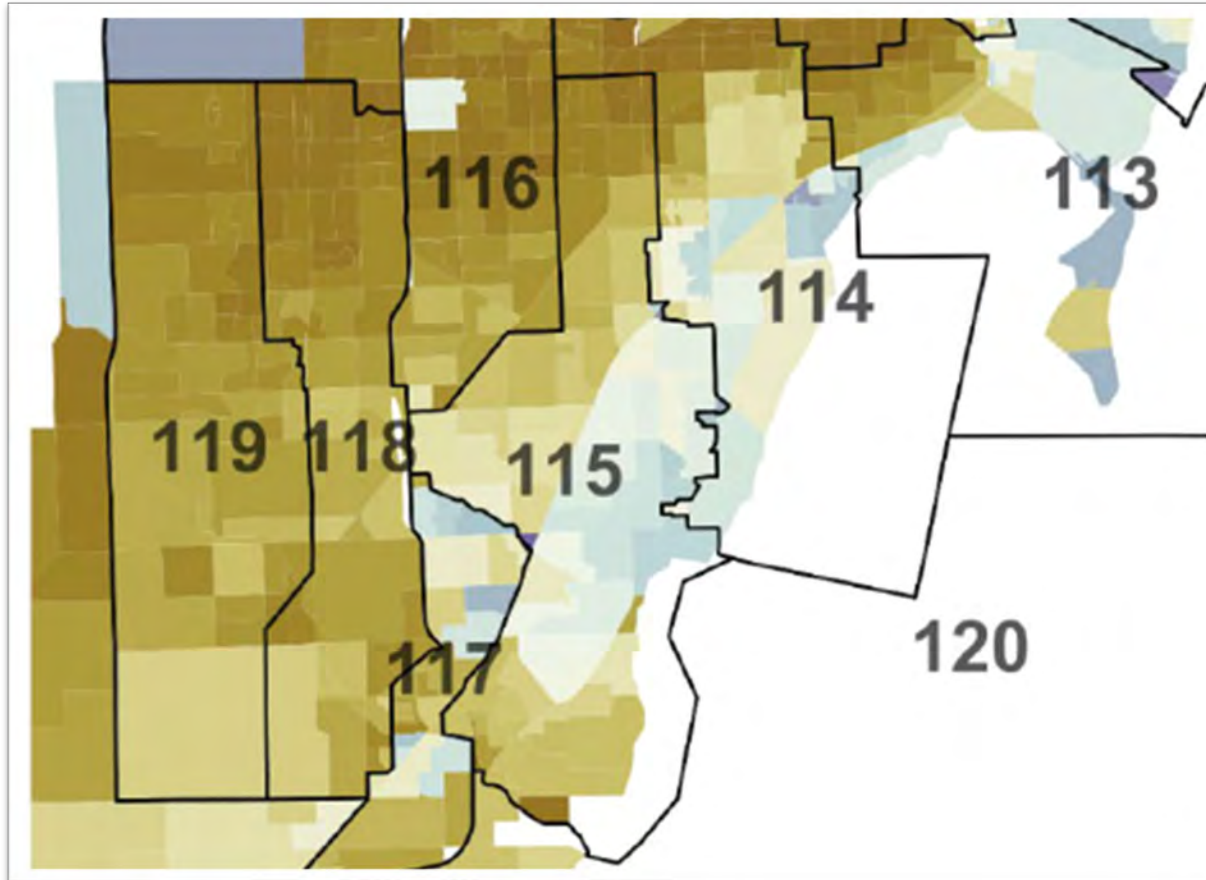
State House Districts 115, 118, & 119 each stretch into a high-HVAP band in Miami-Dade County

House Districts 115, 118, and 119 Each Stretch Into High-HVAP Band



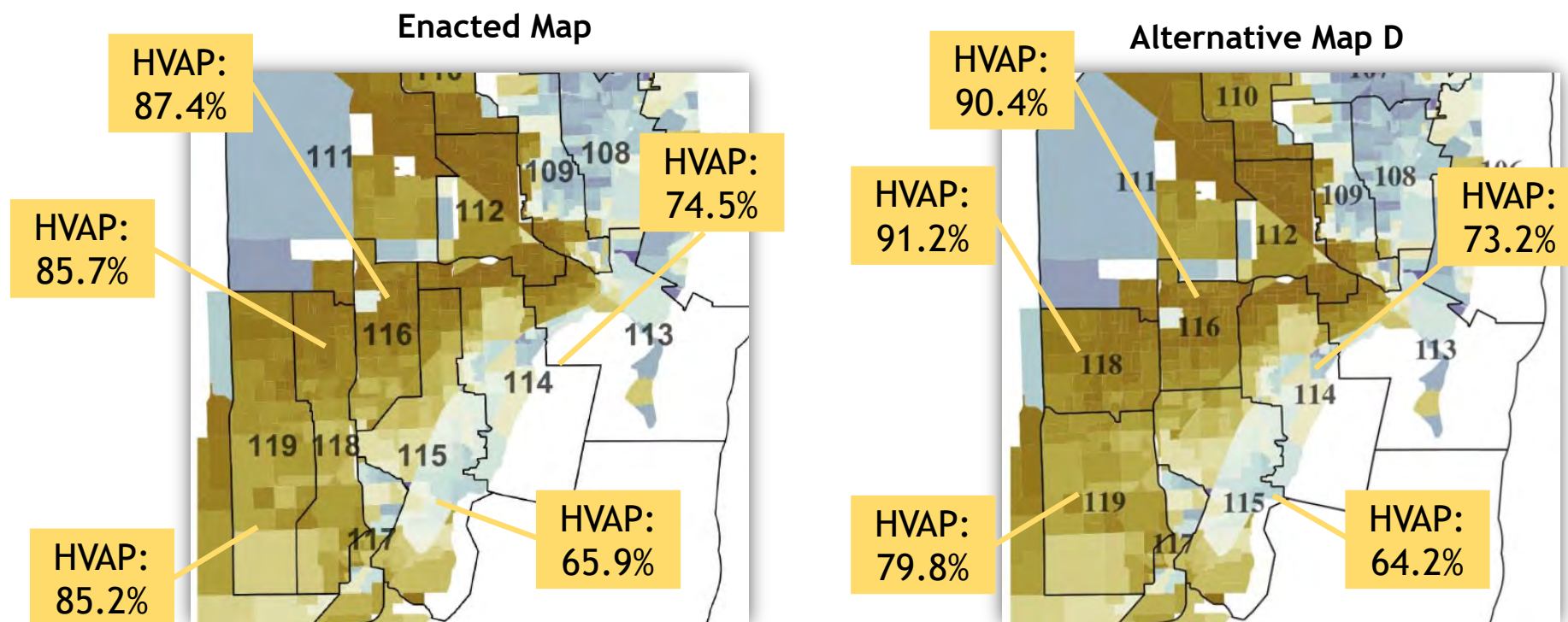
Opening Rep., Fig. 1

House Districts 115, 118, and 119 Each Stretch Into High-HVAP Band



Opening Rep., Fig. 1

Alternative Map Configurations Result in More Variation in HVAP



P225; P178 (Opening Rep., Table 8); P200 (Supp. Rep. Table 8-5); HVAP4

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