

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
CASE NO. 1:24-21983-CIVIL BECERRA/TORRES**

CUBANOS PA'LANTE, et al.,

Plaintiffs,

v.

FLORIDA HOUSE OF REPRESENTATIVES,
et al.,

Defendants.

THE SECRETARY'S AMENDED INITIAL DISCLOSURES

Under Federal Rule of Civil Procedure 26(a)(1), Defendant Secretary of State Cord Byrd amends his initial disclosures as follows:

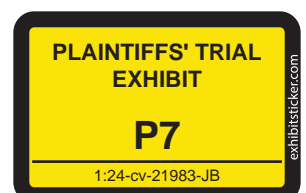
A. Individuals Likely to Have Discoverable Information

Florida Senate, 2022 Legislative Session:

Loranne Ausley
c/o Senate General Counsel's Office
302 The Capitol
404 South Monroe Street
Tallahassee, Florida 32399
(850) 487-5237
Subjects: knowledge of how the challenged districts were drawn and passed

Lori Berman
c/o Senate General Counsel's Office
302 The Capitol
404 South Monroe Street
Tallahassee, Florida 32399
(850) 487-5237
Subjects: knowledge of how the challenged districts were drawn and passed

Lauren Book
c/o Senate General Counsel's Office
302 The Capitol
404 South Monroe Street



Tallahassee, Florida 32399

(850) 487-5237

Subjects: knowledge of how the challenged districts were drawn and passed

Randolph Bracy

c/o Senate General Counsel's Office

302 The Capitol

404 South Monroe Street

Tallahassee, Florida 32399

(850) 487-5237

Subjects: knowledge of how the challenged districts were drawn and passed

Janet Cruz

c/o Senate General Counsel's Office

302 The Capitol

404 South Monroe Street

Tallahassee, Florida 32399

(850) 487-5237

Subjects: knowledge of how the challenged districts were drawn and passed

Hon. Gary M. Farmer, Jr.

c/o Senate General Counsel's Office

302 The Capitol

404 South Monroe Street

Tallahassee, Florida 32399

(850) 487-5237

Subjects: knowledge of how the challenged districts were drawn and passed

Audrey Gibson

c/o Senate General Counsel's Office

302 The Capitol

404 South Monroe Street

Tallahassee, Florida 32399

(850) 487-5237

Subjects: knowledge of how the challenged districts were drawn and passed

Shevrin D. Jones

c/o Senate General Counsel's Office

302 The Capitol

404 South Monroe Street

Tallahassee, Florida 32399

(850) 487-5237

Subjects: knowledge of how the challenged districts were drawn and passed

Rosalind Osgood
c/o Senate General Counsel's Office
302 The Capitol
404 South Monroe Street
Tallahassee, Florida 32399
(850) 487-5237
Subjects: knowledge of how the challenged districts were drawn and passed

Jason W. B. Pizzo
c/o Senate General Counsel's Office
302 The Capitol
404 South Monroe Street
Tallahassee, Florida 32399
(850) 487-5237
Subjects: knowledge of how the challenged districts were drawn and passed

Tina Scott Polsky
c/o Senate General Counsel's Office
302 The Capitol
404 South Monroe Street
Tallahassee, Florida 32399
(850) 487-5237
Subjects: knowledge of how the challenged districts were drawn and passed

Bobby Powell
c/o Senate General Counsel's Office
302 The Capitol
404 South Monroe Street
Tallahassee, Florida 32399
(850) 487-5237
Subjects: knowledge of how the challenged districts were drawn and passed

Darryl Ervin Rouson
c/o Senate General Counsel's Office
302 The Capitol
404 South Monroe Street
Tallahassee, Florida 32399
(850) 487-5237
Subjects: knowledge of how the challenged districts were drawn and passed

Linda Stewart
c/o Senate General Counsel's Office
302 The Capitol
404 South Monroe Street
Tallahassee, Florida 32399
(850) 487-5237

Subjects: knowledge of how the challenged districts were drawn and passed

Annette Taddeo
c/o Senate General Counsel's Office
302 The Capitol
404 South Monroe Street
Tallahassee, Florida 32399
(850) 487-5237

Subjects: knowledge of how the challenged districts were drawn and passed

Perry E. Thurston, Jr.
c/o Senate General Counsel's Office
302 The Capitol
404 South Monroe Street
Tallahassee, Florida 32399
(850) 487-5237

Subjects: knowledge of how the challenged districts were drawn and passed

Victor M. Torres, Jr.
c/o Senate General Counsel's Office
302 The Capitol
404 South Monroe Street
Tallahassee, Florida 32399
(850) 487-5237

Subjects: knowledge of how the challenged districts were drawn and passed

Florida House of Representatives, 2022 Legislative Session:

Ramon Alexander
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Kristen Aston Arrington
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Robin Bartleman
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550
Subjects: knowledge of how the challenged districts were drawn and passed

Christopher Benjamin
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550
Subjects: knowledge of how the challenged districts were drawn and passed

Kamia L. Brown
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550
Subjects: knowledge of how the challenged districts were drawn and passed

Dr. James Bush III
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550
Subjects: knowledge of how the challenged districts were drawn and passed

Daryl Campbell
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550
Subjects: knowledge of how the challenged districts were drawn and passed

Joe Casello
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Kevin D. Chambliss
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Dan Daley
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Tracie Davis
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Ben Diamond
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Fentrice Driskell
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Bobby B. DuBose
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550
Subjects: knowledge of how the challenged districts were drawn and passed

Nicholas X. Duran
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550
Subjects: knowledge of how the challenged districts were drawn and passed

Jervonte Edmonds
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550
Subjects: knowledge of how the challenged districts were drawn and passed

Anna V. Eskamani
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550
Subjects: knowledge of how the challenged districts were drawn and passed

Joseph Geller
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550
Subjects: knowledge of how the challenged districts were drawn and passed

Joy Goff-Marcil
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Michael Gottlieb
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Michael Grieco
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Omari Hardy
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Dianne Hart
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Yvonne Hayes Hinson
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Christine Hunschofsky
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Evan Jenne
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Dotie Joseph
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Andrew Learned
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Travaris L. McCurdy
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Daisy Morales
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Angela Nixon
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Anika Tene Omphroy
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Michele K. Rayner
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Felicia Simone Robinson
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Kelly Skidmore
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Emily Slosberg-King
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street

Tallahassee, Florida 32399

(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Carlos Guillermo Smith

c/o House General Counsel's Office

317 The Capitol

402 South Monroe Street

Tallahassee, Florida 32399

(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Allison Tant

c/o House General Counsel's Office

317 The Capitol

402 South Monroe Street

Tallahassee, Florida 32399

(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Geraldine F. Thompson

c/o House General Counsel's Office

317 The Capitol

402 South Monroe Street

Tallahassee, Florida 32399

(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Susan L. Valdés

c/o House General Counsel's Office

317 The Capitol

402 South Monroe Street

Tallahassee, Florida 32399

(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Patricia H. Williams

c/o House General Counsel's Office

317 The Capitol

402 South Monroe Street

Tallahassee, Florida 32399

(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Marie Paule Woodson
c/o House General Counsel's Office
317 The Capitol
402 South Monroe Street
Tallahassee, Florida 32399
(850) 717-5550

Subjects: knowledge of how the challenged districts were drawn and passed

Supervisors of Elections:

Melissa Blazier
Collier County
3750 Enterprise Avenue
Naples, Florida 34104
(239) 252-8683

Subjects: feasibility of implementing any remedial plan

Joyce Griffin
Monroe County
5200 College Road
Key West, Florida 33040
(305) 292-3406

Subjects: feasibility of implementing any remedial plan

Christina White
Miami-Dade County
2700 NW 87th Avenue
Miami, Florida 33172
P.O. Box 521550
Miami, Florida 33152
(305) 499-8683

Other Individuals:

Nicholas Warren
ACLU Foundation of Florida
1809 Art Museum Drive, Suite 203
Jacksonville, Florida 32207

(786) 363-1769

Subjects: knowledge of how the challenged districts, and any alternative districts, were drawn

Matthew Isbell
c/o Richard Junnier
113 South Monroe Street
Tallahassee, Florida 23201
(850) 201-7141

Subjects: knowledge of how the challenged districts, and any alternative districts, were drawn, and knowledge of redistricting statistics, software, and analysis

Christian Ulvert
1742 West Flagler Street
Miami, Florida 33135
(786) 762-4990

Subjects: knowledge of how the challenged districts, and any alternative districts, were drawn

Natalie Kato
2051 Country Club Drive
Tallahassee, Florida 32301

Subjects: knowledge of how the challenged districts, and any alternative districts, were drawn

B. Discoverable Documents

All discoverable information is available at:

- <https://www.floridaredistricting.gov/>
- <https://www.flsenate.gov/>
- <https://www.myfloridahouse.gov/>
- House Vote on CS/SJR 100:
https://www.flsenate.gov/Session/Bill/2022/100/Vote/HouseVote_s00100c1487.PDF
- Senate Vote on CS/SJR 100:
https://www.flsenate.gov/Session/Bill/2022/100/Vote/SenateVote_s00100c1002.PDF
- Voting History on CS/SJR 100:
<https://www.flsenate.gov/Session/Bill/2022/100/?Tab=VoteHistory>

C. Damages

Plaintiffs seek reasonable attorneys' fees and costs as provided by law.

D. Insurance Agreements

Not applicable.

E. Reservation of the Right to Supplement

The Secretary reserves the right to supplement these initial disclosures as discovery progresses. The Secretary also reserves the right to call and cross-examine any witnesses listed by any other party as any additional witnesses necessary for rebuttal or impeachment purposes.

October 10, 2024

Bradley R. McVay (FBN 79034)
brad.mcvay@dos.myflorida.com
Joseph S. Van de Bogart (FBN 84764)
joseph.vandebogart@dos.myflorida.com
Ashley Davis (FBN 48032)
ashley.davis@dos.myflorida.com
FLORIDA DEPARTMENT OF STATE
R.A. Gray Building
500 S. Bronough St.
Tallahassee, FL 32399
(850) 245-6536

Respectfully submitted,

/s/ Mohammad O. Jazil
Mohammad O. Jazil (FBN 72556)
mjazil@holtzmanvogel.com
Michael Beato (FBN 1017715)
mbeato@holtzmanvogel.com
zbennington@holtzmanvogel.com
HOLTZMAN VOGEL BARAN
TORCHINSKY & JOSEFIK PLLC
119 S. Monroe St. Suite 500
Tallahassee, FL 32301
(850) 270-5938

Counsel for the Secretary

CERTIFICATE OF SERVICE

I certify that on October 10, 2024, I electronically sent the foregoing to all counsel of record.

/s/ Mohammad O. Jazil
Mohammad O. Jazil.