

# EXHIBIT 23

**In the Matter Of:**  
**HODGES vs PASSIDOMO**

8:24-cv-879

---

**MEIKO SEYMOUR**

*November 26, 2024*

---



**ESQUIRE**  
DEPOSITION SOLUTIONS

800.211.DEPO (3376)  
EsquireSolutions.com

MEIKO SEYMOUR  
HODGES vs PASSIDOMO

November 26, 2024

1

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

KETO NORD HODGES, et al.,

Plaintiffs,

v.

Case No.: 8:24-cv-879

KATHLEEN PASSIDOMO, et al.,

Defendants.

\_\_\_\_\_/

VIDEOCONFERENCE DEPOSITION OF MEIKO SEYMOUR

TAKEN ON BEHALF OF THE DEFENDANT

DATE TAKEN: November 26, 2024

TIME: 10:14 a.m. - 11:45 a.m.

LOCATION: Via Zoom Videoconference

Examination of the witness taken before:

Wendy E. Rivera, FPR

MEIKO SEYMOUR  
HODGES vs PASSIDOMO

November 26, 2024

2

APPEARANCES OF COUNSEL  
(Via Videoconference)

On behalf of the Plaintiffs:

NAOMI ROBERTSON, ESQUIRE  
and  
JAMES M. SHAW, JR., ESQUIRE  
Butler Weihmuller Katz Craig, LLP  
400 North Ashley Drive  
Suite 2300  
Tampa, Florida 33602  
P. (813) 281-1900  
Nrobertson@butler.legal  
jshaw@butler.legal

On behalf of the Defendants:

DENISE M. HARLE, ESQUIRE  
and  
LEILA S. OBERSCHALL, ESQUIRE  
Shutts & Bowen, LLP  
215 South Monroe Street  
Suite 804  
Tallahassee, Florida 32301  
P. (850) 241-1717  
Tprice@shutts.com

Also Present:

MONIQUA BUMOSKEY

MEIKO SEYMOUR  
HODGES vs PASSIDOMO

November 26, 2024

26

1 whether in District 16 or 18 on the map you're  
2 challenging that you believe is problematic?

3 A. Well, the -- the majority of the city's black  
4 residents tend to live in that shaded area in the map --  
5 on the map in front of me, tend to live on the south end  
6 of the city. More majority culture, more majority races  
7 live on the north and west end of the city, so it seems  
8 to me the shaded area seems to encompass the  
9 historically black neighborhoods of St. Pete in that  
10 shaded area.

11 Q. All right. Let's look up at paragraph 6 and 7  
12 of the complaint. Okay. I'll give you time to read  
13 that. The gist here of your allegations in paragraph 6,  
14 you say, quote, in developing the challenged districts,  
15 the legislature elevated race above all other  
16 considerations. And then paragraph 7, you say, quote,  
17 legislators and their staff purportedly drew these  
18 districts in a race predominant manner to avoid the  
19 diminishment of black voters' ability to elect  
20 representatives of their choice in District 16.

21 So based on those allegations, my first  
22 question is, what facts do you have that -- or what  
23 facts do you have related to the racial motivations of  
24 the legislature in drawing the challenged district  
25 lines?

MEIKO SEYMOUR  
HODGES vs PASSIDOMO

November 26, 2024

27

1 MS. ROBERTSON: Object to form.

2 THE WITNESS: Other than it's pretty obvious  
3 that those -- the boundary lines on the St. Pete  
4 side encompasses almost all of the historically  
5 black neighborhoods, I have no facts.

6 BY MS. HARLE:

7 Q. Is there a certain percentage of black voting  
8 age population that you think should be in your  
9 distinct, 16?

10 A. I'm not sure.

11 Q. Do you know the correct percentage of black  
12 voting age population in your district?

13 A. I do not.

14 Q. Are you familiar with the history of the  
15 district boundaries for Hillsborough and Pinellas?

16 A. I am not.

17 Q. Are you aware that the communities that are  
18 combined into District 16 in the map you're challenging  
19 have been part of the same district since the early  
20 1990s?

21 A. I'm not fully aware of that, but just because  
22 it was something done in previous years doesn't mean  
23 that it's right or fair or just.

24 Q. As -- I believe based on your pleadings, you  
25 identify as a black voter; is that right?

MEIKO SEYMOUR  
HODGES vs PASSIDOMO

November 26, 2024

38

1 community?

2 A. St. Pete.

3 Q. And where you allege there that the plan  
4 groups your community with dissimilar ones because of  
5 race, what is the dissimilar community you're referring  
6 to?

7 A. Tampa.

8 Q. Do you know --

9 A. Or --

10 Q. I'm sorry?

11 MS. ROBERTSON: He was going to say something.

12 MS. HARLE: Oh.

13 THE WITNESS: Or other neighborhoods in 16  
14 that's across -- across the bay.

15 BY MS. HARLE:

16 Q. Do you know if the part of 16 across the bay  
17 has a significant number of black residents?

18 A. I'm unsure.

19 Q. Okay. Looking at paragraph 97, this is where  
20 you refer to, quote, the direct evidence of racial  
21 predominance. So I just want to make sure I'm giving  
22 you every opportunity just to share on this point. I  
23 know -- I apologize if it sounds redundant, but what  
24 direct evidence do you have that race predominates the  
25 drawing of the lines of 16 and 18?

MEIKO SEYMOUR  
HODGES vs PASSIDOMO

November 26, 2024

39

1           A.     Again, other than what is obvious on the map  
2     and through -- yeah, what's on the map, I am not  
3     bringing any other sort of evidence.

4           Q.     And so I mean, correct me if I'm wrong, but is  
5     -- is your testimony that you have a general  
6     understanding or belief that the residents of south  
7     St. Pete are predominantly black?

8           A.     Can you repeat the question?

9           Q.     Yes. Is it your understanding or belief that  
10    the residents of south St. Pete that are in District 16  
11    are predominantly black?

12          A.     Yes.

13          Q.     Have you ever looked at the demographic  
14    distribution across all of St. Pete in terms of race?

15          A.     I can't recall.

16          Q.     Let's scroll up to paragraph 95. This was  
17    where you allege, quote, these race-based decisions  
18    resulted in a map that splits neighborhoods and ignores  
19    traditional redistricting criteria.

20                 What do you believe to be appropriate criteria  
21    for the legislature to use when its doing redistricting?

22          A.     Well, I'm not an expert on this stuff;  
23    however, something like a natural border such as Tampa  
24    Bay should definitely be taken into consideration. I  
25    think there may be others, but I can't think of them