

JENNIFER GARCIA
HODGES V. PASSIDOMO

November 20, 2024

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

KETO NORD HODGES, ET AL.,)
)
 Plaintiffs,) CASE NO.
) 8:24-cv-879
 vs.)
)
 KATHLEEN PASSIDOMO, ET AL.,)
)
 Defendants.)
)

VIDEOCONFERENCE DEPOSITION OF
JENNIFER GARCIA

November 20, 2024

3:34 p.m.

Saint Petersburg, Florida

Jake Coppola
Digital Reporter
Commission No. HH 240208



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1 THE REPORTER: All right. We're now on the
2 record at 3:34 p.m. on November 20th, 2024, to take the
3 deposition of Jennifer Garcia, in the case of Keto Nord
4 Hodges, et al., versus Kathleen Passidomo, et al. My
5 name is Eric Stumpf, notary public and digital reporter
6 for Esquire Deposition Solutions in the state of
7 Florida. Pursuant to the general laws of the state of
8 Florida, I'll be capturing the verbatim record of
9 today's proceeding using electronic audio equipment, a
10 computer, and specialized recording software which is
11 not a form of stenography.

12 The witness is currently located in St.
13 Petersburg, Florida, and has confirmed their identity
14 with a Florida driver's license.

15 Could Counsel please identify yourself for the
16 record and state who you represent.

17 MR. WARREN: Nicholas Warren with the ACLU of
18 Florida representing the plaintiffs, including Ms.
19 Garcia. And we will object to the manner of taking the
20 deposition as different than the manner specified in the
21 Notice.

22 MR. SHAW: James Michael Shaw, Jr., Butler
23 Weihmuller Katz Craig, for the plaintiffs. And I -- I'm
24 sorry. And with me as my associate, Naomi Robertson.
25 Observing is Zeina Hasbini.

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1 MS. HARLE: And Denise Harle of Shutts & Bowen
2 on behalf of Senate President Ben Albritton in his
3 official capacity as the President of the Florida
4 Senate. With me is my associate, Leila Oberschall.

5 THE REPORTER: Perfect. Thank you. I think
6 that's everyone.

7 And absent any objection at this point,
8 Counsel and the Witness agree to my remote
9 administration of the oath and that the final transcript
10 may be used for all purposes allowed by the general laws
11 of the state of Florida.

12 MR. WARREN: Yes.

13 THE WITNESS: Yes.

14 THE REPORTER: And, Counsel, are we okay to
15 move forward if -- if they're objecting?

16 MS. HARLE: Yes.

17 THE REPORTER: All right. Thank you.

18 And, Ms. Garcia, could you please raise your
19 right hand?

20 JENNIFER GARCIA,
21 having first been duly sworn, testified as follows:

22 THE REPORTER: All right. You may proceed,
23 Counsel.

24 DIRECT EXAMINATION

25 BY MS. HARLE:

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1 Q. Good afternoon, Ms. Garcia.

2 A. Hi.

3 Q. My name is Denise Harle, I will be taking your
4 deposition today. Could you please just state and spell
5 your name for the record?

6 A. Yes, my name is Jennifer Garcia. That's
7 spelled, J-E-N-N-I-F-E-R, G-A-R-C-I-A.

8 Q. And do you understand that you are being
9 deposed today under oath, under penalty of perjury?

10 A. Yes.

11 Q. Have you ever been de before?

12 A. No.

13 Q. Okay. I see your attorney is there with you.
14 Is there anyone else in the room with you?

15 A. No.

16 Q. Okay. Do you have any other programs open on
17 your computer besides Zoom?

18 A. No.

19 Q. Okay. Do you have your cell phone nearby?

20 A. Yes.

21 Q. I would just ask you not to communicate or --
22 or receive any communications during this deposition on
23 your cell phone; is that okay?

24 A. Yes.

25 Q. -- or receive any communication. Is there

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1 anything preventing you from giving your best truthful
2 testimony today? For example, a medical condition or
3 have you taken any medication or other drugs?

4 A. No.

5 Q. I'm going to just go over some ground rules
6 for depositions. So it sounds like this is your first
7 time. And I -- I will at the end just ask you if you
8 have any questions about them or if you are okay with
9 the rules; is that okay?

10 A. Yes.

11 Q. Great. So because this deposition is being
12 transcribed by our court reporter, I need to make sure
13 that you give verbal responses for the record. Things
14 like nods and uh-huhs do not translate very well. We
15 also need to be careful not to interrupt or to talk over
16 one another, if possible. And if you do answer a
17 question, we will assume that you understood the
18 question. So if I ask you something that's confusing or
19 unclear, please just ask me to clarify because once you
20 give the answer, we will assume you knew what was being
21 asked. Also, you don't need to guess at anything today.
22 However, I am entitled to your best estimate if there is
23 a question that you can give a rough estimate to. Do
24 you understand the difference between a guess and an
25 estimate?

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1 A. Yes.

2 Q. Okay. If at any point seeing a document would
3 refresh your recollection, just let me know and we'll do
4 our best to get it in front of you. As I may be
5 introducing exhibits later on, what -- what I'll plan to
6 do is ask Leila to share her screen with you. But if
7 for some reason that's not workable, we can either drop
8 a PDF in the chat or do something else that you'll have
9 access to what you need.

10 Please be sure to give complete answers to the
11 question. Also, please answer the question even if your
12 attorney objects. Unless your attorney instructs you
13 not to answer, you do need to answer the whole question.
14 And I think that's the list -- the -- it's the list of
15 my standard ground rules. Does that all make sense to
16 you?

17 A. Yes.

18 Q. Okay. Great. Will you please state your
19 address -- your current address?

20 A. My current address is 3680 46th Avenue South,
21 Unit 219, St. Petersburg, Florida 33711.

22 Q. And when did you move there?

23 A. In March of 2023.

24 Q. Is that an apartment?

25 A. Yes.

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1 Q. And do you own it or do you rent?

2 A. Rent.

3 Q. What was your most recent prior address?

4 A. My most recent prior address was 2317 37th
5 Street South, St. Pete, Florida 33711.

6 Q. And do you remember what month and year you
7 moved there?

8 A. I believe it was November 2018.

9 Q. Is there any chance you're aware of that you
10 might be moving in the next year or two?

11 A. Possibly in two years, but I'm not sure.

12 Q. And where would you be going in two years?

13 A. I'm not sure where I would go in two years.

14 Q. Okay. And what makes you think you might move
15 in two years?

16 A. Just because I would want to or because that
17 would be a decision that I would make for my family.

18 Q. But nothing currently that you're considering
19 in terms of moving?

20 A. No.

21 Q. Who is your current employer?

22 A. My current employer is Common Cause.

23 Q. And what is Common Cause?

24 A. Common Cause is a nonprofit democracy
25 organization.

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1 Q. What do you do there?

2 A. I am the regional communication strategist for
3 the south.

4 Q. How long have you worked at Common Cause?

5 A. Since January of 2024.

6 Q. And before that who was your employer?

7 A. The ACLU of Florida.

8 Q. And what did you do at the ACLU of Florida?

9 A. The ACLU of Florida I was the media strategist
10 there.

11 Q. And when you worked at the ACLU of Florida,
12 did you know your current attorneys in this lawsuit, Mr.
13 Warren and Mr. Tillian (phonetic)? I -- I don't have a
14 whole list, but did you know your current attorneys when
15 you were working at the ACLU of Florida?

16 A. I did.

17 Q. And did you work -- did you work with your
18 current attorneys when you were working at ACLU of
19 Florida?

20 A. I did.

21 Q. What's your educational background?

22 A. Can you be more specific?

23 Q. Oh, sure. Can you tell me about your -- just
24 tell me about your education since high school?

25 A. After high school I went to the University of

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1 South Florida St. Petersburg for my bachelor's degree.

2 Q. Did you receive your bachelor's?

3 A. Yes.

4 Q. In what major?

5 A. Journalism and media studies.

6 Q. Did you do any advanced degrees or
7 certificates after your bachelor's?

8 A. No.

9 Q. Was there anything else that comes to mind
10 when I ask about your educational backgrounds?

11 A. Nothing else comes to mind.

12 Q. Okay. Have you worked for a political
13 organization?

14 A. Can you define what a political organization
15 would constitute as?

16 Q. Yeah, I guess what -- do you consider a Common
17 Cause a political organization?

18 A. They're a nonpartisan organization, but they
19 do work in politics.

20 Q. Okay. Do you consider Common Cause a civil
21 rights organization?

22 A. I would consider them more of a voting rights
23 organization.

24 Q. Well, my next question, so thank you. How did
25 you get connected to Common Cause?

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1 A. I applied for their job -- their listing. I
2 knew of their listing online.

3 Q. Had you heard of Common Cause before finding
4 their job opening?

5 A. Yes.

6 Q. Had you done any collaboration or crossover
7 work with Common Cause when you were at the ACLU of
8 Florida?

9 A. I believe so, but I can't recollect when. I
10 know that there's been times that there -- there would
11 be moments of that nature, yes.

12 Q. At the ACLU of Florida, did any of your work
13 involve voting rights?

14 A. Yes.

15 Q. And besides Common Cause and ACLU of Florida,
16 have you worked at any other voting rights
17 organizations?

18 A. No.

19 Q. Have you volunteered in any capacity on voting
20 rights issues?

21 A. Yes.

22 Q. Can you tell me about that?

23 A. Excuse me. Can you be more specific with your
24 question?

25 Q. Sure. Just -- just tell me about any work

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1 that you've done in a volunteer capacity on the issue of
2 voting rights?

3 A. I've worked with several voting rights voting.
4 I'm not sure if you'd want to know any specifics about
5 that.

6 Q. Sure. Like, did you -- did you canvas, did
7 you do phone banks? What were the organizations? Were
8 they -- were they political parties, were they
9 grassroots groups? Just in -- in your own words.

10 A. Okay. I have phone-banked and I have
11 canvassed. I have phone-banked with MoveOn and I phone-
12 banked for the Warnock campaign and then I also
13 canvassed for the Elizabeth Warren campaign.

14 Q. Have you ever done any election canvasing?

15 A. Yes.

16 Q. When and where was that?

17 A. I don't remember. I can't recall the years.

18 Q. Do you recall if it -- if it was for a certain
19 candidate?

20 A. I did canvas for Elizabeth Warren.

21 Q. Any other candidates you've canvased for or
22 phone-banked for?

23 A. Just the ones I've previously stated.

24 Q. And in your voting rights work, what would you
25 say are the main issues that you advocate for?

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1 A. Can you be specific to which job you're
2 talking about?

3 Q. Sure. I mean, I was -- really umbrella for
4 all of them. But -- but what are the main issues or
5 goals that you've -- that you've worked to advance in
6 your volunteer and employed capacity on voting rights?

7 A. My -- the voting rights issues I try to
8 amplify relate to the protection of democracy.

9 Q. And in your view, what does the protection of
10 democracy entail?

11 A. Equal rights for all Americans.

12 Q. Anything else besides equal rights for all
13 Americans that you advocate for in your -- your voting
14 rights advocacy?

15 A. Fair and equal access to the ballot box.

16 Q. Anything else?

17 A. Not that I can think of right now.

18 Q. Besides this lawsuit, have you ever been the
19 party to a -- a civil lawsuit?

20 A. No.

21 Q. Have you ever been convicted of a crime?

22 A. No.

23 Q. Have you ever pled no contest to a crime?

24 A. No.

25 Q. Just tell me in your own words why you're

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1 bringing this lawsuit?

2 A. I believe residents in my community should
3 have fair representation in our democracy.

4 Q. And how do you define your community?

5 A. The St. Petersburg community, Black residents
6 here, residents from diverse backgrounds in St.
7 Petersburg.

8 Q. And do you think that the residents in your
9 community currently do not have fair representation?

10 A. That is correct.

11 Q. And why is that?

12 A. Because of the maps that are drawn to dilute
13 their voices and their voting power.

14 Q. What is it about the map that you believe
15 dilutes the voices of the residents in your community?

16 A. The current maps pack residents into a smaller
17 district and they also combine St. Petersburg residents
18 with Tampa residents.

19 Q. And in terms of your community, is -- is your
20 community the former or the latter? You feel like your
21 community is packed or is -- is combined with the wrong
22 people, or -- I mean, I want you to say it in your
23 words, but what's the problem as to your community?

24 A. I feel like my community is split.

25 Q. And does everyone in the community still have

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1 the ability to vote?

2 A. Yes.

3 Q. And what is it about your community as you
4 define it being split that makes the representation
5 unfair?

6 A. I believe it's the way the maps are split that
7 doesn't allow for voters to vote for representatives of
8 their choice and to have their influence heard.

9 Q. And to explore that more, I think we may get
10 to the Complaint. Do you happen to have a copy of the
11 Complaint with you?

12 A. Not on my screen right now, no.

13 Q. Okay. We'll pull that up for you in a little
14 bit. How did you become to be a plaintiff in this
15 lawsuit?

16 A. Nicholas Warren contacted me.

17 Q. Do you remember what month and year that
18 happened when Mr. Warren contacted you about becoming a
19 plaintiff?

20 A. I can't remember specifics, but it was around
21 March or April before the Complaint was filed.

22 Q. So it was after -- was it after you were no
23 longer working at the ACLU of Florida?

24 A. I believe so, yes, yes.

25 Q. Other than your attorneys who have you spoken

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1 with about this lawsuit?

2 A. Friends and family.

3 Q. Have you -- you don't -- I don't need to know
4 the substance of what you said, but have you spoken with
5 any of the other plaintiffs at any point?

6 A. No.

7 Q. Anyone else besides friends and family?

8 A. Just my friends and family.

9 Q. Okay. And during the redistricting process at
10 issue in this case, the one underlying the map that
11 you're challenging, did you communicate with any members
12 or staff of the Florida Legislature?

13 A. No.

14 Q. Were you aware of the redistricting process at
15 the time that it was going on?

16 A. No.

17 Q. After the redistricting was done, have you
18 communicated with any members or staff of the Florida
19 Legislature regarding the map?

20 A. No.

21 Q. Have you communicated -- other than with your
22 attorneys in this lawsuit, have you communicated with
23 anyone else at the ACLU of Florida either during or
24 after the redistricting process at issue?

25 A. Can you be more specific with that question?

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1 Q. Yeah. So I guess I'll -- let me -- let me
2 break that apart. So if I understand correctly, you
3 weren't aware of the redistricting process when it was
4 happening so if I asked you did you communicate with
5 anyone at the ACLU of Florida during the redistricting
6 process, I would -- I think the answer is no?

7 A. Correct.

8 Q. Okay. And then after the redistricting
9 process Mr. Warren reached out to you regarding becoming
10 a plaintiff in this lawsuit; is that right?

11 A. I believe so.

12 Q. Okay. When you were working at the ACLU of
13 Florida, did you do any kind of work or advocacy
14 relating to the map that you're challenging now?

15 A. No.

16 Q. Have you made any verbal or written statements
17 to any reporters regarding this lawsuit?

18 A. No.

19 Q. Have you made any verbal or written statements
20 to any community organizations or civics group regarding
21 this lawsuit?

22 A. No.

23 Q. Have you made any verbal or written statements
24 on social media regarding the lawsuit?

25 A. No.

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1 Q. Which social media apps or accounts do you
2 have? If you don't mind, try to list off the ones you
3 can think of?

4 A. I have an X account, I have a Twitter -- or I
5 have an Instagram account, and I have a Facebook
6 account, and I --

7 Q. All right.

8 A. -- also have a TikTok account.

9 Q. TikTok?

10 A. Yes.

11 Q. Do you have LinkedIn?

12 A. Yes, I do.

13 Q. Do you have Signal?

14 A. Yes.

15 Q. Do you have GroupMe?

16 A. No.

17 Q. Are you currently a registered voter?

18 A. Yes.

19 Q. Have you voted in every state Senate election
20 since you turned 18?

21 A. No.

22 Q. Do you recall -- or which Senate -- state
23 Senate elections have you voted in if you recall the
24 year?

25 A. I can't recall the year.

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1 Q. Okay.

2 A. I don't know.

3 Q. Let's look now at -- oh, I forgot to say
4 earlier, and hopefully this won't be relevant, but if
5 you do need a break at any time, just let me know. I'm
6 happy to stop whenever you need.

7 MS. HARLE: Leila, can you please pull up
8 the -- the Answers to the Interrogatories, potential
9 Exhibit 2 and share it on your screen.

10 BY MS. HARLE:

11 Q. And do you remember providing interrogatory
12 responses in this lawsuit?

13 A. I would have to see a document to know what
14 you're talking --

15 Q. Sure. Okay. And I know this is a little
16 unwieldy, but we're happy to scroll up and down and Zoom
17 in or -- or whatever you need as we go through this.

18 A. I saw this document, yes.

19 Q. Okay. Great. And do you remember if you
20 reviewed all of the information and -- and signed off
21 before your attorney submitted it?

22 A. I did, but I noticed that there was a typo.

23 Q. Okay. Is this --

24 A. I realized there was -- go ahead.

25 Q. Is there still a typo in there?

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1 A. Yes.

2 Q. Okay. What is it? Anything important?

3 A. My March 2023 address is 2317 37th Street
4 South.

5 Q. Okay. Thank you. Well, let me just ask a few
6 general questions before we get into the specifics.

7 Have you seen what District 18 looks like in the enacted
8 map that you're challenging?

9 A. Yes.

10 Q. And what facts do you have regarding the
11 racial motivations of the Florida Legislature in drawing
12 the districts in the map?

13 A. Can you be more specific about your question,
14 please?

15 Q. Sure. So in your lawsuit at several points
16 you allege that the Florida Legislature had an
17 overriding and impermissible racial motivation in -- in
18 drawing the lines of the districts. Are you aware of
19 those allegations?

20 A. Yes.

21 Q. Okay. So I was just asking what facts do you
22 have regarding the racial motivations of the Florida
23 Legislature?

24 A. While I can't speak to the racial motivations
25 of the Florida Legislature, I can share that my

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1 neighborhood and the neighborhood that has been
2 sectioned off is primarily Black community and -- yeah.

3 Q. Do you have any other facts that you're aware
4 of that would indicate that the districts were drawn by
5 the Legislature with a racial motivation?

6 A. Other than majority Black residents are
7 grouped into one specific area, no.

8 Q. And which specific area do you believe the
9 Black residents are -- are grouped into?

10 A. If you were able to pull up a map, I can show
11 you --

12 Q. Okay.

13 A. -- or I can explain it to you.

14 Q. Yeah. Is there -- can you describe the areas
15 of -- of the counties or the cities that you're
16 referring to?

17 A. I would say east of 34th Street -- east and
18 southeast of 34th Street.

19 Q. And -- and those residents are part of
20 District 18 that you live in?

21 A. I'm not sure. I'd have to look at the map.

22 Q. Is there a certain percentage of Black voting-
23 age population that you think should be in District 16?

24 A. I don't have a specific percentage in mind. I
25 would just want equal representation for the residents

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1 of St. Petersburg.

2 Q. Do you know how the current percentage of
3 Black voting-age population in District 16 compares to
4 the percentage of Black voting-age population before the
5 most recent redistricting?

6 A. Not off the top of my head, no.

7 Q. Do you personally know any facts indicating
8 that Legislature's central consideration in drawing the
9 map was race?

10 A. Can you be more specific in that question?

11 Q. Sure. Do you personally know any facts
12 indicating that the Florida Legislature's central
13 consideration in drawing the map that you're challenging
14 was race?

15 A. I feel like -- I'd need you to break down that
16 question for me.

17 Q. Okay. And -- and maybe what you answered
18 before, I just want to make sure that I'm not missing
19 any facts or information that you have that the Florida
20 Legislature used race as the main purpose or motivation
21 behind the map. So any information or facts you have on
22 that point, I just want to make sure I'm pulling that
23 out.

24 A. I don't have any facts other than what I've
25 stated and what I can think of for right now.

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1 Q. Are you familiar with the historical district
2 boundaries between -- of Hillsborough and Pinellas in
3 terms of, like, prior maps and earlier redistricting?

4 A. I have not looked at prior maps, no.

5 Q. Are you aware that the communities that are
6 combined that you've spoken about earlier, part of
7 Saint -- East St. Pete and -- and Tampa, are you aware
8 that those communities have been combined as part of the
9 same district since the early 1990s?

10 A. I did not know that.

11 Q. Do you know how many counties are split by
12 district lines across the state of Florida?

13 A. No.

14 Q. Did you read the Complaint in full before it
15 was filed?

16 A. Yes, I've reviewed the Complaint.

17 Q. Did you approve of all the allegations in the
18 Complaint before it was filed?

19 A. Yes.

20 Q. Okay.

21 MS. HARLE: Sorry to switch gears, Leila, but
22 can you put the Complaint up, please.

23 And, Eric, I was -- I just was super sloppy on
24 that. You can -- that can be Exhibit 1. If we wanted
25 to make it Garcia 1 maybe. And then the Complaint will

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1 be Garcia 2. And we'll email these to you right
2 afterwards.

3 (Garcia Exhibits 1-2 were marked for
4 identification.)

5 MS. HARLE: Okay. If -- if you can scroll
6 down to Paragraph 11.

7 BY MS. HARLE:

8 Q. All right. So there it says, this plan
9 sacrificed genuine communities of interest. What facts
10 were you relying on in making that allegation that the
11 Legislature sacrificed genuine communities of interest?

12 A. Can you repeat the question?

13 Q. Yes. When you made that allegation that the
14 Legislature sacrificed genuine community of interests,
15 what facts were you relying on?

16 A. I was relying on the fact that communities are
17 split and the concerns of St. Petersburg residents on
18 the east side of 34th is not the same as the interests
19 or the concerns of residents in Temple Terrace or in
20 northern parts of Tampa.

21 Q. And what are the interests of the residents of
22 east St. Pete's?

23 A. I believe our concerns and our situations are
24 different than those in a different county and so
25 they're going to be unique to the area. But I can just

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1 say that they're different than that of Tampa.

2 Q. And -- and how are they different?

3 A. I feel like the community needs different
4 things. And so to group two different communities under
5 the same representation without giving them a say in
6 what happens to all of St. Pete seems like an upper --
7 underrepresented space for Black voters in this area.

8 Q. So do the -- does the community in St. Pete's
9 share the same interests with -- I'm sorry. Does the
10 community in East St. Pete's that we're talking about
11 share the same interests with all of the other residents
12 of the other parts of St. Pete?

13 MR. WARREN: Object to form.

14 THE WITNESS: I'm not sure the question you're
15 trying to ask.

16 BY MS. HARLE:

17 Q. What -- what do you understand community of
18 interest to mean -- or genuine community of interest?
19 Just to use your words.

20 A. I take that to mean what -- what concerns the
21 community members in that area. And that will be
22 specific to the residents of St. Pete. I can't provide
23 a list, I can't think of certain things right now in
24 this moment, but I can guarantee you that they are
25 different than that of the concerns and the interests of

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1 those in Tampa who live in a completely different
2 region.

3 Q. Is a genuine community of interest based on
4 neighborhood?

5 A. There are several different neighborhoods in
6 St. Petersburg. I -- that's my take on it.

7 Q. And -- and do the several different
8 neighborhoods of St. Petersburg share the same
9 interests?

10 A. Possibly. I -- I can't really speak to that
11 particular point.

12 Q. It -- does a genuine community of interest, is
13 that based on race?

14 A. It depends on who you talk to in St. Pete.

15 Q. Okay. Well -- well, talking to you as the
16 plaintiff where -- where you're saying that genuine
17 communities of interest are sacrificed, are you -- are
18 you envisioning a community of interest as -- as based
19 on the race of the residents?

20 A. I would say that the needs of and the voices
21 of Black voters in this area and the voting power of
22 Black voters in this area are -- are diminished because
23 of that, because of the way the maps are designed.

24 Q. So are -- in your view are Black voters a
25 genuine community of interest?

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1 A. Yes.

2 Q. Is -- is genuine community of interest, can
3 that mean religion?

4 A. I'm predominantly talking about the Black
5 areas in St. Petersburg where voters are -- voters'
6 voices are diminished.

7 Q. And in your view, do Black voters have the
8 same concerns as each other?

9 A. Can you be more specific about that question?

10 Q. Sure. So if you've identified that a
11 community of interest, you're referring to Black voters
12 and I'm asking in your perspective then do Black voters
13 share the same concerns as voters as other Black voters?

14 MR. WARREN: Object to form.

15 THE WITNESS: I'm not sure I understand what
16 you're trying to ask. And I don't know if there's
17 another way to say it or to hear it. I'm just -- can
18 you --

19 BY MS. HARLE:

20 Q. I'm -- I'm trying to still get an
21 understanding of what the communities of interests are
22 that you're saying were sacrificed. And I thought we
23 narrowed it down to you are primarily talking about
24 Black voters; is that correct?

25 A. Correct.

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1 Q. Okay. So in your view do Black voters then
2 share -- typically share the same concerns as voters?

3 A. I mean --

4 Q. As opposed to non-Black voters? Have -- most
5 have -- have -- do they have different concerns?

6 A. I feel like the concerns is one thing, but
7 it's also who they choose to represent their district or
8 they choose to represent in leadership. And so it --
9 it's not necessarily dependent on a specific thing. I
10 feel like it's -- it's more so just the fact that Black
11 voices are underrepresented and -- and just diminished
12 in -- in our democracy. And so I can't necessarily
13 pinpoint a specific thing, but I do feel like Black
14 voters' voices are -- they -- with these gerrymandered
15 maps, they -- they carry less voting power.

16 Q. And is that based on a -- a particular fact
17 that you're aware of?

18 A. The fact of geographical location and the
19 demographics of the maps that were -- that are being
20 presented. Yes, that's what I'm -- that's what I'm
21 seeing. And I've shared that the location of where
22 Black residents reside is also -- is -- is a reason that
23 I can think of.

24 Q. And in terms of outcomes, is there -- is there
25 something particular in the outcomes of representation

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1 that you're identifying as a -- as a racial problem in
2 terms of who is representing District 16 and District
3 18?

4 A. I feel that regardless of who -- who is
5 chosen, that -- like, in terms of outcomes, Black voters
6 don't necessarily get a fair say in that -- in those
7 elections or those opportunities to vote. And so I feel
8 like that's -- that's my reasoning for that.

9 Q. Did you just say Black voters don't have a
10 fair opportunity to vote?

11 A. No. I meant to say that they don't have a
12 fair representation in who they want to see represented.

13 Q. And -- and you -- in your view do Black voters
14 all have the same preferences in terms of who they want
15 to represent them?

16 A. No.

17 Q. Do you think a -- a genuine community of
18 interest might be based on socioeconomic status?

19 MR. WARREN: Object to form.

20 THE WITNESS: Can you be more specific in the
21 question?

22 BY MS. HARLE:

23 Q. Try to be more specific. I'll try to
24 rephrase. And you've worked a lot in the voting rights
25 space so you may have different ways you describe this.

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1 But when you think of voting interest groups, right,
2 you've -- you've talked about Black voters, do you see
3 certain socioeconomic classes as potentially being a
4 legitimate voting interest group?

5 A. I think it would depend, but I don't --
6 I've -- in my voting rights work it's been more
7 dependent on marginalized communities.

8 Q. Okay. Well, that's helpful. Can you list for
9 me the types of marginalized communities that you think,
10 you know, comprise voting interest groups?

11 A. I think for the basis of this case, the Black
12 voting community is the marginalized community that we
13 are discussing.

14 Q. And are you aware there's a number of
15 different reasons why district lines can be drawn in
16 different ways?

17 A. Yes, I'm aware.

18 Q. So are there any other marginalized voting
19 interest groups that you're aware of that you could tell
20 me?

21 A. I -- I don't necessarily know the process of
22 how maps are drawn and so I wouldn't necessarily be able
23 to share what's the deciding factor in those areas.
24 I -- that's my answer to this question.

25 Q. Do you understand political parties to be

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1 voting interest groups?

2 A. Yes.

3 Q. And do you understand the -- the sexes to be
4 voting interest groups?

5 A. Yes.

6 Q. Would you have done your voting rights work --
7 well, let's just start with the Common Cause. Which
8 voting rights are -- which types of voters are you
9 reaching out to with Common Cause?

10 A. All voters.

11 Q. All voters? So how do you get the contact
12 info?

13 A. I'm not responsible for getting the contact
14 info.

15 Q. Do you recall -- and I'm trying to remember
16 what you said. You said you discussed with them
17 protecting democracy; is that right?

18 A. Protecting democracy I believe was my
19 definition to why I participate in voting rights or what
20 my -- what voting rights means to me.

21 Q. And so I think -- I think you said you're the
22 senior communications strategist? Or what was your
23 title?

24 A. Regional communications strategist for the
25 south.

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1 Q. All right. So are you -- in that capacity are
2 you drafting written communications?

3 A. Yes.

4 Q. Okay. And it would that include emails?

5 A. No.

6 Q. Social media?

7 A. Not often, but sometimes.

8 Q. Okay. Articles?

9 A. Press releases, yes.

10 Q. Those fliers?

11 A. I'm not sure what you mean by sliders.

12 Q. Oh, I said fliers. Sorry.

13 A. I have --

14 Q. -- like, pamphlets?

15 A. I have drawn -- I've done one or two fliers in
16 my time there.

17 Q. Okay. What am I missing? So basically press
18 releases and what else are you writing?

19 A. Earned media strategy.

20 Q. And your target audience there is -- is it all
21 voters or is it something else?

22 A. It's all voters.

23 Q. And what are you trying to encourage them to
24 do?

25 A. Make their voices heard at the ballot box.

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1 Q. So vote?

2 A. Yes.

3 Q. Does it -- does it matter to you who they vote
4 for?

5 A. No.

6 Q. Does it matter to you which community of
7 interest they're a part of?

8 A. No.

9 Q. Looking there at -- back to the screen on
10 Paragraph 13 it says that -- Floridians third line
11 there, Floridians, including individual legislators,
12 called out and questioned the Legislature's
13 unconstitutional actions. Which Floridians are you
14 aware of who called out or questioned the Legislature
15 regarding the redistricting process?

16 A. I -- I can recall that voting rights
17 organizations have -- have called out Legislature's
18 unconstitutional actions. I can't recall other than my
19 lawyers on this call if anyone has spoken out
20 specifically on this map -- on these maps in question.

21 Q. Okay. So -- okay. So then I get -- do you
22 know how the Legislature responded? This -- it says,
23 their concerns were dismissed by the legislature as a
24 whole. Are you aware when -- of -- of anything the
25 legislature said in response to those questions?

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1 A. Not specifically, no.

2 Q. Let's look down at Paragraph 20. We've talked
3 about this a little bit. If this says, the enacted plan
4 harms plaintiffs because, among other reasons, it splits
5 up their communities along racial lines and groups their
6 communities with dissimilar ones simply because of their
7 race. So my question is when you make the allegation
8 that the plan grouped your community with dissimilar
9 ones simply because of your race, which dissimilar
10 communities are you referring to there?

11 A. Can you repeat the question please?

12 Q. Sure. When -- when you made the allegation
13 that the plan grouped your community with dissimilar
14 ones unnecessarily simply because of their race, which
15 dissimilar communities are you referring to there that
16 you said your -- your community was grouped with?

17 A. I believe that the lines of these maps are
18 grouping someone like me as an Afro-Latina in other
19 majority white districts that don't allow for -- it --
20 it really honestly doesn't allow for me to vote for a
21 representative that is similar to that of maybe somebody
22 in a -- a community or a group that I would seem as
23 similar.

24 Q. And so in terms of the dissimilarity, just
25 trying to drill down on that, is that primarily race --

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1 A. Yes.

2 Q. -- or something else?

3 A. Yes.

4 Q. All right. Okay. Is it -- is the
5 dissimilarity anything else besides race in your mind?

6 A. I believe it's also socioeconomic status.

7 Q. And what socioeconomic status do you identify
8 yourself with?

9 A. Middle class.

10 Q. And are you grouped with other socioeconomic
11 classes in District 18?

12 A. I believe my socioeconomic status in this
13 entire district could be -- I -- I'm not exactly sure
14 what the socioeconomic status is. I can tell from my
15 nearby communities that there may be more than upper
16 middle class.

17 Q. Do you tend -- tend to believe you vote
18 differently than folks who are not middle class?

19 A. Can you repeat the question?

20 Q. Yeah. Do you -- do you tend to vote -- do --
21 you in your view, do you tend to vote differently
22 because you're in middle class?

23 A. I vote based on the issues that are important
24 to me in my community. And my community can look like
25 anything.

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1 Q. So your community is more than just race; is
2 that right?

3 A. I don't -- I don't really know if that's true,
4 but race plays a big role in my community.

5 Q. Did you vote in the last state Senate
6 election?

7 A. No.

8 Q. If we can look down at Paragraph 97.

9 A. Actually, I'd --

10 Q. Did you --

11 A. -- like to correct. So sorry. I would like
12 to --

13 Q. Yes, please do that. Anytime. Yeah.

14 A. Yeah. I would like to correct what I last
15 said. I believe I did vote in the last state Senate
16 election. I just didn't vote in the primaries --

17 Q. Okay.

18 A. -- but I did this year's election.

19 Q. Well, I think there's a way to confirm that,
20 so --

21 A. Okay.

22 Q. -- we'll do that. Do you remember what issues
23 you voted on in that -- in that -- when you were voting
24 in the last state Senate election, do you remember which
25 issues you had front of mind?

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1 A. I can't recall. It was so long ago.

2 Q. Do you remember what year was the last date
3 Senate election for your district?

4 A. I couldn't tell you off the top of my head.

5 Q. Okay. Here we are. Paragraph 97. Not trying
6 to be a dead horse, but I just want to make sure I, you
7 know, hear everything you had in mind when you made
8 these allegations. So this says, this refers to the
9 direct evidence of racial predominance. So my first
10 question is what is your direct evidence that race
11 predominates the drawing of the lines for District 16
12 and 18?

13 A. Based on the geographical locations of the
14 Black residents that are contained in the districts
15 outlined.

16 Q. And in your mind that shows that race is the
17 predominant factor in where the line is?

18 A. In my mind, yes. Based on what I can think of
19 right now.

20 Q. Actually, let's go up to the Paragraph 95.
21 Okay. This one says, these race-based decisions
22 resulted in a map that splits neighborhoods and ignores
23 traditional redistricting criteria. So I'm wondering
24 what criteria do you understand to be appropriate
25 criteria for the Legislature to use in redistricting?

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1 A. I think -- I think the Legislature should
2 consider grouping communities that are within the same
3 county. I also think they should consider St.
4 Petersburg as a whole which has a diverse group of
5 opinions and thoughts but that would equally represent
6 Black voices, Black voters.

7 Q. Any other traditional redistricting criteria
8 that you're aware of that the Legislature can use --

9 A. Not that I can think of.

10 Q. -- should have used? Okay. Okay. So I wrote
11 down the county lines and city lines. Did I miss
12 anything?

13 A. Not that I can think of, no.

14 Q. And let's see. Do you know if it's
15 appropriate for the Legislature to -- to give deference
16 to where lines have previously been drawn in -- in prior
17 maps maybe that have already been upheld in court?

18 A. Can you break down that question for me?

19 Q. Yeah. Do you know whether one of the criteria
20 the Legislature can use is where district lines have
21 traditionally been drawn in the past?

22 A. I --

23 Q. Do you know if that holds any weight in the
24 analysis of -- of where they draw lines?

25 A. I do not.

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1 Q. And -- okay. We're good. We're making great
2 time.

3 MS. HARLE: Let's go to Paragraph 131, please.

4 BY MS. HARLE:

5 Q. This one says, the legislature lacked good
6 reasons to believe that the enacted plan was necessary
7 to achieve Tier 1 compliance. So my question is, do you
8 know what Tier 1 compliance means?

9 A. No.

10 MR. WARREN: Could we zoom out on the
11 document? It's -- it's covered up by the --

12 MS. HARLE: Oh, yes.

13 MR. WARREN: Thank you.

14 MS. HARLE: Thank you, Leila.

15 BY MS. HARLE:

16 Q. Did you remember seeing the phrase, "Tier 1"
17 in your Complaint?

18 A. I do remember reviewing it, but it was so long
19 ago that I reviewed it, so I don't recall.

20 Q. So do you recall any facts you were relying on
21 when you made the allegation that the Legislature did
22 not have good reasons that the plan was required for
23 Tier 1 compliance?

24 A. Can you break down that question again,
25 please?

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1 Q. Yeah. So I -- I know -- I know you said
2 you -- you don't remember what Tier 1 compliance means,
3 right?

4 A. Yes.

5 Q. Okay. So I just want to make sure. You can't
6 think of any facts that you had in mind when you made
7 that particular allegation?

8 A. I cannot.

9 Q. Okay. I don't -- definitely don't tell me
10 anything you said to your attorney, but did -- you when
11 you reviewed the Complaint, did you -- do you remember
12 if you asked your attorney any questions about the
13 substance that was in there at all, anywhere in the
14 Complaint?

15 A. Can I check with my lawyer if this is a
16 question of privilege?

17 Q. He would object I assure you. Just yes or no.
18 Did you -- you know, did you -- did you ask your lawyer
19 any questions about the Complaint before it was filed?
20 Just yes or no?

21 MR. WARREN: You can answer.

22 THE WITNESS: No, I did not ask any questions
23 about the Complaint.

24 BY MS. HARLE:

25 Q. Okay. Let's see. Okay.

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1 MS. HARLE: Leila, my bad. I just wrote down
2 a page number for this one. But on Page -- it's Page 13
3 and 14 where Plan 42 is. You may have to zoom out. Oh,
4 there it is.

5 BY MS. HARLE:

6 Q. Okay. Are you able to see that, Jennifer -- I
7 mean, Ms. Garcia?

8 A. Yes.

9 Q. Okay. Have you -- do you know have you seen
10 this map of -- this map 42 before?

11 A. I've reviewed it in the Complaint, yes.

12 Q. Are you able to tell me, just in your own
13 words, why is plan 42 better than the enacted map that
14 you're challenging?

15 MR. WARREN: Object to form.

16 THE WITNESS: I would say that this map shown
17 in front of me groups together all St. Pete residents
18 giving more voting access and more voter power and
19 influence to -- to Black voters who want their voice
20 heard.

21 BY MS. HARLE:

22 Q. And under this map, which Black voters are you
23 saying would have more power? Like, located where?

24 A. In District 24 specifically listed.

25 Q. Any particular part of that district?

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1 A. The ones that are currently -- the community
2 that's currently split on the current map. So I -- I
3 would have to see the other map to show you what I mean.

4 Q. Do you notice any other areas on there where
5 you think the Black vote would be diluted?

6 A. I feel like this splits communities evenly and
7 gives equal representation.

8 Q. Okay. Your Complaint also mentions the Isbel
9 (phonetic) map. Do you remember if you've seen a map
10 called the is Isbel map?

11 A. Can you show it to me?

12 Q. Yes, I think so.

13 THE WITNESS: Also, while you're looking for
14 that, would it be okay to call for a break in five
15 minutes?

16 MS. HARLE: Yeah. Why don't we take a break
17 now and then I can find the map and then we'll hop back
18 on in -- maybe at 4:45? Okay. Thanks.

19 THE REPORTER: Okay. Off the record at 4:36.

20 (A recess was taken.)

21 THE REPORTER: All right. We're back on the
22 record 4:44.

23 BY MS. HARLE:

24 Q. Okay. Go ahead, Ms. Garcia.

25 A. Yes. I -- I recently filed for divorce and so

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1 I didn't know if that can -- that was considered, like,
2 a civil -- earlier you had asked me if I was in any
3 other lawsuits. Does that -- would that count towards
4 that as well?

5 Q. Thank you. It might. And I'm -- I'm sorry to
6 hear that, but thank you for -- for clarifying that.

7 A. Okay.

8 Q. Hopefully that will not result in any
9 depositions.

10 A. Yes, it has not. It's -- it's been -- the
11 case has been settled.

12 Q. Okay. Okay. So let's pull up -- you -- you
13 keep asking me and I'm -- I'm finally going to do this
14 for you. And let's pull up Figure 3 of your Complaint
15 which is the challenge map.

16 MS. HARLE: Leila, if you can share your
17 screen. That's on Page 20.

18 BY MS. HARLE:

19 Q. I just wanted to give you a chance to -- to
20 say anything else about the problems on this map that
21 you're challenging that you haven't been able to
22 articulate earlier today?

23 A. Is this the map that you were referring to
24 before the break?

25 Q. No, this is the map that you're challenging in

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1 your lawsuit. But I will -- I will pull up that other
2 map too and ask you about it.

3 A. Okay.

4 Q. So this is the existing map that you're suing
5 over?

6 A. Yes, I understand that.

7 Q. Okay.

8 A. And can you repeat the question on that? Is
9 there --

10 Q. Yes. And so is there anything else about this
11 map that you think is problematic that we haven't
12 already talked about today?

13 A. No.

14 Q. Okay. Sometimes I thought the visual might
15 help if -- you know, if there was anything else you
16 wanted to share. Okay. So the other map I was asking
17 about is on is Figure 5 of your Complaint. I think Page
18 26 under -- there it is, there it is. The is Isbel
19 plan. This is referenced in your Complaint as a viable
20 alternative map. And so I was just curious, in your
21 words, why this map is a viable alternative or a better
22 alternative --

23 MR. WARREN: Object to --

24 BY MS. HARLE:

25 Q. -- than the challenge map?

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1 MR. WARREN: Object to form.

2 THE WITNESS: This map from what I'm seeing
3 now in front of me will group St. Petersburg residents
4 together and keep them within the same district.

5 BY MS. HARLE:

6 Q. And the St. Petersburg voters you think
7 typically vote like one another?

8 A. I believe St. Petersburg voters based on their
9 community and based on the issues pertaining to their
10 concerns.

11 Q. Do you know the partisan composition of St.
12 Petersburg in terms of Democrat, Republican,
13 Independent?

14 A. I do not.

15 Q. Do you know the racial composition of St.
16 Petersburg?

17 A. I do not.

18 Q. This is -- just yes or no. Have you seen any
19 of the expert witness reports that have been filed in
20 this case yet?

21 A. I have reviewed what's in front of me and the
22 Complaint. I have not seen any specific things from
23 other plaintiffs in this case.

24 Q. Okay. How -- do you know if you've seen
25 anything from expert witnesses?

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1 A. I have not.

2 Q. Okay. Between the two alternative maps that
3 we've talked about today, is there -- is there one that
4 you think is preferable in your view?

5 A. I prefer the map that gives equal
6 representation to Black voters.

7 Q. Okay. And is that -- is that a particular map
8 you have in mind or just is there a particular map that
9 you think does that?

10 A. Based on these two maps if both of them offer
11 equal representation to Black voters, then I am for both
12 maps.

13 Q. Okay. And when you're saying equal
14 representation of -- of -- to Black voters, can you --
15 can you further define what you mean by that?

16 A. I mean, maps that don't split communities and
17 map lines that group all of St. Petersburg together so
18 that Black voters have more influence than they
19 currently have.

20 MS. HARLE: Okay. I think this will be our
21 last exhibit. Pull up the Initial Disclosures.

22 (Garcia Exhibit 3 was marked for
23 identification.)

24 MS. HARLE: And could you zoom out on this one
25 a little bit, too? Thank you.

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1 BY MS. HARLE:

2 Q. Does this document look familiar to you, Ms.
3 Garcia?

4 A. I believe so.

5 Q. You want us to scroll down?

6 MS. HARLE: Leila, maybe can you scroll to
7 the --

8 BY MS. HARLE:

9 Q. The date on that was May 31st. That would've
10 been late -- late spring, almost summer. Does that --
11 does it look familiar now that you've seen it?

12 A. Possibly. I -- it's been, again, a very long
13 time. So I've -- I've looked at these documents, but
14 I -- I -- I've seen a lot of documents.

15 Q. Understood. So can -- can you recall whether
16 you've previously reviewed the information in here?

17 A. I believe I -- I looked over documents from --
18 for the case. But again like I stated, I can't recall
19 if this was a specific document that comes to mind.

20 Q. Okay. And so just for context, these are
21 called Rule 16 Initial Disclosures. And the general
22 idea is parties in the lawsuit exchange information with
23 each other. I don't file this with the Court. It just
24 shares who we think might have relevant information in
25 the case. So for example, you can see there at 1A,

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1 there's your name and the other -- the plaintiffs and it
2 says, that you're likely -- you have information
3 showing -- intending to show that the challenged
4 districts cause harm to themselves and to other
5 residents. So what harm do you allege that the
6 challenged district lines cause you?

7 A. Particularly as a voter I can't vote with
8 residents across the street from me -- across 34th
9 Street. I can't vote in the same district as they are
10 in.

11 Q. But you understand that districts do have to
12 have lines, correct? They have to have boundaries at
13 some point, right?

14 A. Absolutely.

15 Q. So there will always be people who live one
16 block from boundary lines, correct?

17 A. Correct.

18 Q. And what harm do you -- do the challenged
19 district lines cause to other residents, in your view?

20 A. In my view and as stated in this case, I
21 believe that these lines that are drawn as is currently
22 diminish the voting influence of Black voters in St.
23 Petersburg and in this area.

24 Q. And let's look at 1D, which is Page 4 of the
25 documents. This is a list of third-parties, some --

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1 some media folks.

2 MS. HARLE: Leila, can you scroll down just a
3 little bit?

4 BY MS. HARLE:

5 Q. Do you have knowledge of any members of the
6 media who might have information about whether the
7 district lines for your district were drawn based on
8 race?

9 A. I believe members of the media have covered
10 issues of gerrymandering in this county and in the Tampa
11 Bay area.

12 Q. Are there any in particular that you are aware
13 of?

14 A. Not that comes to mind, but you would have to
15 check with the people listed on this list.

16 MS. HARLE: Okay. That's the end of my
17 questions.

18 MR. WARREN: I just have a -- a couple
19 questions.

20 CROSS-EXAMINATION

21 BY MR. WARREN:

22 Q. Ms. Garcia, Ms. Harle had asked you about if
23 you had voted in different elections. Did you vote in
24 the 2024 general election that just happened two weeks
25 ago?

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1 A. Yes.

2 Q. Do you remember if there was a state Senate
3 race on that ballot?

4 A. I can't remember --

5 Q. Okay.

6 A. -- but yeah.

7 Q. Okay. Did you vote in the 2022 general
8 election two years ago?

9 A. I believe so, yes.

10 Q. That was when Ron DeSantis was at the top of
11 the ticket I think?

12 A. I believe so, yes.

13 Q. Do you remember if there was a state Senate
14 race on that ballot?

15 A. I can't remember what the ballot said.

16 Q. Okay. Do you remember if you voted in the
17 2020 general election?

18 A. Yes.

19 Q. Do you remember if there was a state Senate
20 race on that ballot?

21 A. I cannot remember what was on that ballot.

22 Q. Do you remember if you voted in the 2018
23 general election?

24 A. I can't remember if I voted in that election.

25 Q. I believe that was when Andrew Gillum and Ron

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1 DeSantis and the original Amendment 4 were on the
2 ballot?

3 A. Yes, I believe so. I remember those.

4 Q. And you remember voting in that election?

5 A. Yes.

6 Q. Do you remember if there was a state Senate
7 race on that ballot?

8 A. I can't recall.

9 Q. And just one last one. Do you remember if you
10 voted in the 2016 general election?

11 A. Yes, I did.

12 Q. And do you remember if there was a state
13 Senate race on that ballot?

14 A. I cannot recall.

15 MR. WARREN: Okay. That's all I have.

16 MS. HARLE: Okay. I think we're done then.

17 MR. WARREN: And we will read.

18 THE REPORTER: Any orders before we get off?

19 MS. HARLE: Yes, Eric. Thanks. We'd like a
20 copy. Shutts & Bowen order one.

21 MR. WARREN: We won't order, but we will read.
22 Thank you, Eric.

23 THE REPORTER: No problem. We -- so we're off
24 the record then at 4:55.

25 (Deposition concluded at 4:55 p.m.)

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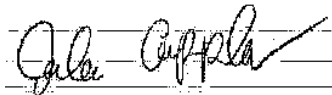
CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF HILLSBOROUGH

I, the undersigned authority, certify that
JENNIFER GARCIA personally appeared before me and was
duly sworn on this 20th day of November, 2024.

WITNESS my hand and official seal this 26th day of
November, 2024.



Jake Coppola

Notary Commission Florida No.: HH 240208

Commission Expires: March 14, 2026

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November 20, 2024

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1 CERTIFICATE OF REPORTER

2
3 I, JAKE COPPOLA, a Digital Reporter and
4 Notary Public within and for the State of Florida do
5 hereby certify:

6
7 That the foregoing witness whose examination
8 is hereinbefore set forth was duly sworn and that said
9 testimony was accurately captured with annotations by me
10 during the proceeding.

11
12 I further certify that I am not related to
13 any of the parties to this action by blood or marriage
14 and that I am in no way interested in the outcome of
15 this matter.

16
17 IN WITNESS THEREOF, I have hereunto set my
18 hand this 26th day of November, 2024.

19
20 

21 JAKE COPPOLA

22 Notary Commission Florida No. HH 240208

23 Commission Expires: March 14, 2026
24
25

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CERTIFICATE OF TRANSCRIPTIONIST

I, SANDRA REDAVID, located in the State of Florida do
hereby certify:

That the foregoing is a complete and
accurate transcript of the digital audio recording of
the testimony and proceedings captured in the
above-entitled matter, all to the best of my skills
and ability.

I further certify that I am not related to
any of the parties to this action by blood or marriage
and that I am in no way interested in the outcome of
this matter.

IN WITNESS THEREOF, I have hereunto set my
hand this 26th of November, 2024.

SANDRA REDAVID

SANDRA REDAVID