

KETO NORD HODGES  
HODGES V. PASSIDOMO

November 26, 2024

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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.

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VIDEOCONFERENCE DEPOSITION OF KETO NORD HODGES

TAKEN ON BEHALF OF THE DEFENDANT

DATE TAKEN: November 26, 2024

TIME: 2:09 p.m. - 3:49 p.m.

LOCATION: Via Zoom Videoconference

Examination of the witness taken before:

Wendy E. Rivera, FPR

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APPEARANCES OF COUNSEL  
(Via Videoconference)

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4 KETO NORD HODGES,

5 having been first duly sworn and responding "Yes,"  
6 testifies as follows:

7 DIRECT EXAMINATION

8 BY MS. HARLE:

9 Q. Good afternoon, Mr. Nord Hodges. My name is  
10 Denise Harle. I'm one of the attorneys for the Florida  
11 Senate in this case and I'll be taking your deposition  
12 today.

13 Can you please state and spell your name for  
14 the record.

15 A. Yes. Keto, K-e-t-o, Nord, N-o-r-d, Hodges,  
16 H-o-d-g-e-s.

17 Q. Great. And do you understand that you are  
18 under oath today and giving deposition testimony, which  
19 is subject to the penalty of perjury?

20 A. Yes.

21 Q. Have you ever been deposed before?

22 A. No, I haven't.

23 Q. Did you observe any of the depositions of your  
24 co-plaintiffs in this case yet?

25 A. Yes. I observed the -- I believe it was the

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1 first one, the lady with the Hispanic last name. She  
2 referred to herself as an Afro-Latina. I don't recall  
3 her last name.

4 Q. Ms. Garcia?

5 A. Yes. There you go. Ms. Jen Garcia, yes.

6 Q. Great. Well, this will probably sound all  
7 very familiar to you today, but we just need, for the  
8 sake of ground rules, to make sure a few things happen:  
9 One, that you speak audibly and give complete answers;  
10 two, try to let me finish my question before you begin  
11 to answer; three, if your attorney does object, you need  
12 to go ahead and answer the question unless she instructs  
13 you not to answer.

14 Four, if you don't understand my question, I  
15 need you to just let me know that it's not clear. I  
16 could've asked a bad question. That definitely happens.  
17 If you do give an answer, it will be on the record under  
18 oath and we will all assume that you understood the  
19 question; and five, I just need you to make sure your  
20 responses are verbal, so, you know, things like head  
21 nods, for example, or uh-huhs doesn't really work very  
22 well because this is being transcribed.

23 Does all that make sense to you?

24 A. Yes.

25 Q. Great. If you need to take a break at any

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1 time, please just let me know and we can find a stopping  
2 point. No problem. If at any point seeing a document  
3 will help refresh your recollection, also please let me  
4 know and I'll try to get that in front of you.

5 Is there anything that's preventing you from  
6 giving truthful testimony today?

7 A. No, there's not.

8 Q. Very good. What did you do to prepare for  
9 your deposition today?

10 A. Spoke with the attorneys.

11 MS. ROBERTSON: Keto, just make sure you don't  
12 disclose anything you spoke about with your  
13 attorneys.

14 THE WITNESS: Of course. Of course. I spoke  
15 with the attorneys and I reviewed the -- I believe  
16 it was the initial filing document laying out the  
17 -- I guess the ground rules of the case or ground  
18 information of the case.

19 BY MS. HARLE:

20 Q. Okay. Did you review any other documents in  
21 preparation for today?

22 A. You asked did I review any other documents in  
23 preparation for today?

24 Q. Yes, sir.

25 A. No, I did not.

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1 Q. And again, not telling me anything that was  
2 said, but approximately how long did you meet with your  
3 attorney to prepare for your deposition?

4 A. I'm not exactly sure how long.

5 THE WITNESS: Would you estimate an hour?

6 MS. ROBERTSON: If you know --

7 THE WITNESS: I'll estimate about two hours to  
8 my recollection.

9 BY MS. HARLE:

10 Q. Okay. Can you please state your address,  
11 where you currently reside.

12 A. Yes. I reside at 10907 North Hyacinth Avenue,  
13 Tampa 33612.

14 Q. And when did you move to that address?

15 A. I moved to that address June of 2019.

16 Q. What was your most recent prior address?

17 A. My most recent prior address, I struggle to  
18 remember. It was in Town 'n' Country, ZIP code 31655.  
19 I believe it was 9,000 something. It was in a condo  
20 community. I don't recall the exact address.

21 Q. Was that in Tampa?

22 A. Well, actually, let me see. Sorry. Give me a  
23 -- may I correct myself?

24 Q. Yes.

25 A. Okay. Let's see. 7349 Abonado Road, Tampa,

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1 33615. There it is.

2 Q. Okay. How far is that from where you live  
3 now?

4 A. I'm sorry. Can you repeat the question?

5 Q. Sure. How far is that Abonado Road address  
6 from where you live now?

7 A. That is I'd say approximately eight to  
8 nine miles.

9 Q. Okay. So then Abonado Road, is that -- it's  
10 more in South Tampa or middle of Tampa?

11 A. That's in Town 'N' Country. That's on the  
12 other side of the airport.

13 Q. Oh, okay. So -- okay. I'm bad at that.

14 Back to where you live now, is it a house or  
15 an apartment?

16 A. It's a house.

17 Q. Do you own it?

18 A. No, rent.

19 Q. Is there any reason you're aware of that you  
20 might be moving in the next year or two?

21 A. Possibly, yes. I may be moving in the next  
22 year or two.

23 Q. And where would you be moving to?

24 A. I'm not sure yet, wherever the rent is not too  
25 high.



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1 Q. Do you know if you would stay in Tampa?

2 A. I do not know that at this time. I have  
3 children in college, so I'm not sure.

4 Q. Are they in college in Florida?

5 A. Yes. Yes, they are.

6 Q. Whereabouts?

7 A. Hillsborough Community College and University  
8 of South Florida.

9 Q. It's nice to have your children nearby?

10 A. Yes, sometimes.

11 Q. Did you live in Lakeland, Florida, in the  
12 past --

13 A. Yes, I did.

14 Q. Okay. When was that?

15 A. Let's see. Two -- eight through -- I believe  
16 it was May 2008 through about the end of September 2011  
17 I lived in North Lakeland, Florida.

18 Q. And did you own a home there?

19 A. Yes, I did. I owned a home with my -- with my  
20 wife and family at the time.

21 Q. But you've been in Tampa since what year?

22 A. I originally moved to Tampa September 1991 as  
23 a child.

24 Q. And then in your most recent stint in Tampa,  
25 where did you move -- which year did you move back to

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1 Tampa?

2 A. I moved back to Tampa that -- I believe it was  
3 the last day of September 2011.

4 Q. You said you may move somewhere in the next  
5 year to find lower rent.

6 Are you currently scoping out different places  
7 to live at the moment?

8 A. No, I'm not. I'm tired of looking right now  
9 because the market is un -- has proven to be  
10 unreasonable, so I'm not looking right at this time.

11 Q. Have you been looking for a place to move  
12 recently, say, in the past three to six months?

13 A. In the past six months, yes.

14 Q. Can you give me your educational background,  
15 if you would, starting just since high school.

16 A. All right. Certainly. I graduated from  
17 Hillsborough Adult High school in Tampa with my underage  
18 GED, and then I earned my associate in arts degree,  
19 two-year degree, at Hillsborough Community College in  
20 computer science. Then I transferred to the University  
21 of South Florida, earned my bachelor of science in  
22 management information systems magna cum laude in 2002  
23 and my MBA from USF, entrepreneurship, in 2005 -- May  
24 2005.

25 Q. Well, congratulations.

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1 A. Thank you.

2 Q. Who is your current employer?

3 A. My current employer is Hillsborough County  
4 Public Schools.

5 Q. And what is your job title there?

6 A. VE. That's variant exceptionalities math  
7 instructor. That's another word for special education  
8 math instructor.

9 Q. Great. What -- are you assigned to one  
10 particular school?

11 A. Yes. I'm assigned to Dr. Carter G. Woodson PK  
12 through 8 academy.

13 Q. When did you first start working as a VE math  
14 instructor for Hillsborough County Public Schools?

15 A. I started working as a VE math instructor  
16 November 2014 full time, but I was a part-time VE  
17 instructor, you know, as a substitute from about  
18 August 2011 until November 2014.

19 Q. Thank you.

20 A. Yes.

21 Q. Are -- did your LinkedIn say that you're a  
22 digital political organizer?

23 A. Yes, it says that among other things.

24 Q. All right. Could you tell me what that means,  
25 that you're a digital political organizer?

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1 A. Yes. That means that -- excuse me -- I  
2 utilize graphics design to create digital products for  
3 different political campaigns in the Tampa Bay area.

4 Q. And is that a paid position?

5 A. Yes. Yes. It's a -- it's -- how would you  
6 say -- at-will. So if a campaign reaches out to me and  
7 says, you know, we need these particular products, then  
8 they may pay me on a at-project basis or, you know, on a  
9 monthly basis, for example, to provide work for the  
10 campaign.

11 Q. So you're kind of like a contractor?

12 A. Yes. I would say that.

13 Q. And it's just your own business? You're kind  
14 of an entrepreneur in that space?

15 A. Yes. Yes. Yes.

16 Q. List for me the -- any of the political  
17 campaigns that you've worked on?

18 A. All right. Well, full time -- let's see.  
19 Full time and part time or as a volunteer, it's too many  
20 to name, but I could -- because I've been doing it since  
21 -- I've been volunteering or working in different  
22 campaigns since about 2019 when I first got my voter's  
23 registration, but most recently, I recall three -- let's  
24 see -- two or three campaigns, Tammy Shamburger for  
25 school board in Hillsborough County. Let's see. Who

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1 else? Walter L. Smith, II, for Tampa City Council and  
2 -- let's see. Who else? Starr Brookins for county  
3 court judge in this most recent cycle. That is all I  
4 can remember right now.

5 Q. And those three you just named, were those --  
6 were those campaigns where you were hired digital  
7 political organizer?

8 A. Let's see. The first two, Smith and  
9 Shamburger, yes. The most recent one I named, I was a  
10 photographer. So the photography on the -- you know,  
11 some -- some clients will book me for both combined  
12 services, photography and digital organizer; some, one  
13 or the other.

14 Q. Have you ever volunteered on any political  
15 campaigns?

16 A. Yes. Since 2019, it's been more campaigns  
17 than I can count and I would do a disservice to try to  
18 sit here and name all of them, local and -- local,  
19 citywide, municipal, county, and statewide and national.

20 Q. Well, let's start with statewide.

21 Have you ever worked on any campaigns for a  
22 state legislator?

23 A. Let's see. I don't believe I have. I don't  
24 believe I have. Oh, wait. Let me see. I apologize. I  
25 recall one in 2014. I volunteered. I wasn't on staff.

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1 I volunteered with photography. Let's see. 2014, yes,  
2 I volunteered and I believe I was paid for photography.  
3 I was a new photographer at the time for Ed Narain for  
4 Florida State Representative in Hillsborough County.

5 Q. Can you name for me the national political  
6 campaigns that you recall working on whether paid or  
7 volunteer?

8 A. Yes, of course. Let's see. Let's see. Let's  
9 see. I would say starting in 2008, I worked for the --  
10 or did work. I volunteered photography and other  
11 activities for Obama for America in 2008 and 2012,  
12 volunteered for -- let's see -- I believe Hillary  
13 Clinton campaign and then the Biden campaigns most --  
14 the last two Biden campaigns most recently and the  
15 Kamala Harris campaign.

16 Q. I may have misheard. Did you say you first  
17 got your voting registration in 2019?

18 A. I believe -- I believe it was 2019 because I  
19 had became a U.S. citizen a few months prior to that,  
20 and so 2019 would've been the first time I was allowed  
21 to vote.

22 Q. Well, that's wonderful.

23 A. Thank you. I take it very seriously.

24 Q. Are you currently involved with any voting  
25 rights groups?

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1 A. How would you define a voting rights group?

2 Q. Are you currently involved with any  
3 organizations that work on issues relating to voting or  
4 voters?

5 A. Yes. I would say I -- involved as a  
6 photographer and social media manager for Hillsborough  
7 County NAACP.

8 Q. Anything else?

9 A. I don't recall any sort of organizations at  
10 this time.

11 Q. Are you involved with the Hillsborough County  
12 Democrats?

13 A. Yes, I am.

14 Q. How long have you been involved with them?

15 A. I've been a precinct captain or precinct  
16 committee person since May 2018.

17 Q. Are you an officer currently for Hillsborough  
18 County Democrats?

19 A. I'm not an officer. I am a committee  
20 chairperson for the diversity equity and inclusion  
21 committee.

22 Q. What do you do in your role as the committee  
23 chair for diversity and inclusion for the Hillsborough  
24 County Democrats?

25 A. As the DEI chairperson, I encourage

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1 approximately -- well, I encourage the membership of the  
2 county Democratic Party to run for state committee  
3 person positions for the -- for the Florida Democratic  
4 Party, which -- to look as much as possible as the  
5 makeup of our membership.

6 Q. And what do Hillsborough County Democrats do  
7 just generally as a organization?

8 A. To my understanding, Hillsborough County  
9 Democrats seek to encourage democracy by -- by educating  
10 on voters' rights for anyone in the Tampa Bay area --  
11 well, anyone in Hillsborough County, Florida, who is of  
12 voting age.

13 Q. Have you ever done any election canvassing  
14 like go door-to-door?

15 A. Yes, I have.

16 Q. And when did you do that?

17 A. I don't believe -- I don't believe it was for  
18 the Democratic Party though. Well, not recently for the  
19 Democratic Party.

20 Q. No. I guess I was switching gears a little  
21 bit on you.

22 When did you do election canvassing?

23 A. I did election canvassing in 2018 and 2019 for  
24 Walter L. Smith, II, for Tampa city council.

25 Q. Okay. Have you ever done any phone banking



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1 for election?

2 A. Yes, I have.

3 Q. Okay. And when was that?

4 A. I did phone banking for Walter L. Smith, II,  
5 2018 and '19; Obama for America 2008 and 2012; and  
6 possibly other campaigns as well, but I don't recall at  
7 this time.

8 Q. Have you ever been involved with a campaign  
9 that was not for a particular candidate or an issue that  
10 was going to be on the ballot?

11 A. I would have to think about that. Let's see.  
12 I'm trying to recall if there were any. Yes. Yes. I  
13 believe I was -- I can recall being involved in  
14 Hillsborough County -- Hillsborough Classroom Teachers  
15 Association, HCTA, recently in -- in pushing for the  
16 half-cent sales tax referendum for Hillsborough County  
17 with the goal of increasing full-time teacher pay in  
18 Hillsborough County.

19 Q. Have you done any public advocacy on any  
20 political or partisan issues?

21 A. Any -- have I done any public advocacy on  
22 political or partisan issues, do you ask?

23 Q. Yes.

24 A. I'm -- I'm trying to think. I hosted a town  
25 hall for Black men for the Kamala Harris campaign

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1 recently.

2 Q. Where was that held?

3 A. That was held at a Baptist church in East  
4 Tampa. I don't recall the name.

5 Q. Anything else you can think of?

6 A. I cannot recall any other events at this time.

7 Q. What did you-all discuss at the town hall for  
8 Black men for Kamala Harris?

9 A. Let's see. There were multiple issues  
10 discussed. I believe one issue may have been our stance  
11 on support of public education in -- nationally and as  
12 it relates to Florida.

13 Q. And did you-all discuss any issues particular  
14 to Black men?

15 A. Yes. Yes. The whole town hall was for Black  
16 men, so any issues that we discussed were related to how  
17 it would impact Black men in Florida.

18 Q. Do you have a blog that you keep updated?

19 A. No, I don't.

20 Q. Do you have an old blog?

21 A. Yes, I have. My old blog was called The Great  
22 Blog of Keto, and -- yes.

23 Q. Okay.

24 A. Yes. That's been discontinued. I'm surprised  
25 it's still around, still up there.

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1 Q. Do you recall talking about political issues  
2 on your blog?

3 A. Yes, I did.

4 Q. Okay. Did you criticize Republicans on your  
5 blog?

6 A. Who? Can you repeat their name, please.

7 Q. Republicans?

8 A. Oh, Republicans --

9 Q. Yes.

10 A. -- on the blog? I don't recall. I may have.  
11 I struggle to recall. It's been a long time since I had  
12 that blog.

13 Q. Why did you discontinue it?

14 A. I'm really not sure. I started it when I was  
15 a technology and blog trainer for -- for personal injury  
16 law firms around the country and I became good at  
17 blogging very quickly, and it was fun, so I started a  
18 blog to speak about issues personal to me and my  
19 community.

20 Q. What kind of issues do you remember blogging  
21 about if not political?

22 A. Let's see. I remember blogging about my  
23 adopted mom who was -- who was a missionary to Haiti  
24 since 1969 and who moved here with me to Florida in  
25 1991. She had at the time -- I know this was an article

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1 from 2010. I did several of them. She landed in Haiti  
2 on the day of the 2010 earthquake, which killed possibly  
3 100,000 or more people, and she went missing for several  
4 weeks. So as part of my research and to try to find  
5 her, I posted blogs from time to time about the process  
6 of trying to locate -- locate her in Haiti.

7 Q. Did you find her?

8 A. Yes, we did.

9 Q. Okay.

10 A. Thank God, yes. Some missionaries -- some  
11 American missionaries I believe located her at an  
12 orphanage assisting with children in the countryside of  
13 Haiti.

14 Q. I'm so glad to hear that.

15 A. Thank you.

16 Q. Are you a board member of the Corporation to  
17 Develop Communities of Tampa?

18 A. Yes, I am.

19 Q. What does that group do?

20 A. Corporation to Develop Communities of Tampa is  
21 a nonprofit in Hillsborough County founded by Ms. Chloe  
22 Coney. It exists to do multiple things, which fight  
23 poverty. One is workforce development, so through the  
24 acquisition of grants and funding, training the  
25 community, those hardest economically hit in places like

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1 East Tampa to have good economic paying jobs and careers  
2 often with a certification or training component. So  
3 that's one, the workforce.

4 And then buying and building affordable  
5 housing for Tampa Bay's families, hardworking families,  
6 that's two. There's a new unit that participates in  
7 providing low cost marketing materials for small  
8 businesses in the Tampa Bay area, nominal cost. That's  
9 three, three pillars. There may be a fourth, but I  
10 believe I referred to the real estate, which has to do  
11 with acquiring and building the homes. That's what I  
12 can recall.

13 Q. Is there a certain portion of Tampa that you  
14 focus on or is it for the entire Tampa area?

15 A. Well, originally, the organization was born in  
16 and targeted East Tampa, which is home to the largest  
17 concentration of African-Americans in Hillsborough  
18 County many of whom are chronically underemployed,  
19 possibly undereducated and underemployed for the  
20 workforce in order to help them bring up the standard of  
21 living and their career opportunities, yes.

22 Q. Is your home in East Tampa?

23 A. No. My home is in North Tampa. I formerly  
24 lived in East Tampa, but my home is in North Tampa and  
25 what's considered an ALICE community, which is --

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1 Q. A what community?

2 A. An ALICE community, A-L-I-C-E. That means the  
3 majority of the residents in that ZIP code are  
4 economically underserved.

5 Q. So your -- let's see. Was your Abonado Road  
6 address in East Tampa?

7 A. No. That's in Town 'n' Country.

8 Q. I see --

9 A. That was the -- I lived there -- I'm sorry.

10 Q. I still don't know where Town 'n' Country is.

11 A. Right. Right.

12 Q. So when was it that you lived in East Tampa?

13 A. I lived in east -- well, let's see -- East  
14 Tampa from about 1995 to 2008 when I moved to Lakeland.

15 Q. All right. So -- I'm sorry. I think I  
16 interrupted you. So originally, the Corporation to  
17 Develop Communities of Tampa was focussed on East Tampa.

18 Is that still the mission focus today?

19 A. It's not -- it's the main focus, but we have  
20 expended throughout Hillsborough County and also have  
21 ongoing projects in St. Petersburg, Florida, for -- in  
22 support of the business community there. Oh, let's see.  
23 We also recently added Fort Myers, Florida, as home to  
24 some of our workforce opportunities.

25 Q. So it's still called Corporation to Develop

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1 Communities of Tampa?

2 A. Yes, Inc. Incorporated, yes.

3 Q. Inc. Okay. But let me make sure I got this  
4 right. Now, you-all serve Tampa, parts of St. Pete, and  
5 Fort Myers, so also Hillsborough County and Pinellas  
6 County; is that right?

7 A. Yes. That would be correct.

8 Q. All right. And the services on kind of the  
9 same issues in all of those localities, it's workforce  
10 affordable housing, small businesses; is that right?

11 A. Yes. I would say that.

12 Q. All right. Besides this lawsuit, have you  
13 ever been involved in a civil lawsuit as a party?

14 A. No, I have not.

15 Q. Have you ever been charged with a crime?

16 A. No, I have not.

17 Q. Have you ever been charged with driving while  
18 your license was suspended?

19 A. I do not believe I have.

20 Q. Ever filed for bankruptcy?

21 A. Yes, I have.

22 Q. How many times?

23 A. Once in 2013, I believe, as part of my divorce  
24 -- as part of my economic restructure after my divorce.

25 Q. Have you ever testified in court?

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1 A. Yes, I have for -- I believe for minor traffic  
2 offenses, traffic tickets.

3 Q. Your own traffic tickets?

4 A. Yes.

5 Q. Can you estimate how many times you've  
6 testified in court for traffic infractions?

7 A. You'd have to specify over what number of  
8 years or time periods.

9 Q. Ever.

10 A. Ever? Ever is a long time. I would struggle  
11 to say. I'll say at least twice that I'm aware of.

12 Q. Tell me in your own words why you're bringing  
13 this lawsuit?

14 A. I'm bringing this lawsuit because I believe  
15 that it's fundamentally unfair to seemingly dilute the  
16 will of the voters in multiple districts by trying to  
17 combine all of the voters that -- as many as possible of  
18 the voters that look alike into one district, whereas  
19 previously, they were in two or -- those same persons or  
20 communities were in two districts.

21 Q. And tell me a little bit more about how you  
22 think the will of the voters is diluted, if I got your  
23 word right, under the current map that you're  
24 challenging?

25 A. Well, if previously -- if, for example,



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1 previously, the different communities had one, let's  
2 call them representative -- political representative  
3 each and now those communities only have one total  
4 between the two of them, I would struggle to see how one  
5 person could effectively represent and advocate for the  
6 diverse interest of both communities.

7 Q. And which communities used to have two  
8 representatives, but now only have one representative?

9 A. South St. Petersburg, Florida, and a large  
10 portion of my district in -- which includes East Tampa,  
11 Florida -- East Tampa, North Tampa, so forth.

12 Q. And again, I never want to know what you said  
13 to your lawyer or what your lawyer said to you, but  
14 other than that, can you tell me, how did you come to be  
15 involved in this lawsuit?

16 MS. ROBERTSON: Keto, just make sure you don't  
17 disclose any conversations with any of your  
18 attorneys.

19 THE WITNESS: I got you. I got it. The law  
20 firm reached out to me and informed me of the case.

21 BY MS. HARLE:

22 Q. Have you spoken with any of the other  
23 plaintiffs in this case? Just yes or no. I don't need  
24 to know what was said. Have you ever spoken with any  
25 other plaintiffs?

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1 A. Yes, I have, but not about the case.

2 Q. Oh, okay. And which plaintiff was that?

3 A. Jarvis El-Amin.

4 Q. And do you know him in a personal capacity  
5 separate and apart from the case?

6 A. Yes.

7 Q. Okay.

8 A. Yes. We volunteered for many community --  
9 community activities together.

10 Q. Got it. When the redistricting process was  
11 going on that resulted in the map that you're  
12 challenging, were you aware at the time that  
13 redistricting was happening?

14 A. Yes, I was aware.

15 Q. Did you communicate with any members of the --  
16 members or staff of the Florida Legislature during the  
17 redistricting process?

18 A. No, I did not.

19 Q. Have you communicated with any members or  
20 staff of the Florida Legislature about the districts  
21 since the redistricting happened?

22 A. No, I have not.

23 Q. Have you ever communicated with any members of  
24 the media regarding the redistricting process?

25 A. Yes, I have.

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1 Q. When was that?

2 A. It was a few months ago after the lawsuit was  
3 filed. I don't remember the reporter's name, but it was  
4 a law reporting organization called -- I believe called  
5 Law360, and they cover lawsuits and legal happenings all  
6 over the State of Florida.

7 Q. All over the nation in fact. I'm very  
8 familiar.

9 A. Okay. Okay.

10 Q. So did you communicate directly with the  
11 Law360 reporter?

12 A. Yes, I did. He contacted me.

13 Q. Oh. Was your -- was it an interview?

14 A. I would say it was. He -- we spoke over the  
15 phone briefly.

16 Q. Did he quote you in an article?

17 A. I believe he did.

18 Q. Was your attorney on the phone call too?

19 A. No. No, they weren't.

20 Q. Uh-oh. And what did you tell the reporter  
21 about the redistricting process?

22 A. To my recollection, I told him the same thing  
23 I stated a few minutes ago, which was that it was  
24 difficult for me to see how having less representation,  
25 less political representation for two or more distinct

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1 voting regions was beneficial to the communities in  
2 those voting regions.

3 Q. Do you recall any other time that you've  
4 spoken with the media about the district lines that  
5 you're challenging?

6 A. I don't recall having participated in any  
7 other interviews.

8 Q. Have you made any written or oral statements  
9 to any community groups regarding the districts that  
10 you're challenging?

11 A. No. I do not recall having made any written  
12 or oral communications to any community groups.

13 Q. Have you spoken with folks at the NAACP  
14 regarding the redistricting process or the lawsuit?

15 A. I don't recall having spoken with anyone at  
16 the NAACP about the redistricting process.

17 Q. Have you spoken with anyone at the  
18 Hillsborough County Democrats about the redistricting  
19 process you're challenging?

20 A. No. I don't recall having spoken with anyone  
21 at Hillsborough County Democrats about the districting  
22 process.

23 Q. Have you made any statements or comments on  
24 social media about this lawsuit?

25 A. I do not believe I've made any comments on

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1 social media about the lawsuit. I believe I may have  
2 once mentioned to someone that the lawsuit had been  
3 filed, but nothing beyond that.

4 Q. Okay. Which social media accounts do you  
5 have?

6 A. I have multiple social media accounts on --  
7 let's see -- Twitter, Facebook, and -- what's the other  
8 one? Instagram to my recollection.

9 Q. And you have LinkedIn, right?

10 A. I'm sorry. Can you say that again?

11 Q. You have LinkedIn, right?

12 A. Yes. Oh, that's right, yes.

13 Q. Do you have TikTok?

14 A. I have, but I don't use it.

15 Q. Are you currently a registered voter?

16 A. Yes, I am.

17 Q. When's the last time you voted?

18 A. I vote every year. I'm a super voter.

19 Q. So have you voted in every state congressional  
20 election you've been eligible for?

21 A. To my recollection, I have voted in every  
22 state congressional election that I'm eligible for.

23 MS. HARLE: Let's pull up the complaint as  
24 Exhibit 1.

25 (Defendant's Exhibit No. 1 was marked for

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1 identification.)

2 BY MS. HARLE:

3 Q. And looking at -- let's start just by looking  
4 at the map that you're challenging, figure 3 on page 20.

5 A. Okay. Was there a question stated?

6 Q. Yes. I was just going to pull that up for --  
7 to give us a frame of reference.

8 Can you explain to me -- well, first, I guess  
9 does this map look familiar to you?

10 A. Yes, it does.

11 Q. Okay. And these are the districts that you're  
12 challenging in this lawsuit, right?

13 A. Yes. That's correct.

14 Q. Can you just explain to me while we have this  
15 up all of the reasons that you think that these district  
16 line are problematic.

17 A. Yes. We can see all the sections in purple  
18 are two different areas of the State of Florida. The  
19 larger section to the right is primarily Hillsborough  
20 County or -- yeah, Hillsborough County from about the  
21 University of South Florida/North Tampa area down to  
22 much further south, the southernmost part of  
23 Hillsborough County, and then the small sliver on the  
24 left is part of South St. Pete.

25 Q. Okay. So in terms of reason why you think

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1 this map is problematic and illegal --

2 A. Yes.

3 Q. -- tell me what those are.

4 MS. ROBERTSON: Object to form.

5 When I say that, you can still answer --

6 THE WITNESS: Okay.

7 MS. ROBERTSON: -- unless I tell you.

8 THE WITNESS: Okay. Yes. There are multiple  
9 -- several reasons I can think of. People in  
10 Hillsborough County and St. Pete -- excuse me --  
11 have different factors that they're concerned  
12 about. One is public transportation. So if you're  
13 in South St. Pete, you have a certain level of  
14 service that you come to expect from PSTA, which is  
15 the public bussing system. If you're in -- and you  
16 have a much smaller area in which you may need to  
17 travel.

18 In Hillsborough County -- excuse me. Sorry.  
19 In Hillsborough County, in that section of  
20 Hillsborough County, HART, H-A-R-T, services much  
21 of that area, but there's a totally different level  
22 of service as customers try to piece together  
23 routes so they can get back and forth from home to  
24 work, school, church, shopping, sports activities,  
25 so forth. That's one issue.

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1           Then another issue is the -- is the school  
2           districting. If you're in South St. Pete, you're  
3           part of the Pinellas County Public School district,  
4           which is much -- much, much smaller and limited in  
5           the number of schools and student that it serves.  
6           In Hillsborough County, that's that slice -- the  
7           purple slice is part of over 200 schools and I  
8           believe the seventh largest school district in the  
9           country with over \$3.2 billion budget, which has  
10          very different factors and -- and points of  
11          interest for the citizens of Hillsborough County as  
12          opposed to St. Pete. Those are two of the issues  
13          that I can think of.

14          Oh, affordable housing, of course, is the  
15          third one. In St. Pete, where it looks like it's  
16          South St. Pete, as far as property values and the  
17          ability of the residents to secure affordable  
18          housing is drastically different from what it looks  
19          like in many parts of Hillsborough County with East  
20          Tampa, North Tampa, you know, South Tampa, so forth  
21          as far as ability of the residents to find  
22          affordable housing.

23 BY MS. HARLE:

24          Q. Tell me just a little bit more about how the  
25          affordable housing issue is different in East Tampa and



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1 North Tampa versus South St. Pete?

2 A. Well, I'm certainly not a geographic expert --  
3 geographic or real estate expert. My understanding is  
4 that some of the -- how do you say -- a number of the  
5 communities in South St. Pete may primarily be  
6 economically depressed, whereas in Hillsborough County,  
7 throughout that large slice, you have multiple levels of  
8 economic ability.

9 So you may have Seminole Heights, for example,  
10 which has houses average three hundred, four hundred  
11 thousand dollars, you know, whereas you may have East  
12 Tampa where a lot of folks live in apartment  
13 communities -- in low income apartment communities.

14 Q. And just going back to what you said about the  
15 school districts, do the voters in the purple part of  
16 St. Pete vote for the Pinellas County School Board?

17 A. Yes, they do.

18 Q. All right. Let's look up to paragraph 6 and 7  
19 of your complaint. There we go. Okay. I'll give you  
20 some time for you to read this.

21 A. All right. Okay.

22 Q. Okay. So I wanted to focus on a couple of  
23 your -- your allegations here. In paragraph 6, you say,  
24 quote, The legislature elevated race above all other  
25 considerations, end quote. And then in paragraph 7, you

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1 say, quote, Legislators and their staff purportedly drew  
2 these districts in a race-predominant manner, end quote.

3 So my first question was going to be, what --  
4 do you have any particular facts regarding the racial  
5 motivations of the legislature in drawing the district  
6 lines?

7 A. No. I don't have any particular facts. I  
8 would have to defer to my attorneys regarding that  
9 discussion, but looking at the maps visually, I can't  
10 see another reason why you would -- why someone or an  
11 entity would divide up the voting district that way  
12 especially considering you have two -- it's one of the  
13 few if not the only district in the area where you have  
14 to cross a body of water and possibly multiple counties.

15 Q. And who is it that you believe is harmed by  
16 the way that district lines are currently drawn?

17 A. I believe primarily African-American voters  
18 living in South St. Pete and Hillsborough County are  
19 harmed by the redrawing of this district.

20 Q. And how are the Black voters in South St. Pete  
21 and Hillsborough County harmed by the way the districts  
22 are drawn?

23 A. Voters in both areas are harmed because they  
24 are -- they previously had multiple political  
25 representatives and now that number has been

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1 artificially shrunk to fewer representatives. Less  
2 representation to me does not seem like a fair thing  
3 especially when you have more, more, more residents  
4 combined in that area now than in years past.

5 Q. Do you believe there are too many Black voters  
6 in your district?

7 A. Let's see. Can you restate what you mean by  
8 that?

9 Q. Yeah. I'm trying to get at what the harm is  
10 to the Black voters from your perspective.

11 Is it your contention that there are too many  
12 Black voters backed into District 16?

13 MS. ROBERTSON: Object to form.

14 You can answer, Keto, if you --

15 THE WITNESS: Okay. Okay. If I believe I  
16 heard you correctly, you're asking do I believe  
17 that the voters -- that the voters are harmed or a  
18 specific group of voters are harmed?

19 BY MS. HARLE:

20 Q. Do you believe there are too many Black voters  
21 that are packed into District 16 under the current map?

22 MS. ROBERTSON: Object to form.

23 Go ahead and answer if you know.

24 THE WITNESS: Yes, I do. I believe there are  
25 too many voters in the district that are diverse --

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1 represent diverse communities.

2 BY MS. HARLE:

3 Q. Do you believe there are too many Black voters  
4 in District 16 currently?

5 A. Yes, I do believe that.

6 Q. And do you know what the current percentage of  
7 Black voting age population is for District 16?

8 A. I'm not aware of that fact. I would have to  
9 defer to my attorneys for their knowledge.

10 Q. Do you have an estimated percentage in mind  
11 that for you is a fair percentage of Black voting age  
12 population for your district?

13 A. No. I do not have a certain percentage in  
14 mind at this time.

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

17 A. I'm familiar with some of the history, not all  
18 of it, and for that discussion, I would certainly have  
19 to refer to my attorneys for historical perspective.

20 Q. What of the history can you -- or which part  
21 of the history of the boundaries are you familiar with?

22 A. I'm familiar with the fact that I -- to my  
23 recollection, the South St. Petersburg sliver was  
24 formerly in a Pinellas County voting district, whereas  
25 the Hillsborough County sliver was strictly in a

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1 Hillsborough County voting district. And with the  
2 drawing that we saw a few -- earlier today, that has  
3 changed. You have combined voters from both areas.

4 Q. Are you aware that the communities that are  
5 combined into District 16 currently have been combined  
6 to a shared district since the early 1990s?

7 A. I'm not familiar with all of the dates. For  
8 that, I'd have to defer to the knowledge of my  
9 attorneys.

10 Q. Did you read the complaint before it was  
11 filed?

12 A. I believe I did. I don't recall the exact  
13 date, so I wouldn't be able to say for sure.

14 Q. Yeah. I don't need the date. I'm just  
15 wondering did you read it in full before it was filed.

16 A. I believe I did.

17 Q. Let's go to paragraph 11.

18 A. Okay. You want me to read it silently?

19 Q. Yes. That'd be great.

20 A. Okay. Okay. I read it.

21 Q. Okay. Great. So I was going to ask about the  
22 part where you say, quote, Plaintiffs are further harmed  
23 because the legislature sacrificed genuine communities  
24 of interest, end quote.

25 My first question is, which genuine

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1 communities of interest are you referring to there that  
2 you believe the legislature sacrificed?

3 A. They genuine communities of interest would be  
4 Black communities in particular in South St. Petersburg  
5 and in Hillsborough County, for example, in East Tampa.

6 Q. And how do you believe the community of Blacks  
7 in East Tampa were sacrificed by the legislature?

8 A. They -- the -- it's my belief that the  
9 legislature put together two totally different  
10 communities, communities who have sent their children to  
11 school in different community schools and different  
12 county systems. For example, communities that pay taxes  
13 in a different -- in different ways at different tax  
14 referendums, different tax rules, different incentives  
15 for small business, for example, they put them all  
16 together among other factors. All of those folks were  
17 suddenly put together despite their differences.

18 Q. And so how has putting them together  
19 sacrificed those communities, just in your own words?

20 A. Putting these two communities together  
21 sacrifices their interest because it's very difficult  
22 for a -- for one person to represent two totally  
23 different areas that have different interests and  
24 different factors that they struggle through on a daily  
25 basis.

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1 Q. And what specific facts are you relying on for  
2 that claim that the legislature sacrificed genuine  
3 communities of interest?

4 A. Can you restate the question, please?

5 Q. Yeah. Were there any specific facts you're  
6 relying on in support of your allegation that the  
7 legislature sacrificed those genuine communities of  
8 interest?

9 A. Well, for specific facts, I would have to  
10 defer to the knowledge of my attorneys.

11 Q. Are there any other communities of interest  
12 that you believe were sacrificed because of the way the  
13 district lines were drawn?

14 A. I'm not aware of any other communities of  
15 interest. It would seem strange for the district to be  
16 drawn this way based on any other factors.

17 Q. What do you understand communities of interest  
18 to mean?

19 A. Communities of interest are groups of people  
20 that reside typically in the same or similar geographic  
21 area in a region, and so they have I would just say many  
22 commonalties and mutual interests in that particular  
23 area that others outside that area may not share.

24 Q. And so the two communities of interest that  
25 you've mentioned are the Black voters in South St. Pete

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1 and the Black voters in East Tampa.

2 So other than race, is there another factor  
3 that you think can serve as a basis for a community of  
4 interest?

5 A. I'm not aware of any other factor at this  
6 time.

7 Q. Do you think political party could be the  
8 basis for a community of interest?

9 A. Not sure. I'm not sure. I'm not sure. I  
10 would have to defer to the knowledge of my -- of my  
11 attorneys in this -- in that case.

12 Q. Do you think income level could serve as a  
13 basis for a community of interest?

14 A. I'm not sure and I'd have to defer to the  
15 knowledge of my attorneys.

16 Q. Looking at the next paragraph there, paragraph  
17 12, just -- if you'll read that to yourself and let me  
18 know when you're ready.

19 A. Yes, I'm ready.

20 Q. Okay. So this one says, quote, The  
21 legislature's racial gerrymandering unjustifiably packed  
22 Black voters into District 16 stripping them from  
23 adjacent District 18 and reducing their influence there,  
24 end quote.

25 So my question is, do you have any specific



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1 facts asserting -- excuse me -- supporting the  
2 allegation that the influence of Black voters in  
3 District 18 is reduced?

4 A. I'm not aware of any specific facts, so I  
5 would have to defer to the knowledge of my attorneys,  
6 but I can't see why you would divide up the district if  
7 that were not a consideration.

8 Q. Okay. So the next paragraph we'll take a look  
9 at too --

10 MS. ROBERTSON: I apologize. Is anyone ready  
11 for a break? I actually need to use the bathroom.

12 MS. HARLE: Yeah. That's fine. We can go off  
13 the record. Back in five.

14 (Brief recess.)

15 BY MS. HARLE:

16 Q. Mr Nord Hodges, I think we were just looking  
17 at paragraph 13 there. We'll give you a minute to read  
18 that. Let me know when you're ready.

19 A. All right. All right. I'm ready.

20 Q. So starting on that third line where you say,  
21 quote, Floridians including individual legislators  
22 called out and questioned the legislature's  
23 unconstitutional actions, end quote, I'm wondering, are  
24 there any specific Floridians you're aware of that  
25 called out and questioned the legislature?

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1 A. I'm not aware of specific names at this time.  
2 I'd have to defer to my attorneys for their knowledge of  
3 different actors in the case.

4 Q. Do you have any general recollection that you  
5 can share with me of who called out what?

6 A. I do not. I watched the news and -- at the  
7 time and I know some did. I don't recall who because it  
8 was all the local Tampa Bay area news stations.

9 Q. Okay. Let's look at paragraph 20, please.

10 A. I'm sorry. Which paragraph number?

11 Q. Paragraph 20. If you can just read that to  
12 yourself.

13 A. Okay. I read it.

14 Q. Okay. So this one talks about the district's  
15 line splitting up Plaintiff's communities.

16 My question is, which community are you  
17 referring to there that you feel like is split up?

18 A. The two communities that's -- two communities  
19 in particular are East Tampa community and the South  
20 St. Petersburg community.

21 Q. And do you consider your community to be North  
22 Tampa?

23 A. Yes. I live in North Tampa. I -- yes.

24 Q. Okay. But North Tampa is not split up, right?

25 A. I'm not sure what you mean by that.

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1 Q. Well, so this is -- quote, The enacted plan  
2 harms Plaintiffs because among other reasons, it splits  
3 up their communities.

4 So I'm just wondering, is your community,  
5 North Tampa, split up in your view?

6 A. Oh, right. I'm trying to make sure I  
7 understand what you're asking. The North Tampa  
8 community that I'm in appears to be part of the same  
9 portion of the Hillsborough County side of the district.  
10 So it's not physically politically split up for them to  
11 be divided from the St. Petersburg -- South  
12 St. Petersburg district.

13 Q. And when you think of your own community, how  
14 would you define your -- Mr. Hodges -- Nord Hodges'  
15 community?

16 A. Let's see. How -- how would I define my  
17 community? Can you be specific as to which community  
18 you're referring to?

19 Q. Well, I'm trying to wrap my mind around what  
20 is meant in your complaint. At various times,  
21 communities are referred to. So I guess if I were just  
22 asking you, you know, how do you define or describe your  
23 community? Is there one answer? Are there different  
24 answers that you would give me?

25 A. Well, one answer I would give you right now

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1 through my recollection is that I'm part of the  
2 Hillsborough County community and all that that entails,  
3 and that community is different from the South  
4 St. Petersburg community.

5 Q. So later in that paragraph 20 where it says,  
6 groups their communities with dissimilar ones, is --  
7 what are you referring to there in terms of  
8 dissimilar --

9 MS. ROBERTSON: Object to form. I'm sorry.  
10 Object to form.

11 THE WITNESS: I'm referring to the fact that  
12 Black communities in areas like East Tampa and  
13 South St. Petersburg are very dissimilar other than  
14 them being Black -- primarily Black.

15 BY MS. HARLE:

16 Q. And you don't consider yourself in East Tampa,  
17 right?

18 A. That's correct, although I serve residents of  
19 East Tampa in the -- through my job in the school  
20 district.

21 Q. So your -- was it called Dr. Carter?

22 A. Yes, Dr. Carter G. Wilson school.

23 Q. That's located in East Tampa?

24 A. No. That's located in West -- in North Tampa  
25 also, but the students come from all over -- all parts

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1 of Hillsborough County including East Tampa.

2 Q. Okay. And then that last line that says,  
3 quote, Simply because of their race, are there any facts  
4 that you know of that we haven't talked about today that  
5 indicate that the lines were drawn simply because of the  
6 race of the voters?

7 A. I would have to defer to my attorneys for  
8 further discussion of that matter, but I can't see why  
9 you would draw the district -- redraw the district that  
10 way if race were not a factor.

11 Q. Let's look at paragraph 95. Read that and let  
12 me when you're ready.

13 A. All right.

14 Q. So this is where you say, quote, These  
15 race-based decisions resulted in a map that splits  
16 neighborhood and ignores traditional redistricting  
17 criteria.

18 So my first question is, which --

19 A. Well, hang on.

20 Q. I'm sorry.

21 A. I haven't had a chance to finish reading it  
22 yet.

23 Q. Oh, I'm sorry.

24 A. That's okay. You said 95 or 96?

25 Q. Just number 95, yes, sir.

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1 A. Right. Okay. Go ahead.

2 Q. My first question is, which neighborhoods are  
3 split in the map?

4 A. Well, South St. Petersburg -- South  
5 St. Petersburg is politically split from the rest of  
6 St. Petersburg, which is not -- which has not always  
7 been the case.

8 Q. Is South St. Petersburg -- South  
9 St. Petersburg itself a neighborhood?

10 A. Yes, it is.

11 Q. And is all of South St. Petersburg currently  
12 in District 16?

13 A. You would need to show me a map again and  
14 restate the question, please.

15 Q. Okay. Sure. Let's -- let's go down to the  
16 figure 3 real quick.

17 So the purple part on the map there, that's  
18 South St. Petersburg, correct?

19 A. Yes. Well, the purple shaded part.

20 Q. Purple with the diagonal white lines?

21 A. Yeah.

22 Q. Okay. So my question is, just that boundary  
23 between 16 and 18 on the Pinellas side, do you see that?

24 A. Yes.

25 Q. Okay. Is any part of South St. Pete in

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1 District 18 on that map?

2 A. Yes, it is.

3 Q. Okay. So is South St. Petersburg the  
4 neighborhood, as you described it, split between  
5 District 16 and 18?

6 A. Oh, is South St. Pete split between District  
7 16 and 18?

8 Q. That's what I'm trying to ask.

9 A. No, it's not. It's divided from it.

10 Q. Okay. Thank you. All right. Let's look back  
11 at 95 for the second part of that question, which is --  
12 this says that the legislature ignores traditional  
13 redistricting criteria, so I'm wondering, which criteria  
14 do you understand it to be appropriate for the  
15 legislature to use when drawing district lines?

16 A. Well, for further discussion of that, I would  
17 have to defer to the knowledge of my attorneys.

18 Q. And which criteria do you believe the  
19 legislature ignored in drawing these district lines?

20 A. I believe they simply ignored geographic  
21 criteria by going across multiple counties and dividing  
22 it up with the body of water all of -- both of which are  
23 unusual.

24 Q. Anything else?

25 A. Not at this time.

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1 Q. Okay. All right. Let's look at paragraph 97.

2 A. Okay. Let me read it. Okay. Go ahead.

3 Q. Just focussing on the first line that refers  
4 to, quote, The direct evidence of racial predominance,  
5 what direct evidence are you aware of that race  
6 predominates the drawing of the district lines you're  
7 challenging?

8 A. I'm not certain on all of the particular  
9 factors, so I would have to defer to my attorneys for  
10 more complete answering of this.

11 Q. But do you know of any direct evidence that  
12 race predominates the drawing of the lines?

13 A. I'm not sure at this time, but I can't see why  
14 else you would need to draw a district in this way.

15 Q. Looking at paragraph 131 -- take a minute to  
16 read that and let me know, please.

17 A. Yes. You can go ahead.

18 Q. Okay. Do you know what the phrase Tier One  
19 compliance means in that allegation?

20 A. I don't recall. I've seen the definition  
21 somewhere in my reading of this lawsuit, I believe, but  
22 I'd have to refer to -- or defer to my attorneys for  
23 more definitions or knowledge.

24 Q. Let's look at the map of what's called plan  
25 42, which is in your complaint. There it is.



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1 Does that look familiar to you?

2 A. Yeah. I have seen it in the past.

3 Q. I'll just represent to you this is a --  
4 obviously, it's in your complaint. This is a map that  
5 you and your Co-Plaintiffs have proposed as a better  
6 alternative to the map you're challenging.

7 Can you tell me anything about this map that  
8 you think is better than the map that you're challenging  
9 in the lawsuit?

10 A. Yes. If you look at 19, 18, 16, and 24, you  
11 can travel the width and height of the -- of those areas  
12 without crossing into another county, and the entire  
13 community or geographic area is enclosed within the  
14 boundaries of each specific voting district.

15 Q. Based on your knowledge of the demographics in  
16 Hillsborough, would there be roughly the same number of  
17 Black voters in this map or more or less than the one  
18 that you're challenging?

19 A. I would have to defer to my attorneys, who I'm  
20 sure may be relying on the census and other political --  
21 and other information or more accurate and complete  
22 discussion of that question.

23 Q. Okay. Let's look at what's called the Isbell  
24 map. It's also in your complaint. Does this -- let's  
25 see.

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1           The Isbell Plan, does that look familiar to  
2     you?

3           A.     I believe I've seen it before.

4           Q.     Okay. And this is in your complaint as an  
5     alternative map.

6           What is it about this map that you prefer to  
7     the map that you're challenging in the lawsuit?

8           A.     Again, it appears that the -- that each of the  
9     voting districts is self-contained and does not cross  
10    over or -- or share parts of another voting district.  
11    You can travel the width and the depth of each district  
12    without crossing a body of water and without -- without  
13    crossing through another district.

14          Q.     And in this plan, it looks like the voters of  
15    South St. Pete are not combined with the voters of  
16    Tampa; is that right?

17          A.     That appears to be accurate.

18          Q.     Do you know whether under this plan in the  
19    region shaded 17 there would be a diminishment of the  
20    Black voting power as compared to the map that you're  
21    challenging now?

22          A.     I'm not aware of all the specific boundaries  
23    of this proposed plan. I'd have to defer to my  
24    attorneys for more complete and accurate discussion.

25          Q.     Have you seen any of the maps that your expert

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1 witnesses have provided in their reports in this case?

2 A. I'm not sure. I -- I'm not sure. I would  
3 have to be pointed to specific maps. It seems like  
4 there's a lot of them.

5 MS. HARLE: That is correct. Let's look at  
6 your initial disclosures. This will be Exhibit 2.

7 (Defendant's Exhibit No. 2 was marked for  
8 identification.)

9 If you can scroll down, Leila, to the bottom  
10 and then back up.

11 BY MS. HARLE:

12 Q. Does this document look familiar to you  
13 Mr. Nord Hodges?

14 A. Let's see. Let me see. Well, my name looks  
15 familiar.

16 Q. Okay. Are you able to say whether you've  
17 reviewed this before?

18 A. I believe I have. All the documents kind of  
19 seem to run together.

20 Q. I understand. Well, let's look at what it  
21 says there in 1A where it has your name. So it says  
22 that you, quote, have information tending to show that  
23 the challenged districts caused harm to themselves and  
24 other residents.

25 So I'm wondering, what harm do the challenged

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1 districts cause to you?

2 A. Yes. Specifically, the harm to me is that I'm  
3 forced to share a legislature now -- or not necessarily  
4 legislature, a political representative with -- with  
5 residents of South St. Pete with whom I have nothing in  
6 common other than being Black. So again, less  
7 representation to me is not better than more  
8 representation.

9 Q. And do you believe that Black voters are a  
10 community of interest?

11 A. Yes, I do.

12 Q. So in what way does being in the same district  
13 as other Black voters harm you?

14 MS. ROBERTSON: Object to form.

15 You can answer.

16 THE WITNESS: Okay. In what way does being in  
17 a district with other Black voters harm me?

18 MS. HARLE: Yes, sir.

19 THE WITNESS: Well, if the -- I'm sorry. Go  
20 ahead.

21 MS. HARLE: Yes, sir. That was my question.

22 THE WITNESS: Okay. It harms me if I have to  
23 share time with a legislator who's -- instead of  
24 being able to be dedicated to the interest of my  
25 community has conflicting interest in at least two

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1 different communities that they have to consider,  
2 research, work on, so forth. So possibly, I may  
3 get less, less advocacy on -- for my community on  
4 my side of the map and some in another part of the  
5 map.

6 BY MS. HARLE:

7 Q. And if -- if the voters of South St. Pete were  
8 moved out of your voting district and that caused the  
9 number of Black voters in your district to go down,  
10 would you be in favor of that?

11 A. Yes, I would.

12 Q. Okay. So the second part of your claim there  
13 is that you have information tending to show that the  
14 challenged district cause harm to other residents.

15 So is there any harm to other residents of the  
16 districts that you have information on that we haven't  
17 talked about yet?

18 A. I'm not aware of other specific information.  
19 I'd have to defer to my attorneys for complete and  
20 accurate discussion.

21 Q. Okay. Are there any other individuals you  
22 know of that have information about whether the district  
23 lines were drawn near -- primarily based on race?

24 A. I'm not aware at this time of who has or  
25 doesn't have information about the districts being

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1 redrawn.

2 MS. HARLE: And then just one, I think, final  
3 exhibit. This will be your blog from November 9th,  
4 2012. Give you time to read it.

5 (Defendant's Exhibit No. 3 was marked for  
6 identification.)

7 THE WITNESS: Okay.

8 BY MS. HARLE:

9 Q. Does this kind of look like your blog?

10 A. Yes. That is definitely me.

11 Q. Okay. If you don't mind, just read that entry  
12 and I'll just have a couple questions.

13 A. All right. Sure. Give me a moment. All  
14 right. I finished.

15 Q. Okay. I just wanted to hone in on towards the  
16 bottom there starting with -- I'll read it into the  
17 record just so we have it. Quote, Even the Cuban  
18 population is no longer Republican in Florida.  
19 Unfortunately, I guarantee that the blind will continue  
20 to lead the blind and tea partying war-mongering GOP  
21 party leadership will stupidly assume that they lost  
22 this election because their candidates were not more  
23 extreme. For their sakes, they should get it right  
24 because the number of old white men in America is  
25 shrinking and you cannot win with just their vote. Duh,

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1 end quote.

2 Did I read that right?

3 A. Yes, you did.

4 Q. Okay. Would you say that you had animosity  
5 towards Republicans at the time you wrote this?

6 A. No, not at all. I've -- I'm a first  
7 generation immigrant who grew up in the south in  
8 Arkansas and Florida surrounded by Republicans,  
9 Democrats, Independents, and others from school age  
10 including my school in church and my community groups  
11 that I actively fellowshiped and was and am still  
12 friends with until this day.

13 Q. Okay. So you don't have any animosity today  
14 towards old white men?

15 A. No, I did not.

16 Q. Okay. And do you think -- do you think  
17 Republicans are stupid?

18 A. No. This was just an opinion piece based on  
19 certain political actions at the time. And being 12  
20 years ago, many things have -- are not the same today as  
21 they were in 2012.

22 MS. HARLE: Understood. Well, thank you. I  
23 think that's the end of my questions.

24 THE WITNESS: You're welcome.

25 MS. ROBERTSON: I don't have any questions.

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1 We would like to read.

2 MS. HARLE: And we will order an electronic  
3 copy.

4 MS. ROBERTSON: We'll also order. And can you  
5 bill the ACLU instead of Butler.

6 (This deposition was concluded at 3:49 p.m.)

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CERTIFICATE OF OATH

STATE OF FLORIDA )

COUNTY OF DUVAL )

I, WENDY E. RIVERA, Florida Professional  
Reporter, Notary Public, State of Florida, certify that  
KETO NORD HODGES personally appeared before me via  
videoconference on November 26, 2024, and was duly  
sworn.

Signed this 13th day of December, 2024.

*Wendy E. Rivera*

Wendy E. Rivera  
Notary Public, State of Florida  
Commission No.: HH 373469  
Expires: March 15, 2027



WENDY E. RIVERA  
Commission # HH 373469  
Expires March 15, 2027

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CERTIFICATE OF REPORTER

STATE OF FLORIDA )

COUNTY OF DUVAL )

I, WENDY E. RIVERA, Florida Professional  
Reporter, do hereby certify that I was authorized to and  
did remotely stenographically report the videoconference  
deposition of KETO NORD HODGES; that a review of the  
transcript WAS requested; and that the foregoing  
transcript, pages 1 through 56, is a true record of my  
stenographic notes.

I FURTHER CERTIFY that I am not a relative,  
employee, or attorney, or counsel of any of the parties,  
nor am I a relative or employee of any of the parties'  
attorney or counsel connected with the action, nor am I  
financially interested in the action.

DATED this 13th day of December, 2024.



Wendy E. Rivera