

In the Matter Of:
HODGES V. PASSIDOMO

8 24 CV 879

JARVIS EL-AMIN

November 21, 2024

Exhibit 23



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JARVIS EL-AMIN
HODGES V. PASSIDOMO

November 21, 2024

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

KÉTO NORD HODGES, et al.,

Plaintiffs,

vs.

Case No: 8:24-CV-879

KATHLEEN PASSIDOMO, et al.,

Defendants.

DEPOSITION OF JARVIS EL-AMIN

DATE: November 21, 2024

TIME: 2:01 p.m. to 3:51 p.m.

LOCATION: Videoconference-Zoom

SETTING FIRM: Shutts & Bowen - Tallahassee

REPORTER: Jill Saravis-Regan, Court
Reporter and Notary Public for
The State of Florida at Large

FILE: J12008347

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1 APPEARANCE :

2
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1 THEREUPON,

2 JARVIS EL-AMIN,
3 a witness, having been first duly sworn, upon his oath,
4 testified as follows:

5 DIRECT EXAMINATION

6 BY MS. HARLE:

7 Q. Good afternoon, Mr. El-Amin. My name is Denise
8 Harle. I'm one of the attorneys for the Florida Senate in
9 this case.

10 Could you please state and spell your name for the
11 record?

12 MR. SHAW: I think -- before we start, are we --
13 (Thereupon, a discussion was held off the record.)

14 BY MS. HARLE:

15 Q. Will you please state and spell your name for the
16 record?

17 A. Jarvis Karin El-Amin, Jarvis is J-a-r-v-i-s;
18 Karin is K-a-r-i-n; El-Amin is E-l, hyphen, capital "A,"
19 m-i-n.

20 Q. Thank you. Did you attend yesterday's deposition
21 of Ms. Garcia in this case?

22 A. No.

23 Q. All right. Have you -- do you understand that
24 you're being deposed under oath today? Meaning, your
25 testimony is subject to penalty of perjury.

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1 A. Yes, ma'am.

2 Q. Do you -- let's see. Have you ever been deposed?

3 A. Yes.

4 Q. Okay. Tell me about all of the other times
5 you've been deposed, please.

6 A. I can't recall.

7 Q. Okay. Do you recall any times that you've been
8 deposed previously?

9 A. No.

10 Q. Okay. Have you -- have you been a witness and
11 sat for a deposition before?

12 A. Repeat your question. I can't understand what
13 you're saying.

14 Q. Sorry. Have you been deposed before today?

15 A. Yes.

16 Q. Okay, when were you deposed?

17 A. I don't remember. A long time ago.

18 Q. Were you previously deposed one time or more than
19 one time?

20 A. One time.

21 Q. Was it a criminal matter or a civil matter?

22 A. I don't recall.

23 Q. Were you a party to the dispute?

24 A. I can't remember, ma'am.

25 Q. What was the nature of your deposition testimony;

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1 what was the subject matter?

2 A. I don't remember.

3 Q. Is there anything at all that you remember about
4 your previous deposition; where it happened, who was
5 involved, which court it was related to?

6 A. All I remember is it was a long time ago in
7 Miami, I'm sorry.

8 Q. Okay. You -- was it 30 years ago, can you give
9 me a ballpark estimate?

10 A. I can't recall how many years, ma'am.

11 Q. Do you think it was more than ten years ago?

12 A. I cannot say.

13 Q. Were you a defendant in the case?

14 A. I don't remember, ma'am.

15 Q. Have you ever testified in court?

16 A. Could you clarify what you mean by that?

17 Q. Have you ever given testimony in a court of law?

18 A. Yes.

19 Q. Okay. Have you done that more than one time?

20 A. I don't recall, ma'am.

21 Q. Is there only one time you recall previously
22 giving testimony in court?

23 A. One time I remember.

24 Q. Okay. Can you tell me about that time, please?

25 A. I don't remember what it was. I was young, I

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1 don't remember.

2 Q. Was it the same matter that you gave the
3 deposition in?

4 A. No, I don't remember, ma'am.

5 Q. Mr. El-Amin, when you testified in court
6 previously, was that in a civil case?

7 A. I don't remember. I think it was civil, I'm not
8 remembering for certain.

9 Q. Were you a party in that lawsuit?

10 A. I don't remember, ma'am.

11 Q. What were the civil claims, or what was the
12 subject matter of the dispute that you testified in court
13 about?

14 A. I don't recall, ma'am.

15 Q. Was that here in Florida?

16 A. Yes.

17 Q. What city was that in?

18 A. Miami.

19 Q. Can you estimate what year or what decade your
20 court testimony occurred in?

21 A. It could have been the late 70s.

22 Q. Do you remember anyone else who was involved in
23 that case that you can identify?

24 A. No, I don't.

25 Q. How did you get involved in the case where you

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1 testified in court?

2 A. I don't remember, ma'am.

3 Q. And the previous deposition testimony you gave,
4 was that also here in Florida?

5 A. Could you clarify what you said?

6 Q. Earlier, you told me that you had been deposed
7 before. I'm asking, did that occur here in Florida, your
8 deposition?

9 A. Yes.

10 Q. Okay. What city was that in?

11 A. It could have been Miami. I'm not certain.

12 Q. And are you able to give me an estimated decade
13 when that occurred?

14 A. No, ma'am.

15 Q. We'll just to go over a few ground rules for
16 today. So far you seem to be doing well on all of these,
17 but I just need to make sure that you give a verbal
18 response to all of my questions; that you're careful not
19 to interrupt me or talk over me. If you have any trouble
20 understanding my question, please just ask me to rephrase
21 or try it again. I'm happy to do that.

22 If you do answer my question, that answer will be
23 under oath, and we will all assume that you understood my
24 question and the answer you gave is binding and accurate.

25 If at any point, seeing a document would help you

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1 refresh your recollection or your understanding, please
2 just let me know and I'll be happy to try to assist you on
3 that.

4 If at any point you need a break, I'm also happy to
5 accommodate that as well, just let me know. We'll find a
6 good stopping point.

7 Your attorney may object to some of the questions I
8 today, but unless your attorney instructs you not to
9 answer, you do still need do go ahead and answer the
10 question.

11 Does all of that make sense?

12 A. Yes, ma'am.

13 Q. Thank you. Could you please state your address,
14 your current residence?

15 A. 4818 East 99th Avenue, Tampa, Florida 33617.

16 Q. And when did you move there?

17 A. I moved there initially in 1989. For two years,
18 I moved away, and came back in 2003 to current.

19 Q. In that exact same address?

20 A. Excuse me, not 2003, 2005.

21 Q. Okay, so just to clarify, you've lived at your
22 current address, 4818 East 99th Street in Tampa -- excuse
23 me, East 99th Avenue in Tampa since 2005?

24 A. I initially moved there in 1989 and stayed away
25 from there from 2003 to 2005. I moved back there in 2005.

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1 I've been there since 2005.

2 Q. And is that a house?

3 A. Yes, ma'am, yes.

4 Q. Do you own the house?

5 A. Yes.

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

8 A. No chance.

9 Q. What's your educational background since high
10 school?

11 A. I have high school diploma and some college.

12 Q. Where did you attend college?

13 A. I attended Miami-Dade Junior College and
14 Hillsborough County Community College.

15 Q. Sir, after college, what did you do after leaving
16 college?

17 A. Well, opened up the restaurant business.

18 Q. Was that -- was that in the Miami area?

19 A. In Miami.

20 Q. And how long did you work in the Miami -- excuse
21 me, the restaurant business in Miami?

22 A. About five years, six years.

23 Q. What did you do after that?

24 A. I went into salesmanship. I worked for a company
25 doing sales.

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1 Q. And what kind of sales?

2 A. Insurance.

3 Q. How long did you do insurance sales?

4 A. I don't recall, a couple of years.

5 Q. And what did you do after that for a line of
6 work?

7 A. Entrepreneurship, working at flea markets.

8 Q. Did you say flea markets?

9 A. Yes, ma'am.

10 Q. Is that what you still do, nowadays?

11 A. No.

12 Q. Okay. You don't do entrepreneurship now -- or do
13 you do entrepreneurship now?

14 A. Yes.

15 Q. Okay. Well, maybe we'll start there and then we
16 can work backwards if we need to. What -- tell me about
17 your current employer, please.

18 A. I have my own company, Enhancement Enterprises.
19 I do sales training and consulting.

20 Q. What's the name of your business?

21 A. Enhancement Enterprises.

22 Q. How long have you owned that business?

23 A. Fifteen years.

24 Q. Do you have a physical office location?

25 A. No.

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1 Q. Have you ever worked for a political
2 organization?

3 A. Yes.

4 Q. Which political organization have you worked for?

5 A. I worked for specific engagement -- I don't know
6 if it's political -- Florida Rising

7 Q. I'm sorry, what was it called?

8 A. Florida Rising.

9 Q. Florida Rising, okay. And what does Florida
10 Rising do?

11 A. Specific engagement.

12 Q. Can you tell me more specifically some of the
13 particular activities of Florida Rising?

14 A. Yes, it's canvassing about particular issues in
15 the community, all people, about different issues in the
16 community and educate people through the voting process.

17 Q. And when did you work there?

18 A. Recently, from July to -- this year, July to
19 September of 2024; July, 2024, to September.

20 Q. So you worked with Florida Rising for three or
21 four months earlier this year. Is that right?

22 A. Forty-five days.

23 Q. Okay, and how did you get involved with Florida
24 Rising?

25 A. Just knew of the work that they do in the

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1 community.

2 Q. Where -- geographically, where did you do your
3 work for Florida Rising?

4 A. In the Tampa Bay area.

5 Q. Anything more particular or is it the whole
6 entire Greater Tampa Bay area?

7 A. Inside of Tampa.

8 Q. Was it certain areas inside of Tampa?

9 A. No.

10 Q. Was there any particular reason why you focused
11 on doing the Florida Rising work inside Tampa?

12 A. I don't understand that question.

13 Q. Well, you told me that Florida Rising does
14 specific engagements and that you've worked with them on
15 specific engagements inside of Tampa. So out of the
16 Greater Tampa Bay area -- just curious -- was there any
17 reason why your focus was inside the City of Tampa?

18 A. No.

19 Q. What particular issues did you work on with
20 Florida Rising?

21 A. Affordable housing.

22 Q. I'm sorry, say that one more time.

23 A. Housing.

24 Q. Housing. Affordable housing. Anything else?

25 A. And high electric bills.

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1 Q. Anything else?

2 A. That's it.

3 Q. Other than Florida Rising, have you ever worked
4 for a political organization or a civic engagement
5 organization?

6 A. No.

7 Q. Have you ever worked for a legal organization?

8 A. No.

9 Q. Are you currently involved in any civil rights
10 organization?

11 A. Could you clarify what you mean by "civil rights
12 organization"?

13 Q. Are you currently involved in any voting rights
14 organizations?

15 A. Could you clarify what you mean by "voting rights
16 organization"?

17 Q. Are you currently involved with any organization
18 that works on issues related to voters and voting?

19 A. Yes.

20 Q. Okay, and what organization is that?

21 A. NAACP.

22 Q. And are you an officer with NAACP?

23 A. No.

24 Q. Are you a member of NAACP?

25 A. Yes.

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1 Q. How long have you been a member of NAACP?

2 A. I can't recall the exact date.

3 Q. Can you estimate?

4 A. Maybe five years.

5 Q. And what does the NAACP have to do with respect
6 to voting?

7 A. Civic engagement.

8 Q. What do you mean by "civic engagement"?

9 A. Encouraging people to participate in the
10 political process.

11 Q. And what do you do as a member of NAACP in terms
12 of that organization?

13 A. (inaudible).

14 Q. What do you do in terms of activities within the
15 NAACP organization? You personally.

16 A. I sit on the executive committee.

17 Q. Do you sit on the executive committee?

18 A. Yes.

19 Q. But you're not an officer?

20 A. No.

21 Q. Okay. Do you have a title on the executive
22 committee?

23 A. Executive Committee Member At Large.

24 Q. Does the NAACP do advocacy relating to black
25 voters specifically?

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1 A. No.

2 Q. Are you a member of any other organization or are
3 you involved with any other community organization that
4 focuses on issues relating to black residents of the Tampa
5 area?

6 A. No.

7 Q. Are you a member of City of Tampa Racial
8 Reconciliation Committee?

9 A. Yes.

10 Q. Okay, and what does that organization do?

11 A. Well --

12 MR. SHAW: Object to form.

13 Go ahead and answer.

14 THE WITNESS: Well, it hasn't been formed yet.
15 It's just been made by the city counsel. It hasn't
16 been formed. We haven't even had its first meeting.

17 BY MS. HARLE:

18 Q. Are you involved in any other community
19 organization that focuses on particular groups or
20 subgroups of people?

21 A. What do you mean by that?

22 Q. Well, one of the issues of the case is, you know,
23 you talking and complaining about communities of interest.
24 So are there any other organizations you're involved with
25 actively that focus on certain communities of interest,

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1 whether that be voters, black residents, religion,
2 anything at all?

3 MR. SHAW: Object to form.

4 You can answer it.

5 THE WITNESS: I'm involved with my faith
6 community. The same way --

7 BY MS. HARLE:

8 Q. Very good. What -- okay.

9 A. The same way in terms of civic engagement.
10 And --

11 Q. Okay. And are -- is there a -- I'm sorry, I
12 interrupted you.

13 A. Yes. I'm involved in my faith community and
14 civic engagement educating them to the voting process.

15 Q. And is that an organized involvement with a
16 particular group, or is that something more organic?

17 A. Organic.

18 Q. In other words, is there a specific group with a
19 group name that you are involved with in your faith
20 community?

21 A. No.

22 Q. Are you familiar with a Nasr Community
23 Development Corporation?

24 A. Yes.

25 Q. Okay. And what is that?

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1 A. That is a community development organization,
2 it's called "Nasr." "An-Nasr" means help. It does youth
3 development, youth entrepreneurship, and training youth in
4 lower income communities teaching them about
5 entrepreneurship. I'm one of the founding members of
6 that.

7 Q. That's great. Are you familiar with the
8 Jacksonville Masjid of Al-Islam?

9 A. Could you repeat the question?

10 Q. Well, I might be saying it wrong, but are you
11 familiar with the Jacksonville Masjid, M-a-s-j-i-d, of
12 Al-Islam?

13 A. I'm familiar with it because it is a part of a
14 African-American Muslim Association that I'm familiar
15 with, and it's called Jacksonville Masjid. "Masjid" means
16 "place of worship."

17 Q. Are you actually involved in that organization or
18 just aware of it?

19 A. Just aware of it.

20 Q. How about the Masjid and Nasr, are you familiar
21 with that organization?

22 A. Yes.

23 Q. Are you involved with that organization?

24 A. Yes.

25 Q. Are you the vice chairman of that organization?

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1 A. Yes.

2 Q. Okay, and what does that organization do?

3 A. It is a community that do outreach in the
4 community; food pantry, social concerns, youth
5 development, and mentoring young, new Muslims into the
6 Islamic faith.

7 Q. So does that organization have any participation
8 on the civic engagement front?

9 A. No.

10 Q. Is there any other voting-related activities that
11 you're involved with that I haven't asked about yet?

12 A. No.

13 Q. Okay. Did you at one time participate in a tax
14 payer-funded voter education program in Hillsborough's
15 black community?

16 A. Repeat the question.

17 Q. Did you at one time participate in a tax
18 payer-funded voter education program in Hillsborough's
19 black community?

20 A. No, I didn't.

21 Q. Do you know someone named Buddy Johnson?

22 A. Yes, I do.

23 Q. Okay. Did you participate in a voter education
24 program, Buddy Johnson? Does that refresh you memory?

25 A. It was a campaign event. He was running for

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1 re-election. In his campaign, I did some consulting work
2 for him, for his campaign; not for the supervisor election
3 office.

4 Q. So it was a -- was it a one-time campaign event,
5 or you're you saying you worked for his campaign?

6 A. I did consulting work for his campaign.

7 Q. Over what period of time?

8 A. I can't recall the dates. It's been a quite a
9 while ago.

10 Q. And who paid you for that?

11 A. Each campaign paid my company, my consulting
12 company.

13 Q. Is that a consulting company that you still
14 currently operate?

15 A. No.

16 Q. Other than working with Buddy Johnson, have you
17 done any other campaign consulting?

18 A. Yes, I have.

19 Q. Okay. And please tell me the candidates or
20 issues or groups that you've done campaign consulting.

21 A. It's been quite a few, so I'll name as many as I
22 can remember.

23 Q. Thanks.

24 A. I worked with Bob Buckhorn when he ran for Mayor.
25 I worked for Kevin Beckner. I worked with Sandra Murman.

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1 I worked with Betty Reed. Just to name a few.

2 Q. Have you ever been an outreach coordinator for a
3 campaign?

4 A. Yes.

5 Q. Okay, and when was that?

6 A. I worked with David Strauss campaign, 2019. I
7 was the Urban and Muslim outreach coordinator.

8 Q. And what did you do in your capacity as an
9 outreach coordinator for that campaign?

10 A. I reached to the black voters and Muslim voters
11 and discussed his campaign with those people.

12 Q. And was your outreach focused on a particular
13 geographic area?

14 A. Yes.

15 Q. Which geographic area was your outreach focused
16 on?

17 A. The Urban core and the Muslim community.

18 Q. Was all of that within the city of Tampa?

19 A. Yes.

20 Q. And where -- if you can just sort of give me a
21 rough idea -- is the urban core of Tampa, toward the north
22 or the east or the south, somewhere else?

23 A. Central east.

24 Q. Is there any other time that we haven't discussed
25 that you worked on voting issues or campaign issues or

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1 partisan issues?

2 A. No.

3 Q. Have you ever volunteered as a phone maker in an
4 election?

5 A. Yes.

6 Q. Okay, and when was that?

7 A. A long time ago, when Barack Obama ran for
8 president.

9 Q. Any other time?

10 A. No.

11 Q. And have you ever canvassed for an election?

12 A. Yes.

13 Q. And when was that?

14 A. When Barack Obama ran for president.

15 Q. Any other time?

16 A. When I was hired for campaigns. Any of those
17 campaigns I mentioned to you, I did some canvassing with
18 those campaigns.

19 Q. Besides this lawsuit, have you ever been involved
20 in a civil lawsuit as a party?

21 A. No.

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

23 A. Say it again, ma'am.

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

25 A. I had a case that was in a Federal court that was

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1 a pre-arrangement I made. I'm not certain. My lawyers
2 know that it wasn't -- was told through litigation I
3 wasn't convicted. I'm not certain of that.

4 Q. And do you recall what year that was in?

5 A. 2000; twenty-four years ago. It's been quite a
6 while ago.

7 Q. And what were the charges?

8 A. It was credit card -- no, it was social security
9 identity and mail fraud.

10 Q. And I think you said you plead no contest, or you
11 said you were convicted?

12 A. It was a plea agreement; I made a plea with the
13 U.S. Attorney's Office.

14 Q. Have you ever plead no contest to a crime?

15 A. I can't recall.

16 Q. Are there any other times that you recall when
17 you were convicted of a crime?

18 A. No.

19 Q. Do you recall pleading no contest to a first
20 degree domestic violence battery in the year 2000?

21 A. No. I had problems with my daughter and that
22 case was dissolved in anger management. I don't recall
23 pleading guilty to the charge.

24 Q. And, so, you don't recall whether you were
25 convicted of that?

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1 A. No.

2 Q. And the earlier -- the other incident you
3 described with the identity and the mail fraud, and the
4 plea agreement, what did you say was the ultimate penalty
5 or punishment of that case?

6 A. Yes. It was three years, 36-month regular
7 probation at six months.

8 Q. Are there any other times that you have been
9 convicted of a crime or plead no contest to a crime?

10 A. I can't recall.

11 Q. Okay. Do you recall a time in 2005 where there
12 was a felony information filed against you for a criminal
13 incident?

14 A. Some of the things that you mentioned have been
15 over 20 years ago, so I may not recall them clearly. So
16 if you can, refresh my recollection.

17 Q. The reason -- you know, the reason I'm exploring
18 this is, just, in the Federal Courts when someone has been
19 convicted of a crime or pled no contest to a crime that is
20 subject to a year or more in prison, that's something that
21 actually can become relevant in the case; so I'm just
22 trying to figure out what happened in some of your
23 background here.

24 So have you ever lost your voting rights at any point?

25 A. I'm not sure that I'd lost my voting rights.

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1 Because what happened was, action was taken, but -- and I
2 was on probation. And when they resolved the probation,
3 they gave me any passport back. So I don't recall losing
4 my voting right.

5 Q. Do you recall ever having to take steps to
6 restore your voting rights?

7 A. No.

8 Q. Do you recall ever having to pay any criminal
9 fees or costs or restitution related to the felony?

10 A. Yes.

11 Q. Okay, and as far as you know, do you have any
12 outstanding costs that you need to pay related to the
13 felony at this point?

14 A. No outstanding costs. They -- all was paid.
15 They wouldn't have let me off probation with it. That's
16 the only thing.

17 Q. Have you ever been a party to any bankruptcy
18 proceedings?

19 A. Yes.

20 Q. How many times?

21 A. Three times.

22 Q. Did those end up involving any court testimony?

23 A. I don't recall.

24 Q. Do you recall what years those bankruptcies were?

25 A. No.

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1 Q. All right. Tell me, just in your own words, if
2 you will, why you're bringing this lawsuit challenging the
3 map?

4 A. Well, I was put in touch with one of the
5 attorneys and discussed representation, fair
6 representation, for the community in which I live in. And
7 fairness and equity is all I can say.

8 Q. Okay. Well, let me be clear. I don't want you
9 to ever tell me anything you said to your attorney or
10 anything your attorneys have said to you, but I would like
11 it if you would be able to unpack a little bit more why
12 you think that fairness and equity support your current
13 legal challenge to the map.

14 A. I just think representation matters and -- I'll
15 leave it there.

16 Q. And what is it about the map that you're
17 challenging that you think harms fair representation?

18 A. Well, I'm not an expert on maps, but I can tell
19 you for certain that the only reason I can see that you
20 would take one group of people and lock them across the
21 bay to another group of people, would be to put people
22 that look alike in all in one area. I don't think that
23 it's fair.

24 Q. And when you say "people that look alike," what
25 kinds of people are you talking about?

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1 A. Black people.

2 Q. Okay. And, so -- and do you think it's unfair to
3 have black voters in the same district as other black
4 voters?

5 MR. SHAW: Object to form.

6 Go ahead and answer.

7 THE WITNESS: I didn't say that. If you -- you
8 can ask me the question another way, but that ain't
9 what I said. But you can ask me a question.

10 BY MS. HARLE:

11 Q. Yeah, so what's unfair about having groups of
12 black voters in the same district?

13 A. Nothing.

14 MR. SHAW: Object to form.

15 Go ahead and answer.

16 THE WITNESS: Nothing.

17 BY MS. HARLE:

18 Q. Okay. Well, then what's unfair about the map
19 you're challenging?

20 A. Like I said, I'm not an expert on maps, but I
21 know that people on this side of the bay and the
22 Hillsborough side of the bay have different issues and
23 concerns than people that live in South St. Petersburg,
24 even though they're going to be the same color. They got
25 different issues, different concerns, and they process

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1 issues differently.

2 Q. And what are some of the issues that the voters
3 on the one side of the bay would see differently than
4 voters on the other side of the bay?

5 A. I'll just say this, I'm not an expert on what
6 other people see, but I do know the issues are different.
7 Very -- they're different.

8 Q. Okay. Yeah. Tell me what those very different
9 issues are.

10 A. I'm not an expert on what the issues are, but
11 I'll give you one example. Housing is different on this
12 side of the bay than it is in South St. Petersburg.

13 Q. And in your perspective, what are the housing
14 issues that are of concern on the Tampa side?

15 A. I think that the housing issues concerned on the
16 Tampa side is affordability and gentrification.

17 Q. Do you know if there's any housing issues of
18 concern on the St. Pete side of the bay?

19 A. No.

20 Q. Are there any other issues you can think of that
21 are very different from Tampa and St. Pete?

22 A. The way crime is addressed.

23 Q. Tell me more about that.

24 A. Well, policing one area, small area, can be
25 different from policing a larger area that's more diverse.

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1 Q. What's -- what police in a small area are you
2 referring to?

3 A. Well, we're talking about South St. Petersburg.

4 Q. Okay. And so what's the different in policing
5 between South St. Petersburg and policing in Tampa, if
6 there is any difference.

7 A. One is policing an almost all-black community,
8 and one is policing a more diverse area with people of
9 different diverse backgrounds.

10 Q. And which area is almost all black?

11 A. South St. Petersburg.

12 Q. I'm making sure that I don't miss anything. So
13 are there any other issues that jump out to you that are
14 very different than the two areas of the district that
15 you're challenging?

16 A. No, those are the main two.

17 Q. Other than your attorneys, who have you spoken
18 with about this lawsuit?

19 A. My wife.

20 Q. Anybody else?

21 A. I briefly spoke to Mr. Keto Nord.

22 Q. Another plaintiff in this case?

23 A. Right.

24 Q. And I don't want you to tell me what you guys
25 talked about, but was that -- do you remember roughly when

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1 you spoke to him?

2 A. After the case was filed in court.

3 Q. Shortly after it was filed, or more recently?

4 A. Shortly after it was filed.

5 Q. Okay. Do you know any of the other plaintiffs in
6 this lawsuit in a personal capacity?

7 A. No.

8 Q. And other than Mr. Nord Hodges, have you spoken
9 with any of the other plaintiffs?

10 A. No.

11 Q. During the redistricting process that resulted in
12 the maps at issue in this case, did you communicate with
13 any members of staff of the Florida legislature?

14 A. No, I did not.

15 Q. When the redistricting process was going on that
16 resulted in the map you're challenging, were you aware
17 that redistricting was happening?

18 A. I saw pictures recently. Pictures just on the
19 news, and just a sound-bite on the news talking about it,
20 that's it.

21 Q. Do you remember what year that was?

22 A. Sometime this year.

23 Q. After the redistricting was done and the new map
24 you're challenging was selected, did you communicate at
25 that point with any members or staff of the Florida

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1 legislature?

2 A. No, I did not.

3 Q. At any point during or after the redistricting
4 process, have you communicated with any members of the
5 media regarding the redistricting process or the map?

6 A. Would you repeat the question again?

7 Q. Well, maybe I can just say it this way. Have you
8 communicated with any members of the media regarding the
9 redistricting process or the resulting map?

10 MR. SHAW: Object to form.

11 You can go ahead and answer.

12 THE WITNESS: I spoke to -- not directly to the
13 media -- some people on my attorneys, just for the
14 press release together, and ask for a statement from
15 me.

16 BY MS. HARLE:

17 Q. Okay. If I understood you, your attorneys put
18 together press releases on this case. Is that what you
19 said?

20 A. There was somebody on my attorney's staff that
21 said they was putting together a press --

22 MR. SHAW: Don't say what you discussed in the
23 attorney's office.

24 BY MS. HARLE:

25 Q. So have you -- but have you ever spoken directly

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1 with a member of the media regarding the redistricting
2 process of map --

3 A. No.

4 Q. Okay.

5 A. No, I have not spoken directly to the media.

6 MR. SHAW: Hey, Denise, we're almost at an hour
7 and I need to use the restroom. Is now a good time
8 for a -- like, a five-minute break?

9 MS. HARLE: This is just fine, yes.

10 (Thereupon, a short break was taken.)

11 BY MS. HARLE:

12 Q. All right. Mr. El-Amin, have you made any
13 statements to any of the community organizations that
14 you're involved with regarding this lawsuit?

15 A. No.

16 Q. Have you made any social media posts about this
17 lawsuit?

18 A. No.

19 Q. What social media apps or accounts do you have?

20 A. I have Facebook and Instagram.

21 Q. Do you have X, or Twitter?

22 A. No.

23 Q. Do you have LinkedIn?

24 A. Yes, but I don't use it.

25 Q. Do you have a TikTok?

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1 A. No.

2 Q. Are you currently a registered voter?

3 A. Yes.

4 Q. Have you voted in every state's senate election
5 since you have been 18?

6 A. Yes.

7 Q. When was the most recent time that you voted in a
8 state senate election?

9 A. I think two years ago.

10 Q. Did you vote in the election -- the election we
11 just had in November for any -- in any capacity for any of
12 the elections involved?

13 A. Yes. Yes.

14 Q. You did. Do you know any reason why you wouldn't
15 show up on the Secretary of State's voter registration
16 rolls?

17 A. No.

18 Q. Is your polling place still at Temple Terrace
19 United Methodist Church?

20 A. Yes.

21 Q. Have you seen any of the alternative maps
22 involved in this lawsuit? In other words, if we didn't
23 have the challenge map, some different maps that you in
24 your complaint say would be preferable. Have you seen
25 those maps?

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1 MR. SHAW: Object to form.

2 Go ahead.

3 THE WITNESS: Yes, I've seen some maps.

4 BY MS. HARLE:

5 Q. Let's pull up the complaint. So if we have some
6 exhibits today, my colleague Leila is going to share her
7 screen. Hopefully you'll be able to see it. Just let us
8 know if you need us to zoom in or zoom out, or if we need
9 to try to get it to you in some other format, we'll do
10 that as well.

11 So looking at the complaint --

12 MS. HARLE: And, Jill, this will be I guess
13 Exhibit 1, LLE-1.

14 (The document referred to was marked for identification as
15 Exhibit No. LLE-1.)

16 BY MS. HARLE:

17 Q. Let's look, just for example, at -- well, I'll
18 start with this question. Did you read the complaint
19 before it was filed?

20 A. Briefly, not fully.

21 Q. I'm sorry, what did you say?

22 A. I read it briefly.

23 Q. And did you approve of everything in the
24 complaint before it was filed?

25 A. Yes.

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1 Q. Let's look at paragraph 6 and 7. Do you need
2 time to read that -- the gist of these?

3 And my question will be, in these allegations, you
4 alleged, for example, in paragraph 6, quote, the
5 legislature elevated race above all other considerations.
6 And then in paragraph 7, it says, quote, the legislators
7 and their staff reportedly drew these districts in a race-
8 predominate manner to avoid the diminishment of black
9 voters' ability to elect representatives of their choice.

10 So my question is, what facts do you know is related
11 to the legislature's racial motive in drawing the maps?

12 A. I'm not an expert on maps. All I know is that to
13 put -- go across a body of water and put one group in
14 South St. Pete, in with the Hillsborough side, don't seem
15 as fair to me.

16 Q. And do you personally know any facts that
17 indicate that the legislature's predominant criteria in
18 drawing District 16 was race?

19 MR. SHAW: Objection to form.

20 Go ahead and answer.

21 THE WITNESS: No, like I said, I just don't see
22 putting one body of South St. Pete and up and into
23 Tampa as being fair.

24 BY MS. HARLE:

25 Q. Do you personally know any facts indicating that

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1 a legislature's central consideration in the overall
2 map-making process was race?

3 MR. SHAW: Object to form.

4 Go ahead.

5 THE WITNESS: No.

6 BY MS. HARLE:

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

9 A. No.

10 Q. Do you know how the crime percentage of black
11 voting age population in District 16 compares to the
12 percentage and of black voters' population under the prior
13 map?

14 A. No.

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

17 MR. SHAW: Object to form.

18 THE WITNESS: Somewhat.

19 BY MS. HARLE:

20 Q. Okay. And what do you know about the history of
21 those district lines in Hillsborough sand Pinellas County?

22 A. I know it --

23 MR. SHAW: Object to form.

24 Go ahead.

25 THE WITNESS: I know it's drawn similar to the

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1 way it's not. It was wrong then and it is wrong now.

2 BY MS. HARLE:

3 Q. So are you aware that the communities currently
4 combined in District 16 have been combined in a -- in the
5 same district since the early 1990s?

6 A. Yes, ma'am, I'm aware of that. It was wrong
7 then, and it's wrong now. Unfair then, and it's unfair
8 now.

9 Q. Before filing this lawsuit, have you ever done
10 any advocacy or spoken out against the district boundaries
11 combining those parts of Hillsborough and Pinellas?

12 A. No.

13 Q. Have you ever spoken about the issue with the
14 NAACP?

15 A. No.

16 Q. Looking at paragraph 11 of your complaint, that
17 paragraph says that, quote, The legislature sacrificed the
18 genuine communities of interest.

19 So my question is which communities of interest are
20 you referring to there?

21 A. It would be faith community, black community,
22 civic community that vote.

23 Q. Did you say the faith community?

24 A. Faith communities, black community, and civic
25 communities that vote.

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1 Q. What do you mean by the civic community that
2 votes?

3 A. People that live in that community can vote.

4 Q. And where do you define the community? Are there
5 certain boundaries?

6 MR. SHAW: Object to form.

7 Go ahead.

8 THE WITNESS: Community of Hillsborough.

9 BY MS. HARLE:

10 Q. Oh, okay. So in your view, is Hillsborough
11 County a genuine community of interest?

12 MR. SHAW: Object to form.

13 Go ahead.

14 THE WITNESS: The community interest is that --
15 is the areas in Hillsborough that the map been drawn
16 for. There's a community interest.

17 BY MS. HARLE:

18 Q. And what are the shared -- if there are any, what
19 are the shared characteristics of these members of these
20 communities of interest? I just want to get more details
21 of, you know, who exactly you're talking about?

22 A. I don't understand your question. Could you
23 repeat the question and clarify what you're saying?

24 Q. Yeah. What do you understand "communities of
25 interest" to mean?

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1 A. Anybody that shared the same interest of
2 representation.

3 Q. And how many communities of interest do you
4 allege are sacrificed under the map you're challenging?

5 MR. SHAW: Object to form.

6 Go ahead.

7 THE WITNESS: Community interest would be the
8 communities that has already been assigned to the maps
9 that -- that the legislature had put together.

10 BY MS. HARLE:

11 Q. And where your complaint says the legislature
12 sacrificed genuine communities of interest, I'm just
13 asking, can you describe for me which communities of
14 interest are sacrificed under the map?

15 A. The greatest one is the black community.

16 Q. The black community where?

17 A. In Hillsborough County.

18 Q. Any other communities of interest that are
19 sacrificed, in your view, under the map?

20 A. Yes.

21 Q. Okay, please tell me.

22 A. South St. Petersburg.

23 Q. Is certain people in South St. Petersburg, or all
24 people in South St. Petersburg?

25 A. Like I said, I'm not an expert on the map, but

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1 the only other reason I can see predominant people that
2 live in South St. Petersburg, black men, lumped into
3 Hillsborough County. It's simply sacrifices interests of
4 both black communities.

5 Q. Okay. So in your view, is South St. Petersburg
6 itself a community of interest?

7 A. Yes, ma'am.

8 Q. Are there any other communities of interest that
9 you believe are sacrificed in the map you're challenging?

10 A. No.

11 Q. Do you believe that communities of interest could
12 be based on a political party?

13 A. I'm not sure.

14 Q. Do you think that communities of interest might
15 be based on religion?

16 A. I don't know.

17 Q. Do you think that communities of interest might
18 be based on socioeconomic status?

19 A. I'm not sure.

20 Q. Do you think that communities of interest might
21 be based on sex?

22 A. I'm not sure.

23 Q. And how did you identify the communities of
24 interest that you allege are sacrificed in the plan?

25 MR. SHAW: Object to form.

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1 Go ahead.

2 THE WITNESS: Black voters.

3 BY MS. HARLE:

4 Q. Well, my question was, how did you identify the
5 communities of interest that you allege are sacrificed?

6 MR. SHAW: Object to form.

7 THE WITNESS: I think that -- like I said, I'm
8 not an expert. It's obvious that a predominant black
9 community, South St. Petersburg, was locked into a
10 body of water across the bay into Tampa.

11 BY MS. HARLE:

12 Q. And when did you first form that belief?

13 A. As I said earlier, it's been wrong since it's
14 been designed like that, and it's wrong now.

15 Q. When did you first come to believe that
16 communities of interest are sacrificed under the current
17 district lines?

18 A. I can't give you an exact date.

19 Q. Can you give me a month and year?

20 A. I cannot.

21 Q. Can you give me a year?

22 A. All I can say is, long time ago.

23 Q. And how did you -- how did you come to realize
24 and form the opinion that communities of interest are
25 sacrificed under the district lines?

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1 A. It's very simple for me. One representative
2 trying to represent two sets of citizen's interests being
3 separated by a body of water, instead of one
4 representative for each of the areas. It seems very
5 simple to me.

6 Q. And is it your view that a district should only
7 have one community of interest per district?

8 A. I wouldn't say that. When you're talking about
9 this particular one you're asking me about. I don't have
10 expertise on those districts. I have expertise on this
11 district, the best answer to that question that you're
12 asking.

13 Q. Is it your understanding that a district might
14 have multiple communities of interest?

15 A. It's possible. Everything is possible. But in
16 my opinion, it's wrong then and it's wrong now.

17 Q. And what is it that's sacrificed when South
18 St. Pete black voters are voting for the same
19 representative as voters in Tampa?

20 A. Representation, separately. True representation
21 of their interests and concerns.

22 Q. And what, to you, would allow the voters of South
23 St. Pete to have true representation, in your words?

24 A. A representative that understands the issues and
25 concerns; and, geographically, is there to answer their

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1 concerns.

2 Q. And you don't live in South St. Pete, do you?

3 Sir, do you live in South St. Pete?

4 A. No, I don't.

5 Q. Let's look at -- oh, we're there already.

6 Paragraph 12 says that -- let's see. It's referring to
7 black voters in District 16.

8 It says, the legislature, quote, stripping them from
9 adjacent District 18 and reducing their influence there.

10 So my question would be, do you know of any facts
11 supporting the allegation that the map reduces the
12 influence of black voters?

13 A. No.

14 Q. Here in Paragraph 13, it says that, starting with
15 the third line, quote, Floridians, including individual
16 legislators, called out and questioned the legislature's
17 unconstitutional actions.

18 Do you know that what these Floridians called out and
19 questioned?

20 A. Yes. Representative Driscoll spoke about the
21 maps. I saw that on TV. And that's to the extent that I
22 know about the call out.

23 Q. Okay. And what did the representative Driscoll
24 call out?

25 A. I don't know specifically, but something along

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1 the lines of areas.

2 Q. And what was the legislature's response to that
3 concern?

4 A. I don't know what their response was.

5 Q. Any other incidents you're aware of where
6 Floridians called out and questioned the legislature in
7 redistricting?

8 A. No, ma'am; no.

9 Q. And when did you -- you told me, when did you
10 learn about Representative Driscoll's comments?

11 A. As I said before, it was a soundbite on TV
12 somewhere, sometime, this year in 2024. I can't give you
13 exact date.

14 Q. Okay. I just want to make sure I understood your
15 earlier testimony. Did you say you weren't aware of the
16 redistricting process while it was actually going on, is
17 that right?

18 A. No, I wasn't.

19 Q. Okay. Let's move down to Paragraph 20, please.
20 This says, quote, The inactive plan harms plaintiffs
21 because, among other reasons, it splits up their
22 communities among racial lines and groups their
23 communities with dissimilar ones, unnecessarily, simple
24 because of their race.

25 So my first question is, when this says it splits up

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1 the community -- it's -- your plaintiff -- which community
2 are you referring to there, specifically?

3 MR. SHAW: Object to form.

4 Go ahead.

5 THE WITNESS: Could you show me a picture of the
6 enacted map, so I can see it?

7 BY MS. HARLE:

8 Q. Yes.

9 MS. HARLE: Leila, I think that's figure 3. Are
10 you able to scroll to figure 3? I think it's page 23.

11 THE WITNESS: Is that the enacted map?

12 BY MS. HARLE:

13 Q. That's the enacted map, sir.

14 A. Okay.

15 Q. So the question was, in your allegation, that the
16 plan splits up your community, which community are you
17 referring to specifically?

18 A. Specifically, according to this enacted map, is
19 clearly a mix of southern part of St. Pete, South
20 St. Pete, with Hillsborough split up by a body of water
21 that you can see on the map.

22 Q. Okay, so is your community split up in the map
23 you're challenging?

24 MR. SHAW: Object to form.

25 Go ahead.

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1 THE WITNESS: What do you mean when you say "your
2 community," could you explain that?

3 BY MS. HARLE:

4 Q. Well, your allegation is that you -- is it okay
5 if we scroll back to your allegations so we can see the
6 words that you used?

7 Paragraph 20, your allegation is that the plan splits
8 up your community.

9 So I am asking you, is your community split up under
10 the plan you're challenging?

11 MR. SHAW: Object to form.

12 Go ahead and answer.

13 THE WITNESS: Well, what I'm reading, ma'am, it
14 said "their communities," split up "their communities"
15 along racial lines; and it says, "your community."

16 So could you repeat the question? I'm reading it
17 myself.

18 BY MS. HARLE:

19 Q. So you are a plaintiff, right, sir?

20 A. Ma'am?

21 Q. Are you a plaintiff?

22 A. Yes.

23 Q. Okay, great. So this says, the enacted plan
24 harms plaintiffs because, among other reasons, it splits
25 up "their" -- "their" being the plaintiff, that would be

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1 you -- communities.

2 So I'm asking you, is your community split up under
3 the enacted plan?

4 MS. HARLE: Object to form.

5 Go ahead.

6 THE WITNESS: Yes.

7 BY MS. HARLE:

8 Q. Okay, and what is your community?

9 A. The community of voters that live in Hillsborough
10 County and community voters that live in South St. Pete.

11 Q. Okay, so is your definition -- and you can say no
12 if I'm getting it wrong. But are you defining your
13 community as the voters of Hillsborough and the voters of
14 South St. Pete?

15 A. No. I'm saying that their community is the
16 communities of your enacted map. That is the communities.
17 The enacted plan is the communities I'm talking about,
18 according to the map you showed me a minute ago.

19 Q. Okay, so this allegation says that the plan
20 splits up the plaintiff's communities.

21 Do you understand that?

22 MR. SHAW: Object to form.

23 THE WITNESS: Yes, ma'am, I do.

24 BY MS. HARLE:

25 Q. Do you agree with that?

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1 A. I do agree with it.

2 Q. Okay. So can you tell me yes or no. Is your
3 community split up under the enacted plan?

4 A. Yes, it does.

5 Q. Okay. Can you tell me, how do you view or define
6 your community, sir?

7 A. A community of voters that has similar interests.

8 Q. Okay, great. And what are some of those
9 interests that you and your community share as voters?

10 A. I don't have a list of interests, but I did
11 create some testimony that said we have housing issues,
12 issues of the client's address, gentrification. Those are
13 the ones I mentioned before, and those are the ones I'm
14 mentioning now.

15 Q. Okay, and what is it about the lines that splits
16 up your community of interest?

17 A. Those issues I just mentioned now are addressed
18 differently, based on the geographic location that they're
19 taking place in.

20 Q. And are you split from others in your community
21 into different districts?

22 MR. SHAW: Object to form.

23 THE WITNESS: I don't understand that question.

24 Can you explain and clarify what you're asking?

25 BY MS. HARLE:

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1 Q. Yeah. You've testified, and you allege, that the
2 plan splits up your community. So I'm asking you, what is
3 it about the district lines that splits your community?

4 MR. SHAW: Object to form.

5 THE WITNESS: I'll just say it like this, again.
6 People on different sides of the bay being separated
7 by water have different interests, and they have to be
8 addressed differently by the representative for the
9 district, and representation matters.

10 And the only reason I can see that South St. Pete
11 is locked into the district is because of race.
12 That's the only thing that I can see.

13 MR. SHAW: Denise, I think all of your questions
14 are assuming a certain reading of Paragraph 20 that I
15 don't think is right, and that's why we're having such
16 a who's-on-first disconnect between your questions and
17 his answer.

18 BY MS. HARLE:

19 Q. Mr. El-Amin, is there anyone in your community
20 who's in a different voting district than you in this map?

21 A. I'm not an expert on voting districts, to be
22 honest. I can't answer that question. I don't know for
23 certain, ma'am.

24 Q. Okay, and do you -- what are the dissimilar
25 communities that you allege you're grouped with?

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1 A. Well, let me just answer it this way. There are
2 different issues in South St. Pete than there are, for
3 example, in Temple Terrace in east Tampa. There are
4 different issues that are addressed different by the
5 representative. That's what I mean in this complaint.

6 Q. So is it your -- is it your view that black
7 voters are a community of interest?

8 MR. SHAW: Object to form.

9 THE WITNESS: Yes, ma'am, I would say so.

10 BY MS. HARLE:

11 Q. Is it your view that black voters may have
12 certain issues that they see differently than other black
13 voters?

14 A. Yes.

15 Q. And then just before we move on from that
16 paragraph, it says that, you know, the plaintiffs are
17 split up, the communities are split up, and grouped with
18 dissimilar ones simply because of their race. I just want
19 to make sure, are there any facts you're relying on there
20 when you say the communities were split up and grouped
21 differently because of their race?

22 A. I personally don't have no advice, but it's
23 simply looking at -- in maps, and looking at who lives in
24 south St. Pete and who lives in, for example, in east
25 Tampa and Tampa Terrace. It's different as a race.

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1 Q. Do you know what types of criteria the
2 legislature is allowed to use when drawing district lines?

3 A. I'm not an expert on maps; I honestly don't.

4 Q. Do you know any criteria that the legislature is
5 allowed to use when drawing district lines?

6 A. No.

7 Q. Do you know any criteria that the legislature is
8 required to use when drawing district lines?

9 A. No.

10 Q. Let's look at Paragraph 95 of your complaint.

11 Okay. So this allegation says, quote, these
12 race-based decision resulted in a map that splits up
13 neighborhoods and ignores traditional redistricting
14 criteria.

15 What traditional redistricting criteria do you allege
16 is ignored in the current map?

17 A. Genuine fairness is all I can say.

18 Q. Did you say "fairness?"

19 A. Genuine fairness --

20 Q. Genuine fairness.

21 A. -- is all I can stay.

22 Q. And what's your understanding of how the
23 legislature usually uses fairness as a criteria?

24 A. I'm not sure -- an expert on -- or how they come
25 up with that. All I can say is, it's the way this one is

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1 drawn. It's not giving genuine fairness to me. It's not
2 giving that to me.

3 Q. Are there any other traditional redistricting
4 criteria that you're aware of that you believe that
5 legislature ignored?

6 A. No.

7 Q. And let's look at Paragraph 131.

8 All right. This one says, quote, The legislature
9 lacked good reasons to believe that the enacted plan was
10 necessary to achieve Tier 1 compliance.

11 Do you know what Tier 1 compliance means in your
12 complaint?

13 A. No, I don't.

14 Q. Okay. Did you do anything to confirm the
15 allegations in the complaint before it was filed?

16 MR. SHAW: Before you answer that, do not discuss
17 any conversations that you had with your attorneys or
18 their staff. You can answer if you did anything other
19 than communicate with your attorneys and your staff.

20 THE WITNESS: I'm not at liberty to discuss what
21 I talked about with my attorneys.

22 BY MS. HARLE:

23 Q. And did you do any independent research to verify
24 any of the allegations in the complaint?

25 MR. SHAW: That's a work product inquiry and I'm

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1 instructing him not answer.

2 MS. HARLE: I can't -- I didn't hear that.

3 BY MS. HARLE:

4 Q. Sir, did you do any independent research to
5 confirm any of the allegations in the complaint?

6 MR. SHAW: Objection because it's a work product
7 question. And I'm going to instruct him not to
8 answer.

9 BY MS. HARLE:

10 Q. Sir, did you draft the complaint?

11 MR. SHAW: Denise, you know he didn't draft the
12 complaint.

13 Did you draft the complaint, Mr. El-Amin?

14 MS. HARLE: Then how is it work product?

15 MR. SHAW: Because you're not allowed to ask a
16 litigant about the research that they did about the
17 case. You're not -- just like you're not allowed to
18 ask him about the conversations that he had with his
19 attorney.

20 BY MS. HARLE:

21 Q. All right. Let's look at pages 13 and 14 of your
22 complaints. This is a map called "Plan 42."

23 Have you seen that map before, do you recall?

24 A. Yes.

25 Q. And can you just tell me in your own words what

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1 I -- if you contend this map is better than the enacted
2 map?

3 A. Repeat your question.

4 Q. Yes. Can you tell me, do you contend that this
5 map is better than the map that you're challenging?

6 A. Yes.

7 Q. Okay, and if you could just tell me in your own
8 words, what is it about this map that you think is better
9 than the map that you're challenging?

10 A. Number one, it's all in Hillsborough County, it
11 don't separate no water.

12 Q. Anything else?

13 A. No.

14 Q. And then if we can look at figure 6, I think it's
15 on page 23 or 26 of the complaint. Thank you.

16 Okay, do you recall seeing this map before, sir?

17 A. Yes, I do.

18 Q. Okay, and do you contend that this map is better
19 than the map you're challenging?

20 A. Yes.

21 Q. Okay. And what is it about this map that you
22 think is better than the map you're challenging?

23 A. It's all in Hillsborough County, and it stands a
24 little further south than Hillsborough County.

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

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1 witnesses have proposed in this case?

2 A. I'm not sure.

3 Q. Alright, let's look at your initial disclosures.

4 MS. HARLE: This will be, I guess, Exhibit 2.

5 (The document referred to was marked for identification as
6 Exhibit No. 2.)

7 BY MS. HARLE:

8 Q. Does this document look familiar to you?

9 MS. HARLE: Leila, do you want to scroll down
10 just a little bit so we can see the whole thing.

11 BY MS. HARLE:

12 Q. Do you remember seeing this document before?

13 A. Yes.

14 Q. Okay. On the first page at part A-1, it says
15 there, you'll see your name, Jarvis El-Amin, says you
16 have, quote, have information tending to show that the
17 challenge districts caused harm to themselves and other
18 residents.

19 So the first question is, what is the harm that the
20 challenged district lines caused to you personally?

21 A. Can you explain what you mean by "challenged
22 district?"

23 Q. Yes, sir. I think that is -- well, maybe it's
24 your attorney's words, but in the document that you all
25 submitted there, you say "challenged districts." I --

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1 that should be referring, I assume, to District 16 and 18
2 in the complaint that you're challenging.

3 So the question was, what harm do the challenged
4 districts do to you personally?

5 A. What it does to me personally is, it takes away
6 my chance to have equitable, fair, and good representation
7 in the Florida House of Representatives Senate.

8 Q. Is it your contention that your vote is diluted
9 because of the district lines?

10 A. Repeat that question again, ma'am.

11 Q. Yeah. Is it your contention that your vote is
12 diluted by the district lines?

13 A. I would just answer it the way I just answered
14 it. It just robs me and other people like me in that the
15 community has a chance to have fair and equitable and good
16 representation, addressing concerns of the community.

17 Q. And when you say people like you, who are you
18 referring to?

19 A. Other voters.

20 Q. All other voters?

21 A. Other voters.

22 Q. Which other voters?

23 A. Other voters in the same geographical area that I
24 live in.

25 Q. And you were on the Hillsborough side, sort of

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1 the south, is that right?

2 A. Repeat what you said.

3 Q. You're in Hillsborough in the south part of
4 Tampa?

5 A. Yes.

6 Q. And going back to that sentence, what is the harm
7 that you believe the districts caused to other residents?
8 Is it anything different than when what you just told me?

9 A. There's nothing different than what I just told
10 you; it's the same. It's the same.

11 Q. And then looking down at document -- at Section
12 1D, that's where you shared -- and the other plaintiff
13 shared -- some individuals you believe may have
14 information regarding consideration of race in their
15 districting process.

16 So my question is, on that list --

17 MS. HARLE: And, Leila, can you scroll a little
18 bit?

19 BY MS. HARLE:

20 Q. Do you know of any members of the media
21 specifically who would have information about whether the
22 district lines were drawn primarily based on race?

23 A. No.

24 Q. Any of those names on the list -- can you
25 identify any of the people on the list of people who you

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1 believe have information that would suggest the lines are
2 drawn primarily based race?

3 MR. SHAW: Object to form.

4 Go ahead.

5 THE WITNESS: No.

6 MS. HARLE: Well, that's the end of my questions.

7 Did you want to take a -- I don't know if you're-

8 Did you want to ask --

9 MR. SHAW: I don't have any follow-up questions.

10 We will be ordering a copy. Witness will read.

11 MS. HARLE: We'll order a copy, thank you.

12 MR. SHAW: Okay. Then we'll take one, too.

13 (Thereupon, the deposition concluded.)
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CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF COLLIER)

I, the undersigned authority, certify that Jarvis
El-Amin personally appeared before me and was duly sworn.

WITNESS my hand and official seal this 10th day
of December, 2024.



Jill Saravis-Regan
Notary Public-State of Florida
My Commission No.: HH 452361
Expires: 10-09-2027

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1 REPORTER'S DEPOSITION CERTIFICATE

2
3 STATE OF FLORIDA)
4 COUNTY OF COLLIER)5
6 I, Jill T. Saravis-Regan, Certified Shorthand
7 Reporter, and Notary Public, certify that I was authorized
8 to and did stenographically report the deposition of
9 Jarvis El-Amin; that a review of the transcript was
10 requested and that transcript is a true and complete
11 record of my stenographic notes.
1213 I further certify that I am not a relative,
14 employee, attorney, or counsel of any of the parties; nor
15 am I a relative or employee of any of the parties'
16 attorney or counsel connected with the action; nor am I
17 financially interested in the action.
18

19 DATED this 10th day of December, 2024

20
21 
2223 Jill T. Saravis-Regan, CSR
24
25

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61ERRATA SHEET
CHANGES AND SIGNATURE

WITNESS NAME: JARVIS EL-AMIN

DATE: _____

PAGE/LINE

CHANGE

REASON

Executed this _____ day of _____, _____

JARVIS EL-AMIN

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WITNESS DECLARATION

I declare under penalty of perjury under the laws
of the State of _____ that the foregoing is true
and correct. Executed at _____, _____,
on _____.

JARVIS EL-AMIN

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